CHAPTER 2
Response to Comments

2.1 Distribution of the Draft EIR

This chapter documents the comments on the Draft Environmental Impact Report (Draft EIR) that were submitted by agencies at the local, state, and regional levels, as well as organizations and individuals during the public review period (July 31 through September 11, 2017). During this period, comments could be submitted by letter, fax, email, or orally at public meetings for the Galleria project. All of the comments received and the responses to those comments are presented below in Section 2.3. A list of all comment letters received is presented in Section 2.2. A total of 67 letters were received, containing a total of 475 written comments. A total of 43 oral comments were made at two public meetings for the Draft EIR. In total, 518 comments were received on the Draft EIR.

2.2 Comments on the Draft EIR

The comment letters received on the Draft EIR are grouped and numbered below. Each written comment letter is designated as being provided either by an agency, organization, or individual, and a number, or ID Code, is assigned to the letter based on the order in which it was received. Within each written comment letter, individual comments are labeled with an additional number as part of the topic identification process. For example, a letter from a State agency has the prefix “AS” with the subsequent numbering system to follow for each specific comment within the letter. Individual, or public comments are designated as “PC” or “PT” for comments provided as public testimony during two publicly held meetings for the Draft EIR. Immediately following each numbered comment is an individual response. Where responses have resulted in changes to the Draft EIR, these changes appear in Chapter 3, Modifications to the Draft EIR. The following agencies, organizations, and individuals submitted written comments on the Draft EIR during the public review period.
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**Index of Public Comments Received on the Draft EIR**

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### 2. Response to Comments

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2. Response to Comments

This section presents responses to issues raised in comments received on the Draft EIR during the review period related to environmental effects of the proposed South Bay Galleria Mixed-Use Project. The California Environmental Quality Act (CEQA) Guidelines indicate that a Final EIR should address comments on the Draft EIR. Comments that state opinions about the overall merit of the proposed project and alternatives are included in the City of Redondo Beach’s public record and will be taken into account by decision-makers (Redondo Beach City Council) when
they consider the proposed project, but are generally not responded to unless a specific environmental issue is also raised, consistent with CEQA Guidelines Section 15088(a). Each comment received is reproduced here in its entirety. Responses are identified based on the system described above and are provided for each comment; the comment numbers are shown as headers to each comment and response to comment. As mentioned, any changes to the Draft EIR are referenced in the response, with added text shown as underlined and deleted text shown as strikeout in Chapter 3, Modifications to the Draft EIR.

2.3.1 State Government

Comment Letter AS001: Department of Transportation–District 7

Comment AS001-1

The commenter states, the California Department of Transportation (Caltrans) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed South Bay Galleria Improvement Project. The proposed project includes demolishing some existing structures and redesigning portions of the site by combining expanded retail and dining venues with open-air promenades, hotel, and residential development. Retail square footage, including department stores, mall shops, dining and entertainment would be increased by up to 224,464 square feet (sf). Overall density of the development on the site (including retail, hotel, and housing) would increase to a maximum of 1,950,565 sf of building floor area. The proposed project includes a hotel of up to 150 rooms (105,000 sf) and up to 650 residential apartment homes (650,000 sf). Currently, the site does not contain any residential units or overnight accommodations.

Response to Comment AS001-1

Thank you for your comment. The comment summarizes the proposed project but does not address an environmental issue; consequently, no further response is required. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment AS001-2

The commenter states, the mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl.

Response to Comment AS001-2

The comment does not address an environmental issue; therefore, no further response is required. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment AS001-3

The commenter states the development is in a suburban area, where vehicles are a dominant mode choice. Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on state and local facilities. With limited room to expand vehicular
capacity, this development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Response to Comment AS001-3

While the commenter describes the site as “suburban,” pursuant to the definition of “urbanized area” under CEQA Guidelines Section 15191(m), the City and the project site would meet the definition of an urban area. As also noted in the Draft EIR, Section 3.0.3, Environmental Analysis, the project site meets the definition of a Transit Priority Area. Consequently, the proposed project has been designed to provide pedestrian- and transit-oriented development and the creation of an urban center at this location. The various buildings would be sited to include common pedestrian walkways between buildings, courtyards, and other open spaces, including the open-air retail area. The proposed project would emphasize the development of open-air pedestrian promenades. As also noted in the Draft EIR Project Description, the project would include bicycle facilities, such as bicycle racks and bicycle fix-it stations. As further explained on Draft EIR page 3.13-10, the project site also has access to existing and proposed Class II and III bicycle facilities, with additional Class I facilities proposed in the surrounding area. Please see Section 3.13 Transportation and Traffic for more information. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment AS001-4

The commenter states, we encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths, and achieve a high level of nonmotorized travel and transit use. We also encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

Response to Comment AS001-4

Thank you for your comment. The proposed project is a mixed-use redevelopment project that would be located within walking distance to public transportation as well as existing residential uses within the city, which would reduce VMT and associated GHG emissions. As detailed in the Transportation Impact Study, Appendix L of the Draft EIR, the project’s VMT are expected to be lower than a regionally comparable use. The project applicant would also provide alternate transportation opportunities for its occupants and customers, such as bicycle accommodations (bicycle racks and one or more bicycle fix-it stations) and electric vehicle charging stations.

A TDM plan is required under the City’s Municipal Code (RBMC § 10-2.2400 et seq.) and included as part of Mitigation Measure MM GHG-1, which would reduce VMTs and associated GHG emissions. The TDM Program provides for the following:
• Include priority parking associated with electrical charging stations for both the residential and commercial portions of the project.
• Establishment of carpool, buspool, or vanpool programs;
• Vanpool purchase incentives;
• Cash allowances, passes or other public transit subsidies and purchase incentives; – Preferential parking locations for ridesharing vehicles;
• Guaranteed ride-home program for ridesharing;
• Computerized commuter rideshare matching services;
• Bicycle programs including bike purchase incentives, storage, and maintenance programs;
• On-site car share and bike share;
• Preparation of a Parking Management Plan to address parking accommodations for large events; or
• Designation of an on-site transportation coordinator for the project.

Comment AS001-5
The commenter states the South Bay Galleria Improvement project will generate a net 8,020 daily trips and 365/449 AM/PM peak hour trips. Related projects will generate peak hour trips, therefore cumulative impacts may occur. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate cumulative traffic impacts in the future.

Response to Comment AS001-5
The Draft EIR transportation Level of Service and CMP analyses considered project-specific and cumulative impacts in Draft EIR Section 3.13, Transportation and Traffic, more specifically, Draft EIR pages 3.13-38 through 3.13-43 and pages 3.13-50 through 52. This included disclosure of cumulatively considerable contributions (significant impacts) under cumulative conditions without mitigation at Intersections 13, 15, 16, 17, and 19.

Comment AS001-6
The commenter states, we note I-405 Southbound Ramp & Artesia Boulevard (Intersection 18) - The eastbound approach would be restriped from two through lanes, one shared through/right-turn lane, and one right-turn lane to two through lanes and two right-turn lanes. Existing signage upstream of the intersection would be changed to identify the lane configuration and restrictions.

Response to Comment AS001-6
The comment summarizes the text of Mitigation Measure MM TRA-4. 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 AS001-7
The commenter states the measure would mitigate the significant Project impact under the Existing plus Project and Cumulative plus Project conditions.
Response to Comment AS001-7

The commenter identifies the scenarios in which the proposed mitigation measure MMR TRA-4 at I-405 Southbound Ramp and Artesia Boulevard (Intersection 18) would mitigate the significant impact at the intersection. 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 AS001-8

The commenter notes that the proposed mitigation improvements at the intersections of Hawthorne Boulevard & Artesia Boulevard (Intersection 16) and I-405 Northbound Ramps & Artesia Boulevard (Intersection 19) have been determined to be infeasible. The commenter states Caltrans is available to discuss alternative mitigation measures.

Response to Comment AS001-8

The commenter identifies the intersections of Hawthorne Boulevard and Artesia Boulevard (Intersection 16) and I-405 Northbound Ramps and Artesia Boulevard (Intersection 19), where the mitigation measures that were considered in the Draft EIR were determined to be infeasible. The commenter states that Caltrans is available to discuss alternative mitigations measures. The comment is acknowledged. However, the commenter does not identify any specific improvements to mitigate the significant impacts at Intersections 16 and 19. (See San Diego Citizenry Group v. County of San Diego (2013) 219 Cal.App.4th 1, 17.).

A meeting was held between the Draft EIR team, the City of Redondo Beach, and Caltrans on December 18, 2017 to discuss alternative mitigation measures for the intersections of Hawthorne Boulevard & Artesia Boulevard (Intersection 16) and I-405 Northbound Ramps & Artesia Boulevard (Intersection 19). Caltrans acknowledged that mitigation at these intersections is not feasible due to limited right of way, as described in greater detail in Response to Comment AS003-7. Caltrans did not suggest any additional mitigation measures that the City could implement to reduce impacts these two intersections.

Comment AS001-9

Caltrans would like to recommend the extension of the Class II Bike lane along Hawthorne Boulevard (SR 107) south to Pacific Coast Highway (SR 00l) or the possibility of a Class IV bikeways along Hawthorne Boulevard. All recommended and installed per Caltrans Standards.

Response to Comment AS001-9

Caltrans recommends the extension of the Class II bike lane along Hawthorne Boulevard south to Pacific Coast Highway or the possibility of a Class IV bikeway along Hawthorne Boulevard. While the comment does not directly address a significant environmental impact, and mitigation measures are not required for impacts that are determined to be less than significant. (CEQA Guidelines Section 15126.4(a)(3).) Nevertheless, the City will coordinate with Caltrans on the feasibility of implementing bicycle facilities along Hawthorne Boulevard as part of the City’s independent city-wide planning processes.
Comment AS001-10
The commenter states, if you have any questions regarding these comments, please contact project coordinator Miya Edmonson, at (213) 897-6536 and refer to GTS#07-LA-2017-01052.

Response to Comment AS001-10
The comment does not address an environmental issue; therefore, no further response is required. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment Letter AS002: State Clearinghouse
Comment AS002-1
The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 11, 2017, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Response to Comment AS002-1
The comment does not address an environmental issue; therefore, no further response is required. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment Letter AS003: Department of Transportation–District 7
The comment was submitted on September 14, 2017 after the close of the Draft EIR Comment period.

Comment AS003-1
The commenter states, Appendix L: Transportation Impact Study

1. Provide a schematic diagram for traffic movement volume at all intersections for AM and PM peak for all years and all conditions.

Response to Comment AS003-1
The comment was submitted on September 14, 2017 after the close of the Draft EIR Comment period. The commenter requests a schematic diagram of the AM and PM peak intersection volumes for all years and all conditions. The AM and PM peak hour intersection turning movement volumes are provided for all analysis scenarios in Appendix E (“Intersection Volumes”) of the Transportation Impact Study (Appendix L of the Draft EIR). These tables provide a listing of traffic movement volume at all intersections for AM and PM peak for all years and all conditions. Similarly, Appendix F (LOS Worksheets”) of the Transportation Impact
Study (Appendix L of the Draft EIR), provides turning movement volumes by intersection and lane for all scenarios. The HCM component of this appendix, prepared for the Caltrans analysis, also provides traffic volumes with diagrams of the turning movements. (Start on pdf page 302 of Draft EIR Appendix L).

**Comment AS003-2**

The commenter asks:

2. Which alternative was used for LOS analysis at all intersections for Table 6, 7, and 8?

**Response to Comment AS003-2**

The commenter questions which alternative was used for the LOS analysis in Table 6, Table 7, and Table 8. While not stated in the comment, the reference to Tables 6, 7, and 8 appears to address Appendix L of the Draft EIR. Table 6 is included in Section 2.5 of Appendix L, titled “Existing Intersection Operating Conditions.” Consequently, Table 6 represents existing baseline conditions without the proposed project or the alternatives. As stated on page 37 of Draft EIR Appendix L, Table 8 provides a discussion of “Cumulative (2023) without Project conditions” consequently it does not represent the proposed project or any alternatives. Table 7 of Appendix L, is within Section 2.6 (“Existing Pedestrian & Bicycle Conditions”) and therefore presents the existing peak hour pedestrian and bicycle volumes at the study intersections consequently it does not represent the proposed project or any alternatives. An analysis of LOS conditions for the proposed project is included in Sections 4 of Appendix L. An analysis of LOS conditions for alternatives to the proposed project is provided in Section 5 of Draft EIR Appendix L.

**Comment AS003-3**

The commenter asks:

3. Why HCM methodology is not used for LOS analysis at all intersections?

**Response to Comment AS003-3**

As explained in Draft EIR Section 3.13, Transportation and Traffic, specifically in 3.13.4 (“Methodology”): “Consistent with the City of Redondo Beach’s requirements, signalized intersections were analyzed using the ICU methodology…. The City of Torrance uses both the ICU and HCM methodologies for signalized intersections and HCM methodology for unsignalized intersections…. The City of Lawndale and County of Los Angeles use the ICU methodology for signalized intersections.” HCM was used because some jurisdictions utilize different traffic methodologies and significance thresholds, and the EIR applied selected methodologies and thresholds at intersections in other jurisdictions. However, CEQA provides a Lead Agency discretion to select ICU instead of HCM. (Sierra Club v. City of Orange (2008) 163 Cal.App.4th 523 [Rejecting argument that the City was required to utilize HCM methodology for its traffic analysis.].)

**Comment AS003-4**

The commenter requests the EIR:
4. Provide LOS analysis for horizon year 2040.

**Response to Comment AS003-4**

The commenter requests LOS analysis for Year 2040. The horizon year for the cumulative traffic analysis (2023) was based on the year the project is projected to become operational. (Draft EIR Section 2.6.1.) The Cumulative 2023 Traffic analysis is considered conservative because SCAG’s traffic model shows a decline in traffic of approximately 3 percent through 2040 due to (a) planned transportation infrastructure improvements, and (b) land use changes and policy strategies associated with the RTP and the SCS (see Draft EIR p. 3.13-25.) Nevertheless, in the short term, the City assumed a conservative annual increase in cumulative traffic volumes of 0.38 percent, based on SCAG’s population growth projections.

This approach to the horizon year of the cumulative analysis is consistent with Caltrans’ own guidance document which states “When a general plan amendment is not proposed and a proposed project is seeking specific entitlement…Cumulative Conditions…Trip assignment and peak hour LOS analysis in the year the project is anticipated to complete construction.” Other public agencies utilize the same approach for selecting the horizon years for their traffic analyses. (See *City of Irvine v. County of Orange* (2015) 238 Cal.App.4th 526 noting that the “SEIR 564 includes a traffic study projecting morning and evening rush hour effects of the project… in the year 2030 (projected completion of all 7,854 beds).”.) This is also consistent with the 2010 LA County Congestion Management Program, which explains: “Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. *In general, the horizon year should reflect a realistic estimate of the project completion date.*” (2010 CMP for LA County, Appendix D.5.2.) Finally, this issue was also addressed by the Court of Appeal in *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2012 Case No BS32655). While the case was ultimately considered by the California Supreme Court, the Supreme Court did not overturn the aspects of the Court of Appeal decision addressing selection of the Cumulative traffic horizon year, wherein the Court concluded “the decision on whether to use the opening year or a later year within the planning horizon is within the agency’s discretion. Petitioner has shown no abuse of that discretion.” (Slip Opinion, page 20, fn9.)

Consequently, the requested analysis is not necessary to comply with CEQA. As noted under CEQA Guidelines Section 15204(a), “CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.” Furthermore, as discussed in the Draft EIR Section 3.13, *Transportation and Traffic*, on page 3.13-25, the SCAG population growth rate (not traffic growth) was applied to traffic volumes to reflect near-term development; however, in the long term in Redondo Beach, the transportation investments analyzed in the SCAG RTP/SCS are expected to result in lower traffic volumes citywide by approximately 3 percent. Consequently, the requested 2040 analysis would show impacts that are reduced in comparison to the 2023 cumulative analysis.

**Comment AS003-5**

The commenter states: Appendix H: Caltrans Analysis
1. Provide a schematic diagram for traffic movement volume at all intersections for AM and
   PM peak all years and all conditions.

**Response to Comment AS003-5**

Please see Response to Comment AS003-1.

**Comment AS003-6**

The commenter asks:

2. Which alternative was used for LOS analysis at all intersections? Provide LOS analysis
   for all alternatives at all intersections.

**Response to Comment AS003-6**

The commenter questions which alternative was used for the LOS analysis in Appendix H of the
Transportation Impact Study (TIS) (Appendix L of the Draft EIR) and requests that the LOS
analysis for all alternatives be provided. The LOS analysis presented in Appendix H of the TIS is
for the study intersections located within Caltrans’ jurisdiction. Appendix H of the TIS was
prepared based on input received from Caltrans. The proposed project was analyzed as part of the
LOS analysis presented in Appendix H of the TIS. As shown in the TIS, the proposed project
would generate more trips than any of the alternatives to the proposed project. Therefore, the
analysis in Appendix H of the TIS represents the worst-case scenario with respect to
transportation impacts at the selected intersections. An analysis of LOS conditions for alternatives
to the proposed project are provided in Section 5 of the TIS. Please also see Draft EIR Section 4,
for discussion of alternatives, including mitigation measures.

**Comment AS003-7**

The commenter states:

3. There are more than one intersection in the state right of way impacted by the project.
   Please discuss about mitigation measures about these intersections.

**Response to Comment AS003-7**

The commenter requests a discussion of the mitigation measures proposed at intersections that
fall under Caltrans’ jurisdiction. The Draft EIR, Section 3.13, Transportation and Traffic,
concluded that the proposed project would result in three significant and unavoidable intersection
impacts at Intersection No. 16 (Hawthorne Blvd./Artesia Blvd.), Intersection No. 17 (Prairie
Ave./Artesia Blvd.), and Intersection No. 19 (I-405 Northbound Ramps/Artesia Blvd.). As noted
in Draft EIR Appendix L, Table 1, Caltrans has jurisdiction over one of these three intersections
(Intersection No. 19). The other comment letter submitted by Caltrans (Comment AS001-8),
acknowledged that the Draft EIR concluded that mitigation at Intersection No. 19 would be
infeasible. (Draft EIR p. 3.13-47, Draft EIR Appendix L, p. 55) As discussed under CEQA
Guidelines “The EIR shall describe feasible measures...If the Lead Agency determines that a
mitigation measure cannot be legally imposed, the measure need not be proposed or analyzed.”
(Section 15126.4(a)(1) and (a)(5).) The discussion in the Draft EIR is consistent with this
guidance. Nevertheless, Draft EIR Appendix L, p 55, contains additional discussion on this issue, which explains “I-405 Northbound Ramps & Artesia Boulevard (Intersection 19) – [T]he proposed mitigation measure would add a westbound through lane. The mitigation has been determined to be infeasible due to lack of right-of-way and physical limitations due to the I-405 undercrossing.”

On page 55 of the Draft EIR (Appendix L), the feasibility of adding a westbound through lane at Intersection No. 19 was explored. The mitigation measure was determined to be infeasible due to the need to acquire additional right-of-way on the north side of Artesia Boulevard, and the physical limitations presented by the existing width of the I-405 undercrossing”. Widening Artesia Boulevard at this location would, therefore, require the reconstruction of the freeway underpass and the acquisition of private property. The cost of such a mitigation measure would be very high (tens of millions of dollars), and would potentially displace current residents of properties on the north side of Artesia Boulevard. Implementation of this mitigation measure would also result in environmental impacts associated with major physical construction, including disruption of traffic flows, the generation of construction-related air pollutant emissions, noise impacts, and loss of housing. Furthermore, the continued expansion of roadways leads to secondary impacts to alternate modes of transportation, such as pedestrian access. This would conflict with the proposed project objectives, as stated in Section 2.2, Project Objectives, of the Draft EIR, “to further the City of Redondo Beach General Plan land use policies to “achieve the character of a pedestrian-oriented ‘urban center’”; and “to create a project with readily accessible and easily identifiable pedestrian connections, transit connections, and conveniently located parking facilities providing access by foot, bicycle, bus, and car to a synergistic mix of complementary commercial and residential uses.”

On November 9, 2016, Caltrans issued the Local Development Intergovernmental Review Project Interim Guidance Implementing Caltrans Strategic Management Plan 2014-2020 Consistent with Senate Bill (SB) 743 (Interim Guidance). This document provides guidance to Caltrans staff in regard to commenting on local EIRs in a manner consistent with SB 743. Among other things, it suggests that Caltrans should provide recommendations that strive to reduce vehicle miles traveled (VMT) generation and improve pedestrian, bike, and transit service rather than providing recommendations that primarily accommodate motor vehicle travel. In addition, comments related to the State Highway System should focus on VMT and not vehicle delay or a project’s effects on road capacity. The proposed project includes numerous policies to improve access to pedestrian, bicycle, and transit systems, to reduce trip generation through transportation demand management, and to reduce VMT, which is consistent with the intent of SB 743 and with the intent of the Caltrans interim guidance.

For the reasons noted above, the improvements needed to mitigate the significant impact at Intersection No. 19 were determined to be infeasible due to economic, social, environmental, and policy reasons described above.

Additionally, if Caltrans would consider developing a Freeway System Nexus Study to plan for improving freeway operations within the context of new development, the nexus between proposed development projects and regional freeway impacts, and proposed specific physical or
operational improvements, the City would coordinate with Caltrans, as appropriate. To our knowledge no such plan exists at this time. Descriptions of the feasible and infeasible mitigation measures considered at these intersections is provided in Section 4.6 on pages 54 through 55 of the Transportation Impact Study (Appendix L of the Draft EIR).

**Comment Letter AS004: Department of Transportation–District 7**

**Comments AS004-1 through AS004-10**

Comments AS004-1 through AS004-10 are duplicates of AS001-1 through AS001-10, just sent on different dates, with Comment Letter AS004 being sent after the close of the comment period.

**Response to Comment AS004-1 through AS004-10**

Please see comment responses AS001-1 through AS001-10.

**Comment Letter AS005: State Clearinghouse**

**Comment AS005-1**

The commenter states the enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on September 11, 2017. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

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

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (20151 01009) when contacting this office.

[The comment contained a copy of Caltrans’ comment letter, included as Comment AS001.]

**Response to Comment AS005-1**

The comment from OPR does not address an environmental issue, therefore no further response is required. However, the comments from Caltrans, which were included as an attachment, have been addressed in Response to Comments AS001.

**2.3.2 Regional Government**

**Comment Letter AR001: Los Angeles County Sanitation Districts**

**Comment AR001-1**

The commenter states the County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on September 14, 2016. The proposed project is located within the jurisdictional boundaries of District No. 5. We offer the following comments regarding sewerage service:
Response to Comment AR001-1
The comment does not address an environmental issue; therefore, no further response is required. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. The commenter is also referred to Response to Comment AR002, which contains responses to the LA County Sanitation District’s more recent correspondence.

Comment AR001-2
The commenter states, the wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' El Nido Trunk Sewer, located in 182nd Street at Hawthorne Boulevard. The Districts' 12-inch diameter trunk sewer has a capacity of 1.5 million gallons per day (mgd) and conveyed a peak flow of 0.5 mgd when last measured in 2011.

Response to Comment AR001-2
The Draft EIR has been corrected to include this background information on the El Nido Trunk Sewer and El Nido Relief Trunk Sewer, including the correct terminology (clarified as two separate sewer line connections), capacity, and peak flow. The commenter is referred to the Final EIR, Chapter 3.0, Modifications to the EIR. These revisions do not change the significance conclusions of the EIR of otherwise trigger recirculation. As discussed in Section 3.14.2, Utility Services, on-site sewers are connected to off-site sewers in Hawthorne Boulevard (8-inch) and Kingsdale Avenue (10-inch). The off-site sewers in Kingsdale Avenue and Hawthorne Boulevard run south to 182nd Street where they connect to the El Nido Trunk Sewer and El Nido Relief Trunk Sewer. It was determined that no physical improvements were necessary to the El Nido trunk line under existing or cumulative conditions, given the cumulative growth rates discussed under Impact UTL-2. In addition, Condition of Approval UTL-2 will confirm that the proposed project’s on-site and off-site wastewater conveyance system has been developed to accommodate the land uses proposed at the project site. Your comment will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment AR001-3
The commenter states the wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 256.8 mgd.

Response to Comment AR001-3
As discussed in Section 3.14.2, Utility Services, wastewater generated within the City is conveyed to the Joint Water Pollution Control Plant (JWPCP), located in the City of Carson. The Draft EIR states that the JWPCP has a capacity of treating 400 million gallons per day (mgd) and currently processes an average flow of 280 million gallons of wastewater per day. The Draft EIR used a more conservative estimate for the average flows currently being processed at the plant, and therefore analyzed a worst-case scenario than what is anticipated by the commenter. Your comment is acknowledged and will be included in the Final EIR presented for review and
consideration by the City’s decision-making body. Please see Response to Comment AR002-6, which incorporates more recent information into the Final EIR.

**Comment AR001-4**

The commenter states the expected increase in average wastewater flow from the proposed project, described in the document as an increase of 217,864-square-feet increase to the existing shopping center square footage, 150 hotel rooms, and 650 residential units, is 190,956 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

**Response to Comment AR001-4**

The commenter states that the proposed project would generate an increase of 190,956 gpd, which equates to 213 AFY of wastewater. As discussed in Section 3.14.4, Utility Services, Impact UTL-1, made conservative assumptions that the proposed project would generate a net increase of approximately 371.2 AFY of wastewater for the proposed project. The Draft EIR used a more conservative estimate for wastewater generation, and therefore analyzed a worst-case scenario than what is anticipated by the commenter. 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 AR001-5**

The commenter states, the Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts’ Sewerage System or for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts ' Chief Engineer will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.

**Response to Comment AR001-5**

As discussed in Section 3.13, Utility Services, Impact UTL-2, the proposed project would require additional on-site sewer piping and laterals for the proposed additional buildings and uses. The project would increase the existing sewer load, thus upsizing of off-site sewer lines would be required. COA UTL-2 states that prior to issuance of the Building Permit, the City’s Public Works Department, in concurrence with the LACSD, will confirm the proposed project applicant’s on-site and off-site wastewater conveyance system has been developed to accommodate the land uses proposed at the project site. Part of this conformance would include applicable fees to connect to the LACSD’s sewerage system. 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 AR001-6**

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

**Response to Comment AR001-6**

As discussed in Section 3.14 *Utility Services, Cumulative Impacts*, the Draft EIR states that the design capacities of the LACSD’s wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). No significant cumulative impact related to wastewater is anticipated to occur because the adopted growth projections and proposed project together would not exceed the capacity of wastewater infrastructure and result in the construction of new infrastructure that could cause significant environmental impacts. COA UTL-2 states that prior to issuance of the Building Permit, the City’s Public Works Department, in concurrence with the LACSD, will confirm the proposed project applicant’s on-site and off-site wastewater conveyance system has been developed to accommodate the land uses proposed at the project site. 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 AR002: Los Angeles County Sanitation Districts**

**Comment AR002-1**

The commenter states the Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on July 28, 2017. The proposed project is located within the jurisdictional boundary of District No. 5. Previous comments submitted by the Districts in correspondence dated November 2, 2016 (copy enclosed) still apply to the subject project with the following updated information and additional comments:

**Response to Comment AR002-1**

The comment does not address an environmental issue; therefore, no further response is required. Please see Response to Comments AR001-1 through AR001-6 for response to the November 2,
2016 NOP comments. 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 AR002-2**

The commenter states, the wastewater flow originating from the proposed project discharging to the local sewer line in Hawthorne Boulevard is conveyed to the Districts' 12-inch diameter El Nido Trunk Sewer, located in 182nd Street at Hawthorne Boulevard.

**Response to Comment AR002-2**

Thank you for your comment. The Draft EIR has been corrected to include this background information on the El Nido Trunk Sewer and El Nido Relief Trunk Sewer, including the correct terminology (clarified as two separate sewer line connections), capacity, and peak flow. The commenter is referred to the Final EIR, Chapter 3.0, Modifications to the EIR. These revisions do not change the significance conclusions of the EIR or otherwise trigger recirculation. As discussed in Section 3.14.2, Utility Services, on-site sewers are connected to off-site sewers in Hawthorne Boulevard (8-inch) and Kingsdale Avenue (10-inch). The off-site sewer in Kingsdale Avenue (10-inch) runs south towards the intersection of Kingsdale Avenue and 182nd Street where it connects to the El Nido Relief Trunk Sewer (18-inch). The off-site sewer in Hawthorne Boulevard (8-inch) runs south toward the intersection of 182nd Street and Hawthorne Boulevard where it connects to the El Nido Trunk Sewer (12-inch). It was determined that no physical improvements were necessary to the El Nido trunk line under existing or cumulative conditions, given the cumulative growth rates discussed under Impact UTL-2. In addition, Condition of Approval UTL-2 will confirm that the proposed project’s on-site and off-site wastewater conveyance system has been developed to accommodate the land uses proposed at the project site. Your comment will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

**Comment AR002-3**

The commenter states, the wastewater flow originating from the proposed project discharging to the local sewer line in Kingsdale Avenue is conveyed to the Districts' 18-inch diameter El Nido Relief Trunk Sewer, located in a private right of way northeast of the intersection of Kingsdale Avenue and 182nd Street, has a capacity of 3.7 million gallons per day (mgd), and conveyed a peak flow of 1.1 mgd when last measured in 2011.

**Response to Comment AR002-3**

Thank you for your comment. The Draft EIR has been corrected to include this background information on the El Nido Trunk Sewer and El Nido Relief Trunk Sewer, including the correct terminology (clarified as two separate sewer line connections), capacity, and peak flow. The commenter is referred to the Final EIR, Chapter 3.0, Modifications to the EIR. These revisions do not change the significance conclusions of the EIR or otherwise trigger recirculation. As discussed in Section 3.14.2, Utility Services, on-site sewers are connected to off-site sewers in Hawthorne Boulevard (8-inch) and Kingsdale Avenue (10-inch). The off-site sewer in Kingsdale Avenue (10-inch) runs south towards the intersection of Kingsdale Avenue and 182nd Street where it connects to the El Nido Relief Trunk Sewer (18-inch). The off-site sewer in Hawthorne Boulevard (8-inch) runs south toward the intersection of 182nd Street and Hawthorne Boulevard where it connects to the El Nido Trunk Sewer (12-inch). It was determined that no physical improvements were necessary to the El Nido trunk line under existing or cumulative conditions, given the cumulative growth rates discussed under Impact UTL-2. In addition, Condition of Approval UTL-2 will confirm that the proposed project’s on-site and off-site wastewater conveyance system has been developed to accommodate the land uses proposed at the project site. Your comment will be included in the Final EIR presented for review and consideration by the City’s decision-making body.
Boulevard (8-inch) runs south toward the intersection of 182nd Street and Hawthorne Boulevard where it connects to the El Nido Trunk Sewer (12-inch). It was determined that no physical improvements were necessary to the El Nido trunk line under existing or cumulative conditions, given the cumulative growth rates discussed under Impact UTL-2. In addition, Condition of Approval UTL-2 will confirm that the proposed project’s on-site and off-site wastewater conveyance system has been developed to accommodate the land uses proposed at the project site. Your comment will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment AR002-4
The commenter states, Section 2.4.3, page 2.10, Table 2-3 - Based on the project details described in the table, the expected increase in average wastewater flow from the proposed project is 193, 101 gallons per day. Revise accordingly throughout the document.

Response to Comment AR002-4
Comment AR002-4 states that the proposed project would generate an increase of 193,101 gpd, which equates to 216 AFY of wastewater. As discussed in Section 3.14, Utility Services, Impact UTL-1, conservatively assumed the proposed project would generate a net increase of approximately 371.2 AFY of wastewater for the proposed project. The Draft EIR used a more conservative estimate for wastewater generation, and therefore analyzed a worst-case scenario than what is anticipated by the commenter. 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 AR002-5
The commenter states that Section 3.14 Utility Services, page 3.14-1, Wastewater paragraphs one - LACSD is a public agency created under state law to manage wastewater and solid waste on a regional scale and consists of 24 independent special districts serving approximately 5.6 million people in Los Angeles County. The service area covers approximately 850 square miles and encompasses 78 cities and unincorporated territory within the county. The wastewater system includes approximately 1,400 miles of sewers, 49 active pumping plants, and 11 wastewater treatment plants that transport and treat about half of the wastewater in Los Angeles County. Revise accordingly throughout the document.

Response to Comment AR002-5
Thank you for your comment. The Draft EIR has been corrected to include the updated information in Comment AR002-5, including the number of people in Los Angeles County, the square miles covered within the service area, and number of active pumping plants. Revisions in response to tour comment will be included in the Final EIR, Chapter 3.0, Modifications to the EIR. These revisions do not change the significance conclusions of the EIR or otherwise trigger recirculation.

Comment AR002-6
The commenter states, Section 3.14 Utility Services, page 3.14-1, Wastewater paragraph two - The Joint Water Pollution Control Plant treats approximately 260 mgd under existing conditions,
and has a total permitted capacity of 400 mgd. Treated wastewater from the JWPCP is disposed into an outfall into the Pacific Ocean located 1 ½ miles offshore from White Point on the Palos Verdes Peninsula. Revise accordingly throughout the document.

**Response to Comment AR002-6**

Draft EIR Section 3.14, Utility Services, states that the JWPCP has a capacity of treating 400 million gallons per day (mgd) and currently processes an average flow of 280 million gallons of wastewater per day (LACSD 2016). The Draft EIR used a more conservative estimate for the average flows currently being processed at the plant, and therefore analyzed a worst-case scenario than what is anticipated by the commenter. Consequently, there would be no new impacts, and no increase in severity of impacts. Draft EIR pages 3.14-1, 3.14-2, 3.14-21, 3.14-26, and pages 4-91, 4-92, 4-138, 4-140, 4-186 are hereby revised to acknowledge the reduction in existing average wastewater generation. The commenter is referred to the Final EIR, Chapter 3.0, Modifications to the EIR. The Draft EIR has also been corrected to include the distance of the outfall from White Point, included in the Final EIR, Chapter 3.0, Modifications to the EIR. The City finds that these revisions do not trigger recirculation. Your comment will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

**Comment AR002-7**

The commenter states Section 3.14 Utility Services, page 3.14-2, Wastewater section continued at top of page - The offsite sewers in Kingsdale Avenue and Hawthorne Boulevard run south towards 182nd Street where they connect to El Nido Trunk Sewer and El Nido Relief Trunk Sewer. Revise accordingly throughout the document.

**Response to Comment AR002-7**

Thank you for your comment. The Draft EIR has been corrected to include the El Nido Relief Trunk Sewer in the Final EIR, Chapter 3.0, Modifications to the EIR. The City finds that these revisions do not trigger recirculation. Your comment will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

**Comment AR002-8**

The commenter states, all other information concerning Districts' facilities and sewage service contained in the document is current.

**Response to Comment AR002-8**

The comment does not address an environmental issue; therefore, no further response is required. 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 AR003: Los Angeles County Metropolitan Transportation Authority

Comment AR003-1
The commenter thanks the City for the opportunity to comment on Notice of Availability, Notice of Completion and Notice of Public and Agency Review Period for the Draft Environmental Impact Report (DEIR) for the proposed South Bay Galleria Improvement project. The project is located at 1815 Hawthorne Blvd, Redondo Beach, CA. The Agency provided our last comments on the DEIR on October 28, 2015. This letter conveys additional recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency’s statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TOCs). TOCs are built by considering transit within a broader community and creating vibrant, compact, walkable, and bikeable places centered around transit stations and hubs with the goal of encouraging the use of transit and other alternatives to driving. Metro looks forward to collaborating with local municipalities, developers, and other stakeholders in their land use planning and development efforts, and to find partnerships that support TOCs across Los Angeles County.

Response to Comment AR003-1
The comment does not address an environmental issue. The commenter references comments on the Draft EIR dated October 28, 2015. However, the Draft EIR was not released until July 2017; the commenter appears to be referencing their NOP/IS October 2015 responses, which were considered in preparation of the Draft EIR. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment AR003-2
The commenter states, Project Location/ Description:

The project site approximately 29.85 acres in the City of Redondo Beach. The project site is roughly square in shape and is bound by Artesia Boulevard to the north, Kingsdale Avenue to the west, Hawthorne Boulevard to the east, and by the 150-foot-wide Southern California Edison high voltage easement to the south. The proposed project consists of modifications and additions to the existing 29.85-acre South Bay Galleria enclosed mall property in the City of Redondo Beach. The proposed project includes demolishing some existing structures and redesigning portions of the site by combining expanded retail and dining venues with open-air promenades, hotel, and residential development.

Retail square footage, including department stores, mall shops, dining and entertainment would be increased by up to 224,464 square feet (sf). Overall density of the development on the site (including retail, hotel, and housing) would increase to a maximum of 1,950,565 sf of building floor area. The proposed project includes a hotel of up to 150 rooms (105,000 sf) and up to 650
residential apartment homes (650,000 sf). Currently, the site does not contain any residential units or overnight accommodations, but the project site is identified in the City of Redondo Beach 2013–2021 General Plan Housing Element as the “site with the greatest potential for future residential development” in the entire City. The Housing Element identified the project site as “an ideal location for transit-oriented development involving high-density residential uses.”

**Response to Comment AR003-2**

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

**Comment AR003-3**

The comment states that Metro operates many bus lines in the vicinity of the proposed project. Most of the bus lines use a turnaround loop via southbound Hawthorne Blvd, Right – 182nd St, Right – Kingsdale Ave, Right – Artesia Blvd and then continue east or north on various streets. During construction, buses will continue to need access 7 days a week to this important turnaround loop.

**Response to Comment AR003-3**

The Draft EIR explained that the existing transit center located on the western border of the project site was scheduled for relocation1 within 18 months of release of the South Bay Galleria Draft EIR. Consistent with that discussion, bidding for the transit center construction activities is set to begin in January 2018 or shortly thereafter, with construction anticipated to take a year, to a year and a half to complete. Whereas the proposed project is not anticipated to begin construction until the second quarter of 2020. (Draft EIR Section 2.6.)

As discussed on page in Section 3.13, Transportation and Traffic, page 3.13-44 and 3.13-45 of the Draft EIR, construction staging would occur primarily on site and would not be expected to disrupt access to nearby uses, including the bus turnaround loop. No major road closures are anticipated. While construction impacts would be less than significant, the City is proposing that the applicant prepare and implement a Construction Management Plan for the project as a standard Condition of Approval, which includes measures minimizing lane closures, providing detours, and maintaining unobstructed access to land uses in proximity to the project site. While some trenching in the right of way may be required to implement pipeline infrastructure improvements, such construction work would be performed in phases to maintain access for all motor vehicles (including transit), as it typical for such infrastructure work. Nevertheless, the Condition of Approval has been updated to include the following text:

“The applicant shall coordinate with Metro and other affected transit operators who use the turnaround loop at least 30 days in advance of right-of-way construction work to ensure that any such construction activities are consistent with maintaining the transit services’ operations.” See

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Final EIR, Chapter 3.0, Modifications to the EIR. Your comment will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

**Comment AR003-4**

The commenter states that Metro bus lines 40, 130, and 740 serve a very important bus stop on eastbound Artesia Blvd east of Kingsdale Ave and our buses and customers will need to continue to have access. Similarly, Metro bus lines 210, 211, and 710 serve the South Bay Transit Center bus bays on northbound Kingsdale Ave, just south of Artesia Blvd. Metro buses will continue to need access to these bus bays along with some municipal operator buses from Gardena (G Trans Line 3) and Torrance Transit (Line 3 Rapid). Lawndale and Beach Cities Transit also have service to the bus bays on northbound Kingsdale Ave. In addition, Metro Line 344 operates on Hawthorne Blvd, adjacent to the proposed project. In addition to the Metro bus stops on the corner of Artesia/Kingsdale and at the South Bay Transit Center on Kingsdale Ave; there is a heavily used bus stop on the southwest corner of Hawthorne & Artesia that is directly adjacent to the proposed project. The following comments relate to bus operations and the bus stops:

1. Although the project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus facilities and services that are present. The existing Metro bus stops must be maintained as part of the final project.

**Response to Comment AR003-4**

See Response to Comment AR003-3.

**Comment AR003-5**

The commenter states, during construction, the stops must be maintained or relocated consistent with the needs of Metro Bus Operations. Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may Impact Metro bus lines at least 30 days in advance of initiating construction activities. For closures that last more than six months, Metro’s Stops and Zones Department will also need to be notified at 213-922-5188, 30 days in advance of initiating construction activities. Other municipal bus lines may also be impacted and should be included in construction outreach efforts.

**Response to Comment AR003-5**

See Response to Comment AR003-3.

**Comment AR003-6**

The commenter states, LACMTA encourages the installation of bus shelters, benches and other amenities that improve the transit rider experience. The City should consider requesting the installation of such amenities as part of the development of the site. Metro is aware that the City is building a new transit center west of Kingsdale Ave and we trust the construction schedule for that facility is being considered in light of the proposed project.
**Response to Comment AR003-6**

As noted in Draft EIR Section, 2.0, *Project Description*, 2.4.2, the existing Transit Center was approved\(^2\) for relocation back in 2010 to the parcel below the existing Target Store (just north of 182nd along the west-side of Kingsdale Ave). As discussed in the February 2010 Administrative Report for the relocation, the transit center relocation project includes numerous amenities, including (26) bicycle racks and twelve (12) bicycle lockers will be provided in close proximity to the transit center building. Twelve (12) benches to accommodate the transit riders will be located in three (3) landscape areas located within the circular arrangement of the bus bays. The remaining area, approximately 26 percent of the transit center hub site, is to be landscaped. The current plans also call for three bus shade structure shelters.

**Comment AR003-7**

The commenter states the final design of the bus stops and surrounding sidewalk areas must be Americans with Disabilities Act (ADA) compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development. The ADA also requires a clear area of five (5) feet by eight (8) feet at the bus stop (five (5) feet parallel and eight (8) feet perpendicular to the bus). Please contact the Metro Civil Rights office with any questions about ADA specifications (call Benjamin Alcazar at 213 922-2634).

**Response to Comment AR003-7**

Thank you for your comment. While the comment does not directly address an environmental issue associated with the proposed project, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, in order to respond to your comment, the City will ensure the proposed project is compliant with all ADA requirements prior to the issuance of any occupancy permits.

**Comment AR003-8**

Transit Orientation

The commenter states that LACMTA is studying the extension of light rail transit service along a 4.6-mile segment of the Harbor Subdivision Corridor from the existing Redondo Marine Station in Redondo Beach to the proposed Regional Transit Center in Torrance. The extension will be served both by Metro Green Line and the Crenshaw/LAX Line (currently in construction and scheduled in 2019). Metro is currently preparing a Supplemental Alternatives Analysis (SAA) Study and is collecting feedback from corridor cities along this segment and stakeholders to refine and update alternatives previously identified as part of the Metro Harbor Subdivision Alternative Analysis Report prepared in 2009.

In the previous Draft EIR/EIS prepared in 2012, this extension included a proposed station at the planned Redondo Beach Transit Center (RBTC), which would serve the South Bay Galleria Mall. Because this station is in great proximity to the South Bay Galleria Project (Project), optimal and successful integration of the Extension with the Project would be of benefit to both projects.

Metro would like to discuss and coordinate with respect to the design and construction, as well as other linkages, in the immediate vicinity of the Extension and Project site.

**Response to Comment AR003-8**

Thank you for your comment. While the comment does not directly address an environmental issue, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, the City would welcome the opportunity to discuss and consult with Metro regarding its Supplemental Alternatives Analysis.³

**Comment AR003-9**

The commenter states that in order to ensure coordination and communication between the two agencies moving forward, Metro is providing the following comments on South Bay Galleria Draft Environmental Impact Report (DEIR).

1. Given that the Project is located approximately 1,300 feet from Metro rail station platform, and 1,000 feet from the RBTC bus plaza, consider providing a wayfinding system, clear pedestrian paths, and bike paths to connect transit riders to the Galleria.

**Response to Comment AR003-9**

Thank you for your comment. While the comment does not directly address an environmental issue with the project your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, in order to respond to your comment, the City will coordinate with LACMTA regarding wayfinding for transit riders. Additionally, the proposed project area includes clear paths, that are consistent with the City of Redondo Beach’s General Plan Circulation Element, which includes goals to reduce trip generation, promote bicycle and pedestrian modes, and link existing and proposed bicycle facilities, creating opportunities for physical activity.

**Comment AR003-10**

The commenter states, the South Bay Galleria DEIR mentions the Project’s adjacency to the Extension and the planned RBTC, which would be located one block south of the Galleria. However, the proposed Project does not include any specific designs or plans that would integrate the Galleria with the RBTC or the Extension. It will be important to coordinate on station integration with the Project and RBTC in order to ensure seamless connection. The South Bay Galleria DEIR identifies a 0.56 acre parcel currently used as a transit terminal at the westerly edge of the site along Kingsdale Avenue, to be removed and incorporated into the South Bay Galleria site. In exchange for this land, the project applicant, Forest City, has provided land

³ The commenter also references a 2012 Draft EIR/EIS prepared by Metro; however the referenced 2012 document was not finalized or released for public review. Additionally, the City has verbally consulted with Metro Staff who indicated that the earliest date for potential construction activity for a possible Green line extension would be 2028 with such a project not becoming operational for three years or more thereafter; which would be well beyond the horizon year for the Galleria project’s operational cumulative analysis.
(block to the south at 1521 Kingsdale Avenue) to relocate the existing bus turn-out to a larger intermodal transit center.

**Response to Comment AR003-10**

Thank you for your comment. The commenter states that the Galleria Draft EIR does not include any specific designs for the Transit Center Relocation, referenced by the commenter as “RBTC.” The Transit Center Relocation is a separate project with independent utility that was approved in 2010, including the adoption of a Mitigated Negative Declaration. While initial approval occurred in 2010, construction bidding is currently scheduled for February 2018, or shortly thereafter. While the comment does not directly address an environmental issue, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, in order to respond to the comment, the South Bay Galleria is compatible with providing transit center access to projects residents, employees and visitors. Please also see Response AR003-9.

**Comment AR003-11**

The commenter states a recorded Noise Easement Deed in favor of LACMTA is required, a form of which is attached. In addition, any noise mitigation required for the project must be borne by the developers of the project and not LACMTA. The easement recorded in the Deed will extend to successors and tenants as well.

**Response to Comment AR003-11**

Thank you for your comment. The commenter requested that the Applicant record a Noise Easement Deed in favor of LACMTA. As discussed in Response AR003-10, the Transit Center Relocation is a separate project with independent utility that was first approved in 2010. In finalizing the approvals for that project, the City and real parties will comply with all legal requirements.

It should also be noted that the Draft EIR analyzed the impacts of the project on the existing noise environment, and determined that the project does not result in significant operational noise impacts, and construction noise impacts were reduced to less than significant with implementation of MM NOI-1 through 6.

**Comment AR003-12**

The commenter states, the project sponsor should notify LACMTA of any changes to the construction/building plans that may impact the use of the ROW.

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4 Planning Commission, February 2010 Administrative Report:
http://laserweb.redondo.org/WebLink/PDF/gbc5oi5jigkxvpm0uprgste0/19/AG%20PKT%202010-02-18%20PC%208.pdf. Subsequent Administrative Report noted that the City of Lawndale Community Services Manger consulted on this project. (City Council Admin Report, June 4, 2013, p 2:
Response to Comment AR003-12
Thank you for your comment. Please see Response to Comment AR003-3.

Comment AR003-13
The commenter states, there shall be no encroachment onto the railroad ROW. If access is necessary for the applicant or its contractor to enter the ROW during construction, a temporary right-of-entry agreement must be obtained from LACMTA. Contact Velma Marshall, Deputy Executive Officer of Real Estate, at 213-922-2415 for right-of-entry permits.

Response to Comment AR003-13
Thank you for your comment. While the comment does not directly address an environmental issue, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, in order to respond to the comment, it is not anticipated the project in anyway would encroach onto the railroad ROW, but if for whatever reason access is necessary for the applicant or its contractor to enter the ROW during construction, a temporary right-of-entry agreement must be obtained from LACMTA.

Comment AR003-14
The commenter states that it should be noted that there could be a number of Overhead Catenary System (OCS) support structures in the public right-of-way immediately adjacent to the project site. Building protrusions into the public right-of-way along Washington Boulevard, including balconies, awnings and other appurtenances, shall maintain a minimum distance of five feet from the OCS and support structure.

Response to Comment AR003-14
Thank you for your comment. While the comment does not directly address an environmental issue, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, in order to respond to your comment, the proposed project is not located near Washington Boulevard, and the project will comply with regulations requiring a minimum distance of 5 feet of OCS support structures.

Comment AR003-15
The commenter states, that considering the proposed project’s proximity and the constrained space at this location, the project sponsor should be advised that construction activities will not be allowed to impact LACMTA ROW.

Response to Comment AR003-15
Thank you for your comment. While the comment does not directly address an environmental issue, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, in order to respond to your comment, the LACMTA ROW is located more than 500 feet from the closest border of the project site.
Comment AR003-16
The commenter states that during construction, a protection barrier of acceptable material shall be constructed to cover the full height of the building to prevent objects, material, or debris from falling onto the Metro ROW.

Response to Comment AR003-16
Thank you for your comment. While the comment does not directly address an environmental issue, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, in order to respond to your comment, the LACMTA ROW is located more than 500 feet from the closest border of the project site, and is separated from the project site by two blocks of residential development. The Galleria project would not result in materials, debris or other objects falling into the LACMTA right of way.

Comment AR003-17
The commenter states, LACMTA staff shall be permitted to monitor construction activity to ascertain any impact to the ROW.

Response to Comment AR003-17
Thank you for your comment. While the comment does not directly address an environmental issue, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, in order to respond to the comment, the proposed project is not located near the Metro ROW, the commenter is referred to Response to Comment AR003-14 and 16.

Comment AR003-18
The commenter states, the project sponsor should be advised that LACMTA may request reimbursement for costs incurred as a result of project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure.

Response to Comment AR003-18
Thank you for your comment. While the comment does not directly address an environmental issue, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, in order to respond to the comment, the proposed project is not located near the Metro ROW, the commenter is referred to Response to Comment AR003-16.

Comment AR003-19
Congestion Management Program
The commenter states, that beyond impacts to Metro facilities and operations, LACMTA must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the “2010
2. Response to Comments

Congestion Management Program for Los Angeles County”, Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

**Response to Comment AR003-19**

Draft EIR Section 3.13 and the Transportation Impact Study (TIS), Appendix L of the Draft EIR, were prepared in accordance with the requirements CEQA and the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. This includes an impact evaluation of CMP facilities in Chapter 4.4 of the TIS, and in Section 3.13, *Transportation and Traffic*, beginning on page 3.13-50 of the Draft EIR. The CMP impact evaluation complies with the 2010 Los Angeles County CMP requirements.

**Comment AR003-20**

The commenter states that all CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).

**Response to Comment AR003-20**

The commenter is referred to Response to Comment AR003-19. The 50-or-more trip screening limit for arterial intersections was expressly noted on Draft EIR page 3.13-19, 28, 31, and 50 and was utilized in the CMP analysis.

**Comment AR003-21**

The commenter states, if CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.

**Response to Comment AR003-21**

The commenter is referred to Response to Comment AR003-19 and 20.

**Comment AR003-22**

The commenter states mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.

**Response to Comment AR003-22**

The commenter is referred to Response to Comment AR003-19. The 150-or-more trip screening limit for freeways was expressly noted on Draft EIR page 3.13-19, 28, 31, and 51 and was utilized in the CMP analysis.

**Comment AR003-23**

The commenter states that Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.
Response to Comment AR003-23
Caltrans was consulted in person on September 14, 2015 to determine the scope of the analysis of Caltrans facilities (i.e., mainline freeway segments and ramp terminals) as noted on Draft EIR page 3.13-3. The analysis of Caltrans facilities is provided in Appendix H of the TIS (Appendix L of the Draft EIR), and under Impact TRA-1 beginning on Draft EIR page 3.13-33 for Existing plus Project conditions and on page 3.13-39 for Cumulative plus Project conditions (see also Impact TRA-2, Congestion Management Program).

Comment AR003-24
The commenter states, the CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

Response to Comment AR003-24
The commenter is referred to Response to Comment AR003-19.

2.3.3 Local Government

Comment Letter AL001: Torrance Transit System, City of Torrance
Comment AL001-1
The commenter states, I am in receipt of the EIR for the South Bay Improvement Project. Thank you for sharing. I will have my staff review for comments and I forward the information to the appropriate City of Torrance representative as well.

Response to Comment AL001-1
The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. No further response is required, as the comment does not address environmental issues. (CEQA Guidelines Sections 15088(a), 15204(a).)

Comment Letter AL002: City of Lawndale
Comment AL002-1
The commenter states, on behalf of the City Council of the City of Lawndale, Lawndale takes this opportunity to provide comments and express concerns on the proposed South Bay Galleria Improvement Project (SBGIP) in the City of Redondo Beach, as outlined in the Draft Environmental Impact Report (DEIR). While the City understands that there are a number of potential benefits associated with the project, the City remains concerned that substantial impacts to the citizens of Lawndale are not being adequately presented in the DEIR.
Response to Comment AL002-1

The Comment states that the letter was submitted on behalf of the City Council of the City of Lawndale. While the Lawndale Planning Commission generally discussed the Galleria Draft EIR, it does not appear the Lawndale City Council ever considered the Galleria Draft EIR. The Lawndale City Council meeting minutes were reviewed from the end of 2016 through the date of submission of the comment letter and no discussion of the Galleria Draft EIR was agendized or referenced in the City Council’s Minutes.

Comment AL002-2

The commenter states, we respectfully submit these comments to help ensure that local decision makers fully comply with the California Environmental Quality Act (Public Resources Code § 21000 et seq., "CEQA") and the CEQA Guidelines (14 Cal. Code of Regulations §§ 15000 - 15387) with respect to the project. The City believes the project should be rejected as proposed. It is too massive for the area and fails to conform with Redondo Beach's General Plan and zoning. Redondo Beach may deny the proposed project without certifying the EIR. (Pub. Resources Code § 21080 (b)(5) [CEQA does not apply to - project which a public agency rejects or disapproves].) The following list outlines the City's comments and concerns:

Response to Comment AL002-2

The commenter does not cite a single specific goal or policy in making this allegation. General Plan consistency was discussed Draft EIR Section 3.8, Land Use; while not every single policy in the General Plan was discussed in detail in that chapter, all of the policies were considered in making a consistency conclusion, as explained in Section 3.8.4 under “Methodology.” This approach is consistent with CEQA Guidelines Section 15125(d), which only requires a discussion of an “inconsistency” with a plan.

Comment AL002-3

Aesthetics. The commenter states that the Aesthetics section of the Draft Environmental Impact Report is inadequate. The Aesthetics section of the DEIR did not adequately identify, study, or mitigate the potential impacts on the surrounding area with regards to the proposed residential structures as well as commercial components of the project. The aesthetics of the proposed project will have a significant impact on the environment.

Response to Comment AL002-3

The Draft EIR does not contain impact analysis under CEQA for Aesthetics because it is statutorily exempt from consideration for this project, as described in detail in Section 3.0.3. More specifically, that Section explains “‘Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment,’ (Public Resources Code Section 21099(d)(1)).” As a result, the aesthetic impacts (including, but not limited to, scenic vistas,
scenic resources, visual character, light, glare, and shade and shadow) were not considered impacts in the Draft EIR.

Comment AL002-4

Air Quality. The commenter states the Air Quality section of the DEIR is inadequate and incomplete. The Air Quality sections of the DEIR did not adequately address or identify traffic trips and the emissions generated a significant amount of traffic trips that will be generated as a result of the proposed project. This proposed project will also create a significant amount of air quality issues locally and regionally.

Response to Comment AL002-4

The Draft EIR adequately analyzed the proposed project’s operational criteria air pollutant emissions, which included consideration of the proposed project’s traffic, as demonstrated in the Draft EIR, Section 3.1, Air Quality. As expressly discussed on Draft EIR page 3.1-21:

Mass mobile-source emissions were modeled based on the daily vehicle trips that would result from the proposed project. Vehicle fleet mix and fuel efficiencies for mobile-source emissions were based on the CalEEMod default assumptions. Project trip generation rates and VMT assumptions were obtained from the proposed project’s traffic analysis (Section 3.13, Traffic and Transportation, and Appendix L). (Emphasis added.)

As noted above, the Draft EIR air quality analysis considered the project’s air quality emissions associated with mobile sources, and determined that impacts would be less than significant.

As shown in Section, 3.1, Air Quality, Table 3.1-8, Proposed Project Unmitigated Operational Emissions, the proposed project net emissions would not result in long-term regional emissions of ROG, NOx, CO, SOx, PM_{10} or PM_{2.5} that exceed thresholds, and impacts would be less than significant. Table 3.1-9, Daily Traffic Volumes, show’s that the project maximum daily traffic at the two busiest impacted intersections, cumulative plus project traffic, would be 76,100 and 78,690 vehicles per hour. As none of the daily traffic levels at any of the intersections would come close to 100,000 vehicles per hour, CO emissions from these vehicles volumes would be less than significant. Additionally, as depicted in Table 3.1-11, Proposed Project Localized Operational Emissions, operational-related emissions generated on-site would not exceed SCAQMD’s screening operational LSTs.

Therefore, since project traffic trips were properly identified and adequately addressed, and air quality emissions were adequately addressed in the Air Quality analysis, Section 3.1 of the Draft EIR, the Draft EIR is not inadequate or incomplete.

Comment AL002-5

Baseline Conditions. The commenter states the DEIR did not adequately address nor establish throughout the entire DEIR, baseline conditions. The identified areas lacking adequate baseline conditions include: Air Quality, Greenhouse Gases, and Traffic/Transportation sections. Pursuant to CEQA, the Lead Agency is required to address and establish the baselines conditions in the DEIR.
Response to Comment AL002-5

As discussed under CEQA Guidelines Section 15125(a), “The description of the environmental setting [baseline] shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives.” As described in greater detail below, baseline information was provided for Air Quality, Greenhouse Gases, and Traffic/Transportation.

Baseline conditions were discussed in Section 2.4.1, Existing Land Uses, in the Draft EIR, and resource specific baseline conditions were provided in the individual resource chapters of the Draft EIR, under Section 3.0, which is where the Air Quality, Greenhouse Gases, and Transportation and Traffic baseline conditions are discussed. As such, baseline existing air quality emissions are found in Table 3.1-4, Emissions from Exiting Uses and the baseline setting is discussed in Section 3.1.2, Environmental Setting. The baseline existing GHG emissions are found in Table 3.5-1, Estimated Existing Operations-Related GHG Emissions and the baseline setting is discussed in Section 3.5.2, Environmental Setting. The transportation and traffic existing baseline conditions, including intersection data, traffic, etc., are found in Section 3.13.2, Environmental Setting. The baseline environmental settings were identified in each of the sections and the analysis conducted includes the proposed project with regard to existing baseline conditions. The commenter fails to provide any information on why they believe the Draft EIR’s baseline information is inadequate, consequently no further response is possible.

Comment AL002-6

Biology. The Biology section of the DEIR is incomplete and inadequate. The Biology section of the DEIR did not identify, study, or properly mitigate the potential biological impacts with regards to bird surveys or special status species (DEIR p. 3.2.3). The site has acres of existing trees throughout the parking areas and project site and no surveys were completed to determine the limits and potential impacts the proposed project could have on biological resources.

Response to Comment AL002-6

The commenter provides general assertions regarding the adequacy of the Biology chapter to “identify, study, or properly mitigate the potential biological impacts.” The commenter also asserts the City did not perform a “survey” of the existing biological resources (i.e. challenging the adequacy of the baseline).

The commenter does not provide a definition of how they define “survey” however, the Draft EIR explained that the biological resource impact analysis was based upon aerial and ground photographs of the project site, as well as a literature review, including the California Natural Diversity Database and the California Native Plant Society lists for the survey area and the surrounding area. (Draft EIR Section 3.2.1.) These photographs were taken by ESA (the Galleria Draft EIR consultants) during a site visit on February 11, 2016]. These materials were reviewed by ESA’s biologist, Tommy Molioo who has ten years’ experience working as a biological consultant in Southern California, and holds a B.A. in Biology and a M.A.S. in Environmental Policy & Management. Mr. Molioo is a generalist biologist, but focuses on terrestrial wildlife biology, with a specialty in western bat species identification.
Additionally, the biological research performed for the Galleria project is significantly more than has been performed for the City of Lawndale’s CEQA documents. For example, on May 19, 2016 the City of Lawndale prepared a Mitigated Negative Declaration for the “Lawndale Legacy Mixed Use Development Case No. 14-11), which included 41 residential units and commercial space on 1.2 acres of empty parcels covered in vegetation. The approved MND for that project had a biological impact analysis which stated “The project site is located in an urbanized area and is currently vacant. The project site does not contain any natural habitat or species identified as a candidate, sensitive, or of special status. Therefore, no impact would occur.” Similar discussion was provided in Lawndale’s MND for the Grevillea Gardens 26 Unit Condominium Development which stated “The project site is located in an urbanized area and is currently vacant. The project site does not contain any natural habitat or species identified as a candidate, sensitive, or of special status. Therefore, no impact would occur.” Similar discussion was included in the Lawndale Negative Declaration for its Housing Element which stated:

The proposed 2008-2014 Housing Element will not cause any adverse effect on any species identified as a candidate, sensitive, or special status species. The sites inventory includes infill parcels within a mostly built-out and highly urbanized community and therefore will not have a substantial adverse effect on any riparian habitat or other sensitive natural community. There are no federally protected wetlands identified in the City of Lawndale as defined in Section 404 of the Clean Water Act. No known migratory wildlife corridor exists within the City or vicinity and therefore the project could not substantially interfere with the movement of native resident or migratory fish or wildlife.

There is no evidence that the City of Lawndale has performed any biological surveys for its own environmental documents in urban areas. While the Galleria project site is currently developed with commercial structures and parking lots (except for small ornamental planters), the City of Lawndale’s Legacy Mixed Use Project was on a completely vacant parcel covered in vegetation.

CEQA explains that “reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.” (CEQA Guidelines Section 15204(a).) The Galleria Draft EIR provided an overview of existing biological conditions, which explained:

The survey area is located within an urban area of the City of Redondo Beach, and is entirely developed with commercial buildings and paved parking lots associated with the South Bay Galleria, an enclosed mall property. Commercial developments are located immediately north, east, and south of the survey area. Single-family residences and apartments are located to the east and west of the survey area. The topography surrounding the survey area is relatively flat. Vegetation is minimal on the project site

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7 City of Lawndale May 19, 2016 MND for the Legacy Mixed Use Development: http://www.lawndalecity.org/ASSETS/PDF/CDD/Initial%20Study%20(Legacy%20Mixed%20Use)%201.pdf. This project and MND were approved by City Council as being in compliance with CEQA on June 5, 2017: http://www.lawndalecity.org/HTML/DEPTHTML/CCLERK/CityCouncil/Minutes/CCM060517.pdf

and is found only sporadically in landscaped areas around the edges of the parking lots and near the storefronts. Ornamental plant and tree species, commonly planted in Southern California urban environments, occur in the landscaped areas of the project site. These ornamental tree species include: Mexican fan palm (Washingtonia robusta), jacaranda (Jacaranda mimosifolia), and camphor tree (Cinnamomum camphora). Because of the developed nature of the project site, animal species are limited to common songbirds that thrive in urban environments, such as house finch (Haemorhous mexicanus), American crow (Corvus brachyrhynchos), and mourning dove (Zenaida macroura). Special-status plant and wildlife species are not found within the project site or survey area and are not expected to occur because of the lack of native habitat and existing disturbances. (Galleria Draft EIR Section 3.2.2.)

Given the highly developed urban environment, the lack of sensitive or special status species, and the lack of native vegetation, the level of detail provided in the analysis was consistent with CEQA. (CEQA Guidelines Section 15204(a).) As shown in Draft EIR Appendix J, Figure 2, the Galleria site is highly developed and only contained approximately 93,761 sf (2.1 acres) of landscaping dispersed over an approximately 30-acre site. Nevertheless, it was conservatively determined that non-special status (common) avian species that are afforded protection under the MBTA and CFG Code Section 3500 could potentially nest on site. Those most likely to do so include species known to occur in developed and urban settings such as common raven (Corvus corax), northern mockingbird (Mimus polyglottos), and mourning dove. These are common species that typically occur in urban environments, and therefore are accustomed to a high level of human presence and noise associated with regular vehicle and pedestrian traffic within the South Bay Galleria. However, the temporary increase in noise from construction equipment would be significant when compared to the current ambient level of noise (see Section 3.9), and could cause a bird to abandon an active nest. The proposed project would also remove existing landscaping on the project site and replace it with new landscaping upon completion of the project; therefore, there would be destruction of suitable nesting habitat for birds. These would be significant impacts.

Additionally, subsequent to the construction phase of the project, operational activities that occur at the site will be similar to current conditions in the study area. These operational activities will not create a significant impact to avian species that may choose to nest within the study area after construction has been completed. Therefore, operational activities associated with the project will be less than significant.

As discussed in Oakland Heritage Alliance v. City of Oakland (2011) 195 Cal.App.4th 884 “where practical considerations prohibit devising such measures early in the planning process…, the agency can commit itself to eventually devising measures that will satisfy specific performance criteria articulated at the time of project approval.” Most common bird species will generally nest between February and August; however, different bird species may nest at different times of the year depending on seasonal and climatic conditions. Since specific nesting periods are variable among species which is why nesting bird surveys are typically conducted just prior to the start of construction. Therefore, bird nesting will vary from month to month, and year to year.

Consequently, providing a more detailed nesting survey, more than three years before the start of potential construction would not be practical or provide useful information, as any tree/nesting
The survey would no longer be representative of conditions on the project site by the time construction begins. Additionally, to avoid potential impacts to nesting bird species, a pre-construction clearance survey conducted within one week prior to the start of construction is typical to determine the presence/absence of any active nests. As an industry standard, pre-construction clearance surveys are conducted just prior to construction in order to impacts if project activities cannot avoid the breeding season. This is why MM BIO-1 requires a pre-construction survey a maximum of 7 days before commencement of construction activities.

The Court of Appeal also expressly rejected an identical argument asserting the biological mitigation measures were improperly deferred in Save Panoche Valley v. San Benito County (2013) 217 Cal.App.4th 503 [*In sum, though the mitigation measures pointed out by Save Panoche Valley…require that a qualified biologist conduct preconstruction surveys, these measures do not improperly defer significant aspects of mitigation. The measures provide for specific actions to be taken upon discovery of a certain species, such as including a set buffer zone.*] Similar to the measures in Panoche the Galleria Draft EIR mitigation measure MM BIO-1 requires a preconstruction survey and buffer zones. Additional revisions have been made to MM BIO-1 to provide default buffer zones; please see Final EIR, Chapter 3.0, Modifications to the EIR.

**Comment AL002-7**

The commenter states, that deferred mitigation is inconsistent with CEQA Guidelines. DEIR page 3.3.2 proposes deferring mitigation measures by completing a Pre-Construction Nesting Bird Survey; this deferral of potential mitigation does not address the potential biological impacts that the project could have on the environment.

**Response to Comment AL002-7**

Please see comment response AL002-6 and Draft EIR, Section 3.2, *Biological Resources*, for additional information on specific species of birds and trees potentially found within the proposed project site and proposed mitigation.

**Comment AL002-8**

The commenter states that on DEIR page 3.2.3 it was determined that there would be "less than significant impacts" on special status species. How was this assessment made without first completing a special species survey of the area in which to justify less than significant impacts on Biological Resources? It would be impossible to arrive at this conclusion without first basing the assessment on completed special surveys conducted by a licensed and certified biology expert.

**Response to Comment AL002-8**

As discussed in the Draft EIR, Section 3.2, *Biological Resources*, the assessment is based on a review of existing available information conducted in February 2016 for the project site. This includes aerial and ground photographs of the project site, and relevant literature and database reviews, such as the California Natural Diversity Database and California Native Plant Society lists for the survey area and surrounding areas. The project survey found there was no evidence of special-status species presence, or habitat on the project site that could support any special-status
species. Please see response AL002-6 and Section 3.2, *Biological Resources*, for information on specific species of birds and trees within the proposed project site.

**Comment AL002-9**

**Green House Gases.** The proposed GHG mitigation measures are not adequate. Deferral of mitigation measures is inconsistent with the CEQA Guidelines. On DEIR page 3.5-18, MM GHG-1 requires the applicant to prepare a preliminary GHG Reduction Plan specifying which mitigation and design features would be incorporated into the proposed project. A GHG study must be prepared and analyzed to ensure appropriate mitigation measures are incorporated into the project.

**Response to Comment AL002-9**

While the comment alleges that Mitigation Measure GHG-1 is not adequate, the commenter does not cite any specific language in the mitigation measure they believe they be inadequate.

Mitigation Measure GHG-1 is not deferred, as Described in the Draft EIR, Section 3.5, *Greenhouse Gas Emissions*, Mitigation Measures GHG-1 “to reduce GHG emissions from the project site and to maximize the project’s ability to achieve GHG emissions reductions the project shall implement any combination of the following options, to achieve a minimum reduction of 57 percent of the project-related emissions. Prior to the issuance of building permits, the applicant shall provide to the Community Development Department a preliminary GHG Reduction Plan specifying which mitigation and design features would be incorporated into the proposed project. A final GHG Reduction plan shall be submitted by the applicant and approved by the Community Development Department prior to the certificate of occupancy.” Mitigation Measure GHG-1 then goes on to provide a specific listing of options to achieve the 57 percent reduction. (See Draft EIR pages 3.5-18 through 19.)

The mitigation measure sets a specific reduction target and provides a listing of specific options to achieve this GHG reduction value. It is well settled that an EIR may set forth a “menu” or range of choices of potentially appropriate mitigation measures without committing the lead agency to any one (or more) specific choices prior to further study. (*Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1275; see also CEQA Guidelines Section 15126.4(a)(1)(B) “measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.” (*Sacramento Old City Ass’n v. City Council* (1991) 229 Cal.App.3d 1011, 1021, 1030.)

As shown in the mitigation measure, the preliminary GHG Reduction Plan must be approved by the City Community Development Department prior to the issuance of building permits and the final GHG Reduction Plan must be approved by the City Community Development Department prior to the certificate of occupancy. This approach does not defer mitigation, but provides flexibility in project design, since the design is not yet finalized, as long as the 57 percent reduction is met through various GHG reduction measures. The City will provide final approval prior to issuing building permits and prior to occupancy, so the reductions have to be proved and justified in the GHG Reduction Plan. Nevertheless, in order to provide clarity in the reduction methodologies for the applicant, the mitigation measure has been modified in the Eratta to this
FEIR. The City finds that the revised measure is equally as effective as the version originally proposed in the DEIR.

As shown in Table 3.5-5, Mitigated Construction and Operations-Related GHG Emissions for Calculating GHG Emissions per Service Population, implementation of Mitigation Measures GHG-1 would reduce GHG emissions to a less-than significant level.

The level of detail and performance standards included in the Galleria Draft EIR MM GHG-1 are significantly more detailed than similar mitigation measures prepared by the City of Lawndale. For example, in the 2015 MND for Lawndale’s Grevillea Gardens 26-unit Condominium Development, the City of Lawndale drafted Mitigation Measure GS1 which stated “Prior to the approval of final plans a geotechnical report including a soil study, shall by conducted by a certified engineering geologist or civil engineer pursuant to California Public Resources Code Section 2695(a). The report shall conclude if the project site is appropriate for the intended development and if any further mitigation measures are required.” (Emphasis added, Lawndale Grevillea Gardens MND, pp. 13-14.) The Lawndale MND Measure GS1 does not provide any specific mitigation options. Unlike the Lawndale’s MND, Galleria Measure MM GHG-1, provides a specific list including installation of 37 MWh of solar photovoltaics.

Comment AL002-10

Housing. The DEIR does not include any discussion whether any affordable units would be provided. Redondo Beach's Regional Housing Needs Allocation (RHNA) for the 2013-2021 planning period has been determined by SCAG to be 1,397 housing units, including 186 units for extremely low income households, 186 units for very low income households, 223 units for low income households, 238 units for moderate income households, and 564 units for above moderate income. There's no indication of what percentage of the units, if any would be below market rate or be consistent with the goals of the Housing Element. Furthermore, by failing to identify affordable housing in the project's residential component, the residential component of this project fails to serve the stated objective of providing housing consistent with Redondo Beach's General Plan.

Response to Comment AL002-10

The gravamen of the comment is a challenge to the City’s General Plan consistency conclusions; however, the commenter does not cite a single specific goal or policy in making this allegation. General Plan consistency was discussed Draft EIR Section 3.8, Land Use; while not every single policy in the General Plan was discussed in detail in that chapter, all of the policies were considered in making a consistency conclusion, as explained in Section 3.8.4 under “Methodology.” This approach is consistent with CEQA Guidelines Section 15125(d), which only requires a discussion of an “inconsistency” with a plan.

As outlined in this response, the comment (1) ignores the standard of review for General Plan consistency, (2) fails to reference any specific inconsistencies, and (3) ignores the fact that the City of Lawndale does not follow the methodology referenced in their comment letter when making General Plan consistency conclusions for their own projects.
The standard of review and methodology for General Plan consistency was described in detail in Section 3.8.4, which states in part:

The proposed project is considered consistent with the provisions of the identified regional and local plans if it meets the general intent of the applicable land use plans. A given project need not be in perfect conformity with each and every policy nor does state law require precise conformity of a proposed project with every policy or land use designation for a site. It follows that it is nearly, if not absolutely impossible for a project to be in perfect conformity with each and every policy set forth in the applicable plan. If the proposed project is determined to be inconsistent with specific individual objectives or policies of an applicable plan, but is largely consistent with the land use or the other goals and policies of that overall plan and would not preclude the attainment of the primary intent of the land use plan, the project would not be considered inconsistent with the plan. [1] Furthermore, any such inconsistency would also have to result in a physical change in the environment, not analyzed in the other resource chapters of this EIR, to result in a significant environmental impact.


The South Bay Galleria project furthers the fundamental goals of the General Plan as outlined under Impact LUP-1, including the City’s Housing Goals. As also discussed in Draft EIR Section 3.10, Population and Housing, the South Bay Galleria Site has been identified by the Housing Element as a key housing site. The project would further the goals of the General Plan Housing Element, including Policy 3.1 which calls for the City to “implement land use policies that allow for a range of residential densities and products, including low-density single-family uses, moderate-density townhomes, and higher-density apartments, condominiums and units in mixed-use developments.” Similarly, both Housing Element Policies 3.2 and 3.3 call for the City to encourage transit oriented development near neighborhood commercial areas. Similar concepts are incorporated into Programs 12 and 13 of the City’s most recently adopted Housing Element in September 2017. As noted under Impact LUP-1 and this discussion, the Galleria project furthers the City’s General Plan goals, including its Housing Goals and does not obstruct the City’s affordable Housing Goals. While the project may not ultimately meet the definition of an affordable housing project, not every project is required to further every individual policy. (San Francisco Tomorrow et al. v. City and County of San Francisco (2015) 229 Cal.App.4th 498.) Furthermore, providing non-affordable housing reduces the market demand for other housing categories, including affordable housing. As noted in the 2015 State Legislative Report:

A collection factors drive California’s high cost of housing. First and foremost, far less housing has been built in California’s coastal areas that people demand. As a result, households bid up the cost of housing in coastal regions. In addition, some of the unmet demand to live in coastal areas spills into inland California, driving up process there too. (State Legislative Analyst’s Office, March 17, 2015, California’s High Housing Costs Causes and Consequences. Page 10.)
The commenter also faults the Draft EIR for not providing a discussion of “what percentage of the units, if any would be below market rate or be consistent with the goals of the Housing Element.” As noted above, a project need not further every specific goal or policy in a General Plan, or Housing Element. (San Francisco Tomorrow et al. (supra).) Furthermore, the City of Lawndale does not provide such an analysis in their own CEQA documents. As discussed in the City of Lawndale’s Housing Element,9 Lawndale has been allocated 381 housing units for its Regional Housing Needs Allocation (RHNA), which includes 96 units for Extremely low/Very Low-Income, 57 units of Low-Income, 62 units of Moderate-Income, and 166 units of Above Moderate-Income. However, the City of Lawndale’s recently approved 2016 CEQA document for the Legacy Mixed Use Development (which included 41 residential units) which did not include any discussion of the various affordability sub-categories of housing in its General Plan consistency analysis which states in its entirety:

No Impact. A significant impact would occur if the project were inconsistent with applicable plans, policies, and zoning designations. Various local plans guide development of the project site. At the local level, the Lawndale General Plan implements land use policies for the project site and vicinity. The Lawndale Municipal Code governs land use at the project site through development restrictions and building standards. The project site is currently vacant and is zoned for residential high density uses (R-3) and general commercial uses (GC). The proposed mixed-use component is permitted within the GC zoning district while the component that is strictly residential is permitted within the R-3 zoning district. Both are consistent with the General Plan. Therefore, no impact would occur. (Lawndale Legacy Mixed Use MND, pp. 20-21)10

Similarly, the City of Lawndale prepared a MND in 2015 for the Grevillea Gardens 26-unit Condominium Development. That MND did not provide a specific breakdown of affordability for the proposed units; more specifically, the General Plan consistency discussion in Lawndale’s MND stated:

No Impact. A significant impact would occur if the proposed project were inconsistent with applicable plans, policies, and zoning designations. Various local plans guide development of the project site. At the local level, the Lawndale General Plan implements land use policies for the project site and vicinity. The Lawndale Municipal Code governs land use at the project site through development restrictions and building standards. The project site is currently vacant and is zoned for residential high density uses (R-3). The proposed condominium complex is permitted within the R-3 zoning district and is consistent with the General Plan. Therefore, no impact would occur.

The South Bay Galleria Improvement project would be consistent with the General Plan as a whole, including the Housing Element, as discussed in Draft EIR Section 3.8, Land Use.

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10 City of Lawndale May 19, 2016 MND for the Legacy Mixed Use Development: http://www.lawndalecity.org/ASSETS/PDF/CDD/Initial%20Study%20(Legacy%20Mixed%20Use)%201.pdf. This project and MND were approved by City Council as being in compliance with CEQA on June 5, 2017: http://www.lawndalecity.org/HTML/DEPTHTML/CCLERK/CityCouncil/Minutes/CCM060517.pdf
Comment AL002-11

Land Use. Land Use Element 1.41.7(a) refers to reducing the impacts of height and mass by setting back and lessening the volume of the upper elevations of structures within 50 feet of the property line fronting Kingsdale Avenue. From the project elevations shown in the DEIR, there does not appear to be any lessening of the volume of upper elevations of the structures within 50 feet of the property line fronting Kingsdale Avenue.

Response to Comment AL002-11

Land Use Element 1.41.7(a) does refer to reducing height and mass by setting back and lessening the volume of the upper elevations of structures. However, based on the analysis found in the Draft EIR, Section 3.8, Land Use, Table 3.8-2 of the EIR the proposed project would remain consistent with the General Plan Policy.

The proposed project would consist of several buildings at varying heights (ranging from 36 feet to 90 feet in certain areas of the proposed land use, compared to the existing 90-foot-tall parking garage and cinema) to reduce the sense of large scale massing. Additionally, the projects architectural elements would incorporate varied massing and scale overall to provide compatibility of the projects building and architecture on site, with the surrounding community.

Moreover, as discussed in detail on Draft EIR page 3.8-15, the proposed project is providing a 30-foot setback along Kingsdale Avenue. Additionally, the project is providing massing relief along Kingsdale Avenue through the articulation of the structure within 50 feet of Kingsdale Avenue. In lieu of a flat façade, the building will have a modulated west elevation providing both massing relief and architectural interest at all levels. As can be seen in Draft EIR, Chapter 2.0, Project Description, Figure 2-7, the only new structure located along Kingsdale would be the Residential Building located on the southwest corner of the project site. This new structure is shaped like a horseshoe with the open end facing Kingsdale providing height and massing consistent with Policy 1.41.7. The parking structure in the northwest corner is an existing facility (see Figure 2-3). While the proposed project would add two levels to the existing parking structure, the additional height would be lower than the existing 90-foot tall cinema, allowing the façade to continue to have architectural interest and modulated massing. Therefore, the proposed project is consistent with Policy 1.41.7 and applicable portions of Policy 1.21.7 of the General Plan Land Use Element. Furthermore, the comment does not have any applicability to the adequacy of the analysis of the project’s physical environmental impacts. As discussed in Draft EIR Section 3.8.4, any inconsistency “would also have to result in a physical change in the environment, not analyzed in the other resource chapters of this EIR, to result in a significant environmental impact.” As noted in response AL002-3, aesthetics is statutorily precluded from consideration as an environmental impact in this EIR.

Comment AL002-12

The residential buildings as proposed would exceed the City's building height limitation for the CR regional commercial zone, which is 60 feet. Also, no building may exceed 4 stories (Redondo Beach Municipal Code section 10-2.919(e).) As illustrated, the building elevations from the DEIR below; clearly the proposed buildings exceed the maximum building heights. This is a
significant impact on the environment and violates Redondo Beach's General Plan and Zoning requirements. A project approval must be consistent with the local agency's General Plan. (Govt. Code§ 65300.5.)

Response to Comment AL002-12

The comment does not have any applicability to the adequacy of the analysis of the project’s physical environmental impacts. As discussed in Draft EIR, Section 3.8, Land Use, 3.8.4, any inconsistency “would also have to result in a physical change in the environment, not analyzed in the other resource chapters of this EIR, to result in a significant environmental impact.” 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.) Please also see response AL002-3, which explains that aesthetics is statutorily precluded from consideration as an environmental impact in this EIR. The comment also ignores the standard of review for General Plan consistency, as discussed in Response AL002-10.

The comment ignores Policy 1.41.5 which creates exceptions to the General 60-foot height limit. More specifically, that policy states in part “heights in excess of 60 feet, but in no case greater than 100 feet, may be approved by the Planning Commission for additions to existing structures on the property.” The comment also ignores the substantive analysis which accompanied this discussion on Draft EIR pages 3.8-14 which states:

Inconsistent. The proposed project would include new separate buildings up to a maximum building height of 96 feet. Policy 1.41.5 allows heights up to 100 feet for additions to existing structures. However, as the proposed project would include new detached structures with heights in excess of 60 feet, the proposed project would be inconsistent with these policies. A shade and shadow analysis was conducted for the project, included as Appendix C, which concluded there would be less than significant impacts with regard to shade and shadow on the surrounding sensitive receptors because they would not be in shade/shadow for a majority of the day. As shown in Appendix C, Shade Shadow Analysis adjacent uses would only be in shadow for 3 to 4 hours a day during the March 9:00 a.m. to 12:00 p.m. (Figure 2) and December 9:00 a.m. to 12:00 p.m. times (Figure 14). However, as discussed in Draft EIR Section 3.0.3, after the adoption of this Policy, the California Legislature adopted Senate Bill 743, which implemented Public Resources Code Section 21099(d)(1). This section states that “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Consequently, this does not result in a significant environmental impact.” While the project results in an inconsistency with this set of underlying policies, the project is consistent with the overarching objectives of Objective 1.41 and the General Plan as a whole. The City also does not consider aesthetic impacts caused by this in-fill project as resulting in a significant adverse physical change to the environment pursuant to SB 743. See Section 3.8.4 for additional discussion of General Plan consistency findings and standards of review.
Despite this conclusion for this individual set of policies, the Draft EIR ultimately determined the project to be consistent with the General Plan as a whole as discussed on Draft EIR page 3.8-16 through 17:

The proposed project would be consistent with the General Plan as a whole, even though it results in an inconsistency related to height under Policies 1.41.3, 1.41.4, and 1.41.5. As discussed above, the primary objective for the CR zoning is to “Provide for the continued use of the Galleria at South Bay and surrounding properties as a primary center of regional-serving commercial uses, and provide for the development of mixed-use projects integrating residential with commercial uses; allowing for increases in development which enhance its economic vitality and contribute revenue to the City and improve its character as a pedestrian-oriented activity center, while minimizing impacts on adjacent streets and residential neighborhoods.” Additionally, the proposed height of 96 feet is consistent with the height of the existing cinema and does not exceed the top limit of 100 feet for existing buildings allowed on site (Policy 1.41.5). The proposed project would retain its existing commercial retail uses, while creating new commercial retail opportunities, new residential land uses, new public open space and a new hotel. The project has been designed to integrate the various land uses to create a pedestrian friendly walkable community, while furthering the regional retail hub component of the site, by enhancing the commercial retail opportunities through redesign and the creation of an open-air promenade. [¶] As noted under Government Code 65589.5(a), the legislature has concluded that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California.” The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City “facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community” (Gov. Code Section 65580(d)). More specifically, the Legislature’s stated intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal” (Gov. Code Section 65581). Also under the Redondo Beach Housing Element, the project site represents the greatest potential for future residential development in the City, to meet the City’s Regional Housing Needs Assessment (RHNA), as well as the high regional demand for housing in the County (see also Circulation Element, Goal 8). Furthermore, as discussion in Section 3.0.3 of the Draft EIR, the proposed project provides mixed use development in a transit priority area, and is consistent with the regional RTP goals as well as the City’s goals of encouraging mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance and supporting transit-oriented development (Redondo Beach Circulation Element, G6, G7, and G8). As outlined above, the proposed project would be consistent with the Redondo Beach General Plan as a whole. (Draft EIR page 3.8-16.)

While the commenters Government Code and Municipal Code assertions are beyond the scope of this response to comment (CEQA Guidelines Section 15088(a)), it should be noted that the applicant has applied to construct Alternative 4/4-1, which complies with Land Use Policies 1.41.3 through 1.41.5. (Draft EIR page 4-164). If the project were considered for approval, it would be subject to a variance for height/stories depending upon the alternative selected, as acknowledged in Draft EIR Section 2.8.
Comment AL002-13
Each dwelling unit is to be provided a minimum of 200 square feet of outdoor living space. There's no indication as how the required amount of outdoor living space for each unit is to be provided or configured for the residential units.

The proposed number of stories (7 to 8 stories) violates Redondo Beach's General Plan policy that buildings should not have a maximum floor area ratios of 1.0 to 1.5 for the CR land use designation (GP Policies 1.41.3 and 1.41.4).

Response to Comment AL002-13
The commenter faults the EIR for not specifically describing how the project would comply with the 200-square-foot outdoor living space requirement in the Municipal Code. As noted in Response AL002-10, Lawndale does not provide this level of detail in their own CEQA documents, despite having similar open space requirements for its zoning (E.g. Lawndale Municipal Code § 17.48.135, §17.48.190, § 17.48.210, § 17.48.250).

As discussed under CEQA Guidelines Section 15124 “[t]he description of the project…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 [“Appellants have not established that the general description of the diversion structures in the EIR coupled with approval of final designs after the project is approved violated any CEQA mandate.”].)

Open space is not, in and of itself, an environmental impact. As described in Draft EIR Section 3.12, the Draft EIR was determined to have less than significant impacts associated with recreation, because the project would not result in a substantial physical deterioration of recreational facilities and would not result in development reasonably foreseeable recreational facilities that would result in an adverse physical environmental impact. As discussed in Section 3.12, “the proposed project would incorporate new recreational/open space amenities such as a pool and spa, fitness center, conference room, residents lounge, catering kitchen, and outdoor lounge seating with a fire pit or water feature, on site.” Public open space required for the proposed project is 161,737 SF, and the open space provided by the proposed project is 249,723 SF. The outdoor living space required for the proposed project is 60,000 SF, and the outdoor living space provided by the proposed project is 70,580 SF. Therefore, the proposed project meets the City’s open space requirements. Additional information on the project’s conformity with outdoor living space regulations will be addressed during the entitlement process.

For discussion of height and story limits, please see response AL002-12. The comment also asserts that the number of stories violates Redondo Beach General Plan policies related to Floor Area Ratios (FAR). The number of stories has no relationship to the project’s compliance with Policy 141.4 related to FAR. The overall FAR for the proposed project would be 1.5 (1,950,565 sf of zoning floor area / 29.85 acres of building area = 1.5 FAR), which is consistent with the FAR limits contained in General Plan Land Use Policy 1.41.4 which states “Permit the development of mixed-use structures integrating residential with commercial to a maximum
intensity of a floor area ratio of 1.5.” As noted on Draft EIR page 3.8-14, the proposed project would be consistent with Policy 1.41.4.

**Comment AL002-14**

The commenter states, the proposed project is in violation of Redondo Beach’s General Plan Policy 1.41.7, which requires proposed developments to be “pedestrian-oriented” and “low rise village” development.

**Response to Comment AL002-14**

As an initial matter, Policy 1.41.7 explicitly states that it is not subject to the provisions 1.21.7 calling for a “low-rise village.” As described in detail on Draft EIR, Section 3.8, Land Use, page 3.8-15, the proposed project would provide pedestrian and transit-oriented development and the creation of an urban center at this location. The various buildings would be sited to include common pedestrian walkways between buildings, courtyards, and other open spaces, including the open-air retail area. The proposed project would emphasize the development of open-air pedestrian promenades and updated architecture, and would replace expansive surface parking lots with commercial mixed uses including mid-rise housing to increase synergy between residents and commercial needs. Therefore, the proposed project is consistent with Policy 1.41.7 and applicable portions of Policy 1.21.7 of the General Plan Land Use Element.

Similar concepts are acknowledged in the City of Lawndale’s own Hawthorne Boulevard Specific Plan which includes Land Use Objective 4, which calls for “a mix of land uses that promote efficient utilization of land and promotes increased pedestrian activity.” Lawndale’s Specific Plan also includes as implementation strategy for this goal to “support transit use and provide for increased pedestrian activity to various modes of transportation” and “reduce negative visual effect of surface parking lots.” As explained above, the project is a transit oriented mixed-use development, which replaces the majority of the 1,854 surface parking spaces with parking structures or subterranean parking, consistent with the City of Lawndale’s own goals and objectives for creating a pedestrian oriented development. (Compare Draft EIR Figure 2-3 [Existing Conditions] with Figure 2-7 [Proposed Project].)

**Comment AL002-15**

The commenter states, the proposed project is in direct conflict with the General Plan Land Use Element, Land Use Plan for the Galleria. The proposed project does not mention or include a community center, public square, or pedestrian amenities as outlined below.

**Response to Comment AL002-15**

The comment asserts that the project is inconsistent with the General Plan Land Use Element because it does not include a community center, public square, or pedestrian amenities, however the commenter is not referencing any General Plan Land Use Element Policy. Instead the commenter is referencing a Figure titled “**CONCEPTUAL ONLY.”** It is clear that this figure is

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City of Lawndale Hawthorne Boulevard Specific Plan:  
not setting policy, as asserted in the comment; rather it is a concept of a potential development on the site. Furthermore, as explained in Response AL002-14, the project does provide a pedestrian oriented environment. Additionally, while not labeled a "public square"12 the proposed project includes an open-air promenade/open air retail which are consistent with the concept of a public square. (See Draft EIR Section 2.)

**Comment AL002-16**

Noise. The proposed mitigation measures and noise study are inadequate. The noise study did not analyze potential noise impacts on sensitive noise receptors for the proposed residential component of the project with regards to the existing and proposed commercial expansion. In addition, no mitigation measures were proposed that would protect sensitive noise receptors for the proposed residential component of the project from excessive noise and vibrations from the proposed and existing commercial component of the project.

**Response to Comment AL002-16**

The Draft EIR did analyze potential noise impacts on sensitive receptors for the proposed residential component of the project with regard to existing and proposed commercial expansion, in the Draft EIR, Section 3.9, Noise, Section 3.9.4, Impacts and Mitigation Measures. As discussed under Operational Noise, “new residential buildings would replace much of the other surface parking areas that currently exist, such new development would be generally located away from and/or oriented away from noise-sensitive uses. As such, implementation of the proposed project is not expected to result in any exceedance of the RBMC maximum permissible sound levels for land use types at and adjacent to the project site.”

As noted under CEQA Guidelines Section 15126.2(a), the purpose of CEQA’s environmental analysis is to assess “the impact of a proposed project on the environment” not the impact of the environment on the project. This concept was generally upheld by the California Supreme Court, which explained that “CEQA generally does not require an analysis of how existing environmental conditions will impact a project's future users or residents.” (California Bldg. Industry Assn. v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369, 386.)

Furthermore, existing applicable regulations require that the new residential structures include noise insulation which insures an interior noise level of 45 dBA. (Title 24, California Code of Regulations (California Building Code or “CBC”), Part 2, Volume 1, Section 1207, and 1207.4) These noise levels are accomplished through various noise attenuation features, including insulation, required by the California Building Code. (See CBC Section 1207.) The California Building Code is applicable to all development in California. (Health and Safety Code Section 17950; RBMC Section 9-1.01.) “An Agency may rely on generally applicable regulations to conclude an environmental impact will not be significant and therefore does not require mitigation.” (San Francisco Beautiful v. City and County of San Francisco (2014) 226 Cal.App.4th 1012; see also Residents Against Specific Plan 380 v. County of Riverside (2017) 1st 1012; see also Residents Against Specific Plan 380 v. County of Riverside (2017) (Concluding there would be no noise impact to new residences due to compliance with existing

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12 Public square has been defined as “an area in a town where a public mercantile establishment is set up” or “a place of assembly for the people in ancient Greece” https://www.thefreedictionary.com/public+square
regulations.) While CEQA typically does not address impacts to the future users or residents of the project, even if it did, impacts would be less than significant due to the existing California Building Code requirements.

Furthermore, the residential components of the project are not anticipated to be operational until after completion of the project, with the most intense vibrational sources occurring during demolition and grading/excavation (i.e. the construction phases which will utilize equipment that can result in vibration), (Draft EIR, Table 2-6 and page 3.9-23.) As outlined in Draft EIR page 3.9-24, once operational the project’s operations would not change existing vibration levels or otherwise result in significant vibrational noise sources.

**Comment AL002-17**

**Population and Housing.** The DEIR does not provide adequate analysis of the proposed project as it pertains to the Population and Housing impacts that this project will generate, which is required to be reviewed under CEQA. The analysis states the project will have no impacts to population or housing in the DEIR. The DEIR fails to address or take into account that the proposed project would induce substantial population growth either directly or indirectly and failed to identify if the units would be for sale or rent.

**Response to Comment AL002-17**

The commenter implies that the project will have a significant impact because it will allegedly “induce substantial population growth either directly or indirectly.” As an initial matter the commenter did not apply the actual significant thresholds utilized in the Draft EIR Section 3.10, *Population and Housing*, which asks whether the project would “Induce a substantial unanticipated population growth in an area, either directly or indirectly.” (Emphasis Added.) As also explained in Section 3.10.4, under this threshold “the project would have to result in physical environmental impacts that have not already been addressed in the other resource sections of this EIR.” Additionally, as outlined below, the City of Lawndale does not follow the methodology referenced in the comment in their own CEQA documents.

The CEQA Guidelines explain that population growth, in and of itself, is not necessarily indicative of a significant adverse physical impact. As noted under CEQA Guidelines Section 15126.2(d) “It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.” As further explained in that subsection, the purpose behind looking at growth inducement is to determine whether “Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.” *(Id.* Such potential effects were addressed in detail in Draft EIR Section 3.11, 3.12, and 3.14.

As described in Section 3.10.4, the population, housing, and employment opportunities projected for the proposed project are within the growth projections anticipated for the City of Redondo Beach for the year 2040 as projected by SCAG. The growth projections for population, shown in Table 3.10-7 and Table 3.10-1, include estimates that by 2040 the City is expected to grow to 74,400 persons from the existing population of 68,095 in 2015. This is an increase of approximately 6,305 persons. Based on the City’s population growth anticipated for 2040, the
development of the proposed residential uses is within the population growth projections from 2015 and 2040.

The growth projections for housing, shown in Table 3.10-7 and Table 3.10-2, include estimates that by 2040 the City is anticipated to increase the number of housing units to 33,000 from the existing housing units of 30,651 in 2015. This is an increase of approximately 2,349 between the years 2015 and 2040. The proposed residential units are within the residential unit growth projections between 2015 and 2040.

The growth projections for employment, shown in Table 3.10-7, anticipate that in 2040, the City would have 29,800 available jobs, an increase of 5,800 jobs from the total number of jobs in 2012, which was 24,000. In addition, as described in Section 3.10.4, the majority of the proposed job opportunities on the project site are anticipated to be filled by people living within the local communities and, therefore, would not result in the need for additional housing opportunities within the vicinity of the project other than what is already being proposed. Consequently, analysis in the Draft EIR determines that the development of housing on the project site would not result in substantial unanticipated population growth directly or indirectly, and is not anticipated to result in any physical impacts that have not already been accounted for in the other resource sections of the EIR. See also Draft EIR Chapter 5.0, Other CEQA Consideration, section 5.3.

The City of Lawndale utilized the same methodology in its Hawthorne Boulevard Specific Plan and Redevelopment Area Plan Program EIR (State Clearinghouse No. 98081067 certified by the City of Lawndale in Resolution No. CC-9905-40). Lawndale’s Specific Plan proposed an additional 628,135 square feet of general commercial, retail, and office uses in the project which would generate new employment opportunities in the project area. This, in turn, could create a demand for housing over existing conditions, thus, spurring the growth of the local population. As discussed in Lawndale’s Final EIR Response to Comment F1:

The Draft EIR recognizes that there would not be significant growth inducing impacts associated with implementation of the Specific Plan and Redevelopment Plan. Section 6.3, Growth-Inducing Impacts, of the Draft EIR specifically analyzes growth inducing impacts. The conclusion from page 6-4 is restated below for ease of commenter reference.

“The proposed Specific Plan and Redevelopment Plan would not increase the population, housing or employment forecasts as approved in the City's General Plan and analyzed in the General Plan EIR. Thus, neither the Specific Plan nor the Redevelopment Plan would be directly growth inducing in this regard… In other words, the growth associated with the proposed Specific Plan and Redevelopment Plan is consistent with General Plan projections and related environmental impacts were previously analyzed in the General Plan EIR. Thus, the proposed Specific Plan and Redevelopment Plan would accommodate planned growth projections and not directly induce growth in the area or the City of Lawndale.”
Similarly, the 2015 MND prepared by the City of Lawndale for the Grevillea Gardens 26-unit Condominium Development, concluded that Population impacts would be less than significant because:

The projected growth rate for the City of Lawndale is just over 2.5 percent per every five years through the year 2040. A 2.5 percent growth increase from the 2014 population is 831 persons. If the proposed project housed 89 residents in its first year of operation, it would represent 11 percent of the five year growth rate for the City. This allows for growth from other projects within the City and is consistent with the SCAG population forecast for the City of Lawndale. Therefore, impacts would be less than significant.

The commenter also faults the EIR for not indicating whether the units would be for sale or for rent. As explained in Response AL002-13, “[t]he description of the project…should not supply extensive detail beyond that needed for evaluation and review of the environmental impact.” The Court of Appeal rejected a similar allegation in Maintain Our Desert Environment v. Town of Apple Valley (2004) 124 Cal.App.4th 430, noting that “It is not necessary then, to effectuate the purpose of the [CEQA] statute that the phrase ‘brief description of the proposed project’ be defined to require disclosure of the end user of the project.” Nevertheless, the applicant has indicated that the residential units would be for rent.

Comment AL002-18 & 19

Piecemealing. The impacts of the entire project, not just individual segments, should be analyzed. CEQA forbids "piecemealing" projects. Pursuant to CEQA, the whole of the entire project must be analyzed and those environmental considerations related to project(s) broken down into little projects, thus reducing or minimizing the potential impacts to the environment through "piecemeal" is prohibited. Potential growth impacts, such as new development projects, cannot be deferred to be analyzed in a piecemeal fashion at a later time. Rather, "the need for regional environmental consideration [must be made] at the earliest stage of a planned development before it gains irreversible momentum." (Bozung v. Local Agency Formation Commission of Ventura County (1 975) 13 Cal.3d 263, 284, fn. 28.) An agency cannot treat one integrated large project as a succession of smaller projects to avoid analyzing the environmental impacts of the whole project. (See, CASDBA v. County of Inyo (1985) 172 Cal. App. 3d 151, 165-166 [two separate "packages" of entitlements for one project, each analyzed in a separate Negative Declaration, improper].)

The DEIR's project description site plan encompasses a proposed future transit center (Green Line Extension) as depicted on Page 7. However, the entire DEIR is deficient in identifying and analyzing the potential impacts of the proposed future transit center (Green Line extension). Rather, the DEIR's analyses carveout the Green Line Extension and its cumulative and direct impacts upon and within the project. It is understood that there is a separate EIR currently being drafted by Metro dealing with another segment for the proposed South Bay Green Line extension. However, drafting two different EIR documents for the same Green Line project violates CEQA as a "piecemeal" approach that understates the cumulative environmental impacts of the whole project in violation of CEQA. The entire proposed projects (Greenline Extension and Galleria) must be analyzed together, pursuant to CEQA, not as a separate CEQA documents.
Response AL002-18 and 19

Comments AL002-18 and 19 incorrectly equates the transit center with the Green Line extension and ignores the legal standard of review of “Piecemealing.”

As described in Draft EIR page 2-9, there is an existing 0.56-acre parcel utilized as a transit terminal at the westerly edge of the site along Kingsale Avenue. An application was submitted in 2008 to relocate this transit center, which was approved by the City in 2010, including the adoption of a Mitigated Negative Declaration. The Draft EIR explained that the transit center relocation was scheduled to take place within 18 months of release of the South Bay Galleria Draft EIR. Consistent with that discussion, bidding for the transit center construction activities is set to begin in February 2018 or shortly thereafter, with construction anticipated to take a year, to a year and a half to complete.

The purpose behind the Transit Center Relocation was described in detail in the 2010 Administrative Report:

This [Transit Center Relocation] project consists of the relocation of an existing transit terminal to a new location approximately 1/3 of a mile to the south. The existing transit terminal, developed in 1985, serves as a bus layover and transfer point for eleven (11) regional bus lines including the Los Angeles County Metropolitan Transportation Authority (Metro), Beach Cities Transit, Torrance Transit, Gardena Municipal Bus lines and the Lawndale Beat. The facility consists of eight (8) bus berths, 40 feet in length. Currently buses must back out of four (4) of the bus berths on to Kingsdale Avenue when exiting the terminal. The 65-feet long articulated buses used on two (2) of the Metro bus lines project into the easterly traffic lane on Kingsdale Avenue when using the facility and must currently use 182nd Street and Hawthorne Boulevard for layovers. Metro also lays over its other bus lines which serve the Transit Terminal on 182nd Street, and Gardena Municipal Bus Lines lays over one bus line. Although there is an increase in the demand for bus services there is no room for expansion at the existing location. There are ten (10) bicycle parking spaces available for the commuters. The new location is more appropriate than the existing facility for a variety of reasons including the following: [1] the site is further away from existing single-family uses; [2] the bus berths will no longer encroach into the Kingsdale Avenue right-way; of-rather, [3] they will be appropriately designed to accommodate buses 45 feet in length (which Metro is now using) and 65 feet in length (articulated buses); [4] the bus layover zones on 182nd Street and Hawthorne Boulevard will be eliminated because the buses will be able to layover at the new site; [5] the new site is adjacent to a railway right-way, of-owned by the Metro, that provides a connection for the possible future extension of light-rail services; [6] the site allows for the construction of a custom-designed facility with a much improved and expanded sales ticket office, a sheriff's office, public restroom facilities for the commuters, a private restrooms for the transit center staff, an operators lounge, and a maintenance storage room; [7] there will be improved and expanded on-site bicycle facilities including fourteen (14) bicycles racks, accommodating twenty-eight (28) bicycles, and twelve (12)

13 Planning Commission, February 2010 Administrative Report: http://laserweb.redondo.org/WebLink/PDF/gbc5oi5jgksvpm0uprgste0/19/AG%20PKT%202010-02-18%20PC%208.pdf. Subsequent Administrative Report noted that the City of Lawndale Community Services Manager consulted on this project. (City Council Admin Report, June 4, 2013, p 2: http://laserweb.redondo.org/WebLink/PDF/gbc5oi5jgksvpm0uprgste0/18/AG%20PKT%202013-06-04%20CC%20Rpt%20_%20H%20GALLERIA%201.pdf;
bicycle lockers; and, [8] the site provides a Kiss’n’Ride lot as well as Park’n’Ride facilities exclusively for the use of the transit users.

To the extent the commenter is referencing a potential green-line extension and not the transit center relocation; such a project is not reasonably foreseeable within the horizon year of the Galleria Project. While metro prepared an Alternatives analysis study in 2009, and began preparation of a Draft EIR/EIS in 2012, Metro did not ultimately release an EIR and stopped work on a potential green-line extension until very recently. (See Response to Comment AR003-8). Metro has confirmed that if they were to move forward with a Green-line extension, such a project would not begin construction until 2028 at the earliest, and would not be operational for at least three years thereafter. In fact, as expressly noted on the City of Lawndale’s website:

The original date to complete the Green Line Extension through Lawndale was 2035. In June 2013, the Metro Board voted to seek funding to move the project forward 12 years so that it would be completed in 2023. At this time, Metro has not yet secured full funding to accelerate the Green Line schedule and until it does the construction schedule stays at the 2035 date. The release date for the EIR has not been determined. The EIR will be released once the proposed completion date has been determined.

Additionally, the Mayor of Lawndale submitted correspondence to Metro opposing the Green-line extension stating, “the City of Lawndale is completely opposed to the Light Rail Alternative or the Freight Track Alternative…” and instead suggests “more efficient deployment of Metro buses throughout the South Bay [i.e. the TSM Alternative].”

Piecemealing is defined as an action that (1) is a reasonably foreseeable consequence of the initial project, and (2) will likely change the scope or nature of the initial project or its environmental effects. (East Sacramento Partnership for a Livable City v. City of Sacramento (2016) 5 Cal.App.5th 281.) As explained in the Draft EIR, Chapter 2.0, Project Description, page 2-9 the transit terminal relocation was first considered in 2008 and approved in 2010 almost a decade before the release of this FEIR (and before Forest City discussed the Galleria Project with the City [September 2014]).

As noted above, the purpose behind the Transit Center Relocation was “there is no room for expansion” to meet bus demand. In fact, in March 2017 the City of Lawndale approved an agreement with the City of Redondo Beach to utilize this transit center for its own fixed-route bus stop. This Transit Center Relocation is not a reasonably foreseeable consequence of the South Bay Galleria project, nor is the project a consequence of the transit center relocation. While the South Bay Galleria project and the Transit Center Relocation are compatible with a potential

14 https://www.metro.net/projects/south-bay/
15 http://www.lawndalecity.org/HTML/QAGreenLineExtension.html
16 As noted on the City of Lawndale’s Green-line Extension webpage, the only other alternatives included the No Build Alternative and a Transportation Systems Management Alternative (TSM-low cost bus and signal improvements). http://www.lawndalecity.org/HTML/QAGreenLineExtension.html
17 http://www.lawndalecity.org/PDFs/Special/MayorslettertoMetro052710.pdf
18 City of Lawndale March 6, 2017 Agenda and Minutes (Item G-3): http://www.lawndalecity.org/HTML/DEPTHTML/CCLERK/CityCouncil/Agendas/A030617.pdf (Agenda) and http://www.lawndalecity.org/HTML/DEPTHTML/CCLERK/CityCouncil/Minutes/CCM030617.pdf (Minutes)
Metro Green Line Extension, the project and the Transit Center Relocation have independent utility and are not dependent upon such an extension. As noted in *East Sacramento* a tunnel project was not improperly piecemealed from a residential project because “While the tunnel would be used only for access to and from the project, it is not a necessary part of the project and the project was not conditioned upon its construction.”

**Comment AL002-20**

1. **Traffic Impacts.** The proposed project will have tremendous traffic environmental impacts on the regional and locally-based on the scale and scope of the project. The DEIR is incomplete, deficient, and inadequate and does not analyze traffic impacts to local roadways or to CALTRANS freeways including the State Route 405. The DEIR failed to address traffic impacts or provide measurable mitigation measures.

**Response to Comment AL002-20**

The commenter states that the Draft EIR is incomplete, deficient, and inadequate and does not analyze traffic impacts to local roadways or to Caltrans freeways including Interstate 405 (I-405). Additionally, the comment states that the Draft EIR failed to address traffic impacts or provide measurable mitigation measures.

Contrary to the assertions in the comment, the Draft EIR analyzed the effects of project traffic and potential traffic impacts at 32 intersections around the project site. (See Draft EIR, Impact TRA-1, including Tables 3.13-10 and 3.13-13.) Consequently, the Draft EIR did analyze “analyze traffic impacts to local roadways.” The Draft EIR disclosed three significant and unavoidable local intersection impacts (Draft EIR Section 3.13.6), as the commenter appears to acknowledge in the subsequent comment. (Comment AL002-21 ["the DEIR identifies the proposed project's traffic impacts as significant and unavoidable"].)

Additionally, the commenter incorrectly asserts the Draft EIR did not analyze impacts to “freeways including the State Route 405.” Freeways segments and freeway ramps were assessed under Impact TRA-1, specifically in Draft EIR Table 3.13-11 (which includes 5 segments of the I-405 freeway), and Table 3.13-12, which includes seven freeway ramps. Freeway segments were also assessed under Impact TRA-2, CMP Freeway Analysis.

While the commenter asserts there will be “tremendous traffic environmental impacts on the regional…-based on the scale and scope of the project.” It is not clear what regional impacts the commenter is referencing. For discussion of the geographic scope of the traffic analysis, please see Draft EIR page 3.13-3 for discussion of the “Study Area,” which was based upon intersections “likely to be affected by traffic generated by the proposed project.” To extent the commenter is simply alleging greater regional traffic, this issue was addressed in Draft EIR Section 3.5, which explains that the project site has reduced VMT in comparison to the regional average. (See also Section 3.0.3 for discussion of the project site as a Transit Priority Area.) Los

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19 Metro is in the beginning stages of preparing a Supplemental Alternatives analysis, which would then result in the start of the CEQA process. As also noted in DEIR Appendix L, The Metro Green Line South Bay extension is a potential regional transit project on the east side of the City of Redondo Beach, but is not expected to be implemented by the 2023 Project opening year. As noted above, metro has indicated that such a project would not begin construction until at least 2028 at the earliest, and would take three years or more to become operational.
Angeles County has built fewer housing units in comparison to existing demand, particularly in the coastal communities thereby requiring individuals to commute greater distances (State Legislative Office 2015). Consequently, if the 1,008 residents do not live at the project site, they will continue to reside elsewhere in the SCAG region with greater VMT and the associated VMT and regional air quality emissions.

**Comment AL002-21**

Indeed, the DEIR identifies the proposed project's traffic impacts as significant and unavoidable. However, the project's traffic analysis and the project alternative analyses do not provide sufficient information to support the conclusion that traffic impacts cannot be feasibly mitigated under a less-intense project alternative. Any one significant unavoidable impact requires disapproval of the proposed project unless feasible mitigation measures or alternatives do not exist and specific benefits outweigh the significant impact. (Pub. Resources Code § 21081.) CEQA requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects. (Pub. Resources Code § 21002; Sierra Club v. Gilroy City Council (6th Dist. 1990) 222 Cal.App.3d 30, 41.) The Legislature has stated:

"[I]t is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects…"

(Pub. Resources Code § 21002.) The CEQA Guidelines require an agency to "Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved." In order to implement this policy, the CEQA Guidelines specify that:

"A public agency may approve a project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that: (a) There is no feasible way to lessen or avoid the significant effect..."

(CEQA Guidelines § 15043.) Feasible means "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Public Resources Code § 21061.1.) Project alternatives remain feasible "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (CEQA Guidelines§ 15126.6(b.).)

**Response to Comment AL002-21**

The commenter states the project should be denied because feasible mitigation measures were not considered to reduce significant traffic impacts.

As discussed under CEQA Guidelines “The EIR shall describe feasible measures…If the Lead Agency determines that a mitigation measure cannot be legally imposed, the measure need not be proposed or analyzed.” (Section 15126.4(a)(1) and (a)(5).) Furthermore, the commenter does not identify any specific improvements or alternatives to mitigate the significant and unavoidable
impacts disclosed in the Draft EIR. (See San Diego Citizenry Group v. County of San Diego (2013) 219 Cal.App.4th 1, 17.)

The commenter is also referred to the Draft EIR, Section 3.13, Transportation and Traffic, page 3.13-47, Residual Impacts, no feasible mitigation measures were identified to reduce the significant impacts to less than significant at Intersection #16 (Hawthorne Boulevard & Artesia Boulevard), Intersection 17 (Prairie Ave & Artesia Boulevard), and Intersection #19 (I-405 Northbound Ramps & Artesia Boulevard); therefore, the impacts at these intersections under the Existing plus Project and Cumulative plus Project scenarios would remain significant and unavoidable. The commenter is referred to Appendix L, of the Traffic Impact Assessment, of the Draft EIR, on page 54, which provides additional information regarding mitigation infeasibility. Please also see Response AS003-7 for discussion of mitigation infeasibility.

The commenter also asserts “the project alternative analyses do not provide sufficient information to support the conclusion that traffic impacts cannot be feasibly mitigated.” An EIR is only required to provide a reasonable range of Alternatives. (CEQA Guidelines Section 15126.6(a).) A Reasonable range of Alternatives was provided in Draft EIR Section 4, which included Alternative 1: No Project Alternative, Alternative 2: Reduced Density, No Stand-alone Retail Stores Alternative, Alternative 3: Reduced Density, Reduced Underground Parking Alternative, Alternative 4: Reduced Density, Alternative Residential Location, Alternative 4: Reduced Density, Office Location. Each one of these alternatives contained a transportation impact analysis under Impact TRA-1. While localized intersection impacts were reduced under these alternatives, only the No Project Alternative eliminated the significant and unavoidable impacts.

Moreover, a sensitivity analysis (Errata Appendix L6) was performed for the project to determine the maximum number of vehicle trips that could be generated at the project site without triggering significant unavoidable impacts. The sensitivity analysis concluded that a maximum of 32 PM inbound trips could be generated at the project site without resulting in a significant and unavoidable intersection impact. As shown in Draft EIR Table 3.13-7, this would require the elimination of nearly every single project component, including residential. Please see Draft EIR page 4-42 for discussion of the City’s RHNA allocation and the City’s Housing Element under the No Project Alternative. As also discussed on Draft EIR pages 4-43 and 4-46, elimination of the proposed project, which falls within a Transit Priority Area, would result in greater regional traffic (i.e. VMT) and associated GHG and Air Quality emissions. The legislature adopted Senate Bill 743 (2013) with the goal of “encouraging land use and transportation planning decisions and investments that reduce vehicle miles traveled [VMT] and contribute to the reductions in greenhouse gas emissions.” (See also SB375 [2008] creating SCAG’s Regional Transportation Plan/Sustainable Communities Strategy.) The legislature explained in SB 743 that “there is a need to balance the need for level of service standards for traffic with the need to build infill housing and mixed use commercial developments within walking distance to mass transit facilities, downtowns, and town centers and to provide greater flexibility to local governments to balance these sometimes competing interests.” The project could not be reduced to this level while meeting most of the project objectives discussed in Draft EIR Section 2.2.
The City is aware of CEQA Guidelines Section 15093 which provides for a Statement of Overriding Considerations if the project results in significant and unavoidable impacts. If the proposed project or an alternative is approved that has significant and unavoidable impacts, such a statement would be adopted concurrently with project approval, along with CEQA Findings.

**Comment AL002-22**

CEQA's purpose of avoiding or substantially reducing environmental impacts of a project through the adoption of feasible alternatives is defeated where an EIR fails to ensure that information about potentially feasible alternatives is subject to public and decision maker review. It also fails where an EIR fails to include alternatives that actually reduce a project's impacts below thresholds of significance. Smaller scale versions of the proposed project that avoid or reduce significant impacts would meet most of the objectives and should be adequately analyzed in the EIR.

**Response to Comment AL002-22**

The commenter misstates the law regarding alternatives. CEQA Guidelines Section 15126.6 states that “An EIR shall describe a range of reasonable alternatives to the project …which…would avoid or substantially lessen any of the significant effects of the project…” (Emphasis added; see also Pub. Res. Code Section 21002.) Consequently, the commenter’s assertion that CEQA requires alternatives to “include alternatives that actually reduce a project's impacts below thresholds of significance” is unsupported by the law. Draft EIR Section 4, Table 4-45 provides a summary of the Alternatives’ comparison to the proposed project. Numerous Alternatives substantially lessen the proposed project’s environmental effects, including vehicular intersection impacts. Please also see Response to Comment AL002-21 for discussion of the five reduced density Alternatives analyzed in the Draft EIR. However, each Alternative has tradeoffs, including increased impacts for other resource areas, or increased regional impacts. Please see Draft EIR Section 4 for further details. Please also see Response to Comment AL002-21, which explains that the Draft EIR analyzed several reduced density alternatives.

**Comment AL002-23**

The objectives stated in the DEIR do not require a project of any specific size or scale, and, more importantly, all of the City's objectives could be met with a scaled-down project that requires little, if any diversion from existing land use regulations. Furthermore, because this intense development will have unavoidable significant impacts on this site, off-site locations should be considered. Off-site alternatives should be considered when "significant effects of the project would be avoided or lessened by putting the project in another location." (Guidelines § 15126.6(f)(2)(A).)

**Response to Comment AL002-23**

The commenter is referred to the Draft EIR, Chapter 4.0, *Alternatives*, specifically, section 4.4.1, Alternative Site, which includes a discussion on the reasons why an alternative site was not considered a feasible alternative for the proposed project. (1) no other sites in the City are owned or controlled by the project applicant, (2) no other sites in the City were identified that would support the project and meet the project objectives based on size, configuration, location, and
proximity to existing infrastructure. (3) Additionally, the use of an alternative site would also be expected to result in the same or similar environmental impacts to transportation and circulation as the project, and could even result in increased environmental impacts to the extent that such development is forced out to the urban fringe, as discussed under the No Project Alternative in Draft EIR Section 1. (4) As also noted on Draft EIR page 3.8-16: Government Code 65589.5(a) explains that the legislature has concluded that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California… [3] Among the consequences of those actions are…. reduced mobility, urban sprawl, excessive commuting, and air quality deterioration…”

(5) Additionally, the project site was specifically identified in the City of Redondo Beach General Plan as the site with the greatest potential for future residential development in the City to meet the City Regional Housing Needs Assessment (RHNA). If the City decides to deny or reduce the residential density of such a project, the City would potentially have to meet the requirements of Gov. Code Section 65863, which states in part “No city, county, or city shall, by administrative, quasi-judicial, legislative, or other action, reduce, or require or permit the reduction of, the residential density for any parcel…” Nor does the commenter identify another site that would comply with Gov. Code Section 65863(b). Please see Draft EIR Section 4, Alternative 1: No Project, Impact LU-1 for additional information.

Comment AL002-24

The commenter states, as dramatic as the traffic impacts predicted by the Draft EIR look, these predictions actually underestimate the project's true traffic impact because several of the traffic analysis' assumptions are unsupportable and result in an understatement of impacts:

Response to Comment AL002-24

This comment does not provide any information on why they believe the traffic analysis inadequate. The commenter is referred to Response to Comments AL002-25 through 40.

Comment AL002-25

The commenter states, in general, the cumulative traffic analysis was evaluated incorrectly. Fehr & Peers applied population growth rates from Southern California Association of Government [SCAG] instead of the SCAG traffic growth rates since traffic was forecast to decline in the area; utilized conservative roadway lane configurations (i.e. did not include de-facto right turn lanes); and utilized the conservative threshold of significance in determining if a study intersection was impacted when there were shared intersections.

Response to Comment AL002-25

The commenter states that the cumulative traffic analysis was evaluated incorrectly. The comment states that Fehr & Peers applied Southern California Associate of Governments (SCAG) population growth rates instead of traffic growth rates since the traffic growth rates were forecast to decline. As discussed in Draft EIR Section 3.0.4 and page 3.13-25, SCAG population growth rates were applied in lieu of SCAG traffic forecasts as the traffic forecasts were projected to decrease in the study area. The use of population growth rates for traffic growth represented a
2. Response to Comments

conservative analysis of the cumulative conditions. If the City were to utilize a cumulative reduction in traffic, it would only reduce the project’s impacts. Furthermore, the commenter has not identified how such conservative assumptions would be prejudicial.

The commenter further states that Fehr & Peers utilized conservative roadway lane configurations (i.e., did not include de-facto right-turn lanes). A de-facto right-turn lane at an intersection approach is where the curbside shared through-right turn lane is wide enough to function as one through lane and one right-turn, but is not marked as such. The commenter does not identify specific locations where de-facto right-turns lanes could have been considered. However, certain intersections, such as southbound Intersection 27 assumed a de facto right turn lane. However, the use of de-facto right-turns lanes represents a less conservative condition as the de-facto right-turns provide more roadway capacity at the intersection. Therefore, intersections where de-facto right-turns are present and were not evaluated as such represent a more conservative condition (i.e., higher volume-to-capacity ratio or delay). Furthermore, the commenter has not identified how such conservative assumptions would be prejudicial, as utilizing such a de-facto turn lane would increase intersection capacity and reduce impacts in comparison to the current analysis.

The commenter states that Fehr & Peers utilized a more conservative threshold of significance to determine intersection impacts where intersections were under shared jurisdictions. The commenter confirms that the traffic analysis utilized a conservative approach of identifying significant impacts using the more conservative impact thresholds, as described on Draft EIR page 3.13-30. As an initial matter, the lead agency has discretion to select its significance thresholds. (Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal.App.4th 1059.) Furthermore, the commenter has not identified how such conservative assumptions would be prejudicial, as such a change in methodology would reduce impacts in comparison to the current analysis.

In fact, the City of Lawndale has made similar conservative assumptions in their own CEQA documents and traffic analyses. In the Lawndale Legacy Mixed Use Development also referenced as “the Village” Traffic Impact Analysis dated April 28, 2016, page A-1 states:

Capacity is often defined in terms of roadway width. However, standard lanes have approximately the same capacity whether they are 11-foot or 14-foot lanes. Our data indicates that a typical lane, whether a through lane or a left-turn lane, has a capacity as high as approximately 2200 vehicles per lane per hour of green time. The 1985 Highway Capacity Manual found capacities of 1800 vehicles per lane per hour of green-time. These studies show that values in the 1600 and 1700 range as used in this analysis, should result in a conservative analysis. (Emphasis Added.)

**Comment AL002-26**

The commenter states, the trip generation estimate initially used the Trip Generation Manual, 9th Edition, 2012 by the Institute of Transportation Engineers (ITE) to generate trip generation for the proposed Project, is based on questionable assumptions. The trip generation estimate assumed that all the existing restaurants are "high-turnover" and only 25 percent of the proposed project restaurants would be "high turnover" (the rest would be lower generating "Quality Restaurants").
The proposed project should propose mitigation measures to restrict the amount of restaurants not conforming to the ITE Quality Restaurant definition.

**Response to Comment AL002-26**

The commenter states that the existing trip generation estimate assumed that all existing restaurant space is classified as high-turnover, while the proposed project trip generation estimate assumed that only 25 percent of the proposed restaurant space would be classified as high-turnover. (See Draft EIR Table 3.13-7.) The classification and trip generation estimate of existing restaurant space was determined based on the characteristics of on-site restaurants that were in operation at the time of the NOP.

The assumptions used in the traffic analysis, regarding the proposed project’s mix of quality restaurants versus high turnover, is consistent with other similar projects and consistent with modern trends for the proposed development. As an example, the current mix at Forest City’s Victoria Gardens is composed of 76% high-quality, sit-down restaurants versus 24% high-turnover restaurants. Other centers have a similar composition: The Domain in Austin is approximately 76% high-quality, sit-down restaurants vs 24% high-turnover restaurants; The Grove in Los Angeles is approximately 82% high-quality, sit-down restaurants vs 18% high-turnover restaurants; Scottsdale Quarter is approximately 83% high-quality, sit-down restaurants vs 17% high-turnover restaurants; and Fashion Valley in Mission Valley is 78% high-quality, sit-down restaurants vs 22% high-turnover restaurants. (See Final EIR Appendix N – Restaurant Mix Letter for additional details.) The proposed restaurant classification and trip generation estimate was determined based on the proposed operation of the restaurant space. While the commenter may disagree, as discussed by the Court of Appeal, “A public agency can make reasonable assumptions based on substantial evidence about future conditions without guaranteeing that those assumptions will remain true.” (Pub. Resources Code, Section 21080(e); City of Del Mar v. City of San Diego (1982) 133 Cal.App.3d 401, 412.) The City notes the commenters’ disagreement, but believes that the assumptions provided are reasonable for the reasons described above.

The comment and the requested measures are acknowledged and will be presented in the Final EIR for review and consideration by the City’s decision-making body.

**Comment AL002-27**

The commenter states, the project's theater component traffic impacts were analyzed separately, even though the ITE Trip Generation includes theaters as being in some shopping centers. The rationale for this approach is not clear from the DEIR, nor is there information provided to show if this increases or decreases trips. Nor can one determine the resulting traffic impacts as shopping centers are defined by square footage while theaters are defined by seats. Fehr & Peers did note that the ITE rates are not representative of the project's mixed-use development (MXD) vehicular trip. ITE acknowledges that the ITE rates overestimate the trip generation for this type of development and any other non-suburban location served by substantial transit or with other uses in close walking/bicycling distance.
Response to Comment AL002-27

The comment states that the theater traffic impacts were determined separately from the retail and that the resulting traffic impacts cannot be determined as shopping centers are defined by square footage while theaters are defined by seats.

The commenter is incorrect; the traffic impacts associated with the proposed project’s theater component were not analyzed separately. As discussed in Draft EIR Section 3.13.4, the proposed project’s trip generation was based upon all of the proposed uses. The net change in trip generation was calculated in Draft EIR Table 3.13-7, which includes every component of the proposed project, including the “Theater” uses. The trip generation for the entire project was then used as the basis for the traffic impact analysis in Draft EIR Section 3.13. As explained in the Draft EIR, the “With Project” traffic scenarios were “created by adding the trip generation and distribution data described above…” (Draft EIR pages 3.13-25 through 26.)

The existing and proposed trip generation estimates were developed by utilizing square footages for retail uses and seats for the theater. This approach was appropriate, as it accounted for the net reduction in the number of theater seats proposed by the project. Therefore, the trip generation estimate and resulting traffic impacts reflect the reduced number of theater seats that would occur as part of the proposed project.

The commenter additionally states that Fehr & Peers noted that ITE trip generation rates are not representative of the project’s mixed-use development characteristics, and that the Institute of Transportation Engineers (ITE) acknowledges that trip generation rates for mixed-use developments may be overestimated. As described on pages 3.13-22 and 3.13-23 of the Draft EIR and pages 8 through 10 and 40 through 41 in the Transportation Impact Study (Appendix L of the Draft EIR), a mixed-used development (MXD) trip generation model was used to estimate the trip generation for existing conditions and the proposed project. The MXD trip generation method utilizes raw ITE trip generation estimates and then determines internalization, bike/walk, and transit credits based on built environment variables (also known as Ds) such as design of the project, diversity of uses, demographics, density of uses, distance to transit, destination accessibility, etc. This method provides a much more accurate estimate of external trip generation than ITE trip rates alone. The MXD+ model is based upon two earlier trip generation studies including (1) the National Cooperative Highway Research program (NCHRP) Report 684, and (2) the US EPA sponsored Report “Traffic Generated by Mixed-Use Developments – A Six-Region Study Using Consistent Built Environmental Measures” which in turn was based upon a study of 239 Mixed Use Developments and verified through 27 mixed use sites across the U.S. (Appendix L, Appendix A, p. 10-11.) The MXD+ model combines the datasets and factors from both of these models. (Appendix L, Appendix A, p. 12-16.)

Comment AL002-28

The commenter states that to reduce the initial ITE trip generation estimates of the proposed project, a model known as MXD+ was utilized. This model was developed by Fehr & Peers for the United States Environmental Protection Agency (US EPA) and has been reviewed and refined by several state, regional, and local agencies. Reduction factors were also used to account for pass-by trips. Thus, overestimates in the initial trip generation estimate were carefully removed.
Note that while non-project specific documentation of the MXD+ model was included, no project specific calculation worksheets for the proposed project specific MXD factor or proposed project specific pass-by factor were included in the DEIR. Therefore, the appropriateness of the assumptions in the MXD and pass-by analyses could not be determined. The detailed assumptions for the reduction factors greatly affect the trip generation estimates as the proposed project PM Peak Hour trips generation was reduced by 38.5 percent. It cannot be determined if quality restaurants having lower percentages of pass-by and mixed-use linked trips than average restaurants were properly accounted.

Response to Comment AL002-28

Please see Response to Comment PC002-1 for discussion of the MXD+ model assumptions. Project-specific MXD+ outputs and calculations are provided in Final EIR Chapter 3, Modifications to the Draft EIR.

Regarding the commenters’ request to identify “where the Draft EIR defines the specific discount for each factor or the justification for the discount for each factor.” Trip generation and “discount trip factors” are discussed in Draft EIR Section 3.13, Transportation and Traffic, specifically in Section 3.13.4. The specific trip reduction information is provided in Draft EIR Table 3.13-7, which shows the MXD+ Model trip reduction values (i.e. “MXD+ Model calibration of base ITE rates reflecting project and site-specific characteristics”). The MXD+ model calibrates the trip generation for the totality of the project (i.e. all of the proposed land uses).

Comment AL002-29

The commenter states for the proposed project trip distribution, two travel demand models were used in the development of the distributions for the retail, residential, and hotel components. The Redondo Beach Traffic Model (RBTM) and SCAG 2016 Regional Transportation Plan (RTP) Travel Demand Model. We contend that the trip distribution analysis methodology utilized for the analysis of retail uses incorrectly assumed the proposed project retail is the "average" retail in the models. The DEIR analysis is for a regional center and should have included a larger portion of trips to Interstate 405 (I-405) versus onto local roadways than for the average retail in the models. Further, although the study emphasizes the mixed-use nature of the proposed project, that factor was already accounted for in the trip generation estimates. Therefore, the internal trips should be removed from any distribution analysis, as should any other discounted trips, such as for the automobile trips shifted to bicycles that tend to be the more local trips.

Response to Comment AL002-29

The commenter states that the Draft EIR analysis should have included a larger portion of trips to I-405 and discounted trips should be removed from the distribution analysis. The Redondo Beach traffic model and SCAG travel demand forecasting model were used in addition to other resources including input and review from Fehr and Peers\textsuperscript{20} staff, City of Redondo Beach staff,

\footnotesize\textsuperscript{20} Fehr & Peers has specialized in providing transportation planning and engineering services to public and private sector clients since 1985. They develop creative, cost-effective, and results-oriented solutions to planning and design problems associated with all modes of transportation. They are nationally-recognized experts who routinely
and South Bay Galleria management staff to determine the distribution of project traffic. The proposed project’s trip distribution was discussed in Draft EIR page 3.13-24, with more detailed information provided in Draft EIR Appendix L, Sections 1.4 and 4.2. Please also see response AL002-30 (below) for additional information regarding distribution of trips to I-405 and other regional roadways.

All net new trips calculated in the trip generation estimate for the project were assigned to the roadway network per the established distribution patterns. No additional credits beyond what was determined in the trip generation estimate were applied for internal capture, transit, biking, or walking. All net new trips were assigned beyond the edge of the study area representing a conservative condition, which means the analysis conservatively assumed no trips would end or begin within the study area.

The Draft EIR made reasonable trip distribution assumptions. Similar challenges were rejected by the Court of Appeal in Coalition for Preservation of Arroyo v. City of Pasadena (2015) Unpublished Case No. B255824 [“The Coalition further maintains that the City failed to accurately estimate travel distances of event visitors in evaluating air quality impacts. The EIR estimated that patrons’ average vehicle trip length to the Rose Bowl for attendance of the NFL games would be 45 minutes long. The EIR reasoned that this trip length represented a reasonable average trip length for football fans in the Los Angeles area based on default factors from CalEEMod (an emissions calculations model). The South Coast Air Quality Management District, which is the air pollution control agency for urban Los Angeles county, specifically suggested the City utilize CalEEMod to estimate emissions… The Coalition provides no evidence that the City erred in calculating the average trip length. As no local trip length data existed for NFL games and as the pertinent air pollution control agency recommended the CalEEMod model, we conclude that the City’s choice of methodology regarding the trip distance was also reasonable and supported by substantial evidence.”]

**Comment AL002-30**

The commenter states that in review of the trip distributions directed at all-405 ramps in Figure 6 (Page 43), and confirmed in review of intersection trip distributions in Appendix C, a total of 40 percent of vehicle trips were regionally distributed versus 60 percent that were local trips. The South Bay Galleria is considered a regional shopping center due to the size and tenants that occupy the mall. As a regional shopping center, vehicle trips are expected to be more regional in scope rather than localized. Further, the expansion and additional improvements mean that the South Bay Galleria will continue to be a regional shopping center and, in effect, actually enhances the fact that customers will be encouraged to drive from far and wide. An example is that mainly Quality Restaurants are to be added, which have a much wider market area than do restaurants in the other ITE Manual categories - Fast Food and High-Turnover. Therefore, the overall proposed project trips should have a larger regional distribution than the average retail trips that were analyzed.

publish original research, serve on national committees, and teach courses to others in the industry. Anjum Bawa, AICP is a Principal at Fehr & Peers and Spencer Reed, PE is a senior transportation engineer at Fehr & Peers.
Response to Comment AL002-30

The commenter states that the retail project trips should have a larger regional distribution than what was analyzed. In referencing “regional” versus “local” distribution, the commenter does not appear to be actually discussing trip length, but simply alleging a different trip distribution ratio between freeways versus roadways.

As documented on page 3.13-24 of the Draft EIR, two travel demand models were considered in estimating the trip distribution patterns for the proposed project: the Redondo Beach traffic model and SCAG travel demand forecasting model. In addition to the travel models, input and review from Fehr and Peers staff, City of Redondo Beach staff, and South Bay Galleria management staff was also considered. The use of the travel demand models and input and review from the various entities noted above resulted in estimated trip distribution patterns that accounted for study area characteristics, roadway network, and existing and proposed operations of the South Bay Galleria. The project retail trip distribution takes into consideration the project’s location near I-405 and adjacency to roadways that are either state highways or lead to state highways such as Hawthorne Boulevard and Artesia Boulevard. While the freeway system is known as the regional transportation network, major arterial roadways throughout Los Angeles County provide regional connections. Roadways in the study area such as Hawthorne Boulevard, Artesia Boulevard, and Redondo Beach Boulevard provide an alternative to I-405 for regional access. Additionally, because the traffic analysis was focused on the AM and PM peak hours, when there is congestion on I-405, roadways such as Hawthorne Boulevard, Artesia Boulevard, and Redondo Beach Boulevard provide alternative regional access to and from the project site. To the extent the commenter is suggesting the use of a different trip length, the Draft EIR made conservative trip length assumptions, as described on Draft EIR page 3.13-45 and Response to Comment AL002-29.

Comment AL002-31

The commenter states, a case to note concerning the shopping center size trip distribution effect is that the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP) exempts small retail centers from a fee. The exemption applies to small retail centers because they are local serving, thus having higher than average pass-by trip percentages and shorter than average trip lengths for the remaining trips. Based on this conclusion, large shopping centers (such as the proposed project that will have over one million square feet of retail), have longer than average trips and lower than average pass-by trip percentage. Therefore, the assumption that the proposed project's retail trips distribution can be represented by an average model distribution vastly understates the real and regional impacts that the proposed project will have on routes to/from freeway interchanges.

Response to Comment AL002-31

The commenter states that the retail trip distribution underestimates the regional impacts that the project will have on routes to/from freeway interchanges. The Redondo Beach traffic model and SCAG travel demand forecasting model were used in addition to other resources including input and review from Fehr & Peers staff, City of Redondo Beach staff, and South Bay Galleria management staff to determine the distribution of project traffic. Please see response AL002-30
for additional information regarding distribution of trips to I-405 and other regional roadways.

Pages 3.13-45 and 3.13-46 of the Draft EIR documents how trip lengths were estimated for the project. The average vehicle trip lengths for the proposed project’s various trip types in the Transportation Analysis Zone (TAZ) where the project site is located 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. These trip length estimates reflect the sub-regional nature of the project based on its location and proximity to other retail centers in the South Bay and in the greater Los Angeles area.

All net new trips calculated in the trip generation estimate for the project were assigned to the roadway network per the established distribution patterns. All net new trips were assigned beyond the edge of the study area representing a conservative condition, as no trips would end or begin within the study area.

Comment AL002-32
The commenter states, although the documentation clearly states that the regional trip percentages were understated, as noted above, the pass-by trip adjustment work sheets were not provided. Therefore, the appropriateness of the pass-by rate adjustments cannot be evaluated or verified to ensure the shopping center's regional nature was properly considered.

Response to Comment AL002-32
Please see Response to Comment PC002-1 for discussion of the MXD+ model assumptions. Project-specific MXD+ outputs and calculations are provided in Final EIR Chapter 3, Modifications to the Draft EIR.

Comment AL002-33
The commenter states, Study Area Intersections (Table 1, Page 6) - notes the various jurisdictions in the study area. Intersections 5, 6, and 8 are noted under Caltrans; however, the segment of Hawthorne Boulevard between the I-405 and Redondo Beach Boulevard was relinquished to the City of Lawndale. Intersection 16 is on Hawthorne Boulevard in the City of Redondo Beach and should be listed as under the jurisdiction of Caltrans.

Response to Comment AL002-33
The commenter states that jurisdiction over Hawthorne Boulevard between I-405 and Redondo Beach Boulevard (which includes Intersections 5, 6, and 8) was relinquished to the City of Lawndale and that Hawthorne Boulevard and Artesia Boulevard should be listed under Caltrans jurisdiction. The study intersections along Hawthorne Boulevard between I-405 and Redondo Beach Boulevard were listed as being with both Caltrans and the City of Lawndale’s jurisdiction in Draft EIR, Appendix L, Table 1 and studied per the City of Lawndale analysis criteria as identified in the Draft EIR, Section 3.13, Transportation and Traffic, on page 3.13-50 and pages 13 and 14 of the Transportation Impact Study (Appendix L of the Draft EIR). Draft EIR Appendix L, Table 1 has been revised to remove the Caltrans jurisdiction for Intersections 5, 6, and 8 in the Final EIR.
The commenter states that the intersection of Hawthorne Boulevard and Artesia Boulevard (Intersection 16) should be listed as under the jurisdiction of Caltrans. Intersection operations at Hawthorne Boulevard and Artesia Boulevard (Intersection 16) were evaluated following the analysis criteria of Redondo Beach, Torrance, and Caltrans’ methodology, which is stated on pages 3.13-28 through 3.13-30 of the Draft EIR. Draft EIR Table 3.13-1 and Table 1 in Appendix L of the Draft EIR have been revised to note Caltrans jurisdiction for Intersection 16 in Final EIR. The request does not change any of the operational analysis results or the significance conclusions of the Draft EIR.

Comment AL002-34

The commenter states, Trip Generation Estimate (Table 9, Page 41) does not provide accurate documentation of the calculation for the trip generation rates. The ITE Rates for the theater (ITE Code 445) does not have a daily rate per seat and the Quality Restaurant (ITE Code 931) PM peak hour rate yields a different result. Either the rates assumed are incorrect or adjustment assumptions were made but not stated.

Response to Comment AL002-34

The commenter states that the theater does not have a daily trip generation rate in Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012). The theater’s weekday daily trip generation rate per seat was not provided in Trip Generation, 9th Edition, therefore a daily rate per seat was developed based on the proportional relationship between daily trips to peak hour PM trips for movie screens on a Friday. According to Trip Generation, 9th Edition, the trip generation rate for the peak hour of adjacent street traffic one hour between 4 and 6 PM per screen for a Friday is 7.78 percent of the Friday daily trip generation rate per screen (22.76 trips/screen ÷ 292.5 trips/screen = 7.78 percent). Applying this same relationship to the trip generation rate for the peak hour of adjacent street traffic one hour between 4 and 6 PM per seat for a weekday would result in a daily weekday trip generation rate of 1.03 trips per seat (0.08 trips/seat ÷ 7.78 percent = 1.03 trips/seat). This proportional relationship represents a factored increase from peak hour of adjacent street traffic one hour between 4 and 6 PM to daily trips based on a factor associated with the theaters.

The commenter also states that the quality restaurant PM peak hour trip generation rate in Trip Generation, 9th Edition is different than what was utilized in the trip generation estimate. The trip generation estimate in the Draft EIR made a minor typographical error and utilized a PM peak hour trip generation rate of 7.39 trips per 1,000 square feet of gross floor area for quality restaurant. The PM peak hour trip generation rate from Trip Generation, 9th Edition for quality restaurant is 7.49 trips per 1,000 square feet of gross floor area. Correcting the trip generation rate from 7.39 to 7.49 in the trip generation and utilizing the MXD+ calculations would result in 3 additional inbound PM peak hour trips, which would be spread out over several intersections under the trip distribution assumptions described in Draft EIR Section 3.13. This change represents a 0.66 percent increase in the PM peak hour trip generation. As the Cumulative plus Project scenario results in the greatest number of signification intersection impacts, the intersection analysis was updated to determine the effect of the three additional PM peak hour trips on the significance conclusions disclosed in the Draft EIR. As demonstrated by the updated Table 3.13-13 from the
Draft EIR, the change in the PM peak hour trip generation does not affect the significance conclusions disclosed in the Draft EIR.

Revisions are provided in the Final EIR, Chapter 3, Modifications to the Draft EIR, to Tables 3.13-7 and 3.13-13 of the Draft EIR and Tables 9 and 14 of the Transportation Impact Study (Appendix L of the Draft EIR) (the additional text or modifications are provided in underline and the deletions are shown in strikethrough).

Comment AL002-35

The commenter states that Existing Conditions (AM and PM) Lane Configurations (Appendix B) several of the lane configurations are inconsistent with observed conditions. These lane configuration inconsistencies would apply to all future conditions as well. These include:

i. Hawthorne Boulevard / 165th Street (Intersection 6) – during the AM peak period in the northbound and southbound direction shows a dedicated right-turn lane, however, it appears as though there is not enough clearance along the curb lane to provide for that dedicated turn.

ii. Inglewood Avenue / Robinson Street-166th Street (Intersection 7)–separate peak-hour lane configurations in the northbound and southbound direction were not included for the PM peak-hour northbound direction - the graphic should show one left-turn lane, one through lane, and one shared through-right-turn lane; for the AM peak-hour southbound direction, and it should show one left-turn lane, two through lanes, and one right-turn lane.

iii. Hawthorne Boulevard / 169th Street (Intersection 8) separate peak-hour lane configurations in the northbound direction were not included - the AM peak-hour northbound direction should show one left-turn lane, three through lanes, and one shared through-right turn lane.

iv. 1-405 Southbound Off-Ramp / Redondo Beach Boulevard (Intersection 10)–the southbound lane configuration should show a shared left and right-turn lane and one left-turn lane.

v. Redondo Beach Boulevard / Artesia Boulevard (Intersection 15 )–the northbound lane configuration represents Grevillea A venue which is actually the northern leg of the intersection. This graphic is deceiving since traffic is actually traveling southbound. It was analyzed this way to account for the atypical intersection layout, but there should be a notation explaining this in the figure.

vi. Felton Avenue I Grant Avenue (Intersection 21)–the right-turn lanes in the eastbound and westbound direction were excluded.

vii. Hawthorne Boulevard / 177th Street (Intersection 25) – the eastbound lane configuration should show a shared left-through lane and one right-turn lane.

Response to Comment AL002-35

The commenter addresses the lane configurations of some of the study intersections. Each intersection is addressed separately below:

i. Hawthorne Boulevard and 165th Street (Intersection 6) – The commenter states that there is not enough clearance along the curb lane in the northbound or southbound direction for a dedicated right-turn lane in the AM peak period. The intersection was analyzed in the AM peak hour with one right-turn and three through lanes in the southbound direction and one through/right and three through lanes in the northbound direction (See Draft EIR Appendix L, Appendix B: Intersection Lane Configuration.) Consequently, the commenter is incorrect in asserting that the Draft EIR assumed “during the AM peak period in the northbound direction
During the AM peak hour shows a dedicated right-turn lane.” The intersection was analyzed in the PM peak hour with one through/right and three through southbound lanes and one right-turn and three through lanes in the northbound direction.21

Due to the additional lane in the southbound direction, Intersection 6 should have been analyzed in the AM peak hour with one through/right and three through lanes in the southbound direction.22 This would result in more capacity in the southbound direction and no change in the northbound direction during the AM peak hour. These changes in lane-geometry would not adversely change the intersection operation analysis in the Draft EIR and the Level of Service (LOS) A condition would remain under the existing conditions analysis and the Cumulative plus Project analysis. The significance conclusion remains unchanged.

Due to the additional lane in the southbound direction, Intersection 6 should have been analyzed in the PM peak hour with one through/right and four through lanes in the southbound direction and one through/right and two through lanes in the northbound direction.23 This would result in more capacity in the southbound direction and less capacity in the northbound direction during the PM peak hour. These changes in lane-geometry would not adversely change the intersection operation analysis in the Draft EIR. With the geometry change, the intersection would have a 0.003 increase in V/C ratio from 0.513 to 0.516 and LOS A at the intersection under the Cumulative plus Project condition. The LOS A conditions would remain under the existing conditions analysis and the Cumulative plus Project condition. The significance conclusion remains unchanged.

Revisions are provided in the Final EIR, Chapter 3, Modifications to the Draft EIR, to Table 3.13-13 of the Draft EIR and Table 14 of the Transportation Impact Study (Appendix L of the Draft EIR) (the additional text or modifications are provided in underline and the deletions are shown in strikethrough).

ii. Inglewood Avenue and Robison Street/166th Street (Intersection 7) – The commenter states that separate AM and PM peak hour northbound and southbound lane configurations should have been analyzed. The intersection was originally analyzed in both the AM and PM peak hour with one through/right, two through, and one left-turn lane in the southbound direction and one through/right, two through, and one left-turn lanes in the northbound direction. (See Draft EIR Appendix L, Appendix B: Intersection Lane Configuration.) The commenter is correct in identifying that separate lane configurations should have been analyzed and, as outlined below, these lane configurations have been updated.

The commenter states that the Intersection 7 should have been analyzed in the AM peak hour southbound direction with one right-turn, two through, and one left-turn lane. The City and its consultants reviewed and modified the southbound AM peak hour lane configuration to be more conservative than requested in the comment. More specifically, the lane configuration was modified to one through/right, one through, and one left-turn lane. In this configuration the EIR is not taking credit for the de-facto right turn lane along the red-painted curb.

The commenter also alleges “for the PM peak-hour northbound direction - the graphic should show one left-turn lane, one through lane, and one shared through-right-turn lane.” The lane configuration has been revised to match the requested lane configuration. As the proposed

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21 There are differences between the northbound lane configurations for Intersection 6 during the AM and PM peak hours due to the posted parking prohibitions in the AM peak hour.

22 The analysis at Intersection 6 is also considered conservative because it does not take capacity credit for the southbound left turn lane for Hawthorne Boulevard and 166 St, which passes through Intersection 6.

23 The analysis at Intersection 6 is also considered conservative because it does not take capacity credit for the southbound left turn lane for Hawthorne Boulevard and 166 St, which passes through Intersection 6.
2. Response to Comments

project Cumulative plus Project scenario results in the greatest number of significant intersection impacts, the intersection analysis was updated to reflect less capacity in the southbound direction during the AM peak hour and less capacity in the northbound direction during the PM peak hour. These changes to lane geometry would result in no change to the V/C ratio or LOS condition during the AM peak and a 0.009 increase in V/C ratio from 0.608 to 0.617 and LOS B condition during the PM peak hour at the intersection under Cumulative Plus Project conditions in the Draft EIR. The significance conclusions remain unchanged.

Revisions are provided in the Final EIR, Chapter 3, Modifications to the Draft EIR, to Table 3.13-13 of the Draft EIR and Table 14 of the Transportation Impact Study (Appendix L of the Draft EIR) (the additional text or modifications are provided in underline and the deletions are shown in strikethrough).

iii. Hawthorne Boulevard and 169th Street (Intersection 8) – The commenter states that separate AM and PM peak hour northbound lane configurations were not analyzed. The northbound intersection was analyzed in the both the AM and PM peak hour with one through/right, two through, and one left-turn lane. (See Draft EIR Appendix L, Appendix B: Intersection Lane Configuration.) The commenter states that the intersection should have been analyzed with one through/right, three through, and one left-turn lane in the AM peak hour. The suggested configuration would require four northbound receiving through lanes during the AM peak hour. At the time of the study, the intersection only had three northbound receiving through lanes in both peak hours. Therefore, the suggested configuration would not be possible. Consequently, the configuration utilized in the Draft EIR is more conservative than the requested lane configuration. As stated in the Draft EIR, the proposed project would not result in a significant impact at this intersection under any of the analysis scenarios.

iv. I-405 Southbound Off-Ramp and Redondo Beach Boulevard (Intersection 10) – The commenter states that the southbound configuration should include one left/right lane and one left-turn lane. The intersection was analyzed with one right-turn and one left-turn lane in the southbound direction. (See Draft EIR Appendix L, Appendix B: Intersection Lane Configuration.) While the commenter identification of the southbound lane configuration is correct, the lane configuration analyzed in the Draft EIR is more conservative. The comment’s configuration would increase the capacity of the intersection compared to what was studied in the Draft EIR and improve the intersection LOS. Intersection operations would improve from LOS C to LOS B in the AM peak hour and from LOS D to LOS D in the PM peak hour during the Cumulative plus Project condition. As stated in the Draft EIR, the proposed project would not result in a significant impact at this intersection in any of the analyzed scenarios and, therefore, any increase in intersection capacity would not change the results or findings of the Draft EIR.

Revisions are provided in the Final EIR, Chapter 3, Modifications to the Draft EIR, to Table 3.13-13 of the Draft EIR and Table 14 of the Transportation Impact Study (Appendix L of the Draft EIR) (the additional text or modifications are provided in underline and the deletions are shown in strikethrough).

v. Redondo Beach Boulevard and Artesia Boulevard (Intersection 15) – The commenter states that the northbound configuration depicted in Appendix B of the Transportation Impact Study (TIS) (Appendix L of the Draft EIR) represents Grevillea Avenue. The commenter acknowledges that the intersection has an atypical configuration, but requests that a note be included in Appendix B explaining the figure. Appendix B of the TIS (Appendix L) has been

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24 The differences between the AM and PM peak hour configurations in the northbound and southbound directions is due to the northbound parking prohibition during the AM peak hour and the southbound parking prohibition during the PM peak hour.
updated with a note to explain the configuration of the intersection as it exists. The change to Appendix B is provided in Chapter 3, Modifications to the Draft EIR, of the Final EIR.

vi. Felton Avenue and Grant Avenue (Intersection 21) – The commenter states that right-turn lanes were excluded in the eastbound and westbound direction. The intersection was analyzed with one through/right and one left-turn lane in the eastbound and westbound directions. (See Draft EIR Appendix L, Appendix B: Intersection Lane Configuration.) Due to on-street parking approximately 55 feet from the eastbound limit line and approximately 65 feet from the westbound limit line, the use of a dedicated right-turn lane in the eastbound and westbound directions was not recommended for intersection analysis. The suggested configuration would increase the capacity of the intersection compared to what was studied in the Draft EIR and would improve the intersection LOS. As stated in the Draft EIR, the proposed project would not result in a significant impact at this intersection in any of the analyzed scenarios and, therefore, any increase in intersection capacity would not change the results or findings of the Draft EIR.

vii. Hawthorne Boulevard and 177th Street (Intersection 25) – The commenter states that the eastbound lane configuration should be a left/through lane and right-turn lane. The intersection was analyzed with one left-turn lane and a left/through/right lane in the eastbound direction. (See Draft EIR Appendix L, Appendix B: Intersection Lane Configuration.) The intersection’s existing configuration is striped with a left-turn and through/left at the limit line. A channelized right-turn exists approximately 35 feet away from the eastbound limit line. The suggested configuration is not appropriate given the existing configuration and number of lanes in the eastbound direction of the intersection. To be conservative, the through/left lane was assumed to be left/through/right and the right-turn volume was utilized in the intersection analysis. This conservative assumption resulted in the intersection operating at LOS B and C in the AM and PM peak hours Cumulative Plus Project scenarios, respectively. As stated in the Draft EIR, the proposed project would not result in a significant intersection impact at this location in any of the analysis scenarios.

**Comment AL002-36**

The commenter states that Level of Service (LOS) Worksheets (Appendix F) - Inconsistency in some of the intersection right-turn phasing. These include:

i. Hawthorne Boulevard / I-405 Southbound Ramps (Intersection 4) - should include a southbound overlap phase.

ii. Prairie Avenue / 182nd Street (Intersection 29) – should include a northbound and southbound overlap phase.

**Response to Comment AL002-36**

The commenter addresses right-turn phasing at of some of the study intersections. Each intersection is addressed separately below:

Hawthorne Boulevard and Interstate 405 (I-405) Southbound Ramps (Intersection 4) – The commenter states that a southbound overlap should be included at the intersection. The change to the phasing discussed in the comment is correct and would increase the capacity of the intersection compared to what was studied in the Draft EIR. Due to the
turning movement volumes at the intersection, the inclusion of the southbound overlap does not change the V/C ratio at the intersection. The change to the phasing would result in no change to the intersection LOS in the Cumulative Plus Project condition. The current phasing studied in the Draft EIR is conservative as compared to the requested phasing as less right-turn capacity is provided in the phasing studied. As stated in the Draft EIR, the proposed project would not result in a significant impact at this intersection in any of the analysis scenarios; therefore, any increase in intersection capacity would not change the results or findings of the Draft EIR.

However, signal phasing was revised for the Cumulative Plus Project condition. Due to the turning movement volumes at the intersection, the inclusion of the southbound overlap does not change the V/C ratio at the intersection. The revisions are provided in the Final EIR, Chapter 3, Modifications to the Draft EIR, to Table 3.13-13 of the Draft EIR and Table 14 of the Transportation Impact Study (Appendix L of the Draft EIR) (the additional text or modifications are provided in underline and the deletions are shown in strikethrough).

Prairie Avenue and 182nd Street (Intersection 29) – The commenter states that northbound and southbound overlaps should be included at the intersection. The change to the phasing discussed in the comment is correct and would increase the capacity of the intersection compared to what was studied in the Draft EIR. The change to the phasing would result in an improvement to the intersection LOS. The current phasing studied in the Draft EIR is conservative as compared to the requested phasing as less right-turn capacity is provided in the phasing studied. As stated in the Draft EIR, the proposed project would not result in a significant impact at this intersection in any of the analysis scenarios; therefore, any increase in intersection capacity would not change the results or findings of the Draft EIR.

However, signal phasing was revised for the Cumulative Plus Project condition and the revisions are provided in the Final EIR, Chapter 3, Modifications to the Draft EIR, to Table 3.13-13 of the Draft EIR and Table 14 of the Transportation Impact Study (Appendix L of the Draft EIR) (the additional text or modifications are provided in underline and the deletions are shown in strikethrough).

**Comment AL002-37**

The commenter states, the trip distributions in Figures 6 and 7 (Pages 42 and 43) illustrate the regional trip distribution percentages. No trip assignment graphics are provided with the intersection and driveway trip assignment percentages in order to assess if the site access was properly accounted for in the intersection impact analysis. At the least, Appendix C of the Transportation Impact Study (TIS) (Appendix L of the Draft EIR) should contain driveway trip assignment percentages by turning movement.

**Response to Comment AL002-37**

The commenter states that no trip assignment graphics are provided for intersection or driveways with trip percentages. The commenter acknowledges that Appendix C of the Transportation Impact Study (TIS) (Appendix L of the Draft EIR) does in fact provide the trip assignment percentages, but requests driveway trip assignment. The trip assignment for the study intersections is provided in the tables in Appendix C of the TIS. The title of Appendix C of the TIS will be changed from Project Distribution Estimates to Project Assignment Estimates. The change to Appendix C is provided in Chapter 3, Modifications to the Draft EIR, of the Final EIR. While not
discretely provided, the project trip assignments to the project driveways can be determined from Appendix C of the TIS. Driveway assignment percentages will be included in Appendix C and the updated appendix will be provided in Chapter 3, Modifications to the Draft EIR, of the Final EIR. As stated the response to AL002-29 (above), all net new trips estimated by the project trip generation were assigned to the roadway network per the established distribution patterns. All net new trips were assigned beyond the edge of the study area representing a conservative condition, as no trips would end or begin within the study area.

**Comment AL002-38**

The commenter states that the MXD+ documentation provided in Appendix A states "Short distances to transit help make transit a viable alternative to the automobile”, presumably reduces automobile trip generation for that factor, and then applies the standard CMP automobile trip generation to the transit trip generation ratio. However, no documentation of the transit percentage calculated/assumed in the MDX model is provided the consistency of the assumptions cannot be determined.

**Response to Comment AL002-38**

The commenter states that no documentation of the transit percentage calculated/assumed in the MXD model, is provided. Project-specific outputs and calculations are provided in Chapter 3, Modifications to the Draft EIR, of the Final EIR. The CMP transit analysis used the transit assumptions from the MXD+ model to determine the number of trips that would utilize transit instead of the assumptions provided in the CMP documentation.

**Comment AL002-39**

The SB 743 analysis assumes average retail trip lengths for the proposed project that has an over one million square foot shopping center and 75% of the restaurants meeting the ITE Quality Restaurant definition. This assumption emphasizes that the assumptions utilized in the DEIR understate impacts attributable to the proposed project.

**Response to Comment AL002-39**

The commenter questions the assumptions about retail trip lengths and the Institute of Transportation Engineers classification of the proposed restaurant uses. The Redondo Beach traffic model and SCAG travel demand forecasting model were used in addition to other resources including input and review from Fehr & Peers staff, City of Redondo Beach staff, and South Bay Galleria management staff to determine the distribution of project traffic. Please see response AL002-30 (above) for additional information regarding the distribution of trips to I-405 and other regional roadways.

Pages 3.13-45 and 3.13-46 of the Draft EIR documents the conservatively estimated trip lengths for the project. The average vehicle trip lengths for the project’s various trip types in the Transportation Analysis Zone (TAZ) where the project site is located 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.
These trip lengths reflect the sub-regional nature of the project based on its location and proximity to other retail centers in the South Bay and in the greater Los Angeles area.

All net new trips estimated by the project trip generation were assigned to the roadway network per the established distribution patterns. All net new trips were assigned beyond the edge of the study area representing a conservative condition, as no trips were assumed to end or begin within the study area.

**Comment AL002-40**

The commenter states that based on our peer review of the South Bay Galleria Improvement Project Transportation Impact Study (July 2017), the study contains technical shortfalls as listed above. A primary concern with the analysis pertains to understated traffic impacts resulting from underestimations of the total project vehicle trips, and the trip assignment percentages to and from 1-405 for the proposed project. Underestimates of impacts upon regional routes largely stems from inconsistencies in how the shopping center use was analyzed. The ITE Trip Generation overestimates are fully accounted for, but the potential underestimates are not addressed. As a regional shopping center, and with the expansion and improvements to the existing site and the addition of new land uses, the project would continue to generate a large number of trips from outside the local area, even though it is a mixed-use development. This is overlooked in the trip distribution and assignment methodology that was used. The analysis should have maintained consistency and evaluated the project on a regional scale for both trip generation and trip distribution purposes. As a result, the existing analysis inadequately accounts for regional trips and discounts the potential effects of trips to and from the 1-405. Further, the DEIR does not provide the standard traffic engineering information, such as pass-by trip calculation sheets used to assess the reasonableness of the assumptions. Nor does the DEIR provide worksheets with the assumptions for the mixed-use adjustment calculations. Therefore, the reasonableness of the pass-by and mixed-use assumptions for the analysis cannot be determined.

**Response to Comment AL002-40**


**Comment AL002-41**

Parking. Inadequate parking is provided, and the location of parking for the proposed residential units it is unclear. The project would provide a total of 6,481 parking spaces. Based on the City of Redondo Beach's parking rates, the proposed project would be required to provide 6,812 parking spaces, leaving a clear deficiency of 331 parking spaces. Because of the mixed-use nature of the project, Fehr & Peers conducted a shared parking analysis, located in Appendix I, to determine if the project would provide an adequate parking supply for these shared land uses. The analysis accounted for weekday, weekend, and holiday season (December) parking demands. According to the analysis, the peak parking demand would occur on a weekend day at 2:00 PM with a total of 6,428 parking spaces occupied. It follows that there would be a surplus of 53 spaces, or approximately one percent, of the parking supply would be available at that time. However, the
DEIR does not state that all spaces are shared and it does not show an assignment/reservation of spaces to valet or any individual use; yet the parking analysis appears to be based on that assumption. The conditions of approval need to assure that all spaces will be fully shared, as was assumed.

**Response to Comment AL002-41**

The commenter states that inadequate parking is provided. The commenter also states that the Draft EIR does not state that all spaces will be shared and it does not show an assignment/reservation of the spaces to valet or any individual use. The commenter states that the conditions of approval need to assure that all spaces will be fully shared.

As noted in Section 3.0.3 of the Draft EIR, parking is not considered an environmental impact under CEQA for this project. (Public Resources Code Section 21099(d)(1).) Although not required by CEQA, a shared parking analysis was conducted for the project and the results of the analysis were provided in Draft EIR Section 3.13, page 3.13-20 and Appendix I of the Transportation Impact Study (TIS) which is provided in Appendix L of the Draft EIR. The shared parking analysis identified a peak parking demand of 6,428 parking spaces at 2:00 PM on a weekend day in December. As described in Appendix I of the TIS, the shared parking analysis assumed that the residential units would have 1 parking space reserved for each unit. (Draft EIR Appendix L, Appendix I: Shared Parking Analysis, p. 3.) The residential parking demand not accommodated by these reserved spaces would be accommodated in the proposed project’s shared parking spaces. As identified in the Draft EIR, Section 3.13, Transportation and Traffic on Page 3.13-28 of the Draft EIR, the project’s proposed parking supply of 6,450 parking spaces would be adequate to meet the estimated peak parking demand.

**Comment AL002-42**

The commenter states that with respect to residential units, while some of the parking allotted to residences is reserved to an identified area, it's not clear where the balance of other residential parking will be located. Will additional residential parking be shared in the commercial parking areas? Will non-reserved residential parking be relegated to an area that may be either unavailable or inconveniently located away from the actual units?

**Response to Comment AL002-42**

Although not required by CEQA, a shared parking analysis was conducted for the project and the results of the analysis were provided in Draft EIR Section 3.13, page 3.13-20 and Appendix I of the Transportation Impact Study (TIS) which is provided in Appendix L of the Draft EIR. As described in Appendix I of the TIS, the shared parking analysis assumed that the residential units would have 1 parking space reserved for each unit. The remaining demand of residential parking would be accommodated in the shared parking spaces of the project. Residential parking will be located directly below the residential buildings and will be separated from the commercial spaces and with their own ingress and egress in both above and below grades.
Comment AL002-43

The commenter states that the WSA prepared for the proposed project is inadequate and deficient. It is required to contain sufficient facts to measure the pros and cons of supplying needed project water. (See Vineyard Area Citizens for Responsible Growth v. Rancho Cordova (2007) 40 Cal.4th 412, 430-431.) The WSA fails to do so. "Future water sources for a large land use project and the impacts of exploiting those sources are not the type of information that can be deferred for future analysis." (Id. at 432.) The WSA does not provide sufficient facts for an adequate analysis of the impacts of supplying water to the project.

Response to Comment AL002-43

The commenter cites to Vineyard Area Citizens for Responsible Growth v. [City of] Rancho Cordova (2007) 40 Cal.4th 412, and asserts that the Draft EIR and the Water Supply Assessment did not provide sufficient fact and analysis. The City of Lawndale has not provided this level of detail for their own CEQA analyses. More specifically, the water supply analysis for Lawndale’s 41-unit residential project CEQA analysis (approved in June 2017) stated in its entirety:

Less-Than-Significant Impact. A significant impact would occur if a project were to increase water consumption to such a degree that new water sources would need to be identified or that existing resources would be consumed at a greater pace than planned by purveyors, distributors, and service providers. Potable water for the project would be supplied by the Golden State Water Company, which draws its water supplies from local groundwater and from the Metropolitan Water District of Southern California. Golden State Water Company will require the applicant to submit for project review prior to construction to evaluate whether system modifications are needed to provide adequate water supply to the project, which the applicant would be required to undertake. Impacts would be less than significant. (Lawndale Legacy Mixed Use Development Project MND, p. 31.)

Furthermore, the commenter does not accurately summarize the holding Vineyard and is factually distinguishable. In Vineyard the project involved the development of 22,000 residential units capable of housing 60,000 people, as well as schools, parks, offices, and commercial uses (or roughly the population of the City of Redondo Beach as a whole). The EIR for the Vineyard project also contained (1) inconsistent statements regarding the availability of long term water sources (Id. at 949), (2) contained a significant gap between new water demand and water supply (Id. at 440), (3) contained no analysis of water sources during wet and dry years, and (4) did not contain a discussion of the likelihood of the water supply (Id. at 441). Unlike Vineyard, the South Bay Galleria project is proposing an increase in residential units ranging from 298 to 650. The Galleria EIR analysis contains no discrepancy between long term demand and supply (Appendix J, Section 5, and Tables 8, 9, and 10), contains an analysis of wet and dry years (i.e. drought conditions) (Appendix J, Section 4.5, and Tables 8, 9, and 10; UWMP, Section 5.3), and discusses the likelihood of the supplies (Appendix J, Section 4 through 4.4; UWMP Section 5.4).

26 City of Lawndale May 19, 2016 MND for the Legacy Mixed Use Development: http://www.lawndalecity.org/ASSETS/PDF/CDD/Initial%20Study%20(Legacy%20Mixed%20Use)%201.pdf. This project and MND were approved by City Council as being in compliance with CEQA on June 5, 2017: http://www.lawndalecity.org/HTML/DEPTHTML/CCLERK/CityCouncil/Minutes/CCM060517.pdf
More detailed information was also provided in the 2015 Urban Water Management Plan, which was incorporated by reference. Additionally, as explained by the Supreme Court in *Vineyard*:

“CEQA…does not require a city or county, each time a new land use development comes up for approval, to reinvent the water planning wheel. Every urban water supplier is already required to prepare and periodically update an ‘urban water management plan,’ which must, inter alia, describe and project estimated past, present, and future water sources, supply and demand for at least 20 years into the future…When an individual land use project requires CEQA evaluation, the urban water management plan’s information and analysis may be incorporated into the water supply and demand assessment required by both the Water Code and CEQA ‘[i]f projected demand associated with the proposed project was accounted for in the most recently adopted urban water management plan.”

As noted in the South Bay Galleria WSA (Draft EIR Appendix J): “The 2015 UWMP estimates that the existing water service area population is approximately 105,400 persons, based upon the California Department of Water Resources (DWR) Population Tool, and is estimated to increase to 120,812 by the year 2040 (SA Associates, 2016). The project is expected to add a maximum of 1,008 new residents.” (Draft EIR Appendix J, Section 1.2.) Given this information, the Draft EIR explained that it could be assumed, consistent with Water Code Section 10910(c)(2), that the projected increase in the Torrance Municipal Water District water demand included the proposed project, nevertheless the analysis conservatively assumed the projected water demand associated with the proposed project was additional demand. (Draft EIR page 3.14-25.)

**Comment AL002-44**

In addition, the WSA fails to analyze the effects of any future curtailments of water supplies from the State Water Project and Colorado River Water. The WSA does not discuss what alternatives, if any, there might be in the case of future curtailments of imported water supplies from Metropolitan Water District of Southern California. As such, the WSA does not adequately analyze future water supply availability, and it improperly fails to analyze uncertainties and known contingencies. (Preserve Wild Santee v. City of Santee (2012) 210 Cai.App.4th 260, 283, 285.)

**Response to Comment AL002-44**

The comment cites to *Preserve Wild Santee v. City of Santee*. This case is once again distinguishable in that the Court faulted the EIR for a discrepancy between the EIR’s water demand analysis and the WSA’s analysis and its failure to provide a source of potable water for the 10-acre lake incorporated into the City of Santee project. Furthermore, an EIR need only discuss alternative sources of water if the water sources are determined to be uncertain or unlikely. (*Vineyard* at 432-434.) Consequently, contrary to the commenter’s interpretation, CEQA does not create a general rule that alternative sources of water must be identified in all circumstances. In this instance, the Draft EIR, the WSA, and the UWMP (which was incorporated by reference), described the likely sources of water and determined they are reasonable certain and would have adequate supplies during normal and multiple dry years (Draft EIR Appendix J, Section 4.5; UWMP Section 5.) This included consideration in the UWMP of variables associated with the Colorado River (UWMP Sections 3.3.2, 5.4), Bay Delta concerns (UWMP Section 3.3.3,
5.4.2 [explicitly discussing the “California WaterFix Project”]), West Coast Basin Concerns (UWMP Section 3.3.6), Furthermore, the UWMP described in detail alternative water sources in Sections 2.5, 5.7, 6, and 8, including recycled wastewater, stormwater, grey water, desalinated seawater, and conservation.

The UWMP states that the City of Torrance expects MWD to maintain its Tier 1 limit of 19,204 AFY. But, as stated in the UMWP, the City of Torrance understands that this limit may change in the future. However, the UWMP indicates that 19,204 AFY is a “reasonably available volume” through 2040, and therefore, this volume was used in the WSA analysis.

**Comment AL002-45**

The WSA fails to discuss the status of the State Water Resources Control Board's ongoing hearings on the California WaterFix and what any future failure of the WaterFix project might have on further imported water supplies.

**Response to Comment AL002-45**

Contrary to the assertions in the comment, the WSA incorporated by reference the 2015 UWMP, which discussed the California WaterFix project, as explained in Response AL002-44.

**Comment AL002-46**

The WSA report is inadequate as it does not discuss the effects on groundwater pumping if there are not adequate supplies of either imported water or storm water recharge to replenish the West Coast Basin. Nor does the WSA discuss the status of the buildout of the infrastructure necessary to supply alternative water supplies to the project. Thus, the WSA fails to adequately analyze the possibility of alternative supplies and replacement supplies and the impacts of such supplies. (See Vineyard Area Citizens for Responsible Growth, supra, 40 Cal.4th at 432.)

**Response to Comment AL002-46**

Contrary to the assertions in the comment, both the Draft EIR and the Water Supply Assessment discussed groundwater pumping, including recharge. (Draft EIR Section, Draft EIR Appendix J, Section 4.2.) As discussed in the Draft EIR:

Groundwater has been a relatively small source of water supply and is managed under the 2015 Urban Water Management Plan. Furthermore, this groundwater comes from an Adjudicated Basin. The adjudicated basin limits groundwater pumping to safe yield amounts (safe yield based upon a calculation of rate of groundwater replenishment see 2015 Urban Water Management Plan, West Coast Basin Judgment). Furthermore, the project would increase the impervious surface and on-site stormwater capture thereby providing an increase to groundwater recharge.

In fact, the City of Lawndale, is also subject to the same Adjudicated Basin Judgment and has relied upon its regulations to prevent overdraft in Lawndale’s own CEQA documents. In the
Legacy Mixed Use project MND the City of Lawndale concluded groundwater impacts would be less than significant due to the Adjudicated Basin Judgement:

the [Legacy Mixed Use] project site is located within the West Coast Basin. This basin is adjudicated and is therefore regulated by a Watermaster, the California Department of Water Resources, Southern District. The Watermaster Program ensures that water is allocated by established rights and that only safe yields are produced from the basin. This guarantees that the groundwater levels will not be depleted. Groundwater use as a result of implementing the project would be in accordance with existing plans and projections of the Department of Water Resources and would not substantially deplete groundwater supplies.

Please see Responses AL002-43 and 44 for discussion of Alternative water supplies, which includes recycled wastewater, stormwater, grey water, desalinated Seawater, and conservation. As well as the City’s most recently approved Water Supply projects, including the drilling of two additional wells for the Goldsworth Desalter increasing capacity from 3,500 AFY to 5,000 AFY (UWMP Section 2.2.3 and 2.4) and the Phase V Expansion for the ECLWRF Facility which increased capacity 33 percent. The Draft EIR also analyzed the impacts associated with the infrastructure necessary to provide water services, as noted in in the Project Description pages 2-22 and 2-23 and under Impact UTL-4 in Section 3.14.

Comment AL002-47
The WSA report was inadequate as to the reliability of the imported water supplies for the future.

Response to Comment AL002-47
See Response to Comment AL002-42 through 46.

Comment AL002-48
The commenter states, the comments described above certainly do not represent a complete list, but are demonstrative of the fact that there are many issues related to the proposed project that were not adequately addressed in the DEIR. Lawndale incorporates by reference other public comments submitted upon the DEIR.

Response to Comment AL002-48
Please see the Responses to the other comments contained in Final EIR Section 2, which are incorporated herein by reference.

Comment AL002-49
CEQA was enacted to ensure environmental protection and encourage governmental transparency. (Citizens of Goleta Valley v. Bd. of Supervisors (1 990) 52 Cal. 3d 553, 564.) CEQA requires full disclosure of a project's significant environmental effects so that decision makers and the public are informed of these consequences before the project is approved, to ensure that government officials are held accountable for the consequences. (Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California (1988) 47 Cal.3rd 376, 392.) In order to satisfy CEQA and protect the quality of life in the surrounding region, Lawndale requests that if the project is not rejected outright, that the DEIR be revised to address
the deficiencies identified in these comments and be recirculated to the public prior to preparation of a final EIR.

**Response to Comment AL002-49**

The commenter’s opinion is noted. Please see Response to Comments AL002-1 through AL002-48.

**Comment AL002-50**

The members of the Lawndale City Council would like to make it clear that the City has significant concerns about the proposed project, as it is presented in the DEIR. Given the significance of impacts the proposed project will have upon Lawndale and the surrounding region, we request that the public be granted more than the minimum comment period of forty-five (45) days. Furthermore, we encourage City of Redondo Beach to work with Lawndale, as well as the communities adjacent to the project site, to arrive at a solution that is a benefit, rather than a burden, to the surrounding area as a whole.

**Response to Comment AL002-50**

Please see Response to Comments AL002-1 through AL002-49. Consistent with the published Notice of Availability, the Galleria Draft EIR comment period ended on September 11, 2017 at 5:30 PM.

**Comment Letter AL003: City of Torrance**

**Comment AL003-1**

The City of Torrance has reviewed the Draft EIR for the proposed project and has the following comments related to the proposed Analyzed Project and Alternatives scenarios Numbers 2 through 4:

1) Traffic/The three significantly impacted intersections without identified mitigation of Artesia Blvd/Prairie Ave, Artesia Blvd/405 Freeway and Artesia Blvd/Hawthorne Blvd are all either entirely or partially located within the City of Torrance. Secondly, there does not appear to be sufficient analysis of potential cut-through traffic through the residential street of 177th Street at Prairie Avenue and the function of 177th Street between Hawthorne and Prairie as a local collector. In addition to further analysis of 177th Street, the City of Torrance suggests that the mitigation analysis expand to on-site design measures such as providing funding to Metro to accelerate light rail extensions to the site ahead of existing Metro forecasts and the incorporation of private service roads that afford for improved on-site circulation. These measures would both create capacity on the impacted intersections and avoid unnecessarily directing vehicle trips onto area roads to further reduce the potential impacts on them and the existing adjacent residential uses.

**Response to Comment AL003-1**

The commenter states that three significantly impacted intersections in the City of Torrance were identified without any feasible mitigation measures. These intersections include Prairie Avenue and Artesia Boulevard, I-405 Northbound Ramps and Artesia Boulevard, and Hawthorne...
Boulevard and Artesia Boulevard. The Draft EIR identified six significantly impacted intersections under the Cumulative plus Project scenario without mitigation. The Draft EIR identified the intersections of Inglewood Avenue and Artesia Boulevard, Redondo Beach Boulevard and Artesia Boulevard, Prairie Avenue and Artesia Boulevard, and I-405 Southbound Ramp and Artesia Boulevard as locations where physical improvements (mitigation measures) were determined to be feasible. The Draft EIR identified the intersections of Hawthorne Boulevard and Artesia Boulevard and I-405 Northbound Ramps and Artesia Boulevard as locations where physical improvements were determined to be infeasible.

The commenter also states, “there does not appear to be sufficient analysis of potential cut-through traffic through the residential street of 177th Street at Prairie Avenue and the function of 177th Street between Hawthorne and Prairie as a local collector.” The distribution of traffic generated by the proposed project considered roadway congestion that might cause vehicles to seek alternative travel routes. As discussed under Vehicle Trip Distribution in Draft EIR Section 3.13.4 “[t]he SCAG model assignment accounts for congested travel time on roadways and iteratively assigns trips until equilibrium is reached.” The potential use of 177th Street as a route for project traffic to and from the east is unlikely due to slower speeds on 177th Street, mainly due to the higher number of stop- or signal-controlled intersections as compared to the arterials of Artesia Boulevard and 182nd Street. 177th Street’s location and orientation in the roadway network would only make it a potential alternative route to Artesia Boulevard or 182nd Street from Hawthorne Boulevard to Prairie Avenue. Vehicles attempting to travel further east than I-405 would need to either use Artesia Boulevard or 182nd Street. Travel along Artesia Boulevard or 182nd Street would require vehicles to travel through signalized intersections at Hawthorne Boulevard and Prairie Avenue. Travel along 177th Street would require vehicles to travel through two Two-Way Stop Controlled (TWSC) intersections at Amie Avenue and Prairie Avenue and the signalized intersections at Prairie and Artesia Boulevard or 182nd Street, respectively. These intersection controls on 177th Street do not lend 177th Street to be a faster route to Artesia Boulevard 182nd Street, as vehicles traveling through TWSC intersections typically experience longer periods of delay waiting for an adequate gap in traffic before turning onto or crossing the roadway.

The comment letter also states: “The City of Torrance suggests that the mitigation analysis expand to on-site design measures such as providing funding to Metro to accelerate light rail extensions to the site ahead of existing Metro forecasts and the incorporation of private service roads that afford for improved on-site circulation.” Pages 2.313-20 through 3.13-21 of the Draft EIR identify Transportation Demand Management (TDM) measures that will be required by the City of Redondo Beach for the project. These measures include improvements to bicycle and pedestrian facilities, such as bicycle parking facilities and sidewalks and other pathways providing access to the external pedestrian and bicycle system. To be conservative the traffic analysis did not take a quantitative trip generation credit for the TDM measures required of the project. A TDM Plan is also already required as part of Mitigation Measure GHG-1.

While the commenter suggests “design measures’ the only specific suggestion was payment of fees to Metro to accelerate a potential green-line extension. The commenter’s suggestion is considered speculative, lacks evidence that it would reduce or avoid the proposed project’s
significant and unavoidable impacts, and is unlikely to accelerate implementation of a potential green line extension.

While metro prepared an Alternatives analysis study in 2009 for a potential Green Line Extension, and began preparation of a Draft EIR/EIS in 2012, Metro did not ultimately release an EIR and stopped work on a potential green-line extension until very recently. (See Response to Comment AR003-8). Metro has confirmed that if they were to move forward with a Green-line extension, such a project would not begin construction until 2028 at the earliest, and would not be operational for at least three years thereafter. Metro has indicated that they are only beginning to move forward with a second Alternatives analysis study (Comment AR003-8), which would then require preparation of an EIR, and subsequent construction of the project. Furthermore, in 2016, Metro received a massive increase in funding, through the County-wide adoption of Measure M, which is anticipated to raise approximately $120 billion over the lifespan of the sales tax incorporated therein. Additionally, the project site is already required to pay a fair share of a potential green-line extension through the payment of sales tax, with the Galleria being one of the City of Redondo Beach’s largest sales tax generators. Payment of additional fees from the proposed project is unlikely to accelerate potential development of a green-line extension, which is largely limited by the long planning and input process from Metro, as well as the environmental review process. For example, during the last planning phase, Metro requested input from numerous neighboring jurisdictions over a three-year period. As noted in Response to Comment AL002-18, some of these jurisdictions, such as the City of Lawndale actively opposed a light rail extension. While the City of Redondo Beach will continue to consult with Metro on a potential Green line extension, payment of additional fees is not likely to expedite this process for the reasons described above.

Additionally, depending upon the nature of Alternatives proposed by Metro (i.e. below grade, above grade, at-grade, specific route selected, etc.), there is a potential that a light rail extension could exacerbate Intersection LOS and would not mitigate any of the significant and unavoidable intersection impacts. Given the early stage in Metro’s planning process, the likelihood that a potential green-line extension would mitigate a specific intersection impact is also considered speculative.

Comment AL003-2

2) Land Use and Compatibility/It is the City of Torrance's understanding that in some of the Alternative Scenarios, the proposed structure placements along the northwest corner of Hawthorne/177th Street and the structure would involve 4 or more levels above the adjacent street grade along Hawthorne Blvd with a zero or minimal landscape setback. The City of Torrance is concerned with the transition in mass and scale from the proposed structure and the existing single-family residences that exist to the east of the Hawthorne Blvd service road, along both 176th and 177th Streets, in the City of Torrance. These single-family residential structures range between 16 feet to a maximum of 27 feet in height per the present R-1 zoning. The incorporation of comparable/mirroring service roads or on-site circulation roads, along the Hawthorne Blvd frontage, with a minimum landscape setback of at least 12 feet would better allow for a vertical vegetative screen and the potential of accommodating mature tree canopy capacity. Secondly, placing elevator shafts and mechanical equipment further west of the
proposed structures would help minimize the associated mechanical infrastructure that would likely extend the height of the proposed residential structures beyond what has been analyzed.

**Response to Comment AL003-2**

As discussed in Section 3.0.3. “‘Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment,’ (Public Resources Code Section 21099(d)(1)).” The comment raises concern that the proposed project and alternatives would not result in a compatible land use based upon setbacks, however the comment does not cite to a specific General Plan Policy or a specific Alternative.

While Land Use Element Policy 1.41.7(a) does refer to reducing height and mass on *Kingsdale Avenue*, this policy is not applicable to 176th and 177th Streets or Hawthorne Boulevard.

Nevertheless, the proposed project includes buffers for the three residential structures on the northwest corner of Hawthorne Boulevard and 176/177 Street (similar to Alternative 2 – see Figure 4-1). As shown in Draft EIR Figure 2-7, that corner is proposed to have a surface parking lot and landscaping. Furthermore, the 3-story structures proposed along Hawthorne Boulevard are angled and create buffered landscaped areas ranging from 20 to 70 feet from the western border of the roadway. Furthermore, the existing three residences east of the project site are located approximately 180 feet from the western border of Hawthorne Boulevard. Consequently, the closest residences will be located at distances ranging from 200 to 250 feet from the proposed project structures. The massing of the proposed project along Hawthorne Boulevard can be seen in the section view rendering of the Draft EIR, Chapter 2.0, *Project Description*, Figure 2-9, with massing relief provided throughout the structures in regard to varying heights and the landscaping between the buildings. The estimated shade shadow from the proposed project of minimal cast across Hawthorne Boulevard. Based on the Shade and Shadow Analysis found in Appendix C of the Draft EIR, it was determined that these homes would not be in shade/shadow for a majority of the day. According to the analysis, shade and shadows are estimated to only extending across Hawthorne Boulevard during the afternoon timeframe of the winter months, with December 22 being the timeframe analyzed.

As discussed in Section 4.0, *Alternatives*, of the Draft EIR, Alternative 3 does not include a residential component on the northwest corner of the Hawthorne Boulevard and 176/177 Street. Under Alternative 3, a parking structure is proposed on the northwest corner of Hawthorne Boulevard and 176/177 Street, with the building height for the structure anticipated to be well below the maximum height. The anticipated setback for the parking structure from Hawthorne Boulevard provided. While Alternative 4 does include the development of residential structures on the northwest corner of Hawthorne Boulevard and 176/177 Street, a similar setback is provided from Hawthorne Boulevard as part of this Alternative. The public entry and exit points on Hawthorne Boulevard under both Alternative 3 and Alternative 4 would remain. However, under Alternative 4, entry and exit points onto Hawthorne Boulevard for the residential structure, as shown in Figure 4-13, would be in line with 176th Street. Based on the analysis of the Draft EIR, and the Shade and Shadow Analysis found in Appendix C of the Draft EIR, it was determined that these homes would not be in shade/shadow for a majority of the day.
The commenter states “The incorporation of comparable/mirroring service roads or on-site circulation roads, along the Hawthorne Blvd frontage, with a minimum landscape setback of at least 12 feet would better allow for a vertical vegetative screen and the potential of accommodating mature tree canopy capacity.” The intended meaning of this request is not entirely clear (i.e. incorporation of comparable/mirroring service roads.” The commenter also states, “placing elevator shafts and mechanical equipment further west of the proposed structures would help minimize the associated mechanical infrastructure that would likely extend the height of the proposed residential structures beyond what has been analyzed.” As noted at the beginning of this response, the commenter has not identified any significant impact that the suggestions would reduce or avoid. Additionally, the Draft EIR expressly disclosed heights based upon Top of Roof (T.O. Roof), and Top of Parapet (T.O. Parapet, which included roof top structures). (See Draft EIR Figure 4-1.) Similar information was provided in the Figures for Alternatives 2, 3, and 4. (See Draft EIR Section 4.) Additionally, Draft EIR page 2-3 expressly defined “Height” by RBMC Section 10-2.402(a)(33) and 10-2.1522, which provide explicit discussion of “projections above permitted height” including mechanical equipment. Furthermore, existing regulations already require that roof top mechanical equipment be screened from the adjacent uses. (RBMC Section 10-2.1530.) While the commenter’s suggestions do not relate to an environmental issue, the suggestions are included in the Final EIR for consideration by the decision-makers.

Comment AL003-3

In addition to environmental notifications, the City of Torrance requests that it be added to the notification list of all future public hearing notifications. Please send said notifications to:

Jeffrey W. Gibson, Director
Torrance Community Development Department
3031 Torrance Blvd. Torrance CA 90503

Response to Comment AL003-3

Thank you for your comment, your contact information has been included. While the comment does not directly address an environmental issue, 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 AL003-4

The commenter states as the project is situated along the shared Redondo Beach and Torrance City Boundary, the City of Torrance requests the inclusion of Torrance property owners located within the notification area of all future environmental and public hearing notifications. Attached is a property owner notification list of properties located within the City of Torrance that are most likely to be impacted by the project and are within 500 feet of Hawthorne Blvd.

Response to Comment AL003-4

Thank you for your comment, this contact information has been included. While the comment does not directly address an environmental issue, 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 AL003-5
Should the City of Redondo Beach, or the project applicant, need to contact the City of Torrance please do not hesitate to contact the Planning Division of the Community Development Department at 310-618-5990.

Response to Comment AL003-5
Thank you for your comment, your contact information has been included. While the comment does not directly address an environmental issue, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

2.3.5 Organizations

Comment Letter OR001: Gabrieleno Band of Mission Indians – Kizh Nation

Comment OR001-1
Please see attachment
Sincerely,
Brandy Salas

Andrew Salas, Chairman
Gabrieleno Band of Mission Indians–Kizh Nation
PO Box 393
Covina, CA 91723
cell: (626)926-4131
email: gabrielenoindians@yahoo.com
website: www.gabrielenoindians.org

Response to Comment OR001-1
Thank you for your comment. 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 OR001-2
Please find this letter as a written request for consultation regarding the above-mentioned project pursuant to Public Resources Code§ 21080.3.1, subd. (d). Your project lies within our ancestral tribal territory, meaning belonging to or inherited from, which is a higher degree of kinship than traditional or cultural affiliation. Your project is located within a sensitive area and may cause a substantial adverse change in the significance of our tribal cultural resources. Most often, a records search for our tribal cultural resources will result in a "no records found" for the project area. The Native American Heritage Commission (NAHC), ethnographers, historians, and professional archaeologists can only provide limited information that has been previously documented about California Native Tribes. This is the reason the NAHC will always refer the lead agency to the respective Native American Tribe of the area because the NAHC is only aware of general information and are not the experts on each California Tribe. Our Elder Committee &
tribal historians are the experts for our Tribe and are able to provide a more complete history (both written and oral) regarding the location of historic villages, trade routes, cemeteries and sacred/religious sites in the project area. Therefore, to avoid adverse effects to our tribal cultural resources, we would like to consult with you and your staff to provide you with a more complete understanding of the prehistoric use(s) of the project area and the potential risks for causing a substantial adverse change to the significance of our tribal cultural resources.

Consultation appointments are available on Wednesdays and Thursdays at our offices at 910 N. Citrus Ave. Covina, CA 91722 or over the phone. Please call toll free 1-844-390-0787 or email gabrielenoindians@yahoo.com to schedule an appointment.

**Prior to the first consultation with our Tribe, we ask all those individuals participating in the consultation to view a video produced and provided by CalEPA and the NAHC for sensitivity and understanding of AB52. You can view their videos at: http://calepa.ca.gov/Tribal/Training/ or http:/nahc.cu.gov/2015/12/ab-52-tribal-training/**

**Response to Comment OR001-2**

The letter appears to be a form letter which has been sent to other public agencies.27 As discussed in the Draft EIR, Section 3.3, Cultural Resources (pages 3.3-12 through 13), the commenting party had drafted a consultation letter sent to the City of Redondo Beach on April 26, 2016, included as Appendix B1 to this Final EIR As reported in the Draft EIR, the City consulted with the Gabrieleno Band of Mission Indians–Kizh Nation including a phone call with Chairperson Andrew Salas on September 29, 2016, Mr. Salas indicated that archaeological monitoring, in lieu of a Native American monitor, would be adequate if the City would notify him in the event that prehistoric archaeological materials were encountered. Such provisions were incorporated into the Condition of Project Approval (COA CUL-1 through 3), as noted Draft EIR, Section 3.3, Cultural Resources, pages 3.3-18 through 19. At that time, it was determined that consultation was concluded. This oral consultation was also summarized in the attached memorandum, prepared shortly after that phone call (Phone call September 29, 2016; Memorandum prepared October 6, 2016), included in Final EIR, Appendix B2.

**Comment Letter OR002: Golden State Environmental Justice Alliance**

**Comment OR002-1**

Please find attached comments for the record on behalf of Golden State Environmental Justice Alliance regarding the proposed South Bay Galleria project EIR.

**Response to Comment OR002-1**

Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. The comment does not raise any environmental issues; therefore, no further response is required.

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Comment OR002-2

The commenter states, thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed South Bay Galleria project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. The commenter states the project consists of commercial, residential, and hotel development. The project proposes 1,300,565 square feet total of commercial uses, including department stores, shops, dining, independent retail stores, hotel, and the existing enclosed mall and theater uses (1,287 seats). The residential component includes 650 residential units on two separate pads.

One residential building is proposed on the southwest portion of the site and the second is proposed on the southeast portion of the site. Recreational amenities on-site would include a pool and spa area, fitness center, conference room, resident's lounge and catering kitchen, and outdoor lounge seating with a fire pit. A 150 room hotel is also proposed. The project would also include an expansion of the Redondo Beach Police substation that is currently located at the South Bay Galleria.

Response to Comment OR002-2

Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. The comment does not raise any environmental issues; therefore, no further response is required.

Comment OR002-3

The commenter states construction of the proposed project would occur over approximately three years and seven months from April 2020 through November 2023. Construction activities would be limited to 7:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturdays. No construction activities are proposed on Sundays and holidays. The retail portions of the proposed project are anticipated to have similar hours of operation as the existing mall from about 10:00 a.m. to 1:00 a.m. depending upon the use, with exceptions before and during holidays. The hotel lobby would be open to visitors 24 hours; however, the hotel amenities such as the pool and gym would likely not be open past 12:00 a.m. The dining areas as part of the project would typically be open until 2:00 a.m. The parking structures would be open 24 hours.

Response to Comment OR002-3

Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. The comment does not raise any environmental issues; therefore, no further response is required.
Comment OR002-4

2.8 Intended Uses of the EIR / Project Approvals

The EIR indicates that the proposed project will require discretionary approvals of a Vesting Tentative Tract Map, Variance, Shared Parking, and Conditional Use Permit(s). The project description does not provide any information regarding the details of each request. Further, there is no discussion of these discretionary approvals in the Land Use and Planning section of the EIR or anywhere else within the EIR. The EIR must be revised to provide details regarding the proposed discretionary approvals in order to comply with CEQA's requirements for meaningful disclosure.

Response to Comment OR002-4

The commenter alleges that the project description must be revised “to provide details regarding the proposed discretionary approvals in order to comply with CEQA…”

Contrary to these assertions, this level of detail is not required under CEQA. CEQA Guidelines Section 15124 which states that “[t]he description of the project shall contain the following information but should not supply extensive detail beyond that needed for evaluation and review of the environmental impact…(d) A statement briefly describing the intended uses of the EIR (B) A list of permits and other approvals…” (emphasis added; CEQA Guidelines Section 15124). Consistent with this provision Draft EIR Section 2.8 includes a list of project approvals. No additional information was required.

Similar issues were also raised and rejected by the Court of Appeal in Ogawa v. City of Palo Alto (Nonpublished; 6th App. Dist., 2013, Case No. H037950). In Ogawa petitioners alleged “…the negative declaration did not adequately describe the project because it did not reference the capital improvements program or the VTA grant application.” (Slip Opinion at 8.) In denying the petition on these grounds the Court noted:

Appellants do not argue here that the negative declaration inadequately described the physical elements of the Project. At issue is whether City was required to include certain administrative decisions or approvals in its description of the Project...Case law likewise has noted that “project” “refers to the underlying activity which may be subject to approval by one or more governmental agencies; it does not refer to each of the several approvals sequentially issued by different agencies.” (Committee for a Progressive Gilroy v. State Water Resources Control Bd. (1987) 192 Cal.App.3d 847, 863.) ...Here, the “underlying activity” potentially impacting the environment consists of the streetscape enhancement improvements described above. The negative declaration and the attached study describe the physical aspects of these improvements and analyze their potential impacts in detail. The documents provide (1) a commonly used named for the project, e.g. “California Streetscape Improvements—Phase II”; (2) a map showing the location; (3) a finding that the Project could not have a significant impact on the environment; and (4) an initial study documenting the reasons to support the finding. Appellants do not dispute the accuracy of any of these descriptions or findings…

The omitted actions here—the passage of a resolution and the approval of a financing mechanism—had no direct physical impacts whatsoever. To the extent these actions had indirect physical effects, e.g. by allowing the Project to proceed, these effects consisted
entirely of the physical impacts of the approved street enhancement activities, which were already analyzed in the negative declaration and the attached initial study.

In other words, the negative declaration properly reviewed the potential impacts of the project as a whole. Therefore, appellants’ contention that City should have separately reviewed the impact of purely non-physical, administrative activities associated with the Project—the physical impacts of which had already been reviewed in their entirety—lacks merit. (Slip Opinion at 9-11.)

**Comment OR002-5**

The commenter states that:

"The EIR states that ‘the specific boundaries and the projected growth within those boundaries for the cumulative study area of each environmental issue are identified in the applicable environmental issue sections’. Each section of the EIR discusses cumulative impacts, but does not provide a list of cumulative projects identified for analysis or the scope of the cumulative study area. The commenter states the EIR must be revised to include the location, name, and distance from the project site for each cumulative project considered for analysis and they must be pictured on a map for identification in order for public verification of the adequacy of the cumulative impact analysis (CEQA § 15130).

**Response to Comment OR002-5**

The comment incorrectly equates two separate and distinct concepts associated with cumulative analyses: (1) the geographic scope of the environmental analysis, e.g. the number/location of intersections considered in the Draft EIR (CEQA Guidelines Section 15130(b)(3)), and (2) cumulative growth, either based upon a list of projects or growth projections, e.g. how much cumulative growth in traffic is anticipated to occur at those intersections (CEQA Guidelines Section 15130(b)(1)).

In asserting that the EIR must be revised to include the location, name and distance from the project site, the commenter is impliedly stating that the EIR must use the list of projects approach. However, the commenter is incorrect. As described in Draft EIR Section 3.0.4, the CEQA Guidelines provides two different approaches to cumulative impact analyses, either (1) a list of projects approach, or (2) growth projections. (CEQA Guidelines Section 15130(b); see also Rialto Citizens for Responsible Growth v. City of Rialto (2012) 208 Cal.App.4th 899, 928-931 [EIR not required to use the list of project’s approach to comply with CEQA, and can rely upon growth projections contained in the SCAG travel demand model].) As noted in the South Bay Galleria Draft EIR “The majority of cumulative analyses use a population growth rate of 0.38 percent per year, which was obtained from the SCAG Integrated Growth Forecast for the City of Redondo Beach.” Other analyses, such as water supply, are based upon growth projections in the Urban Water Management Plan, which was incorporated by reference (see Draft EIR Table 3.14-2, Appendix J, Table 6). However, given that the commenter does not reference any specific resource area or analysis, no further response is possible.
Comment OR002-6

The commenter states the project description states that construction activities would be limited to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturdays. No construction activities are proposed on Sundays and holidays. Both statements are in accordance with Section 4-24.503: Construction Noise of the Redondo Beach Municipal Code. The Air Quality Analysis is inconsistent with the project description as only a 5 day construction week with a maximum 8 hour construction day was analyzed. The EIR does not provide a "worst-case scenario" analysis of construction equipment emitting pollutants for the legal 11 hours per weekday plus 8 hours on Saturday, which is the proposed construction schedule in the EIR. It is legal for construction to occur for much longer hours and an additional day (6 days per week including Saturday) than modeled in the Air Quality Analysis. The Air Quality modeling must be revised to account for these legally possible longer construction days and increased number of construction days as described in the project description.

Response to Comment OR002-6

The commenter asserts that the EIR must “provide a ‘worst-case scenario’ analysis of construction equipment" and asserts that the EIR must assume that every piece of construction equipment is operating continuously during each day that construction activity is legally allowed under the City’s noise ordinance. As outlined below, (1) the commenter does not correctly summarize CEQA’s legal requirements, (2) the Draft EIR made appropriately conservative assumptions about the number of hours each day construction equipment would operate, (3) most of the Air Quality analyses are based upon mass daily thresholds and would be unaffected by the commenter’s request to change the number of days, (4) the only air quality analysis which was not based upon daily thresholds utilized cumulative annual assumptions over the full construction period, and made numerous highly conservative assumptions and does not need to be updated, as outlined below. Nevertheless, an updated HRA analysis was performed utilizing 6 days, and impacts were still determined to be less than significant, as outlined in greater detail below.

As an initial matter, the commenter does not cite to any rule of law requiring an EIR to utilize a worst case analysis, in fact, CEQA provides for analysis of “reasonably foreseeable” impacts. (CEQA Guidelines Section 16064(d), 15358.) Furthermore, this assertion has been rejected by the Court of Appeal. More specifically, the Court of Appeal has explained that “A public agency can make reasonable assumptions based on substantial evidence about future conditions without guaranteeing that those assumptions will remain true…” (Environmental Council of Sacramento v. City of Sacramento (2006) 142 Cal.App.4th 1018; Save Round Valley Alliance v. County of Inyo (2007) 157 Cal.App.4th 1437 [holding the DEIR did not need to assume second dwelling unit [theoretical build-out] would be constructed even though allowed by zoning.]; Saltonsall v. City of Sacramento (2015) 234 Cal.App.4th 549 [Rejecting argument that the EIR needed to assume super-capacity crowds that would occur only 0.3 percent of the time].

The commenter also asserts that the construction air quality analysis should have assumed that every piece of construction equipment was operating every minute of every day that construction activity is legally allowed under the City’s noise ordinance (i.e. 8 hours per day up to 11 hours per day). As detailed in this response, the City made appropriately conservative assumptions: (1) that every piece of construction equipment would be operating for 8 hours a day, and (2) that
numerous pieces of construction equipment would be operating simultaneously, despite that fact that some of this equipment cannot physically occur simultaneously. (Draft EIR Appendix D, pdf pp. 8-9)

CalEEMod provides default assumptions based on survey data from actual construction projects that have occurred throughout the state, taking into account the size of the site, the type of construction, and the typical construction day length. The hours of operation per day varies by equipment type and construction phase, however the maximum daily hours of operation for any piece of equipment under the CalEEMod default is 8 hours. Therefore, consistent with the CalEEMod defaults for most equipment and in exceedance of the defaults for others, all equipment onsite was assumed to operate for 8 hours per day. (Draft EIR Appendix D, pdf pp. 8-9.) The only time that equipment is emitting pollutants is when it is running. While the construction day is allowed by City Ordinance to be 11 hours, it is not a given that the site will be active for the full 11 hours. Throughout work days, equipment will be idle for reasons such as scheduled lunch and other breaks for the operators, daily briefings, equipment checks, and scheduled maintenance/monitoring/refueling activities where the equipment would not be operating, as well as other reasons described below.

The HRA assumes constant emissions at full power over an 8-hour work shift. However, it is not typical for all the equipment to be used all day, every day onsite. There may be days where a grader is running 5 hours, and a scraper running 6 hours, but you typically won’t have both a grader and a scraper operating simultaneously for 8 hours per day because they accomplish different tasks for the same area and cannot physically occupy the same space at the same time. Based on survey data from actual construction projects, the Federal Highway Administration (FHWA) developed equipment-specific usage factors for construction equipment, which has been incorporated into the noise analyses (refer to Table 3.9-9 Construction Equipment Noise Level Emissions on page 3.9-19 in the Noise Section of the Draft EIR). Based on the FHWA data, construction equipment is not used at full power consistently over a given work day, but rather for a portion of a workday generally ranging from approximately 10 percent to 50 percent depending on the equipment and activity type. Therefore, because the emissions modeling for the HRA assumes all equipment operates at full power on the same day continuously for 8 hours, and assumes that the construction equipment operations overlap, the modeling provides a highly conservative emissions and exposure estimate.

Similar issues arose in the Court of Appeal wherein, Petitioners challenged the use of the CalEEMod assumptions. See Coalition for Preservation of Arroyo v. City of Pasadena (2015) Unpublished Case No. B255824 [“The Coalition further maintains that the City failed to accurately estimate travel distances of event visitors in evaluating air quality impacts. The EIR estimated that patrons’ average vehicle trip length to the Rose Bowl for attendance of the NFL games would be 45 minutes long. The EIR reasoned that this trip length represented a reasonable

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30 Daily emissions are determined by the amount of grams per horsepower hour emitted by each piece of equipment when operating at full power. When the equipment is not operating a full horsepower, less grams of pollutant are emitted for that time.
average trip length for football fans in the Los Angeles area based on default factors from CalEEMod (an emissions calculations model). The South Coast Air Quality Management District, which is the air pollution control agency for urban Los Angeles county, specifically suggested the City utilize CalEEMod to estimate emissions... The Coalition provides no evidence that the City erred in calculating the average trip length. As no local trip length data existed for NFL games and as the pertinent air pollution control agency recommended the CalEEMod model, we conclude that the City’s choice of methodology regarding the trip distance was also reasonable and supported by substantial evidence.”

The second component of the comment is the assertion that the Draft EIR Air Quality analysis should have assumed that construction was occurring over 6 days a week instead of 5 days a week, again citing to the City’s noise ordinance.

Nearly all of the Air Quality analyses were based upon *daily thresholds* and are unaffected by the number of days assumed in the analysis. As shown in Draft EIR Table 3.1-5, SCAQMD’s Regional Air Quality significant thresholds are based upon “Mass Daily Thresholds.” Similarly, the Localized Significance Thresholds (LST) are based upon daily thresholds (i.e. pounds/day). (See Draft EIR Table 3.1-8.) Similarly, the CO Hot Spot Analysis is based upon “vehicles per day.” (Draft EIR page 3.1-26.) Consequently, none of these analyses would be affected by the second component of the comment. For example, the demolition phase assumes that on a worst case day there would be 4 air compressors, 3 backhoes, 1 crushing/processing equipment, 1 loader, 1 sweeper/scrubber, and 8 haul trucks operating for 8 hours per day resulting in 45 lbs/day of NOx being emitted per day. This 45 lbs/day would be emitted every day these pieces of equipment operated together, and therefore would not change the daily emissions levels regardless of if construction occurred 5 or 6 days per week.

The only air quality analysis that did not utilize daily thresholds was the screening Health Risk Analysis (HRA) provided on Draft EIR page 3.1-34. Carcinogenic risk, as calculated in a numeric, probabilistic HRA, is based on a lifetime exposure; meaning the primary influence on health risk is the total exposure (total days) and not the specific construction schedule. As outlined below, this analysis made numerous highly conservative assumptions.

The construction Diesel Particulate Matter (DPM) HRA was performed using AERSCREEN due to the potential for on-site construction emissions to present a health risk to nearby sensitive receptors. The AERSCREEN model produces estimates of "worst-case" 1-hour concentrations without taking into account site specific information such as weather patterns, elevation, and topography, which can dissipate and dilute emissions. For this highly conservative screening HRA, that maximum hour assumes that the worst case hour (highest emissions) of each construction phase is occurring simultaneously where construction subphases have the potential to overlap during the construction year. So, for example, in 2019 the grading phase (114 days), drainage phase (108 days), building phase (715 days (260 per year for the analysis)), and architectural coating phase (506 days (260 days per year for the analysis)) would potentially occur on the same days for a limited amount of time during this year. The total PM10 emissions for this year (adding emissions from each subphase together) were used to evaluate risk during that year. While building and architectural coating may occur for more than the 260 days,
drainage and grading would occur for significantly less, but the analysis assumed 260 days of exposure to the total emissions (PM10 emissions from all four subphases added together).

Further, the HRA assumed that worst case hour would occur throughout each day of each sub-phase, when experience based on real-life examples (see FWHA discussion above) show that activity and the resultant emissions vary hour-by-hour, and day-to-day. Also, this HRA projected these worst-case hourly emissions to a 260 workday year, which is based on 5 days a week, 52 weeks a year, and does not account for holidays, rain delays, etc. when there would be little to no activity on-site. This means that while the emissions throughout each year of construction would vary based on the construction sub-phases, the analysis assumed a constant exposure throughout an entire construction year, therefore conservatively overestimating the exposure during that year. For example, while the demolition phase is only anticipated to occur for 231 days, the risk assessment assumed that exposure from that phase would occur for 260 days. These assumptions, in conjunction with the use of the AERSCREEN model, therefore conservatively overestimates exposure, and overestimates the potential risk to the nearby sensitive receptors. While the risk levels would be different based on the number of days per year construction occurs, the analysis as provided is a screening level analysis that was conservatively conducted and therefore, as detailed above, overestimates risk as analyzed.

While the original analysis does not need to be revised due to the conservative as detailed above, a refined analysis was preformed to include the 312 day per year exposure frequency (6 days per week, 52 weeks per year) as proof that the original analysis was conservative and the Draft EIR findings are accurate as presented. In the revised analysis the assumptions were refined to 6 days per week (312 days per year). In addition to using a 6 day per week exposure frequency, the revised analysis was also refined to take into account the specific number of days each subphase would occur. Even with these changes the analysis still remains conservative due to the fact that the analysis does not account for holidays and rain days and the use of the AREScreen model, as described above. While the updated analysis has exposure over more days per year, with the incorporation of total number of days of each subphase, the potential cancer risk drops to 6.7 per million, which is less than the 9.24 per million reported in the Draft EIR. Therefore, the significance findings of the Draft EIR are not changed and further, impacts would be reduced from what was conservatively analyzed in the Draft EIR. The calculations for the revised health risk assessment are included in Appendix D1 of the Final EIR.

The Greenhouse gas analysis also analyzes impacts based on an annual threshold. However, with respect to construction the analysis methodology totals all emissions from construction and divides them by a 30-year project lifetime (based on the SCAQMD methodology as detailed on page 3.5-11 of the Draft EIR. Additionally, when the construction emissions were calculated, the pounds per day (lbs/day) for each construction subphase were multiplied by the total number of days for each subphase and then converted into metric tons (MT). For example, in the demolition phase, total lbs/day for CO2e is approximately 9,235. Multiplied by 231 days of exposure equals approximately 2,133,170 lbs over the entire demolition phase, which equates to approximately 968 metric tons per year. Because the GHG emissions analysis took into account the total number of days per construction subphase, and the analysis calls for amortized construction emissions (total construction emissions divided by a 30 year project lifetime), the greenhouse gas
construction emissions used in the Draft EIR would not change regardless of if construction occurred 5 days per week or 6 days per week. Therefore, the analysis in the Draft EIR is accurate as reported.

**Comment OR002-7**

The commenter states the EIR identifies the closest sensitive receptors as single- and multi-family residences located west of the project site across Kingsdale Avenue (approximately 55 feet/16 meters), single family residences east of the project site across Hawthorne Boulevard (approximately 170 feet/50 meters), and the residential community to the north of Artesia Boulevard (approximately 240 feet/73 meters). The Air Quality Analysis defaults back to the SCAQMD minimum 82 foot distance for sensitive receptors even though the closest sensitive receptors are 55 feet (approximately 1/3 closer) than analyzed.

**Response to Comment OR002-7**

The commenter is referring to the 82-foot distance that was used in the localized air quality analysis. The SCAQMD has developed localized significance thresholds (LSTs) to determine whether or not construction and operation activities would create a significant adverse localized air quality impact on nearby sensitive receptors. The LSTs developed by the SCAQMD are based on the pounds of emissions per day that can be generated by a project without causing or contributing to adverse localized air quality impacts, and only applies to the following criteria pollutants: CO, NOX, PM10, and PM2.5. For the purpose of analyzing localized air quality impacts, the SCAQMD has developed LST values for distances of 82, 164, 328, 656, and 1,640 feet from the emissions source for three project site sizes: 1 acre, 2 acres, and 5 acres. The project localized air quality analysis used the most conservative screening analysis of a 1-acre site for construction activities and a 5-acre site for operational activities with receptors at a distance of 82 feet. Additionally, the SCAQMD LST methodology states that “[p]rojects with boundaries located closer than 25 meters [82 feet] to the nearest sensitive receptors should use the LSTs for receptors located at 25 meters [82 feet].” As shown in Tables 3.1-10 and 3.1-11, localized construction and operational emissions, respectively, would not exceed SCAQMD LST thresholds and impacts would be less than significant. Therefore, although the sensitive receptors located west of the project site across Kingsdale Avenue are closer than 82 feet, the LST analysis was correctly conducted using the SCAQMD guidance for LST analysis at the 82 feet distance.

**Comment OR002-8**

The commenter states the project specific modeling must be completed in order for the EIR to meaningfully disclose all potential air quality impacts. Further, the EIR does not specify where on their property the distance to the project site is measured. This is significant because the proposed site plan shows the operational Service Entry/Exit and Public Entry/Exit adjacent to the homes on Kingsdale Ave. The measurement must be taken from the property line closest to the project site in order to fully analyze potential air quality impacts.

Response to Comment OR002-8

As stated above in Response to Comment OR002-7, the LST analysis was done correctly according to the SCAQMD LST guidelines. The measurement for the sensitive receptors across Kingsdale Avenue was measured from the residence to the closest project site boundary across Kingsdale Avenue. The project localized air quality analysis used the most conservative screening analysis of a 1-acre site for construction activities and a 5-acre site for operational activities with receptors at a distance of 82 feet. As shown in Tables 3.1-10 and 3.1-11, localized construction and operational emissions, respectively, would not exceed SCAQMD LST thresholds and impacts would be less than significant. Since the LST significance thresholds were not exceeded, further modeling is not necessary to determine impacts to sensitive receptors based on SCAQMD LST guidelines which state that if the calculated emissions for the proposed construction or operational activities are below the LST emission levels found on the LST lookup tables, then the proposed construction or operation activity is not significant.

Comment OR002-9

The CalEEEMod output tables of the Air Quality Analysis (Appendix D) included construction mitigation measures (Section 3.1 within the tables). These mitigation measures include:

- Use Cleaner Engines for Construction Equipment
- Use Soil Stabilizer
- Replace Ground Cover
- Water Exposed Area
- Reduce Vehicle Speed on Unpaved Roads
- Clean Paved Roads

Response to Comment OR002-9

Please see Response to Comment OR002-10. Additionally, the commenter incorrectly combines two separate assumptions when stating “Reduce Vehicle Speed on Unpaved Roads Clean Paved Roads.” Draft EIR Appendix D, Section 3.1 has this separated into two distinct assumptions “Reduce Vehicle Speeds on Unpaved Roads” and “Clean Paved Roads.”

Comment OR002-10

No mitigation measures are proposed or discussed in the EIR. Each potential impact discussed in the EIR concludes by stating that no mitigation measures are required. The Air Quality Analysis applied mitigation measures to reduce potential impacts without discussion in the EIR. Burying this information in technical tables of an Appendix does not comply with CEQA's requirements for meaningful disclosure. These mitigation measures must be meaningfully enforceable by the Lead Agency with follow-up compliance inspections (CEQA § 21081.6 (b)).

Response to Comment OR002-10

As outlined in detail in the response below, the commenter’s references to “mitigation measures,” are not mitigation measures as that term is used under CEQA, rather the measures referenced in the Air Quality Appendix are assumptions utilized in the CalEEEMod program which incorporate existing regulations which were fully disclosed in the Draft EIR. As discussed by the Court of Appeal “An agency may rely on generally applicable regulations to conclude an environmental impact will not be significant and therefore does not require mitigation.” (San Francisco
The CalEEMod output tables in Appendix D that the commenter refers to utilize default naming conventions generated from CalEEMod. The CalEEMod model is limited as to how project design features can be entered into the model, in most cases the most efficient way to account for these in the model is the use of the “mitigation” feature. This includes selections which consist of assumptions for off-road construction equipment, which are labeled by CalEEMod as “mitigation measures,” such as boxes with supplemental information for fugitive dust emissions. In these options an individual can select which construction equipment will be Tier 4, which then shows up under Section 3.1, Construction Mitigation Measures, in the CalEEMod output as “Use Cleaner Engines for Construction Equipment.” For construction fugitive dust emissions, the “Use Soil Stabilizer”, “Replace Ground Cover”, “Water Exposed Area”, and “Reduce Vehicle Speed on Unpaved Roads”, and “Clean Paved Roads” show up under Appendix D, Section 3.1, Construction Mitigation Measures. However, these are not mitigation measures in the context of CEQA because construction projects in the South Coast Air Basin have to comply with SCAQMD Rule 403, which requires that all of these measures be utilized by the project under existing regulations. Since CalEEMod is a model for the entire state and not all Air Basins will have the same mandatory requirements, CalEEMod labels compliance with existing regulations in the South Coast Air Basin as mitigation measures. Therefore, these aren’t truly mitigation measures in the true sense of a mitigation measure for CEQA.

As stated above, the project checked all the boxes that were required by Rule 403. The discussion of these measures for Rule 403 was described in the Draft EIR on page 3.1-28:

It is mandatory for all construction projects in the SCAB to comply with SCAQMD Rule 403 for controlling fugitive dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas [i.e., “Soil Stabilizers” and “Water Exposed Areas”], reestablishing ground cover as quickly as possible [i.e. “replace ground cover”], utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site [i.e. maintaining Clean Paved Roads], covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12 inches, and maintaining effective cover over exposed areas [i.e. maintaining Clean Paved Roads]. Compliance with Rule 403 and Rule 1113 (governing VOC content of architectural coatings), as a pre-existing regulatory requirements, were accounted for in the construction emissions modeling. Rule 1113 is included as part of the default modeling scenario.

As also discussed in greater detail in Response to Comment OR002-11, the Draft EIR also extensively discussed existing Tier 4 Construction equipment requirements (i.e. Use Cleaner Engines for Construction Equipment). Similarly, SCAQMD Rule 403, Control Measure 13-1 and
Control Action 4(a) and (b) also include “Limit Vehicle speeds to 15 miles per hour” on unpaved roads and staging areas (i.e. Reduce Vehicle Speed on Unpaved Roads).

As stated by the commenter, each potential impact discussed in the EIR concluded that there were no significant air quality impacts and no mitigation measures were required. This is a true statement, as the mitigation measures referred to in Section 3.1, Construction Mitigation Measures in Appendix D are not true mitigation measures, but project specific adjustments that can be made in CalEEMod to reflect compliance with Rule 403 and similar regulations. There was no attempt to bury this information in the Appendix, as noted above, this information was fully disclosed in the Draft EIR. The Air Quality analysis complies with CEQA’s requirements for meaningful disclosure.

Comment OR002-11

Further, the CalEEEMod [sic] run 3/14/2017 indicates that Reduction Measures during construction were implemented based on Project Design features that "Tier 4 Or equivalent Onsite Equipment" will be used and "All Haul Trucks shall be equal to or better than the 2012 fleet Emission Standards". The analysis finds this results in a 93.92% reduction of ROG, 90.21% reduction of NOX, 83.41% reduction in CO, 11.36% reduction in SOX, 99.29% reduction in PM10, and 99.29% reduction in PM2.5 emissions compared to a "standard fleet" (no baseline or definition of ‘standard fleet’ is provided). These Project Design features are not discussed anywhere in the EIR, required as mitigation measures, or enforced by the Lead Agency as a condition of approval with follow-up compliance inspections. The EIR must be revised to accurately describe the proposed Project Design features in order to be an adequate informational document.

Response to Comment OR002-11

The commenter asserts that the EIR does not discuss “project design features” related to Tier 4 construction equipment requirements. Contrary to this assertion, Tier 4 construction equipment was discussed in the Draft EIR. As noted on Draft EIR, page 3-2: “Regulatory Setting Describes the federal, state, regional, and local laws and regulations that will shape the way development occurs on the project site.” The Air Quality regulatory discussion in Draft EIR Section 3.1.3 expressly states:

The federal government sets fuel efficiency standards for construction equipment. The first federal standards (Tier 1) were adopted in 1994 for all off-road engines over 50 horsepower (hp) and to be phased in by 2000. In 1998 a new standard was adopted that introduced Tier 1 for all equipment below 50 hp and introduced the Tier 2 and Tier 3 standards. Tier 2 and Tier 3 standards for all equipment was to be phased in by 2008. Tier 4 efficiency requirements are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068 (originally adopted in 69 Federal Register 38958 [June 29, 2004], and were most recently updated in 2014 [79 Federal Register 46356]). Emissions requirements for new off-road Tier 4 vehicles are to be completely phased in by the end of 2015.

Additionally, as noted in the Air Quality Appendix, Appendix D of the Draft EIR, Tier 4 engines were discussed under Project Construction Assumptions which states that “all off-road equipment with a horsepower (HP) greater than 50 will be USEPA certified Tier 4 interim engines or
engines that are certified to meet or exceed the NOx emission ratings for USEPA Tier 4 interim engines.” In addition to the requirements for off-road equipment, the Project Construction Assumptions also state “all hauling of soils and debris will use a vehicle fleet that consists of trucks with a manufacturer year of 2012 or newer, or meets or exceed the emissions standards of trucks manufactured in 2012.”

The reductions shown in Appendix D, that the commenter discusses, are as compared to a standard fleet, which is a fleet that is in compliance with the scheduled turnover timelines of less efficient equipment and therefore may have equipment that does not meet the Tier 4 standards. In CalEEMod, the default, or standard fleet, assumes that the construction fleet will incorporate newer equipment as older/less efficient equipment is aged out. Therefore, based on the construction year a standard construction fleet is assigned an emission factor that assumes that a small percentage of the fleet would be Tier 4, and that the remainder of the fleet would be made up of older, less efficient equipment including some Tier 0 and Tier 1 pieces. This results in a higher emission rate and therefore greater exhaust emissions than is expected from a fleet consisting of all Tier 4 or Tier 4 equivalent equipment.

As discussed in the Construction Assumptions in Appendix D, the project did state that Tier 4 would be used for all equipment over 50 hp and that the haul trucks for soil and debris would consist of a fleet with a manufacturer year of 2012 or newer for equipment under 50 hp. Since these are part of the construction assumptions, they are not mitigation measures under CEQA. As shown above, they were discussed in the Draft EIR and Appendix D. The City believes these assumptions to be reasonable given that these regulations have been in the Federal Register since 2004, and will have been fully implemented for a five-year period before construction begins in 2020, and are believed to be readily available by the time construction begins. Nevertheless, the Draft EIR’s Project Description (page 2-28) has been updated to include a discussion of the construction fleet. In addition, the Air Quality Section (page 3.1-20) has been modified to direct the reader to the Project Description for further information on the project design features included in the modeling. Additionally, footnote 20 included on page 3.1-27, the footnote in Table 3.1-7, and the footnote in Table 3.1-10 have been revised to clarify the modeling scenario used.

As noted in Response OR002-10, public agencies can rely upon existing regulations in their environmental analysis. (Citizens for Environmental Responsibility v. State ex rel. 14th Dist. Ag. Assn. (2015) 242 Cal.App.4th 555, 574 [pre-existing manure maintenance program was not a mitigation measure and could be considered in the pre-mitigation significance conclusion.]; see also SCAQMD CEQA Handbook guidance (1993) “…mitigation refers to actions beyond those required by rules or ordinances.” (SCAQMD 1993 CEQA Handbook page 9-15.) See also Response OR002-6 noting that public agencies can make reasonable assumptions. Nevertheless, the following Condition of Approval has been added to address the commenter’s concerns:

Condition of Approval: Construction shall include the required use of Tier 4 off-road Construction Equipment and a haul truck fleet that meets or exceeds the emissions standards of a 2012 truck engine.
Comment OR002-12
Additionally, the Project Description states an approximately "100-foot by 100-foot construction equipment staging area" would be used during construction and "the location will vary to accommodate with the phasing of the project. Approximately 1 acre of project site would be paved for this staging area". The CalEEMod [sic] outputs do not indicate that the staging area in its various locations and multiple pavings were included for analysis.

Response to Comment OR002-12
The commenter states that the CalEEMod outputs do not indicate the staging area in its various locations and multiple pavings was included in the analysis. The CalEEMod outputs do not directly call out the staging area separately, but paving was included in the CalEEMod run as shown in Appendix D, which include operational paving for the project site, as well as the construction staging area. (Draft EIR Appendix D, pdf pages, 5, 7, 47.) Additionally, paving was included for every year of construction for the maximum phasing overlap scenario as shown in Appendix D. Therefore, multiple phasing times, which would include different areas, were accounted for in the analysis.

Comment OR002-13
For the operational analysis, the emissions from the discontinued existing uses at the project site were calculated and deducted from the emissions of the proposed project to present net operational emissions rates. The net operational rate of emissions does not accurately disclose the impact of the proposed project. Even though some of the existing uses will end, they will be inherently replaced because the existing site is 971,101 SF of uses and the proposed project includes 1,950,565 SF of uses. Deducting the emissions of the existing uses is not appropriate and presents a skewed analysis of the operational impacts of the proposed project. Applying this methodology to another area of analysis, such as noise, would further demonstrate how it is not appropriate. The previous uses generated a certain dBA of noise, and deducting their dBA generation from the dBA levels generated by the new project would not present an accurate analysis of the potential noise impacts from the new project.

Response to Comment OR002-13
The commenter faults the EIR Air Quality analysis for “deducting emissions of the existing uses.” As summarized in the Draft EIR, Section 3.1, Air Quality, and detailed in Appendix D of the Draft EIR, Air Quality Calculations, the existing emissions calculations included all current operations at the project site, at the time of the NOP, whose operation would continue if the proposed project is not approved. The proposed project emissions included all new buildings that would be constructed and older buildings that would be renovated under the proposed project and all existing South Bay Galleria buildings currently in operation, that would not be demolished under the proposed project. As shown in the analysis, proposed project emissions were not just calculated for the buildings being constructed or renovated under the proposed project. Thus, to get a realistic picture of the total emissions that would be generated under the proposed project, the existing emissions were subtracted from the proposed project emissions (which included proposed new uses and existing uses) to arrive at net emissions from the new uses as shown in Table 3.1-8 of the Draft EIR, Proposed Project Unmitigated Operational Emissions. This
approach is consistent with the definition of baseline conditions pursuant to CEQA. Therefore, only net new emissions, that the proposed project would generate, need to be compared to the SCAQMD significance thresholds.

This methodology is consistent with CEQA’s impact analysis methodology, which is based upon an increase above existing conditions. (CEQA Guidelines Sections 15125(a), 15126.2(a) “In assessing the impact of a proposed project on the environment, the Lead Agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published.” This is also consistent with SCAQMD’s 1993 CEQA Handbook, which states “As part of the impact analysis…the existing level of background emissions and local air quality need also be taken into account.” (SCAQMD 1993 CEQA Handbook, Section 7.2.) In fact, the State Air Resources Board (“ARB”) utilizes the same methodology in their own CEQA documents. For example, the Draft EIR Operational Air Quality analysis for ARB’s Consolidation Project (Testing Facility) stated:

To evaluate the potential environmental impacts of employee commuting changes associated with moving the testing functions from Los Angeles and El Monte to Riverside…Using the traffic analysis and current commutes for employees, the net mobile vehicle mileage (project less existing conditions) at opening day was estimated to be 4,003,440 miles per year. (ARB Consolidation Project FEIR\textsuperscript{32} pp. 5.3-33 through 5.3-36)

(See also Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal.App.4th 1059 [“The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope”].) For discussion of noise please also see Response to Comment OR002-18 through 21.

**Comment OR002-14**

The project description indicates that a fireplace will be included as an amenity for the residences and it was not evaluated in the CalEEEMod analysis.

**Response to Comment OR002-14**

The commenter is incorrect, the Draft EIR project description does not state that fireplaces would be included as an amenity for residences. Nevertheless, the CalEEEMod analysis, did conservatively include fireplaces in the modeling (see Appedix D, electronic PDF pages 25, 142 and 152). Additionally, as discussed in Chapter 2.0, Project Description, page 2-21, recreational amenities on-site would include a pool and spa area, fitness center, conference room, resident’s lounge and catering kitchen, and outdoor lounge seating with a fire pit or water feature. (See also SCAQMD Rule 445(d) which prohibits installation of wood burning fireplaces in new development.)

To the extent the commenter is referencing the “fire pit,” this is a common area fire pit not one provided for each individual residence. As noted above, under SCAQMD Rules this fire pit

would not be wood burning, but would burn natural gas. This fire pit was not originally included in the CalEEMod analysis. However, as noted under CEQA Guidelines Section 15151 “An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible.” The fire pit’s emissions would be minor in comparison to the rest of the project’s emissions. Nevertheless, additional modeling was performed which conservatively assumed that there would be two fire pits in the outdoor recreation areas for the residences and that they would each operate 6 hours a day for 91 days per year. This assumption was used for modeling purposes and for the updates to the GHG analysis. These assumptions were used such that the EIR emissions would convey a worst case emissions estimates. As shown in the CalEEMod runs for the fire pit, see Final EIR Chapter 3, Modifications to the FEIR, the fire pits would add approximately 0.01 lbs/day of ROG, 0.10 lbs/day of NOx, 0.03 lbs/day of CO, less than 0.01 lbs/day of Sox, and 0.01 lbs/day of both PM_{10} and PM_{2.5}. Emissions from the fire pits would change Table 3.1-8, Proposed Project Unmitigated Operational Emissions, as follows:
TABLE 3.1-8
PROPOSED PROJECT UNMITIGATED OPERATIONAL EMISSIONS

<table>
<thead>
<tr>
<th>Emissions Source</th>
<th>Estimated Emissions (lbs/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>ROG</td>
</tr>
<tr>
<td>Existing</td>
<td></td>
</tr>
<tr>
<td>Area Sources a</td>
<td>25.93</td>
</tr>
<tr>
<td>Energy Sources b</td>
<td>0.10</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>74.52</td>
</tr>
<tr>
<td>Total Existing Emissions</td>
<td>100.55</td>
</tr>
<tr>
<td>Proposed Project</td>
<td></td>
</tr>
<tr>
<td>Area Sources a</td>
<td>50.45</td>
</tr>
<tr>
<td>Energy Sources b</td>
<td>0.62</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>61.77</td>
</tr>
<tr>
<td>Fire Pits</td>
<td>0.01</td>
</tr>
<tr>
<td>Total Project Emissions</td>
<td>112.83</td>
</tr>
<tr>
<td>Net Project Increase</td>
<td></td>
</tr>
<tr>
<td>Area Sources a</td>
<td>24.51</td>
</tr>
<tr>
<td>Energy Sources b</td>
<td>0.51</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>(12.75)</td>
</tr>
<tr>
<td>Fire Pits</td>
<td>0.01</td>
</tr>
<tr>
<td>Total Net Project Emissions</td>
<td>12.28</td>
</tr>
<tr>
<td>Regional Significance Threshold</td>
<td>55</td>
</tr>
<tr>
<td>Significant Impact?</td>
<td>No</td>
</tr>
</tbody>
</table>

NOTES: Area sources include emissions from consumer product use, architectural coating and landscape equipment. Energy source include natural gas use for heating/cooling as well as electrical consumption. Use of parenthetical notation indicates a negative value.

SOURCE: ESA CalEEMod Modeling 2016 (based on Appendix D of this Draft EIR)

As shown, the addition of the fire pits, running for 6 hours per day, would not result in a violation of the regional significance thresholds. Therefore, regional air quality impacts would still be less than significant.
Emissions from the fire pits would change Table 3.1-11, Proposed Project Localized Operational Emissions, as follows:

<table>
<thead>
<tr>
<th>Development Phases</th>
<th>Estimated Emissions (lbs/day)</th>
<th>NOx</th>
<th>CO</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing</td>
<td>3.80</td>
<td>10.62</td>
<td>1.37</td>
<td>0.44</td>
<td></td>
</tr>
<tr>
<td>Project</td>
<td>18.65</td>
<td>70.16</td>
<td>3.21</td>
<td>1.98</td>
<td></td>
</tr>
<tr>
<td>Fire Pits</td>
<td>0.01</td>
<td>0.03</td>
<td>0.01</td>
<td>0.01</td>
<td></td>
</tr>
<tr>
<td>Net Project Increase</td>
<td><strong>14.85</strong></td>
<td><strong>59.54</strong></td>
<td><strong>59.57</strong></td>
<td><strong>1.54</strong></td>
<td><strong>1.55</strong></td>
</tr>
<tr>
<td>Localized Significance Threshold</td>
<td>109</td>
<td>1823</td>
<td>4</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Significant Impact?</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

SOURCE: ESA CalEEMod Modeling 2016 (based on Appendix D of this Draft EIR)

As shown, the addition of the fire pits, running for 6 hours per day, would not result in a violation of the localized significance thresholds. Therefore, localized air quality impacts would still be less than significant.

For the GHG analysis, the addition of the fire pits, running for 6 hours per day for 91 days was assumed, this would add about 4 tons per year of CO₂e to the project GHG emissions. As shown in Table 3.5-3, Estimated Construction and Operations-Related GHG Emissions for Calculating GHG Emissions per Service Population, the small addition of CO₂e resulting from the fire pits would not change the analysis of per service population. Impacts would still remain significant as follows:

<table>
<thead>
<tr>
<th>Emissions Source</th>
<th>Estimated Emissions CO₂e (MT/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing Sources Associated with the Project Site</td>
<td></td>
</tr>
<tr>
<td>Area Sources</td>
<td>&lt;1</td>
</tr>
<tr>
<td>Energy Consumption</td>
<td>4,138</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>30,034</td>
</tr>
<tr>
<td>Solid Waste</td>
<td>992</td>
</tr>
<tr>
<td>Water Consumption</td>
<td>550</td>
</tr>
<tr>
<td>Total Existing Emissions</td>
<td>35,713</td>
</tr>
<tr>
<td>Proposed Project (2022)</td>
<td></td>
</tr>
<tr>
<td>Area Sources</td>
<td>152</td>
</tr>
<tr>
<td>Energy Consumption*</td>
<td>6,872</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>36,921</td>
</tr>
<tr>
<td>Emissions Source</td>
<td>Estimated Emissions CO₂e (MT/yr)</td>
</tr>
<tr>
<td>-----------------------</td>
<td>----------------------------------</td>
</tr>
<tr>
<td>Solid Waste</td>
<td>1,106</td>
</tr>
<tr>
<td>Water Consumption</td>
<td>737</td>
</tr>
<tr>
<td>Fire Pits</td>
<td>4</td>
</tr>
<tr>
<td><strong>Total Project Emissions</strong></td>
<td><strong>45,788 45,792</strong></td>
</tr>
<tr>
<td><strong>Net Emissions Increase</strong></td>
<td><strong>10,075 10,079</strong></td>
</tr>
<tr>
<td>Area Sources</td>
<td>152</td>
</tr>
<tr>
<td>Energy Consumption</td>
<td>2,734</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>6,888</td>
</tr>
<tr>
<td>Solid Waste</td>
<td>115</td>
</tr>
<tr>
<td>Water Consumption</td>
<td>187</td>
</tr>
<tr>
<td>Fire Pits</td>
<td>4</td>
</tr>
<tr>
<td><strong>Total Net Emissions Increase</strong></td>
<td><strong>10,075 10,079</strong></td>
</tr>
<tr>
<td>Annual Amortized Construction (30 years)</td>
<td>345</td>
</tr>
<tr>
<td><strong>Total Project Emissions (2022)</strong></td>
<td><strong>10,420 10,424</strong></td>
</tr>
<tr>
<td>Service Population (SP) (Net)</td>
<td>1,933</td>
</tr>
<tr>
<td>Emissions per SP (MTCO₂e/yr/SP)</td>
<td>5.4</td>
</tr>
<tr>
<td>2020 Efficiency Threshold</td>
<td>4.4</td>
</tr>
<tr>
<td>Exceed 2020 Efficiency Threshold?</td>
<td>Yes</td>
</tr>
<tr>
<td>Significant?</td>
<td>Yes</td>
</tr>
<tr>
<td>2022 Efficiency Threshold</td>
<td>4.2</td>
</tr>
<tr>
<td>Exceed 2022 Efficiency Threshold?</td>
<td>Yes</td>
</tr>
<tr>
<td>Significant?</td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Proposed Project (2035)</strong></td>
<td></td>
</tr>
<tr>
<td>Area Sources</td>
<td>152</td>
</tr>
<tr>
<td>Energy Consumption</td>
<td>5,684</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>37,809</td>
</tr>
<tr>
<td>Solid Waste</td>
<td>1,106</td>
</tr>
<tr>
<td>Water Consumption</td>
<td>624</td>
</tr>
<tr>
<td>Fire Pits</td>
<td>4</td>
</tr>
<tr>
<td><strong>Total Project Emissions</strong></td>
<td><strong>46,375 45,379</strong></td>
</tr>
<tr>
<td><strong>Net Emissions Increase</strong></td>
<td><strong>9,662 9,666</strong></td>
</tr>
<tr>
<td>Annual Amortized Construction (30 years)</td>
<td>345</td>
</tr>
<tr>
<td><strong>Total Project Emissions (2035)</strong></td>
<td><strong>10,006 10,010</strong></td>
</tr>
</tbody>
</table>
2. Response to Comments

<table>
<thead>
<tr>
<th>Emissions Source</th>
<th>Estimated Emissions CO₂e (MT/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Service Population (SP) (Net)(^c)</td>
<td>1,933</td>
</tr>
<tr>
<td>Emissions per SP (MTCO₂e/yr/SP)</td>
<td>5.2</td>
</tr>
<tr>
<td>2035 Efficiency Threshold</td>
<td>2.5</td>
</tr>
<tr>
<td>Exceed 2035 Efficiency Threshold?</td>
<td>Yes</td>
</tr>
<tr>
<td>Significant?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

CO₂e= carbon dioxide equivalent; MT/yr = metric tons per year.
Values may not add exactly due to rounding
Parenthetical usage represents a negative.

a. The energy-related GHG emissions, as estimated by CalEEMod, use 2013 Title 24 energy usage rates. Therefore, the project incorporates the additional reductions associated with the 2016 Title 24 energy efficiencies as the project is subject to them.
b. GHG emissions reductions associated with water use resulting from compliance with CALGreen requirements, which requires a minimum 20 percent reduction in indoor water use and the provision of irrigation controllers for outdoor water use, were accounted for in CalEEMod model run.
c. Net emissions equal the total project emissions minus the emissions from the existing operations. Because the emissions are compared to the threshold using a net increase, the service population represents the net increase in service population.

SOURCE: ESA CalEEMod Modeling 2017 (Appendix G)

As with the project without the fire pits, the project with the fire pits would still exceed the 2020 efficiency threshold of 4.4 MT CO₂e project level per service population. Additionally, the project with fire pits exceeds the interim 2022 efficiency threshold of 4.2 MT CO₂e, and the 2035 threshold of 2.5 MT CO₂e annually. Therefore, based on using the 4.4 MT CO₂e threshold, and the 2022 and 2035 efficiency thresholds, GHG emissions resulting from project implementation with the fire pits would still be considered significant without mitigation. Therefore, Mitigation Measures GHG-1 would still be required to lower GHG emissions to a less than significant level.

Table 3.5-5, Mitigated Construction and Operations-Related GHG Emissions for Calculating GHG Emissions Per Service Population, shows the reduced GHG emissions associated with the implementation of mitigation measure MM GHG-1 for the project with the fire pits. As shown in the table, implementation of these measures will reduce emissions from the proposed project plus the fire pits to below the 2020, 2022, and 2035 thresholds. Therefore, the proposed project impacts including the fire pits would be reduced to less than significant levels with implementation of Mitigation Measures GHG-1.
**TABLE 3.5-5**

**MITIGATED CONSTRUCTION- AND OPERATIONS-RELATED GHG EMISSIONS FOR CALCULATING GHG EMISSIONS PER SERVICE POPULATION**

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>Estimated Emissions CO\textsubscript{2}e (MT/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Existing</strong></td>
<td></td>
</tr>
<tr>
<td>Area Sources</td>
<td>&lt;1</td>
</tr>
<tr>
<td>Energy Consumption</td>
<td>4,138</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>30,034</td>
</tr>
<tr>
<td>Solid Waste</td>
<td>992</td>
</tr>
<tr>
<td>Water Consumption</td>
<td>550</td>
</tr>
<tr>
<td>Total Existing Emissions</td>
<td>35,713</td>
</tr>
<tr>
<td><strong>Proposed Project (2020/2022)</strong></td>
<td></td>
</tr>
<tr>
<td>Area Sources</td>
<td>12</td>
</tr>
<tr>
<td>Energy Consumption\textsuperscript{a}</td>
<td>4,685</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>36,921</td>
</tr>
<tr>
<td>Solid Waste</td>
<td>1,106</td>
</tr>
<tr>
<td>Water Consumption\textsuperscript{b}</td>
<td>741</td>
</tr>
<tr>
<td>Fire Pits</td>
<td>4</td>
</tr>
<tr>
<td>Total Project Emissions</td>
<td>43,466 43,470</td>
</tr>
<tr>
<td><strong>Net Emissions Increase\textsuperscript{c}</strong></td>
<td></td>
</tr>
<tr>
<td>Area Sources</td>
<td>12</td>
</tr>
<tr>
<td>Energy Consumption\textsuperscript{a}</td>
<td>548</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>6,888</td>
</tr>
<tr>
<td>Solid Waste</td>
<td>115</td>
</tr>
<tr>
<td>Water Consumption\textsuperscript{b}</td>
<td>191</td>
</tr>
<tr>
<td>Fire Pits</td>
<td>4</td>
</tr>
<tr>
<td>Mitigation</td>
<td></td>
</tr>
<tr>
<td>Electrical Offset \textsuperscript{d}</td>
<td>(2,331)</td>
</tr>
<tr>
<td><strong>Total Net Emissions Increase</strong></td>
<td>7,608 7,612</td>
</tr>
<tr>
<td>Annual Amortized Construction (30 years)</td>
<td>345</td>
</tr>
<tr>
<td><strong>Total Project Emissions (2022)</strong></td>
<td>7,962 7,957</td>
</tr>
<tr>
<td>Service Population (SP) (Net)\textsuperscript{c}</td>
<td>1,933</td>
</tr>
<tr>
<td>Emissions per SP (MTCO\textsubscript{2}e/yr/SP)\textsuperscript{a}</td>
<td>4.1</td>
</tr>
<tr>
<td>2020 Efficiency Threshold</td>
<td>4.4</td>
</tr>
<tr>
<td>Exceed 2020 Efficiency Threshold?</td>
<td>No</td>
</tr>
<tr>
<td>Significant?</td>
<td>No</td>
</tr>
<tr>
<td>2022 Efficiency Threshold</td>
<td>4.2</td>
</tr>
<tr>
<td>Exceed 2022 Efficiency Threshold?</td>
<td>No</td>
</tr>
<tr>
<td>Significant?</td>
<td>No</td>
</tr>
</tbody>
</table>
### Emission Source Estimated Emissions CO\(_2\)e (MT/yr)

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>Estimated Emissions CO(_2)e (MT/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Proposed Project (2035)</strong></td>
<td></td>
</tr>
<tr>
<td>Area Sources</td>
<td>12</td>
</tr>
<tr>
<td>Energy Consumption(^a)</td>
<td>5,684</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>37,809</td>
</tr>
<tr>
<td>Solid Waste</td>
<td>1,106</td>
</tr>
<tr>
<td>Water Consumption(^b)</td>
<td>624</td>
</tr>
<tr>
<td>Fire Pits</td>
<td>4</td>
</tr>
<tr>
<td><strong>Total Project Emissions</strong></td>
<td>45,236 45,240</td>
</tr>
<tr>
<td><strong>Net Emissions Increase</strong></td>
<td></td>
</tr>
<tr>
<td>Area Sources</td>
<td>12</td>
</tr>
<tr>
<td>Energy Consumption(^a)</td>
<td>1,546</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>7,775</td>
</tr>
<tr>
<td>Solid Waste</td>
<td>115</td>
</tr>
<tr>
<td>Water Consumption(^b)</td>
<td>75</td>
</tr>
<tr>
<td>Fire Pits</td>
<td>4</td>
</tr>
<tr>
<td><strong>Mitigation</strong></td>
<td></td>
</tr>
<tr>
<td>Electrical Offset</td>
<td>(5,054)</td>
</tr>
<tr>
<td><strong>Total Net Emissions Increase</strong></td>
<td>4,355 4,359</td>
</tr>
<tr>
<td>Annual Amortized Construction (30 years)</td>
<td>345</td>
</tr>
<tr>
<td><strong>Total Project Emissions (2035)</strong></td>
<td>4,700 4,704</td>
</tr>
<tr>
<td>Service Population (SP) (Net)(^c)</td>
<td>1,933</td>
</tr>
<tr>
<td>Emissions per SP (MTCO(_2)e/yr/SP)(^d)</td>
<td>2.4</td>
</tr>
<tr>
<td>2035 Efficiency Threshold</td>
<td>2.5</td>
</tr>
<tr>
<td>Exceed 2035 Efficiency Threshold?</td>
<td>No</td>
</tr>
<tr>
<td>Significant?</td>
<td>No</td>
</tr>
</tbody>
</table>

CO\(_2\)e= carbon dioxide equivalent; MT/yr = metric tons per year.
Values may not add exactly due to rounding.
Use of parenthetical notation indicates a negative value.

\(^a\) The energy-related GHG emissions, as estimated by CalEEMod, use 2013 Title 24 energy usage rates. Therefore, the project incorporates the additional reductions associated with the 2016 Title 24 energy efficiencies as the project is subject to them.

\(^b\) GHG emissions reductions associated with water use resulting from compliance with CALGreen requirements, which requires a minimum 20 percent reduction in indoor water use and the provision of irrigation controllers for outdoor water use, were accounted for in CalEEMod model run.

\(^c\) Net emissions equal the total project emissions minus the emissions from the existing operations. Because the emissions are compared to the threshold using a net increase, the service population represents the net increase in service population.

\(^d\) Reductions for Electrical offset are accounted for in the modeling results. The value here just shows the reduction and is not subtracted from the Net project emissions or else it would be double counting the reductions.

SOURCE: ESA CalEEMod Modeling 2017 (Appendix G)
As shown in Table 3.5-4, GHG Baseline Emissions Comparison, the addition of the fire pits to the project emissions for 2022 and 2035, total project emissions, including the fire pits, would still be less than the baseline emissions of today.

![Table 3.5-4
GHG Baseline Emissions Comparison](image)

<table>
<thead>
<tr>
<th>Emissions Source</th>
<th>Estimated Emissions CO₂e (MT/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Baseline</strong></td>
<td></td>
</tr>
<tr>
<td>Total Existing Operational Emissions</td>
<td>35,713</td>
</tr>
<tr>
<td>SCAG Regional Trips (1,008 residents)</td>
<td>10,387</td>
</tr>
<tr>
<td><strong>Total Baseline Emissions</strong></td>
<td>46,100</td>
</tr>
<tr>
<td><strong>Proposed Project (2022)</strong></td>
<td></td>
</tr>
<tr>
<td>Total Project Emissions</td>
<td>45,788</td>
</tr>
<tr>
<td>Fire Pits</td>
<td>4</td>
</tr>
<tr>
<td><strong>Total Project Emissions</strong></td>
<td>45,792</td>
</tr>
<tr>
<td><strong>Net Change</strong></td>
<td>(311 308)</td>
</tr>
<tr>
<td><strong>Proposed Project (2035)</strong></td>
<td></td>
</tr>
<tr>
<td>Total Project Emissions</td>
<td>45,375</td>
</tr>
<tr>
<td>Fire Pits</td>
<td>4</td>
</tr>
<tr>
<td><strong>Total Project Emissions</strong></td>
<td>45,379</td>
</tr>
<tr>
<td><strong>Net Change</strong></td>
<td>(724 721)</td>
</tr>
</tbody>
</table>

CO₂e= carbon dioxide equivalent; MT/yr = metric tons per year.
Values may not add exactly due to rounding
Use of parenthetical notation indicates a negative value.

SOURCE: ESA CalEEMod Modeling 2017 (Appendix G)
With implementation of Mitigation Measures GHG-1, project emissions including the fire pit, would still decrease compared to baseline emissions as shown in Table 3.5-6, Mitigated Baseline GHG Emissions Comparison.

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>Estimated Emissions CO₂e (MT/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Baseline</strong></td>
<td></td>
</tr>
<tr>
<td>Total Existing Emissions</td>
<td>35,713</td>
</tr>
<tr>
<td>SCAG Regional Trips</td>
<td>10,387</td>
</tr>
<tr>
<td>Total Baseline Emissions</td>
<td>46,100</td>
</tr>
<tr>
<td><strong>Proposed Project (2022)</strong></td>
<td></td>
</tr>
<tr>
<td>Total Project Emissions</td>
<td>43,466</td>
</tr>
<tr>
<td>Fire Pits</td>
<td>4</td>
</tr>
<tr>
<td>Total Project Emissions</td>
<td>43,470</td>
</tr>
<tr>
<td><strong>Proposed Project (2035)</strong></td>
<td></td>
</tr>
<tr>
<td>Total Project Emissions</td>
<td>40,068</td>
</tr>
<tr>
<td>Fire Pits</td>
<td>4</td>
</tr>
<tr>
<td>Total Project Emissions</td>
<td>40,072</td>
</tr>
<tr>
<td><strong>Net Change</strong></td>
<td></td>
</tr>
<tr>
<td>Proposed Project (2022)</td>
<td>(2,634, 2,630)</td>
</tr>
<tr>
<td>Proposed Project (2035)</td>
<td>-</td>
</tr>
<tr>
<td><strong>Net Change</strong></td>
<td>(6,031, 6,028)</td>
</tr>
</tbody>
</table>

CO₂e = carbon dioxide equivalent; MT/yr = metric tons per year. Values may not add exactly due to rounding. Use of parenthetical notation indicates a negative value.

SOURCE: ESA CalEEMod Modeling 2016 (Appendix G)

As shown in the analysis above, implementation of 2 natural gas fire pits which could run for 6 hours per day for 91 days per year, would not change the impacts identified in the analysis from the project without the fire pits. Therefore, the project could install up to 2 fire pits without causing significant impacts to air quality or GHGs, over those already identified. Mitigation Measure GHG-1 would still have to be implemented to reduce GHG impacts to a less than significant level.

**Comment OR002-15**

The commenter states the EIR indicates that the proposed project is consistent with General Plan Policy 1.41.3 because the Shade Shadow Analysis (Appendix C) finds that adjacent uses would be in shadow for 3 to 4 hours a day during the March 9:00 a.m. to 12:00 p.m. (Figure 2) and December 9:00 a.m. to 12:00 p.m. times (Figure 14). The Shade Shadow Analysis does not provide any written analysis or explanation/description of the methodology behind the analysis. The proposed project will result in adjacent buildings in shadow during both Winter and Spring mornings but the EIR does not explain how this is identified as an insignificant impact.
**Response to Comment OR002-15**

As outlined below, this comment (1) does not accurately summarize the conclusions of the Draft EIR, (2) ignores the methodology and significance criteria associated with General Plan consistency, and (3) ignores that Aesthetics are statutorily precluded from consideration as an environmental impact in this EIR.

As discussed in Draft EIR Section 3.8, **Land Use**, specifically in Section 3.8.4 any inconsistency “would also have to result in a physical change in the environment, not analyzed in the other resource chapters of this EIR, to result in a significant environmental impact.” 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.) As described in both Section 3.0.3 and the Land Use analysis (Draft EIR page 3.8-14), aesthetics, including shade and shadow, are statutorily precluded from consideration as an environmental impact in this EIR.

The comment also ignores the standard of review for General Plan consistency, as discussed in Draft EIR Section 3.8, **Land Use**, 3.8.4: The proposed project is considered consistent with the provisions of the identified regional and local plans if it meets the general intent of the applicable land use plans. *A given project need not be in perfect conformity with each and every policy nor does state law require precise conformity of a proposed project with every policy or land use designation for a site. It follows that it is nearly, if not absolutely impossible for a project to be in perfect conformity with each and every policy set forth in the applicable plan. If the proposed project is determined to be inconsistent with specific individual objectives or policies of an applicable plan, but is largely consistent with the land use or the other goals and policies of that overall plan and would not preclude the attainment of the primary intent of the land use plan, the project would not be considered inconsistent with the plan.[1] Furthermore, any such inconsistency would also have to result in a physical change in the environment, not analyzed in the other resource chapters of this EIR, to result in a significant environmental impact.


While the comment asserts that “EIR indicates that the proposed project is consistent with General Plan Policy 1.41.3,” in the same paragraph the commenter also contradicts this assertion stating that “the EIR states that project is inconsistent with General Plan Policies 1.41.3 and 1.41.5.” Draft EIR page 3.8-14 states:

Inconsistent. The proposed project would include new separate buildings up to a maximum building height of 96 feet. Policy 1.41.5 allows heights up to 100 feet for additions to existing structures. However, as the proposed project would include new detached structures with heights in excess of 60 feet, the proposed project would be inconsistent with these policies. A shade and shadow analysis was conducted for the
2. Response to Comments

The proposed project would be consistent with the General Plan as a whole, even though it results in an inconsistency related to height under Policies 1.41.3, 1.41.4, and 1.41.5. As discussed above, the primary objective for the CR zoning is to “Provide for the continued use of the Galleria at South Bay and surrounding properties as a primary center of regional-serving commercial uses, and provide for the development of mixed-use projects integrating residential with commercial uses; allowing for increases in development which enhance its economic vitality and contribute revenue to the City and improve its character as a pedestrian-oriented activity center, while minimizing impacts on adjacent streets and residential neighborhoods.” Additionally, the proposed height of 96 feet is consistent with the height of the existing cinema and does not exceed the top limit of 100 feet for existing buildings allowed on site (Policy 1.41.5). The proposed project would retain its existing commercial retail uses, while creating new commercial retail opportunities, new residential land uses, new public open space and a new hotel. The project has been designed to integrate the various land uses to create a pedestrian friendly walkable community, while furthering the regional retail hub component of the site, by enhancing the commercial retail opportunities through redesign and the creation of an open-air promenade. [¶] As noted under Government Code 65589.5(a), the legislature has concluded that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California.” The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City “facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community” (Gov. Code Section 65580(d)). More specifically, the Legislature’s stated intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal” (Gov. Code Section 65581). Also under the Redondo Beach Housing Element, the project site represents the greatest potential for future residential development in the City, to meet the City’s Regional Housing Needs Assessment (RHNA), as well as the high regional demand for housing in the County (see also Circulation Element, Goal 8). Furthermore, as discussion in Section 3.0.3 of the Draft...
EIR, the proposed project provides mixed use development in a transit priority area, and is consistent with the regional RTP goals as well as the City’s goals of encouraging mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance and supporting transit-oriented development (Redondo Beach Circulation Element, G6, G7, and G8). As outlined above, the proposed project would be consistent with the Redondo Beach General Plan as a whole. (Draft EIR page 3.8-16.)

**Comment OR002-16**

Further, the EIR states that project is inconsistent with General Plan Policies 1.41.3 and 1.41.5 and fails to make a finding of significance. The EIR must be revised to provide this information to the public and decision makers to comply with CEQA's requirements for meaningful disclosure.

**Response to Comment OR002-16**

Please see Response to Comment OR002-15.

**Comment OR002-17**

The commenter states the project description indicates that the proposed project will require discretionary approvals of a Vesting Tentative Tract Map, Variance, Shared Parking, and Conditional Use Permit(s). The Land Use and Planning section does not provide any information regarding the details of each discretionary action. The commenter states the EIR must be revised to provide details regarding the proposed discretionary approvals in order to comply with CEQA's requirements for meaningful disclosure.

**Response to Comment OR002-17**

The commenter is referred to Response to Comment OR002-4, above which explains that an EIR is only required to provide “a list of permits and other approvals,” to the extent the information is known. As also explained in Response to Comment OR002-15, the commenter also ignores the Draft EIR Land Use Chapter significance criteria and methodology. More specifically, the Land Use threshold asks, “Conflict with any applicable land use plan, of an agency with jurisdiction over the project (including, but not limited to the General Plan, Specific Plan, or local coastal program) and would result in a significant adverse physical change to the environment not already addressed in the other resources chapters of this EIR.” (Emphasis added.) A Vesting Tentative Tract Map, a Variance, Shared Parking, and Conditional Use permits are not considered a “land use plan” (i.e. a plan adopted pursuant to Gov. Code Sections 65302, 65451, or Pub. Res. Code Section 30108.5).

**Comment OR002-18**

Table 3.9-1

This table indicates the approximate distances between the project site and nearby noise-sensitive receptors, as measured at their nearest point but does not specify if the “nearest point” is the property line. The EIR must be revised to define the “nearest point” of measurement.
Response to Comment OR002-18

While the commenter states the EIR does not define the “nearest point” of the noise sensitive receptor locations, this is incorrect. As described in detail in table 3.9-10, Sensitive Receptor locations are based upon “property line” of the sensitive receptors. A footnote in that table also clearly states “the distance represents the nearest construction area of the project site to the property line of the off-site receptor.”

Comment OR002-19

The EIR states that the southern portion of the site would include "new development generally located away from and/or oriented away from noise-sensitive uses". The EIR concludes that "implementation of the proposed project is not expected to result in any exceedance of the RBMC maximum permissible sound levels for land use types at and adjacent to the project site". The EIR does not quantify operational noise in any type of analysis. This is insufficient analysis since the sensitive receptors are identified as located to the east and west of the project site.

Response to Comment OR002-19

The commenter does not accurately summarize the on-site operational impact analysis, which, as noted in Response to Comment OR002-13, is based upon a comparison of existing conditions. Draft EIR pages 3.9-21 through 22 explains in part:

Noise levels from the proposed retail, residential, and hotel uses would be typical of commercial and residential developments. Noise sources would include conversations, patron and residence vehicles, delivery trucks, rooftop ventilation, and trash hauling. These noise sources do not differ from existing noise sources, and the noise levels are not anticipated to change significantly. In particular, the nature, location, and orientation of uses proposed in the central and western portions of the site would be comparable to those of existing conditions, with retail uses continuing a parking structure and theater occupying the western portion of the site, and retail uses occurring in the center portion of the site. (Emphasis added.)

Regarding the commenter’s assertion that these noise impacts must be “quantified,” the level of detail in an EIR is described “in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.” (CEQA Guidelines Section 15204(a).)

The Draft EIR described and quantified existing conditions (i.e. Draft EIR Tables 3.9-1 and 3.9-2), and concluded that those conditions would not change due to on-site uses. Furthermore, the Draft EIR analyzed, quantified, and disclosed specific increases due to off-site operational roadway noise. (See Draft EIR Table 3.9-12.) See also Yuba Group Against Garbage v. Yuba County Bd. of Sup'rs (2001) 2001 WL 1513868:

YUGAG argues the EIR was deficient because it did not attempt to quantify the probability of injuries and accidents to local residents as a result of the increased truck traffic. According the YUGAG, the EIR should have contained information concerning the projected increase in vehicle accidents, collisions with pedestrians, and local traffic
2. Response to Comments

delays. However, YUGAG cites no authority requiring quantification, and its complaint is nothing more than a request for additional study or analysis without showing the provided analysis is deficient.

Comment OR002-20

The commenter states, the proposed site plan shows the operational Service Entry/Exit and Public Entry/Exit adjacent to the homes on Kingsdale Ave. A designated Service Entry/Exit and Public Entry/Exit adjacent to sensitive uses can reasonably increase the ambient noise levels, especially since the project description indicates that parking structures would be operational 24 hours a day and a parking structure is proposed adjacent to Kingsdale Ave. and the Service Entry will reasonably be used during early morning hours (before businesses open) and late night/overnight hours (after businesses close).

Response to Comment OR002-20

The comment implies that the noise analysis did not consider noise associated with motor vehicles utilizing the entry and exit points of the project site. Contrary to this implication, the Draft EIR considered and quantified increases in roadway noise (which includes vehicles entering and exiting the project site), under Impact NOI-3. As discussed on Draft EIR Section 3.9.4 the roadway noise analysis is based upon the Trip Generation and distribution from Draft EIR Section 3.13, which considered the proposed entry and exit points in the Vehicle Trip Distribution. It should also be noted that the proposed project would utilize the same driveways that are currently utilized at the project site under existing conditions for existing visitors, deliveries, and works shifts, however alternative truck access will no longer be provided from 177th Street.

Comment OR002-21

Mitigation Measures NOI 1-4 do not specify an enforcement entity or field verification component for mitigation monitoring. MM NOI 1-4 must be revised in order to meaningfully enforceable, such as sending notice to adjacent property owners regarding an enforcement contact for noncompliance/noise complaints or posting signs with such contact information in areas at the project site which are easily accessible to the public (CEQA § 21081.6 (b)).

Response to Comment OR002-21

The Mitigation Monitoring and Reporting Program is adopted at the time of project approval, and does not need to be included in the EIR. (CEQA Guidelines Section 15097(a).) The commenter’s reference to Pub. Res. Code Section 21081.6(b) does not change this conclusion, and simply confirms that adopted mitigation measures shall be made enforceable through permit conditions. Furthermore, Mitigation Measure MM NOI-4 states that “Equipment staging shall be located in areas that are shielded from and/or set back noise-sensitive receptors, with a minimum of 100 feet separation between the sensitive receptor and the nearest edge of the staging area.” The commenter’s suggestion of providing notice would not substantially reduce or avoid the environmental impact. Nevertheless, the City construction code already requires the posting of contact information pursuant to RBMC §§ 4-22.11 and 9-1.25: Construction information, [E]very holder of a building permit or demolition permit shall post a temporary, weatherproof sign of not
less than twelve (12") by eighteen (18") inches, readily visible from the street containing the name, street address, telephone number and an emergency telephone number of the individual(s) or firm responsible for the construction or demolition.

However, the commenter’s suggestion will be forwarded to the decision makers for their consideration.

**Comment OR002-22**

Impact TRA-3. The EIR refers to Access Points A-J in this portion of the analysis, however, the Access Points are not provided on a map or proposed site plan for verification. The EIR must be revised to include an exhibit demonstrating where each Access Point is located in order to be adequate as an informational document. This especially significant when each of the Access Points are stated to be located "at approximately the same location" without reference to a definition of "same location" for analysis purposes.

**Response to Comment OR002-22**

The commenter states that the project access points are not identified on a map or the site plan for verification. The proposed entry and exit points were also clearly shown in Draft EIR Figure 2-7. Figure 2 of the Transportation Impact Study in Appendix L of the Draft EIR provides a site plan that identifies the access points by letter, as described in Section 3.13, Transportation and Traffic on pages 3.13-52 and 3.13-53 of the Draft EIR.

**Comment OR002-23**

Mitigation Measure TRA-3: Prairie Avenue & Artesia Boulevard (Intersection #17) and Mitigation Measure TRA-4: I-405 Southbound Ramp & Artesia Boulevard (Intersection #19) are found to not mitigate the significant project impact under the Existing plus Project and Cumulative plus Project conditions, resulting in a significant and unavoidable impact. The EIR does not provide analysis or discussion regarding why MM TRA 3-4 are unable to provide full mitigation.

**Response to Comment OR002-23**

The Draft EIR concluded there would be three significant and unavoidable intersections impacts after mitigation at Intersection 16 (Hawthorne Blvd./Artesia Blvd.), Intersection 17 (Prairie Ave./Artesia Blvd.), and Intersection 19 (I-405 Northbound Ramps/Artesia Blvd.). As discussed under CEQA Guidelines “The EIR shall describe feasible measures…If the Lead Agency determines that a mitigation measure cannot be legally imposed, the measure need not be proposed or analyzed.” (Section 15126.4(a)(1) and (a)(5).) The discussion in the Draft EIR is consistent with this guidance. Nevertheless, Draft EIR Appendix L, p 55, contained additional discussion on this issue, which explained “I-405 Northbound Ramps & Artesia Boulevard (Intersection 19) – The proposed mitigation measure would add a westbound through lane…The mitigation has been determined to be infeasible due to lack of right-of-way and physical limitations due to the I-405 undercrossing.” Please also see Response to Comment AS003-7.

The comment states that the Draft EIR does not provide analysis or discussion regarding why Mitigation Measure TRA-3: Prairie Avenue and Artesia Boulevard and Mitigation Measure TRA-
4: I-405 Southbound Ramp and Artesia Boulevard are unable to provide full mitigation. Mitigation measures were developed with input from the City of Redondo Beach, the lead agency of the Draft EIR. The mitigation measures were developed to be implemented within the existing roadway. Draft EIR Table 3.13-7 provides post mitigation V/C values, and as demonstrated in that table, the mitigation measures would not fully mitigate the significant impacts.

Mitigation measures that lack of right-of-way, had physical limitations, or created secondary impacts such as increasing pedestrian crossing distance and time, reduction in pedestrian refuge space, or lane offsets, were determined to be infeasible. Mitigation Measure TRA-3 was identified as a feasible mitigation at the intersection of Prairie Avenue and Artesia Boulevard, however the measure would reduce the level of impact but does not mitigate the project related transportation impact to less than significance under the Existing plus Project and Cumulative plus Project conditions. Intersection analysis worksheets documenting the effect of the mitigation measure at the intersection is provided in Appendix F of the Transportation Impact Study in Appendix L of the Draft EIR.

Mitigation Measure TRA-4 was identified in the Draft EIR as mitigating the significant project impact at the intersection of I-405 Southbound Ramp and Artesia Boulevard under the Existing plus Project and Cumulative plus Project conditions. Intersection analysis worksheets documenting the effect of the mitigation measure at the intersection is provided in Appendix F of the Transportation Impact Study in Appendix L of the Draft EIR.

Comment OR002-24

The EIR does not disclose that Intersections #17 and #19 are located in the city of Torrance, beyond the jurisdiction of the Lead Agency. Further, Intersection #19 may also have Caltrans jurisdiction because it is a highway ramp The EIR must be revised to disclose this pertinent information in order to be an adequate informational document.

Response to Comment OR002-24

The comment states that the Draft EIR does not disclose that the intersections of Prairie Avenue and Artesia Boulevard and I-405 NB Ramps and Artesia Boulevard are located in the City of Torrance. Additionally, the comment states that the intersection of I-405 NB Ramps and Artesia Boulevard also has Caltrans jurisdiction. Contrary to the assertions in the comment, Draft EIR in Section 3.13, Transportation and Traffic, Figure 3.13-1 clearly shows that Intersections 17 and 19 are located in the City of Torrance. Additionally, Draft EIR Appendix L, Table 1, includes a listing of each Intersection and the relevant jurisdictions (along with revisions contained in the Final EIR). The intersection of Prairie Avenue and Artesia Boulevard (Intersection 17) is identified as being under the jurisdiction of Torrance and the intersection of I-405 NB Ramps and Artesia Boulevard (Intersection 19) is identified as being under the jurisdiction of Torrance and Caltrans.
## APPENDIX L, TABLE 1
### STUDY AREA INTERSECTIONS

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<th>ID</th>
<th>N/S Street Name</th>
<th>E/W Street Name</th>
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<th>Lawndale</th>
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</table>
Comment OR002-25

The commenter states, for the foregoing reasons, GSEJA believes the EIR is flawed and an amended EIR must be prepared for the proposed project and recirculated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

Response to Comment OR002-25

Thank you for your comment. Please see Response to Comments OR002-1 through 24. 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 OR003: Coalition for Responsible Equitable Economic Development (CREED LA)

Comment OR003-1

We are writing on behalf of Coalition for Responsible Equitable Economic Development (“CREED LA”) to request mailed notice of the availability of any environmental review document, prepared pursuant to the California Environmental Quality Act, related to the South Bay Galleria Improvement Project (SCH# 2015101009) (“Project), proposed by Cigna Investments, Inc., in the City of Redondo Beach. This request excludes a copy of the Draft Environmental Impact Report (DEIR), its Appendices, and its references otherwise available on the City's website1 as of today's date.

Response to Comment OR003-1

Thank you for your comment. 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 OR003-2

We also request mailed notice of any and all hearings and/or actions related to the Project. These requests are made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108 and 21152 and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

Response to Comment OR003-2

Thank you for your comment. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.
Response to Comments

Comment OR003-3

Please send the above requested items by email and U.S. Mail to our South San Francisco Office as follows: Shelia Sannadan, Adams, Broadwell, Joseph and Cardoza, 601 Gateway Boulevard, Suite 1000, South San Francisco, CA 94080-7037, ssannadan@adamsbroadwell.com

Response to Comment OR003-3

Thank you for your comment. 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 OR004: Coalition for Responsible Equitable Economic Development (CREED)

Comment OR004-1 through OR004-3

The commenter states they are writing on behalf of Coalition for Responsible Equitable Economic Development (“CREED LA”) to request an extension of the September 11, 2017 comment deadline for the South Bay Galleria Improvement Project (SCH# 2015101009) (“Project), proposed by Cigna Investments, Inc., in the City of Redondo Beach.

CEQA requires that an Environmental Impact Report (“EIR”) and all documents referenced in it be made available to the public for the entire comment period. In its Notice of Availability/Notice of Completion, the City of Redondo Beach provided a website where the Draft EIR and all documents referenced in it could be found. However, on August 31, 2017, we noticed that the Draft EIR and its references were no longer available online. The Project page displays an error message that “[t]he page you are seeking has moved, expired, or is otherwise unavailable on our website.” Today, on September 1, 2017, the website is still unavailable.

We request that the City of Redondo Beach correct this problem and provide the public with online access to the Draft EIR and its references consistent with the City's Notice of Availability/Notice of Completion. We also request that the City extend the comment period due to this interruption in access and pursuant to the California Environmental Quality Act.

Thank you for your attention to this matter.

1 See Pub. Resources Code, § 21092(b)(l); 14 Cal. Code Regs.§ 15087(c)(5).

2 See Pub. Resources Code, § 21092(b)(l) (The notice shall ... descri[be] how the draft environmental impact report or negative declaration can be provided m an electronic format.)


4 California Environmental Quality Act Guidelines, 14 Cal. Code Regs.§ 15087, subd. (c) ("The [Notice of Availability/Notice of Completion] shall disclose the following: [...] (2) [t]he starting and ending dates for the review period during which the lead agency will receive comments. [...] (5) [...]he address where copies of the EIR and all documents referenced in the EIR will be available for public review. This location shall be readily accessible to the public during the lead agency's normal working hours.")
Response to Comment OR004-1 through OR004-3

On September 8, 2017, the City of Redondo Beach responded to this letter from CREED LA. This response stated:

On September 1, 2017 your law firm sent a letter to the City of Redondo Beach on behalf of CREED LA to "request an extension of the September 11, 2017 comment deadline for the South Bay Galleria Improvement Project." The basis for this request was:

"CEQA requires than an Environmental Impact Report ("EIR") and all documents referenced in it be made available to the public for the entire comment period. It is Notice of Availability/Notice of Completion, the City of Redondo Beach provided a website where the Draft EIR and all documents referenced in it could be found ... on August 31, 2017, we noticed that the Draft EIR and its references were no longer available online ... Today, on September 1, 2017, the website is still unavailable [FN1 - http://www.redondo.org/depts/community development/planning/galleria_draft_eir.asp]"

The City's Notice of Availability (NOA) stated that electronic copies of the Draft EIR were available “Online at www.redondo.org (follow link to South Bay Galleria on Home Page).” (See Exhibit A for a copy of www.redondo.org.) However, it appears your office did not follow the instructions in the NOA. Your letter appears to be referencing an older Galleria Draft EIR website which is only accessed through a Google search and not through the City's "Home Page." As noted in your letter, CREED LA relied upon the following URL:

http://www.redondo.org/depts/community development/planning/galleria_draft_eir.asp

Unfortunately, this is not the URL provided on www.redondo.org. The City does not have control over Google's indexing functions; consequently, this older weblink that your firm utilized continues to come up when performing a google search. However, the formal Galleria Draft EIR website referenced in the NOA (see link below), which is accessed through the City's homepage (Exhibit A), has been up and running from August 31, 2017 through today's date.

http://www.redondo.org/depts/community_development/planning/south_bay_galleria_draft_eir.asp (See Exhibit B)

It is also clear that your law firm had previous access to the Draft EIR. The Letter from CREED LA to the City dated August 17, 2017 [Comment OR003] specifically acknowledged that CREED LA had previous access to the Draft EIR. More specifically that letter stated that CREED LA's "request excludes a copy of the Draft Environmental Impact Report (Draft EIR), its Appendices, and its references otherwise available on the City's website as of today's date."

Furthermore, CEQA Guidelines Section 15201 makes it clear that there is no legal mandate to make the Draft EIR available online. Section 15201 states "Such procedures should include, whenever possible, making environmental information available in electronic format on the Internet, on a website maintained or utilized by the public..."
agency.” (Emphasis added.) However, it is clear from the context that this is not mandatory language. (See CEQA Guidelines Section 15005(b) ["Should" is not mandatory].) Finally, the Galleria Draft EIR has also continued to be made available at all of the numerous locations referenced in the NOA, including numerous locations at City Hall, two public libraries, and the correct Galleria Draft EIR website linked on the City's homepage.

The Draft EIR Comment period will end on September 11, 2017 at 5:30 PM (comments must be received by this time). No extension will be provided.

[FN1 - As of September 5, 2017, the City updated the older non-NOA Galleria website by providing a weblink to the correct formal NOA Galleria Draft EIR website.]

Comment Letter OR005: Coalition for Responsible Equitable Economic Development (CREED LA)

Comment OR005-1

We write on behalf of the Coalition for Responsible Equitable Economic Development ("CREED LA"), Andrew Akerlund, Charles Bree, Daniel Sattler, Jeffery Lanie, and John Bree to provide comments on the Draft Environmental Impact Report ("DEIR") prepared by the City of Redondo Beach ("City") for the South Bay Galleria Improvement Project (SCH No. 2015101009) ("Project"), pursuant to the California Environmental Quality Act ("CEQA").

Response to Comment OR005-1

Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. The commenter’s firm and CREED LA have submitted comments on numerous mixed use/residential/retail project in the state of California over the last three years, including but not limited to:

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<th>Date</th>
<th>Commenter</th>
<th>Project Description</th>
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<td>February 17, 2017</td>
<td>Adams Broadwell Joseph &amp; Cardozo</td>
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<td>Adams Broadwell Joseph &amp; Cardozo</td>
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</table>
Comment OR005-2

The proposed Project is located at 1815 Hawthorne Boulevard, on approximately 29.85 acres in the City of Redondo Beach. The Project site is roughly square in shape and is bound by Artesia Boulevard to the north, Kingsdale Avenue to the west, Hawthorne Boulevard to the east, and by the 150-foot-wide Southern California Edison high voltage easement to the south. The proposed project consists of modifications and additions to the existing 29.85-acre South Bay Galleria enclosed mall property in the City. The proposed Project includes demolishing some existing structures and redesigning portions of the site by combining expanded retail and dining venues with open-air promenades, hotel, and residential development.

Response to Comment OR005-2

Thank you for your comment. 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 OR005-3

Based upon our review of the DEIR and supporting documentation, we conclude that the DEIR fails to comply with the requirements of CEQA. As explained more fully below, the DEIR fails to adequately disclose, evaluate, and mitigate the Project's impacts. The DEIR's numerous defects render it inadequate as an informational document. As a result of its shortcomings, the DEIR lacks substantial evidence to support its conclusions and fails to properly mitigate the Project's significant environmental impacts. In light of the DEIR's fundamentally flawed nature, the comments contained in this letter should be viewed as illustrative of the problems with the document, rather than as a comprehensive catalogue of the document's deficiencies. Based on the findings of this comment letter, a revised DEIR must be prepared and recirculated before the City may legally approve the Project.²

² 14 Cal. Code Regs., § 15088.5 ("CEQA Guidelines").

Response to Comment OR005-3

Thank you for your comment. The commenter is referred to Section 3.0, Environmental Impact Analysis, of the Draft EIR, which adequately disclosed and analyzed the proposed project’s impacts. All impacts were disclosed, evaluated, and any significant impacts identified were mitigated with implementation of mitigation measures in compliance with CEQA requirements.
The commenter does not provide a sufficient basis for showing that the impacts are substantially greater than presented in the Draft EIR and thus, no recirculation of the EIR is required. As such, the City disagrees with the comment. To the extent the commenter is referencing their subsequent comments, the commenter is referred to Response to Comments OR005-4 through OR005A-35.

**Comment OR005-4**

We prepared these comments with the assistance of air quality and hazards experts Matt Hagemann and Hadley Nolan of Soil/Water/Air Protection Enterprise ("SWAPE"). SWAPE's technical comments ("SWAPE Comments") and curricula vitae are attached hereto as Attachment A. The City must separately respond to these technical comments.

3 Letter from Matt Hagemann and Hadley Nolan to Linda Sobczynski re: Comments on South Bay Galleria Improvement Project, September 7, 2017 ("SWAPE Comments") (Attachment A).

**Response to Comment OR005-4**

Thank you for your comment. The City has responded to the SWAPE technical comments referred to as Attachment A to your letter; please refer to Response to Comments OR005A-1 through OR005A-35, below. As noted in these Responses, Mr. Hagemann (SWAPE), has consistently misapplied the basic analytical tenants under the California Environmental Quality Act. Mr. Hagemann should be readily aware of these requirements, as the Court of Appeal has rejected his arguments on several occasions. (See Parker Shattuck Neighbors v. Berkeley City Council (2013) 222 Cal.App.4th 768, the Court of Appeal rejected Mr. Hagemann’s argument “that an EIR was required because the MND's mitigation measures failed adequately to address the health threat of the toxic soil contamination to construction workers and future residents of the project.”); see also Sierra Club v. City and County of San Francisco (2015, 1st Dist. Case No. A140891) 2015 WL 5724809:33

33 Available online at: www.courts.ca.gov/opinions/nonpub/A140891.DOC
In rejecting Mr. Hagemann’s arguments, the Court of Appeal noted:

Hagemann’s letter addressed the 2009 OEHHA study discussed above. According to his letter, summing the cancer risks presented from the eight carcinogenic chemicals identified in the air above indoor synthetic fields resulted in a total cancer risk of 19 in 1 million – which is greater than the 1 in 1 million standard. However, as we discussed above, the 2009 OEHHA study was addressed in the EIR, and both the EIR and the study itself acknowledged that the study overstated the cancer risks due to its reliance on air sampling data taken from above indoor synthetic fields. Additionally, the Planning Department, in recommending that the Board uphold the certification of the final EIR, addressed the substance of Hagemann’s analysis, by pointing out that petitioners argued “incorrectly that the cancer risks presented for 5 chemicals identified in the 2009 OEHHA study, and disclosed in the EIR, are ‘cumulative’ (i.e., additive). However, this calculation method is not correct, not representative of the results of the 2009 report, and does not accurately represent cancer risks.”

As outlined below, the comments from Mr. Hagemann continue to make numerous legal errors by misapplying CEQA’s framework, and (1) incorrectly attribute baseline conditions as impacts of the project, contrary to CEQA’s legal framework, (2) fail to recognize that the proposed project Air Quality and GHG scenarios include emissions from both the new and existing structures, (3) and make numerous analytical errors and incorrect assumptions.

**Comment OR005-5**

I. STATEMENT OF INTEREST - CREED LA is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public and worker health and safety hazards, and the environmental and public service impacts of the Project. The coalition includes the Sheet Metal Workers Local 105, International Brotherhood of Electrical Workers Local 11, Southern California Pipe Trades District Council 16, Ironworkers Local 433 and Reinforcing Ironworkers Local 416, along with their members, their families, and other individuals who live and work in Los Angeles and surrounding communities like Redondo Beach.

**Response to Comment OR005-5**

The comment does not address an environmental issue therefore no further response is required. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

**Comment OR005-6**

Individual members of CREED LA and its member organizations include Andrew Akerlund, Charles Bree, Daniel Sattler, Jeffery Lanie, and John Bree. These individuals live, work, recreate, and raise their families in Redondo Beach. Accordingly, they would be directly affected by the Project's environmental and health and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist onsite.

**Response to Comment OR005-6**

While the commenter implies the project would result in health and safety impacts, the commenter provides no evidence to support this assertion. To the extent the commenter is
referencing the subsequent sections of their letter, the commenter is referred to Response to Comments OR005-8 through 58 and Response to Comments OR005A.

**Comment OR005-7**

In addition, CREED LA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

**Response to Comment OR005-7**

The comment does not address an environmental issue; therefore, no further response is required. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

**Comment OR005-8**

II. THE DEIR IS NOT IN COMPLIANCE WITH CEQA - CEQA has two basic purposes, neither of which the DEIR satisfies. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. CEQA requires that an agency analyze potentially significant environmental impacts in an EIR. The EIR should not rely on scientifically outdated information to assess the significance of impacts, and should result from "extensive research and information gathering," including consultation with state and federal agencies, local officials, and the interested public. To be adequate, the EIR should evidence the lead agency's good faith effort at full disclosure. The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." "Thus, the EIR protects not only the environment but also informed self-government."

4 CEQA Guidelines, § 15002, subd. (a)(1).
7 CEQA Guidelines, § 15151; see also Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376, 406 ("Laurel Heights 1").
Response to Comment OR005-8

While the commenter alleges the Draft EIR is not in compliance with CEQA, the commenter provides no evidence to support this assertion. To the extent the commenter is referencing the subsequent sections of their letter, the commenter is referred to Response to Comments OR005-9 through 58 and Response to Comments OR005A.

The commenter is referred to Section 3.0, Environmental Impact Analysis, of the Draft EIR which adequately disclosed and analyzed the proposed project’s potential impacts. All impacts were disclosed and evaluated, and any significant impacts identified were mitigated to the extent feasible in compliance with CEQA requirements. The Draft EIR impact analysis did not rely on scientifically outdated information to assess impacts. Impacts in the Draft EIR were assessed and analyzed after extensive research and information gathering of the most recent information available to support the conclusions provided in the Draft EIR. The impact analysis and conclusions of this effort are provided in the Draft EIR. Thus, the Draft EIR is a good faith effort to fully disclose impacts associated with the proposed project.

Comment OR005-9

The commenter states, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures. The EIR serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to "identify ways that environmental damage can be avoided or significantly reduced." If a project has a significant effect on the environment, the agency may approve the project only upon a finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible," and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns" specified in CEQA section 21081.12

10 CEQA Guidelines, § 15002, subd. (a)(2)-(3); Berkeley Jets, supra, 91 Cal.App.4th at 1354.
11 CEQA Guidelines, § 15002, subd. (a)(2).
12 CEQA Guidelines,§ 15092, subd. (b)(2)(A)-(B).

Response to Comment OR005-9

The comment provides an overview of their interpretation of CEQA but does not address the adequacy of the EIR, therefore no further response is required.

Comment OR005-10

The commenter states the comments will demonstrate, the DEIR fails to comply with the requirements of CEQA and may not be used as the basis for approving the Project. It fails in significant aspects to perform its function as an informational document that is meant "to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment" and "to list ways in which the significant effects of such a project might be minimized."13

13 Laurel Heights I, supra, 47 Cal.3d at p. 391.
Response to Comment OR005-10

While the commenter alleges the Draft EIR is not in compliance with CEQA, the commenter provides no evidence to support this assertion. To the extent the commenter is referencing the subsequent sections of their letter, the commenter is referred to Response to Comments OR005-9 through 58 and Response to Comments OR005A. The commenter is also referred to Section 3.0, *Environmental Impact Analysis*, of the Draft EIR which adequately disclosed and analyzed the proposed project’s potential impacts. All impacts were disclosed and evaluated, and any significant impacts identified were mitigated to the extent feasible in compliance with CEQA requirements. The commenter is referred to Section 4.0, *Alternatives*, which evaluated alternatives to the proposed project and their potential impacts in compliance with CEQA requirements. As such, the Draft EIR performs its function as an informational document with detailed information on the effect the project will have on the environment. Additionally, the in the Executive Summary Chapter, the Draft EIR does list in a comprehensive manner the impacts of the proposed project and the mitigation shall be implemented to eliminate, reduce or minimize to the furthest extent feasible the significant effects of the project. Therefore, the Draft EIR is in compliance with CEQA and can be used as the basis for approving the project.

Comment OR005-11

The commenter states, the DEIR must be withdrawn and revised to address these errors and deficiencies. Because of the substantial omissions in the information disclosed in the DEIR, revisions necessary to comply with CEQA will be, by definition, significant. In addition, substantial revision will be required to address significant impacts that were not disclosed in the DEIR. Because these revisions are significant, the revised DEIR will need to be recirculated for additional public comment.14

88 Pub. Resources Code,§ 21091.1; CEQA Guidelines,§ 15088.5.

Response to Comment OR005-11

Please see comment response OR005-3.

The City disagrees with the commenter that the Draft EIR needs to be withdrawn and revised. The commenter is referred to Section 3.0, *Environmental Impact Analysis*, of the Draft EIR which adequately disclosed and analyzed the proposed project’s potential impacts. All impacts were disclosed and evaluated, and any significant impacts identified were mitigated to the extent possible in compliance with CEQA requirements. The commenter is referred to Section 4.0, *Alternatives*, which evaluated alternatives to the proposed project and their potential impacts in compliance with CEQA requirements. The commenter is also referred to Response to Comments OR005-9 through 58 and Response to Comments OR005A. As such, the Draft EIR complies with CEQA requirements and does not contain substantial omissions of information in regard to potential project impacts. Therefore, the Draft EIR complies with CEQA and does not need to be recirculated.
Comment OR005-12

The commenter states the DEIR underestimates the Project’s operational emissions by relying upon a flawed air quality analysis. Our air quality expert, SWAPE, reviewed the Project’s CalEEMod output files and Air Quality Analysis and found calculation errors. More specifically, SWAPE found that even though only a portion of the Project site’s existing lands uses will be demolished, the emissions files indicate that “the entirety of the Project site’s existing criteria air pollutant emissions were subtracted from the proposed Project’s emissions and then were compared to the South Coast Air Quality Management District’s ("SCAQMD") significance thresholds.”

Response to Comment OR005-12

The Draft EIR adequately analyzed the proposed project’s operational criteria air pollutant emissions as demonstrated in the, Section 3.1, Air Quality, of the Draft EIR. As summarized in Section 3.1 and detailed in Appendix D of the Draft EIR, Air Quality Calculations, the existing emissions calculations included all current operations at the project site, at the time of the NOP, whose operation would continue if the proposed project is not approved. The proposed project emissions included all new buildings that would be constructed and older buildings that would be renovated under the proposed project and all existing South Bay Galleria buildings currently in operation that would not be demolished under the proposed project. As shown in the analysis, proposed project emissions were not just calculated for the buildings being constructed or renovated under the proposed project. Thus, to account of the total emissions that would be generated under the proposed project, the existing emissions were subtracted from the proposed project emissions (which included proposed new uses and existing uses) to arrive at net emissions from the new uses as shown in Table 3.1-8 of the Draft EIR, Proposed Project Unmitigated Operational Emissions.

The methodology used in the Draft EIR is consistent with CEQA’s impact analysis methodology, which is based upon an increase above existing conditions. (CEQA Guidelines Sections 15125(a), 15126.2(a) “In assessing the impact of a proposed project on the environment, the Lead Agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published.” This is also consistent with SCAQMD’s 1993 CEQA Handbook, which states “As part of the impact analysis…the existing level of background emissions and local air quality need also be taken into account.” (SCAQMD 1993 CEQA Handbook, Section 7.2.) In fact, the State Air Resources Board (“ARB”) utilizes the same methodology in their own CEQA documents. For example, the Draft EIR Operational Air Quality analysis for ARB’s Consolidation Project (Testing Facility) stated:

To evaluate the potential environmental impacts of employee commuting changes associated with moving the testing functions from Los Angeles and El Monte to Riverside…Using the traffic analysis and current commutes for employees, the net
mobile vehicle mileage (project less existing conditions) at opening day was estimated to be 4,003,440 miles per year. (ARB Consolidation Project FEIR\textsuperscript{34} pp. 5.3-33 through 5.3-36)

(See also Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal.App.4th 1059 ["The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope"]).

Moreover, daily regional and annual construction and operational emissions were estimated using the California Emissions Estimator Model (CalEEMod) software, an emissions inventory software program recommended by the SCAQMD. As shown in Table 3.1-8, net project operational emissions were determined to be below SCAQMD daily thresholds. The Draft EIR Air Quality analysis correctly calculated the operational emissions (project emissions – existing emissions = net emissions) and correctly assessed them against the SCAQMD significance thresholds with a finding of less than significant impacts. As shown in the Draft EIR Appendix D, page 24, “existing Land Use” for the project site existing air quality scenario included 1,062,751 KSF of development and 64.01 KSF for the theater. As shown in Draft EIR Appendix D, page 27, the “Project Assumptions’ Air Quality scenario included both “Mall Uses” including the “Future Retail” and “Future Department Stores” as well as “Existing Mall Uses.” Thus, the analysis was not flawed. There were no calculation errors in the analysis and the project’s operation emissions were not underestimated. As was the case in Parker Shattuck the commenter has misapplied the basic legal framework for environmental impact analysis under CEQA.

**Comment OR005-13**

The commenter states the DEIR should have subtracted only those existing emissions sources that will be eradicated by the proposed Project, not all of the existing emissions sources.\textsuperscript{18} By subtracting all of the existing criteria air pollutant emissions generated on the Project site, the DEIR improperly concludes that the Project would have a less-than-significant air quality impact.

\textsuperscript{18} SWAPE Comments, p.4.

**Response to Comment OR005-13**

The approach that is suggested in Comment OR005-13 would have been correct, if the proposed project emissions scenario only included the new and renovated buildings that would be constructed under the proposed project and not those emissions from current buildings. Then only the demolished portion of the buildings should be subtracted. However, as discussed above under Response to Comment OR005-12, the proposed project emissions included all new buildings that would be constructed and older buildings that would be renovated under the proposed project and all existing South Bay Galleria buildings currently in operation, that would not be demolished under the proposed project. Thus, to get a realistic picture of the new emissions that would be generated under the proposed project, the existing emissions were subtracted from the proposed project emissions (which included proposed new uses and existing uses) to arrive at net emissions.

\textsuperscript{34} ARB Consolidation Project Final EIR: https://www.arb.ca.gov/html/socalfacility/sscp-final-eir.pdf; certified in June 2017 by Executive Order G17-036 available online at: https://www.arb.ca.gov/html/socalfacility/eco-g17-036-dated-june-06-2017.pdf
from the new uses as shown in Table 3.1-8 of the Draft EIR, Proposed Project Unmitigated Operational Emissions. As shown in Table 3.1-8, net project operational emissions were properly assessed against SCAQMD daily thresholds resulting in a less than significant impact. Thus, the Draft EIR correctly concluded that the project’s net emissions are below SCAQMD thresholds.

**Comment OR005-14**

The commenter states, when SWAPE conducted an analysis to determine the Project’s potential for air quality impact, it determined that the Project’s operational emissions increase significantly when compared to criteria air pollutant emissions estimates disclosed in the DEIR. Notably, SWAPE’s analysis also revealed that the Project’s operational VOC, NOx, and PM10 emissions exceeded SCAQMD’s regional significance thresholds for each pollutant. SWAPE adds that its analysis underestimates the emissions because it only considers the Project’s emissions generated by operation of the proposed Project, and does not take into account existing criteria air pollutant emissions generated by other land uses on the Project site. The City must update the DEIR’s air quality analysis to accurately determine significance and identify mitigation measures, as necessary.

20 SWAPE Comments, p.5.

21 SWAPE Comments, p.5.

22 SWAPE Comments, p.5.

**Response to Comment OR005-14**

The SWAPE analysis is an incorrect portrayal of potential air quality impacts of the proposed project and the methodology utilized in the Draft EIR. SWAPE stated that their analysis underestimates project emissions generated by operation of the project because it only considered the project’s emissions generated by the proposed project and did not take into account existing criteria air pollutant emissions generated by other land uses on the project site. However, SWAPE compared the proposed project emissions, which includes all existing uses currently at the site (existing emissions) and new proposed uses/renovations resulting from the project, to the SCAQMD significance thresholds which resulted in SWAPE incorrectly concluding significant impacts for VOC, NOx, CO, and PM10. The SWAPE proposed analysis approach is flawed as explained in detail in Response OR005-12, because the proposed project emissions include existing emissions which will continue at the site even if the proposed project is not approved. Therefore, existing emissions should be subtracted from the proposed project emissions, which include emissions from all currently existing buildings that will not be demolished, to determine net emissions of the project. See Response to Comments OR005-12 and OR005-13, above, for more information on how the project net emissions were calculated. Thus, the Draft EIR accurately calculated the proposed project’s operational emissions and impacts. Since the Draft EIR accurately determined project operation air quality impacts, the City disagrees that the Draft EIR need to be updated.

**Comment OR005-15**

The commenter states, the DEIR failed to adequately analyze the health risk to nearby sensitive receptors as a result of the Project’s emissions generated by construction and operation. Albeit
flawed, the DEIR conducted a health risk assessment ("HRA") for construction impacts, but the DEIR did not assess the health risks associated with operational impacts.\(^{24}\) The City must prepare a revised HRA that uses the corrective exposure frequency in the construction HRA,\(^ {25}\) that evaluates the closest sensitive receptor,\(^ {26}\) and that conducts an operation HRA consistent with SWAPE’s comments.\(^ {27}\)

\(^{23}\) See SWAPE Comments, p.6.
\(^{24}\) SWAPE Comments, pp.6-9.
\(^{25}\) SWAPE Comments, p.6.
\(^{26}\) SWAPE Comments, p.7.
\(^{27}\) SWAPE Comments, p.7.

**Response to Comment OR005-15**

The Draft EIR adequately disclosed and analyzed the project’s health risks to nearby sensitive receptors in Draft EIR Section, Section 3.1, Impact AIR-2. As also detailed in Appendix D of the Draft EIR, Air Quality Calculations, a construction Diesel Particulate Matter (DPM) Health Risk Assessment was performed using AERSCREEN due to the potential for on-site construction emissions to present a health risk to nearby sensitive receptors. The AERSCREEN model produces estimates of "worst-case" 1-hour concentrations for a single source without taking into account site specific information such as weather patterns, elevation, and topography, which can dissipate and dilute emissions. For this highly conservative screening HRA, that maximum hour assumes that the worst case hour (highest emissions) of each construction phase is occurring simultaneously where construction subphases have the potential to overlap during the construction year. So, for example, in 2019 the grading phase (114 days), drainage phase (108 days), building phase (715 days (260 per year for the analysis)), and architectural coating phase (506 days (260 days per year for the analysis)) would potentially occur on the same days for a limited amount of time during this year. The total PM10 emissions for this year (adding emissions from each subphase together) were used to evaluate risk during that year. While building and architectural coating may occur for more than the 260 days, drainage and grading would occur for significantly less, but the analysis assumed 260 days of exposure to the total emissions (PM10 emissions from all four subphases added together).

Further, HRA assumed that worst case hour would occur throughout each day of each sub-phase, when experience based on real-life examples (see FWHA discussion above) show that activity and the resultant emissions vary hour-by-hour, and day-to-day. Also, this HRA projected these worst-case hourly emissions to a 260 workday year, which is based on 5 days a week, 52 weeks a year, and does not account for holidays, rain delays, etc. when there would be little to no activity on-site. This means that while the emissions throughout each year of construction would vary based on the construction phase, the analysis assumed a constant exposure throughout an entire construction year therefore conservatively overestimating the exposure during that year. For example, while the demolition phase is only anticipated to occur for 231 days, the risk assessment assumed that exposure from that phase would occur for 260 days. These assumptions therefore conservatively overestimates exposure, and overestimates the potential risk to the nearby sensitive receptors.
The Exposure Frequency (EF) is the number of days per year of exposure for the given scenario (i.e. residential, worker). The Office of Environmental Health Hazard Assessment (OEHHA) recommends use of 350 days/year for residential exposure (applicable to 30-year risk assessments), and 250 days/year for worker exposure, but emissions should be limited to the period or duration of activities associated with the proposed project\(^{35}\). The HRA was for DPM during construction and emissions from the worst-case day were assumed to occur for the entire year, when these levels would only occur on a peak construction day. Exposure frequencies were calculated for the resident child 3\(^{rd}\) trimester to birth, resident child birth to 2 years, resident child 2 to 16 years, and resident adult. An EF of 260 days, which is approximately 7/10ths of a year (the amount of time construction would occur during the year), was used for all scenarios except the resident child 3\(^{rd}\) trimester to birth. For the 3\(^{rd}\) trimester to birth an EF of 66 days was used as construction would occur for 22 days per month for the three months left of gestation in the 3\(^{rd}\) trimester, which equates to 66 days. The analysis originally assumed that construction would occur 5 days per week for 260 days per year or approximately 22 days per month. An additional analysis was prepared in response to comments which assumed 6 days per week (312 days per year or 24 days per month). The additional analysis still remains conservative as presented. The EF was used with the maximum hourly emissions form AERSCREEN, which occurred at 225 meters from the project site. The emissions for distances from 1 meter to 225 meters were less than the emissions for 225. Therefore, the health risk would be lower at the closer distances\(^{36}\).

As DPM is a subset component of PM10, assuming that all PM10 is DPM, as was done in the screening HRA is appropriately conservative. Using the PM10 concentrations identified for each construction year, the maximum incremental increase in cancer risk for off-site receptors from construction is 9.24 in 1 million under the Draft EIR analysis, which does not exceed the South Coast Air Quality Management District (SCAQMD’s) threshold of 10 in 1 million. The chronic hazard risk (non-cancer health risk) related to DPM for construction would be .0131, which does not exceed the SCAQMD’s threshold.\(^{37,38}\) The AERSCREEN output, included in Appendix D, showed that the highest concentration of pollutants would occur at 225 meters from the project site. As shown in the output, and explained above, the closest sensitive receptors to the site would be exposed to less pollutants. While the analysis is conservative as presented, additional analysis was conducted which represents the emissions from the project using a 6 day per week (312 day per year) exposure and taking into account the specific number of days each subphase would occur. While the updated analysis has exposure over more days per year, with the incorporation of total number of days of each subphase, the potential cancer risk drops to 6.7 per million, which

\(^{35}\) OEHHA Air Toxics Hot Spots Program Guidance Manual, page 8-18 states that “Exposure from projects longer than 6 months should be evaluated for the duration of the project.”

\(^{36}\) With respect to receptor distance, pollutants are carried away from the site and “drop out” of the air or are deposited based on topography and wind speed. Therefore, while there may be receptors closer than the 225 meters, the greatest concentration of pollutants is deposited at the 225 meter distance from the site and therefore these receptors would be exposed to more risk than closer receptors.

\(^{37}\) With respect to chronic risk there are no units corresponding to risk. Therefore, chronic risk is simply the total concentration times the reference exposure level. The calculations of chronic health risk are separate from the calculation of cancer risk. The calculations for chronic health risk are also included in Appendix D.

\(^{38}\) Note that the DEIR contained typographical errors with respect to the risk levels. The DEIR represented health risk and chronic risk as 8.88 in one million and 0.0124 respectively. The actual values, as reported in the response to comments are 9.24 in one million and 0.0131 respectively. These changes do not change the significance findings as presented in the DEIR.
is less than the risk reported in the Draft EIR. Therefore, even with this additional health risk analysis, the significance findings of the Draft EIR are not changed and further, impacts would be reduced from what was conservatively analyzed in the Draft EIR. The calculations for the revised health risk assessment are included in Appendix D1 of the Final EIR.

The comment also demands that the EIR "prepare revised HRA that...conducts an operation HRA..." As an initial matter CEQA Guidelines Section 15204(a) states that “CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.” The proposed project’s operations do not have any typical land uses that are associated with sources of hazardous Toxic Air Contaminants (TACs) (i.e., industrial manufacturing processes, automotive repair facilities, or dry-cleaning facilities). As such, the proposed project would not release substantial amounts of toxic contaminants. The only minor source of potential air toxics associated with proposed project operations include diesel PM10 (Diesel Particulate Matter - DPM) from delivery trucks (e.g., truck traffic on local streets and on-site truck idling), which occur onsite under existing conditions. The SCAQMD recommends that health risk assessments be conducted for substantial sources of DPM (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions. The proposed project is not a truck stop or warehouse distribution facility and would have much less truck traffic than one of these facilities would have, therefore, it is not expected to be a substantial source of DPM. The proposed new uses at the project site are expected to generate approximately 8,020 new vehicle trips which would primarily be automobile trips. Diesel-related activity associated with the proposed project would be deliveries by trucks, which currently exist. Delivery trucks are required to obey Air Resources Board (ARB) and SCAQMD rules and regulations, such as limiting idling times to 5 minutes or less (Title 13, Cal. Code Regulations, Section 2485). As such, there would be no potential for meaningful DPM TAC emissions from the operation of the proposed project and a health risk assessment would not be required. The approach utilized for projects operations has been expressly upheld by the Court of Appeal. (Beverly Hills Unified School District v. Los Angeles County Metropolitan Transportation Authority (2015) 241 Cal.App.4th 627, 667.) Similar to the analysis in Beverly Hills the Galleria Draft EIR provided an overview of the health effect associated with operational criteria pollutants (Draft EIR Table 3.3-1), in addition to the criteria pollutant analysis (Impact AIR-1).

Additionally, the operational air quality analysis included an LST analysis (Impact AIR-2). This localized impact analysis is a screening-level health risk assessment. The LST analysis represents the maximum emissions (NOx, CO, PM10 and PM2.5) from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. If the emissions exceed the LST significance threshold, it is recommended that dispersion modelling be performed to assess potential impacts. As shown in Table 3.1-11, Localized Operational Emissions, emissions did not exceed significance thresholds for a 5-acre site with nearest sensitive receptors at 25 meters,
which is the most conservative scenario. The SCAQMD states, if the calculated emissions for the proposed construction or operational activities are below the LST emission levels found on the LST mass rate look-up tables, then the proposed construction or operation activity is not significant for air quality. Since the Draft EIR adequately addressed operational health risks to the closest sensitive receptors, the City disagrees with the comment that an additional operational HRA needs to be performed and the Draft EIR does not require recirculation. In addition, please see Comment Response OR005-3.

**Comment OR005-16**

The commenter states that according to SWAPE, the DEIR’s conclusions regarding the Project’s health-related impact to nearby sensitive receptors are incorrect, and the potential impact is inadequately addressed.\(^28\) The DEIR’s conclusions on construction-related health risks,\(^29\) and cancer risks posed to the nearest sensitive receptor\(^30\) should not be relied upon to determine Project significance. Additionally, consistent with recent SCAQMD and Office of Environmental Health Hazard Assessment (“OEHHA”) guidance, a revised DEIR should evaluate health risk impacts from Project operation.\(^31\)

\(^{28}\) SWAPE Comments, p.6.

\(^{29}\) SWAPE Comments, pp.6-7.

\(^{30}\) SWAPE Comments, p.7.

\(^{31}\) SWAPE Comments, p.9.

**Response to Comment OR005-16**

Please refer to Response to Comment OR005-15 for a discussion concerning the results of the Draft EIR construction health risk assessment, and why the assumptions included in the analysis is correct and the potential threat to nearby sensitive receptors is adequately addressed. Additionally, Response to Comment OR005-15 provides a discussion of why the construction-related health risk and cancer risks posed to sensitive receptors can be relied upon to determine project significance. Moreover, Response to Comment OR005-15 provides the reasoning for why an operational health risk assessment is not required for the proposed project. Please also see Response to Comments OR005A for specific responses to SWAPE.

**Comment OR005-17**

The commenter states that to demonstrate the potential health risk posed by the Project, SWAPE assessed the Project’s health risk impact and found that the Project’s construction and operational Diesel Particulate Matter emissions may result in a potentially significant health risk impact that was not disclosed in the DEIR.\(^32\) Because this potentially significant impact was not identified in the DEIR, a revised DEIR must be prepared and recirculated.\(^33\) It should also incorporate mitigation measures to reduce construction emissions – SWAPE provided over five pages of feasible mitigation measures.\(^34\)

health risk due to proximity of freeways) (Attachment B); *The Link Between Pollution and Heart Disease* (May 4, 2017) *THE ECONOMIST*, available at https://www.economist.com/news/science-and-3912-003acptechology/21721632-experiment-suggests-pollutants-build-up-arterial-plaques-link-between (describing human health risk due to pollution causing arterial plaques) (Attachment C); see also CEQA Guidelines § 15065(a)(4) (a lead agency shall require an EIR if “[t]he environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.”)

33 *See* CEQA Guidelines § 15088.5, subd. (a)(1); *see also Vineyard Area Citizens for Responsible Growth* v. *city of Rancho Cordova* (2007) 40 Cal. 4th 412 (holding that when information added to the EIR reveals a new potentially significant impact, recirculation is required); *Spring Valley Lake Assn. v. City of Victorville* (2016) 248 Cal.App.4th 91, 108 (requiring recirculation because of new information disclosing a significant air quality impact).

34 SWAPE Comments, pp.13-18.

**Response to Comment OR005-17**

Please refer to Response to Comment OR005-15 for a discussion on why the results of the construction health risk assessment in the Draft EIR are correct and the potential threat to nearby sensitive receptors is adequately disclosed and addressed. The proposed project does not pose a potentially significant health risk to sensitive receptors that was not identified in the Draft EIR. Additionally, Response to Comment OR005-15 provides a discussion of why the construction-related health risk and cancer risks posed to sensitive receptors can be relied upon to determine project significance. Moreover, Response to Comment OR005-15 provides the reasoning for why more detailed operational health risk assessment is not required for the proposed project. All potentially significant health risk impacts were identified in the DIER for construction and operation of the proposed project. Since the Draft EIR adequately addressed construction and operational health risks to the closest sensitive receptors, the City disagrees with the comment that potentially significant impacts were not identified in the Draft EIR. Please also see Response to Comments OR005A for specific responses to SWAPE.

**Comment OR005-18**

The commenter states the DEIR does not mention health impacts from Valley Fever. According to the California Department of Public Health, inhaling spores of the dimorphic fungus fungus *Coccidioides spp.* (*Coccidioides immitis* and *Coccidioides posadasii*) from soil or airborne dust can cause Valley Fever.35


**Response to Comment OR005-18**

Valley Fever is an illness caused by the *Coccidioides immitis* fungus that usually affects the lungs. The fungus grows in areas of low rainfall, high summer temperatures, and moderate winter temperatures. The fungal spores are generally found in the upper 30 centimeters of the soil.
horizon, especially in virgin, undisturbed soils. The spores become airborne when uncultivated soil is disturbed by winds, construction, farming, and other activities. The Draft EIR does not mention Valley Fever as a project impact because the project is the redevelopment of an existing shopping center which is built-out and the upper 30 centimeters of the soil horizon is disturbed throughout the site, and has largely been covered by existing structures and pavement for several decades. (See Draft EIR pp. 3.3-17, 3.3-20 [noting artificial fill to a minimum depth of 3 feet or 91.4 cm].) Additionally, the project is not located in a county with high rates of Valley Fever (In 2016, there were 714 cases of Valley Fever in Los Angeles County [see below]) and the temperatures at the project site are not favorable to fungus growth with moderate summer temperatures, averaging 78 to 79 degrees Fahrenheit from July through September, with year-round averages at 71.9 degrees Fahrenheit (Draft EIR page 3.1-2). In fact, there were no reported cases in the document cited by the commenter in the City of Redondo Beach. The closest City (City of Long Beach) had only 15 reported cases, and Long Beach is located up to 8.5 miles from the ocean. Furthermore, this table does not provide any information on the source of transmission in the Long Beach cases; as noted in the documentation cited by the commenter, it can take 1-3 weeks for an individual to become symptomatic. Consequently, the 15 cases in Long Beach could be a result of exposure from another location.

Therefore, given the location of the proposed project in Los Angeles County, and the ground disturbance of native soil will be greater than 30-centimeters, and the temperature profiles for the area, it is not anticipated that Valley Fever would occur on workers at the project site. There would be no impact from Valley Fever. This is consistent with CEQA Guidelines Section 15204(a), which explains that the level of detail in an EIR is described “in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.” Nor is it feasible for a project to perform an epidemiological study to determine the effect of every possible pathogen that occurs in a region. Additionally, as explained in Response to Comment OR005-19, the project is also subject to existing regulations which prevent fugitive dust, which, as noted in the article cited by the commenter, is the main source of Valley Fever in other areas. Consequently, the project already inherently incorporates measures to address the commenter’s concerns.

In addition, reference to the following article is provided http://laborissuessolutions.com/valley-fever-unions-ceqa-solar-fresno-county/

**Comment OR005-19**

The commenter states in 2016, there were 731 cases of Valley Fever in Los Angeles County, and, in the past, the City of Redondo Beach has included mitigation measures to protect workers from the disease. In 2011, the City released a Mitigated Negative Declaration, which included as a mitigation measure; “Face masks must be used by all employees involved in grading or...
excavation operations during dry period to reduce inhalation of dust which may contain the fungus which causes San Joaquin Valley Fever.”

Despite grading and excavation activities occurring during this Project’s three years and seven months construction period, there is no mention of Valley Fever. The City must disclose, evaluate, and if necessary, mitigate the risk of Valley Fever. As is, the DEIR fails to disclose this risk.

36 Epidemiologic Summary, supra, p.7.


38 SWAPE Comments, p.7.

39 SWAPE Comments, p.9.

**Response to Comment OR005-19**

Although, there were 714 cases of Valley Fever in Los Angeles County, according to the County of Los Angeles Public Health Department, most cases have occurred in the northern areas, specifically Antelope Valley and San Fernando Valley. In fact there were no reported cases in the document cited by the commenter in the City of Redondo Beach. The closest City (City of Long Beach) had only 15 reported cases, and Long Beach is located up to 8.5 miles from the ocean. Furthermore, this table does not provide any information on the source of transmission in the Long Beach cases; as noted in the documentation cited by the commenter, it can take 1-3 weeks for an individual to become symptomatic. Consequently, the 15 cases in Long Beach could be a result of exposure from another location.

The proposed project is not located in either Antelope Valley and San Fernando Valley. Overall, the rate of coccidioidomycosis in LA County is about 7 cases per 100,000 people; among residents of Antelope Valley the rate is about 9-fold higher than elsewhere in the county.

While the commenter cites a seven (7) year old Mitigated Negative Declaration, that CEQA document did not state that there would be significant impacts associated with Valley Fever. The Shade Hotel MND concluded that there would be a significant impact associated with PM10 (Particulate Matter 10 microns or less in diameter) (Shade Hotel MND, Table 5), and proposed the Mitigation Measure cited by the commenter, which included compliance “with SCAQMD Rule 403.” The mitigation measure in that case was a general mitigation measure drafted to address PM10 and was drafted over broadly, likely due to the fact that it was prepared by an


43 https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Library/CocciEpiSummary2016.pdf

44 Ibid.

45 Similar issues have arisen on other Redondo Beach Mitigation Measures. For example, as explained in the Redondo Beach Waterfront EIR certified in October 2016, Response AL001-20: “The EIR does not rely upon this aspect of the mitigation measure to ensure that impacts are less than significant.”
outside environmental firm who prepares similar documents for projects occurring at inland locations.46

Furthermore, since that environmental document was prepared, the Court of Appeal has clarified CEQA’s legal framework, stating “An agency may rely on generally applicable regulations to conclude an environmental impact will not be significant and therefore does not require mitigation.” (San Francisco Beautiful v. City and County of San Francisco (2014) 226 Cal.App.4th 1012.) As noted in Draft EIR Section 3.1.3, the project would be subject to the regulations under SCAQMD Rule 403 (Fugitive Dust Control). As further discussed under Impact AIR-1:

It is mandatory for all construction projects in the SCAB to comply with SCAQMD Rule 403 for controlling fugitive dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12 inches, and maintaining effective cover over exposed areas. Compliance with Rule 403 and Rule 1113 (governing VOC content of architectural coatings), as a pre-existing regulatory requirements, were accounted for in the construction emissions modeling. Rule 1113 is included as part of the default modeling scenario.

Additionally, under the project specific health and safety plan that would be developed (Cal Osha regulations. Title 8 Section5144. Respiratory Protection), it would cover personal protective equipment, which would include clothing and respirators, if needed.

Consequently, the Galleria project would not result in significant impacts associated with PM 10 (or Valley Fever). (Draft EIR Table 3.1-7.)

Please refer to Response to Comment OR005-18 for the reasons that Valley Fever is not a concern for this project. The City has determined that Valley Fever was not a risk for the proposed project, thus it does not need to further evaluate the impact and no mitigation is required.

Comment OR005-20

The commenter states, the DEIR concluded that the Project’s greenhouse gas (“GHG”) impact is significant without mitigation.40 However, the DEIR underestimates GHG emissions and consequently may not require sufficient mitigation measures to reduce the Project’s GHG emissions to less than significant.41 SWAPE reviewed the DEIR’s GHG evaluation and found deficiencies in the analysis.42 SWAPE concluded that the DEIR’s conclusions that the Project’s otherwise significant GHG impact would result in a less-than-significant GHG impact with mitigation is incorrect and unreliable and should not be relied upon to determine Project significance.”43

Response to Comment OR005-20

The Draft EIR adequately analyzed the proposed project’s greenhouse gas emissions as demonstrated in the Section 3.5, Greenhouse Gas Emissions. As detailed in Appendix G of the Draft EIR, Greenhouse Gas Emissions Calculations, the existing GHG emissions were calculated for all current operations at the project site, at the time of the NOP, whose operation would continue if the proposed project is not approved. The proposed project GHG emissions included all new buildings that would be constructed and older buildings that would be renovated under the proposed project plus all existing South Bay Galleria buildings currently in operation (existing emissions) that would not be demolished under the proposed project. As shown in the analysis, proposed project emissions were not just calculated for the buildings being constructed or renovated under the proposed project, but for all operations that will exist under the project. Thus, to get a realistic picture of the total GHG emissions that would be generated under the proposed project, the existing emissions were subtracted from the proposed project emissions (which included proposed new uses and existing uses) to arrive at net GHG emissions from the project. This approach is consistent with the definition of baseline conditions pursuant to CEQA. Therefore, only net new emissions, that the proposed project would generate, need to be compared to the SCAQMD significance thresholds.

The proposed project would have a net increase of 1,993 employees and residents. As shown in Table 3.5-3, Estimated Construction- and Operations-Related GHG Emissions for Calculating GHG Emissions per Service Population, the per service population emissions for 2022 would equal 5.4 MTCO₂e annually which would exceed the 2020 efficiency threshold of 4.4 MTCO₂e annually per service level population and the interim 2022 efficiency threshold of 4.2 MTCO₂e annually. The project’s per-service population emissions for 2035 would be 5.2 MTCO₂e which would exceed the 2035 efficiency thresholds of 2.5 MTCO₂e. Therefore, operational GHG impacts resulting from project were considered to be significant without mitigation. Mitigation Measure GHG-1 sufficiently reduces GHG emissions to below the 2020, 2022, and 2035 thresholds, as shown in Table 3.5-5, Mitigated Construction and Operations Related GHG Emissions for Calculating GHG Emissions Per Service Population. As evidenced in Table 3.5-5, the project’s per-service population emissions would equal 4.1 MTCO₂e annually which would not exceed the 2020 efficiency threshold of 4.4 MTCO₂e annually or the interim 2022 efficiency threshold of 4.2 MTCO₂e annually. The project’s per-service emissions for 2035 would be 2.4 MTCO₂e, which would not exceed the 2035 threshold of 2.5 MTCO₂e annually. Therefore, operational GHG impacts resulting from the project were considered to be less than significant with implementation of Mitigation Measure GHG-1. As shown above, GHG emissions were calculated correctly, are a reliable representation of the project’s impact and can be relied upon to determine project significance. Please also see Response to Comments OR005A for specific responses to SWAPE.
2. Response to Comments

Comment OR005-21
The commenter states, the DIER relies on the Project’s net GHG emissions, rather than its total GHG emissions. By relying on net emissions, the DEIR fails to comply with Office of Planning and Research guidance, which directs lead agencies to consider the effect that the project will have on the larger environment, not just whether the project increases or decreases GHG emissions.44 SWAPE concluded that it is “inadequate to simply evaluate only new net sources of GHG emissions…and omit an analysis of all sources of GHG emissions from the Project site unless substantial evidence shows that the existing emissions sources at the Project site will be extinguished and not simply displaced elsewhere.”45

45 SWAPE, p.21.

Response to Comment OR005-21
Please refer to Response to Comment OR005-13 for discussion of CEQA’s analytical methodology. Please also refer to Response to Comment OR005-20 for a discussion of how the project’s net GHG were calculated and why they represent the project’s total GHG emissions. The Draft EIR comports with the Office of Planning and Research guidelines and does assess the effect the project will have on the larger environment and not just the increase or decrease in emissions. The analysis provides a service population estimate of GHG emissions for comparison against thresholds and a baseline analysis for comparison against existing conditions. All GHG sources were taken into account in the modeling calculations and were adequately analyzed. As stated in Response to Comments OR005-20, the existing GHG emissions would continue to occur whether or not the proposed project is approved. Thus, those emissions do not have to be accounted for in the proposed project.

While the commenter states that the EIR fails to consider GHG emissions on “the larger environment.” It is unclear precisely what the commenter means by “larger environment.” While the commenter references the 2009 Statement of Reasons for Regulatory Action, that discussion simply confirms that “Section 15064.4(b)(1) advises lead agencies to consider the extent to which a project would increase or decrease greenhouse gas emissions compared to the existing environmental setting.” To the extent the commenter is referencing regional emissions, the Draft EIR analysis expressly considered “regional emissions.” (See Draft EIR page 3.5-13.) To the extent the commenter is asserting the analysis should consider the physical environmental effects associated with climate change, that information was provided on Draft EIR page 3.5-2. The Draft EIR adequately analyzed the project’s GHG emissions and their impact on the environment.

Comment OR005-22
The commenter states that by failing to disclose total GHG emissions, the DEIR underestimates the Project’s GHG impact.46 Therefore, it is uncertain if the Project’s mitigation measures would bring the significant GHG impact to less-than-significant.47 Additional mitigation measures may
be needed to bring the Project to a less-than-significant level, or the City may need to adopt a finding of overriding consideration if the impact cannot be sufficiently reduced.

46 SWAPE, p.20

47 DEIR, p.3.5-14 (Mitigation Measures MM GHG-1

48 CEQA Guidelines § 15126.5 describe feasible measures to minimize significant adverse impacts).

49 CEQA Guidelines §§ 15091 (changes have been required in, or incorporated into the project which avoid or substantially lessen the significant environmental effects), 15093(b) (significant effects are not avoided or substantially lessened).

**Response to Comment OR005-22**

Please refer to Response to Comment OR005-13 for discussion of CEQA’s analytical methodology. The Draft EIR correctly calculated and estimated the project’s GHG emissions. Please also refer to Response to Comment OR005-20 for a discussion of how the project’s net GHG were calculated and why they represent the project’s total GHG emissions. Please refer to Response to Comment OR005-20 for a discussion of how Mitigation Measure GHG-1 sufficiently reduces project impacts to a less than significant level.

**Comment OR005-23**

The commenter states in order to estimate the Project’s potential GHG impacts, SWAPE conducted a GHG analysis using the Project’s total GHG emissions and found that the Project’s Per Service Population Annual Emissions exceeded the 2020 and 2035 SCAQMD Project Level Efficiency Thresholds. Because the Project’s operational GHG emissions may present a potentially significant impact, even with mitigation, SWAPE provides additional feasible mitigation measures to reduce emissions. The City should revise and recirculate the DEIR’s GHG analysis and, as needed, include additional GHG mitigation measures for this potentially significant GHG.

50 SWAPE, p. 20; DEIR, p. 3.5-15 (“The term ‘service population’ represents the users (residential plus employees) of the project.”).

51 SWAPE, pp.21-27.

52 SWAPE, p. 21.

**Response to Comment OR005-23**

As outlined in greater detail below, the fundamental error that the commenter and SWAPE have made in all of their calculations is assuming that baseline conditions are impacts of this project. This ignores the basis tenants of a CEQA analysis as explained in Response to Comment OR005-12. As discussed by the Court of Appeal “The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope.” (Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal.App.4th 1059.) See also Black Property Owners Assoc. v. City of Berkeley (1994) 22 Cal.App.4th 974, wherein the court concluded that adoption of a Negative Declaration was appropriate because “in most cases the agency will not be required to assess the
environmental effects of the entire plan or preexisting land use designations. Instead, the question is the potential impact on the existing environment of changes in the plan which are embodied in the amendment.” (Emphasis in the original.)

The Draft EIR correctly calculated and estimated the project’s GHG emissions. Please refer to Response to Comment OR005-20 for a discussion of how the project’s net GHG were calculated and why they represent the project’s total GHG emissions. Please refer to Response to Comment OR005-20 for a discussion of the project’s GHG emissions impact and how Mitigation Measure GHG-1 sufficiently reduces project impacts to a less than significant level.

The SWAPE analysis is an incorrect portrayal of potential GHG impacts of the proposed project. SWAPE stated that their analysis found that the project’s per service population annual emissions exceed 2020 and 2035 SCAQMD Project Level Efficiency Thresholds. The Draft EIR states that those levels would be exceeded as well without implementation of Mitigation Measure GHG-1. However, the difference lies in that SWAPE compared the proposed project emissions, which includes all existing uses currently at the site (existing emissions) and new proposed uses/renovations resulting from the project, to the SCAQMD significance thresholds which resulted in higher significant GHG impacts than those presented in the Draft EIR. The SWAPE analysis is flawed, because the proposed project GHG emissions that SWAPE used include existing emissions which will continue at the site even if the proposed project is not approved. Therefore, existing emissions should be subtracted from the proposed project emissions, which include emissions from all currently existing buildings that will not be demolished, to determine net emissions of the project. Thus, the Draft EIR accurately calculated the proposed project’s GHG operational emissions and impacts. Since GHG impacts were significant, the Draft EIR proposed Mitigation Measure GHG-1 which mitigates the GHG impact to less than significant. Since the Draft EIR accurately determined project operational GHG impacts, and the mitigation measure sufficiently reduces the impact to less than significant, the City disagrees that the Draft EIR need to be updated nor do additional feasible mitigation measures need to be provided.

**Comment OR005-24**

The commenter states to expand on one of SWAPE’s feasible mitigation measures, the City should consider including cool roofs and pavements in the list of GHG reduction options under Mitigation Measure GHG-1. The purpose of the mitigation measure is to reduce GHG emissions and maximize the Project’s ability to achieve GHG emissions reductions. The Project proposes to construct parking structures, restripe roads, and demolish parking surfaces. On those exposed surfaces (roofs and/or pavements), the City should install light-reflective surfaces. Indeed, the City of Redondo Beach’s Efficiency Climate Action Plan includes Measure 6.2 to incentivize or require light-reflective surfaces, yet this concept is absent from the DEIR.

53 SWAPE, p. 23 (“Install ‘cool’ roofs and ‘cool’ pavements.”)

54 DEIR, pp. 3.5-18-19.

55 DEIR, pp. 3.5-18-19.
56 DEIR, p. ES-7, id., at p. 2-14 (“A majority of the existing surface parking available at the project site would be removed and replaced with three new parking structures and a modification to the existing parking structure as described below.”).

57 DEIR, pp. 3-46-47.

58 DEIR, p. 2-14 (“Macy’s and most of the asphalt surface parking would be demolished.”).


**Response to Comment OR005-24**

The commenter suggests installation of cool roofs as a mitigation measures. As explained in Draft EIR section 3.5 impacts would be mitigated to less than significant with the mitigation currently proposed.

As stated in Mitigation Measure GHG-1, in Section 3.5 of the Draft EIR, to reduce GHG emissions from the project site and to maximize the project’s ability to achieve GHG emissions reductions the project shall implement any combination of the options, to achieve a minimum reduction of 53 percent of the project-related emissions. The features are not an all-inclusive list of GHG reduction options, and additional options can be relied upon if the applicant provides substantial evidence that the 53 percent reduction would be achieved. However, the applicant is already required by the existing California Energy Code to install cool roofs, consequently the commenters’ request is already inherently incorporated into the project. (See Title 24, Part 6, Sections 140.3(a)(1), 141.0(b)(2)(B), 141.0(b)(3)).

As shown in Figures 2-7 and Figure 4-13, upon completion of the project or an alternative, the majority of the land area on the project site would either have a structure situated on it, which is already subject to the cool roof Energy Code standards referenced in the previous paragraph, or would be landscaped. Very little area would be paved, as most of the existing surface parking would be converted to below ground parking. Consequently, given the small number of paved...
the commenter’s suggestion for cool pavement is not anticipated to substantially reduce a significant impact. Please also see Response to Comments OR005A for specific responses to SWAPE.

**Comment OR005-25**

The commenter states the City's Energy Efficiency Climate Action Plan discusses cool roofs and cool pavements as follows:

Cool roof is built from materials with high thermal emittance and high solar reflectance—albedo—to help reflect sunlight (and the associated energy) away from a building. These properties help roofs to absorb less heat and stay up to 50-60°F (28-33°C) cooler than conventional materials during peak summer weather. Cool roofs may be installed on low-slope roofs (such as the flat or gently sloping roofs typically found on commercial, industrial, and office buildings) or the steep-sloped roofs used in many residences and retail buildings.

Cool pavement is built from materials that reflect more solar energy, enhance water evaporation, or have been otherwise modified to remain cooler than conventional pavements. This pavement can be created with existing paving technologies as well as newer approaches such as the use of coatings, permeable paving, or grass paving. Cool pavements save energy by lowering the outside temperature, allowing air conditioners to cool buildings with less energy, and reducing the need for electric street lighting at night.  

**Response to Comment OR005-25**

Refer to Response to Comment OR005-24 regarding the use of cool roofs and/or pavements.

**Comment OR005-26**

The commenter states that with respect to reducing the need for electric street lighting at night, the City should consider the synergy between motion activated lights in the parking garage and reflective surfaces. If the parking garages (or other surfaces) have reflective surfaces, which will reduce the amount of light needed to illuminate the area, then fewer lights will need to be installed or activated.

**Response to Comment OR005-26**

The Draft EIR includes as part of Mitigation Measure GHG-1 “motion detectors on lights in parking garages that service the residential portion of the project.” It is unclear precisely what the commenter is suggesting by the “synergy” of this provision with reflective surfaces. To the extent the commenter is simply suggesting installation of reflective surfaces as a mitigation, as discussed in Response to Comment OR005-24, the projects GHG impacts are reduced to less than significant with implementation of Mitigation Measure GHG-1. Nevertheless, in order to respond to the comment, in the Draft EIR Section 3.11, Public Services, on page 3.11-7. The parking...
garage lighting topic is addressed as more of a security related issue. “The RBMC requires security lighting for parking facilities and that the light source shall not be visible from the street or surrounding residential properties and be reflected away from any nearby residential properties (RBMC Section 10-5.1706(c)(10).”

**Comment OR005-27**

The commenter states, the Lawrence Berkeley National Lab also describes additional benefits to cool pavements, which are discussed in further detail in Section II.F., below.64

64 LBL, Cool Pavement, supra.

**Response to Comment OR005-27**

The comment does not specifically address an environmental issue. However, your comment regarding additional benefits to cool pavements from the Lawrence Berkeley National Laboratory is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Please refer to Response to Comments OR005-24, and OR005-29 through 35 (i.e. Section II.F).

**Comment OR005-28**

The commenter states, the Torrance Municipal Water District should have prepared the Water Supply Assessment.

The public water system is Torrance Municipal Water District ("TMWD").65 According to the California Water Code, the public water system (i.e., TMWD) is responsible for preparing the Project's Water Supply Assessment ("WSA").66 Here, it is not clear if TMWD prepared the WSA because Todd Groundwater prepared the WSA. 67 There is no indication that Todd Groundwater prepared the assessment on behalf of TMWD. The DEIR must clarify whether TMWD prepared the WSA. If it did not, then TMWD must prepare a WSA for this Project, consistent with the Water Code and CEQA.68

65 DEIR, p. 3.7-3 ("The project site, despite being located in Redondo Beach, receives its operational water supply from the City of Torrance Municipal Water District (TMWD).); DEIR, Appendix J., WSA, p. 1 ("The City of Torrance is the public water provider for the South Bay Galleria property. Therefore, water supply and demand information for the City of Torrance will be presented herein.").

66 Cal. Water Code, § 10910(c),(g).

67 DEIR, Appendix J.

68 Cal. Water Code, §§ 10910 et seq.

**Response to Comment OR005-28**

Contrary to the assertions in the Comment, the Water Supply Assessment expressly states that “This assessment was prepared by Liz Elliott, Senior Hydrogeologist, and Iris Priestaf, President, on behalf of the cities of Redondo Beach and Torrance.” (Draft EIR, Appendix J, Section 1.4.) The City of Torrance reviewed and revised the Water Supply Assessment for the Galleria Project and finalized the document on July 6, 2017 by email from Michael Ritchey, City of Torrance
Associate Civil Engineer, stating “Yes, the City has reviewed the revisions to the WSA [made pursuant to Torrance’s request] from Liz, at Todd Groundwater, and finds them acceptable.”

**Comment OR005-29**

The commenter states the DEIR fails to propose all feasible mitigation measures to address the significant Transportation and Traffic impact.

The DEIR states that the Project will have significant and unavoidable Transportation and Traffic impacts, even with mitigation. 69 The impacts are, in part, a result of an increase of 8,020 daily net new vehicle trips. 70 CEQA requires public agencies to avoid or reduce environmental damage when "feasible" by requiring "environmentally superior" alternatives and all feasible mitigation measures. 71 The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to "identify ways that environmental damage can be avoided or significantly reduced."72 If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns."73

69 DEIR, p. 3.13-14.

70 DEIR, pp. 3.13-31, 3.13-46 (discussing traffic volumes and mentioning SB 375; see also DEIR, p. 4-42 ("[SB 375] encourages land use and growth patterns near transit facilities and non-motorized transportation infrastructure, and reducing [Vehicle Miles Traveled (VMT)].").

71 CEQA Guidelines, § 15002(a)(2)-(3) (italics added); see also Berkeley Jets, supra, 91 Cal.App.4th at p. 1354; Citizens of Goleta Valley, supra, 52 Cal.3d at p. 564.

72 CEQA Guidelines, §15002(a)(2).


**Response to Comment OR005-29**

The Draft EIR Chapter 3.13, *Transportation and Traffic* and supporting Transportation Impact Study (Appendix L) reviewed all feasible mitigation measures to reduce impacts associated with the proposed project’s impact on Transportation and Traffic, the mitigation measures were included in the Draft EIR. Moreover, Section 4.0, *Alternatives*, includes a discussion of four project alternatives and also includes discussion of the environmentally superior alternative on page 4-206 of the Draft EIR.

**Comment OR005-30**

The commenter state the significant and unavoidable impacts would occur at three intersections #16 (Hawthorne Boulevard & Artesia Boulevard (AM and PM peak hours)), #17 (Prairie Avenue & Artesia Boulevard (Al and PM peak hours)), and #19 (I-405 Northbound Ramps & Artesia Boulevard (PM peak hour)). 74

74 DEIR, pp. 3.13-46-47.
**Response to Comment OR005-30**

The commenter identifies three significant and unavoidable impacts at the intersections of Hawthorne Boulevard and Artesia Boulevard, Prairie Avenue and Artesia Boulevard, and I-405 Northbound Off-Ramp and Artesia Boulevard. As noted in Draft EIR Section 3.13.6, the proposed project would result in three significant and unavoidable impacts at Intersection 16 (Hawthorne Boulevard & Artesia Boulevard), Intersection 17 (Prairie Avenue & Artesia Boulevard), and Intersection 19 (I-405 Northbound Ramps & Artesia Boulevard).

**Comment OR005-31**

At intersection #17, the mitigation measure - modify traffic light signals - would not fully mitigate the significant impact.\(^{75}\) For intersections #16 and #19, the DEIR indicates that no feasible mitigation measures were identified to address their significant impacts.\(^{76}\) Other intersection impacts (#13, #15, and #18) are significant, but would be reduced to a less-than-significant level by implementing mitigation measures that would restrripe the lanes and would modify traffic light signal timing to accommodate the Project's traffic patterns.\(^{77}\)

\(^{75}\) DEIR, p. 3.13-46.
\(^{76}\) DEIR, p. 3.13-47.
\(^{77}\) DEIR, p. 3.13-46.

**Response to Comment OR005-31**

The comment identifies that the mitigation at Prairie Avenue and Artesia Boulevard would not mitigate the significant impact, that no feasible mitigation was identified Hawthorne Boulevard and Artesia Boulevard and I-405 Northbound Off-Ramp and Artesia Boulevard. The comment also identifies that the mitigations at the intersections of Inglewood Avenue and Artesia Boulevard, Redondo Beach Boulevard and Artesia Boulevard, and I-405 Southbound Ramp and Artesia Boulevard would mitigation the significant impact. 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 OR005-32**

The City's concession that it could determine "no feasible mitigation measures" for some of the Transportation and Traffic impacts is inadequate for CEQA purposes.\(^{78}\) There are additional feasible mitigation measures that would reduce vehicle trips, and therefore reduce the significant Transportation and Traffic impact. These include implementing measures to reduce vehicle transit and increase pedestrian and bicycle travel. As discussed in Section II.D., supra, this could include installing reflective pavement to encourage pedestrian and bicycle travel to the Project site.

\(^{78}\) DEIR, p. 3.13-47.

**Response to Comment OR005-32**

The comment states that the determination that no feasible mitigation is available for some of the transportation impacts is inadequate for CEQA purposes. Mitigation measures were developed with input from Fehr and Peers, and the City of Redondo Beach the lead agency of the Draft EIR. The mitigation measures were developed to be implemented within the existing roadway.
Mitigation measures that had lack of right-of-way, had physical limitations, or created secondary impacts such as increasing pedestrian crossing distance and time, reduction in pedestrian refuge space, or lane offsets, were determined to be infeasible. Mitigations at the intersections of Hawthorne Boulevard and Artesia Boulevard and I-405 Northbound Ramps and Artesia Boulevard were explored but due to the physical constraints or potential secondary impacts, these mitigation measures have been determined to be infeasible. Descriptions of the mitigations explored are provided on page 55 of the Transportation Impact Study.

The commenter asserts that there are “additional feasible mitigation measures that would reduce vehicle trips, suggesting “measures to reduce vehicle transit and increase pedestrian and bicycle travel.” However, the only specific suggestion is installing reflective pavement to encourage pedestrian and bicycle travel.” As an initial matter, the entire project’s objective is to “promote pedestrian traffic, reduce regional vehicular travel,” and “To further the City of Redondo Beach General Plan land use policies to ‘achieve the character of a pedestrian-oriented ‘urban center’ at this location.” (Draft EIR Section 2.2.) Furthermore, the primary objective for the CR zoning (Galleria Site) is to “Provide for the continued use of the Galleria at South Bay and surrounding properties as a primary center of regional-serving commercial uses, and provide for the development of mixed-use projects integrating residential with commercial uses; allowing for increases in development which enhance its economic vitality and contribute revenue to the City and improve its character as a pedestrian-oriented activity center.” As also noted in Draft EIR Section 3.0.3, the project site meets the definition of a Transit Priority Area, due to public transit service from 11 existing bus-lines and the on-site transit center. As confirmed in the Vehicle Miles Traveled Analysis, the proposed project’s mix of uses contemplated for the project site inherently reduces the trips and vehicle miles traveled, thus incorporated the general concepts referenced in the comments. As outlined on Draft EIR Sections 3.13-23, due to the mix of uses on the project site, and access on on-site public transit, the project results in a reduction of 8,077 trips as compared to a situation where each of the proposed uses were sited individually. (Draft EIR Table 3.13-7 “MXD+ Model Calibration”; see also page 3.13-45 [VMT Summary].)

The commenter suggests installation of “reflective pavement to encourage pedestrian and bicycle travel.” However, the commenter provides no evidence that this would indirectly encourage those modes of transportation to the extent that there would be a reasonably foreseeable substantial reduction in traffic generation at these intersections. As noted in Response to Comment OR005-24, the majority of the project site would not have paved surfaces. Given the lack of paved surfaces on the project site under the proposed conditions, there would not be an appreciable reduction in temperature through installation of reflective pavement. Furthermore, as noted on Draft EIR page 3.1-2, the average annual maximum temperature in the area is 71.9 degrees Fahrenheit. Given all of these factors, the one specific suggestion to indirectly encourage bicycle and pedestrian activity is not anticipated to substantially reduce or avoid the significant and unavoidable impacts of the proposed project for all the reasons described above. (See also Living Rivers Council v. State Water Resources Control Board (2017) Case No. A148400 [“The likelihood that an indirect effect (such as increased groundwater pumping) will materialize, and the severity of the effect if it does materialize, are relevant to assessing a proposed mitigation measure’s likely success [i.e. feasibility] in achieving the goal of protecting the environment.”].)
2. Response to Comments

**Comment OR005-33**

The Transportation and Traffic implications for installing reflective pavement are as follows: (1) pedestrians benefit from cooler air and cooler pavements; and, (2) drivers have increased visibility. First, the Lawrence Berkeley National Laboratory has studied reflective pavements and has found that "cool pavements cool the city air, reducing heat-related illnesses, slowing the formation of smog, and making it more comfortable to be outside. Pedestrians also benefit from cooler air and cooler pavements." Encouraging individuals to travel outdoors, by foot or bicycle, may reduce vehicle trips and therefore reduce the Transportation and Traffic impact.

Response to Comment OR005-33

Please refer to Response to Comments OR005-24 and 32 regarding cooler pavements and roofs. The comment also states that by installing reflective pavement drivers have increased visibility. The commenter provides no evidence that the reflective pavement would “increase visibility,” in fact in some instances reflective pavement could create an additional source of glare for a driver. Furthermore, the Draft EIR did not identify any transportation safety impacts. (See Draft EIR Section 3.13.)

**Comment OR005-34**

Second, although the DEIR states that the Project would not substantially increase vehicular hazards, such as collisions, collisions do and will continue to occur at the Project site. so "Light-colored pavements better reflect street lights and vehicle headlights at night, increasing visibility for drivers." This, too, may encourage individuals to travel outdoors, by foot or bicycle, if they believe they are more visible and less likely to be struck. Increasing visibility may mitigate the likelihood of collision.

Response to Comment OR005-34

The comment states that light-colored pavements better reflect street lights and headlights, increasing visibility for drivers. The comment additionally states that people traveling by foot or bicycle many increase if they believe they are more visible and less likely to be struck and increasing visibility may mitigate a collision. As stated on page 3.13-52 of the Draft EIR, the project would not substantially increase hazards due to a design feature and that many of the access points to/from the project would remain the same.

It should be noted that as part of the conditions for approval process, the applicant shall fund and implement a Fire, Life-Safety and Security Plan, which will include a lighting plan approval after review by the RBPD Chief and RBFD Chief prior to the issuance of Building Permits, and issuance of Certificate of Occupancy. Therefore, lighting at the entry and exit points of the project site would be adequately designed based on the lighting plan, and as outlined in the Draft
EIR under Impact TRA-3, the project would not result in significant and unavoidable safety impacts, consequently no mitigation measures are required. (CEQA Guidelines Section 15126.4(a)(3); see also Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal.App.4th 1059 [“The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope”].) Nevertheless, the suggestion will be considered as part of the City’s normal Citywide planning process. While the commenter equates the “flagmen” under Condition of Approval TRA-1, the two situations are not comparable (i.e. construction vehicles versus personal motor vehicles operating under operational conditions). Construction activities, which are addressed under COA TRA-1, involve heavy and oversized construction equipment, which often have limited maneuverability. Flagman can assist in directing these vehicles in such scenarios.

Comment OR005-35

As described in further detail above, reducing vehicle trips and increasing bicycle or pedestrian trips is consistent with the City of Redondo Beach's Energy Efficiency Climate Action Plan. 83 It is also consistent with the Project's goals "to replace expansive surface parking fields with mid-rise housing to increase synergy between residents and commercial needs, promote pedestrian traffic, reduce regional vehicular travel, and increase project revenue to applicant and City."84 The City must consider all feasible mitigation measures to reduce the significant and unavoidable transportation impact. The City's conclusion that it could not find any feasible mitigation measures to reduce traffic impacts is unsubstantiated, as there are means to encourage more pedestrian and bicycle trips in place of vehicular trips. The City must recirculate a revised DEIR that incorporates all feasible mitigation measures to reduce the traffic and transportation impacts.

83 RB, EECAP, supra, at pp. 26-27 (promoting safe walking and bicycling); see also id., at pdf. p. 169 (reflective surfaces).
84 DEIR, p. 4-3 (italics added).

Response to Comment OR005-35

The comment states that the conclusion that feasible mitigation measures to reduce significant and unavoidable traffic impacts could not be found is unsubstantiated, as there are means to encourage more pedestrian and bicycle trips in place of vehicle trips. Please see the response to comment OR005-32 regarding the determination of infeasible mitigations and please see response to comment OR005-32 regarding the commenter’s alleged improvements to encourage more pedestrian and bicycle use. Additionally, please refer to response to Comments OR005-29 through 34.

Comment OR005-36

The commenter states the DEIR fails to evaluate alternatives that would allow consistency with the General Plan.

The DEIR fails to consider a Project alternative that accommodates the maximum amount of residential dwelling units allowed at the site. CEQA requires that a lead agency describe a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.85
If an alternative was rejected as infeasible, the lead agency should briefly explain the reasons underlying the lead agency's determination. Among the factors that can be used to eliminate alternatives are failure to meet basic project objectives, and inability to avoid significant environmental impacts.

85 CEQA Guidelines, § 15126.6(a).
86 CEQA Guidelines, § 15126.6(c).
87 CEQA Guidelines, § 15126.6(c).

Response to Comment OR005-36

The proposed project Draft EIR analyzed four different and distinct alternatives at the project site (as well as a fifth modified alternative), which constitute a reasonable range of alternatives. As discussed above in the comment, CEQA requires that a lead agency describe a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.

The subsequent comments from CREED LA assume that the 650-residential-unit value was set by the City based upon the calculations in the Housing Element. However, this value was the amount of development requested by the Property Owner/Applicant (Forest City). Consequently, this was the amount of development analyzed in the Draft EIR, not due to the calculations performed at length by the commenter in the subsequent comments. The commenter acknowledges that CEQA Alternatives must be capable of substantially reducing or avoiding a significant impact, however this rule of law is ignored in the comment letter. The commenter does not provide any evidence that increasing the amount of residential development on the project site would reduce or avoid a significant impact. In fact, such a suggestion is inherently inconsistent with Comments OR005-32, which requests alternatives to reduce intersection impacts. As outlined in Draft EIR Section 4, the Reduced Residential Density Alternatives result in reduced localized intersection impacts. (Draft EIR page 4-204.) Furthermore, as noted in Village Laguna of Laguna Beach, Inc. v. Board of Supervisors of Orange County (1982) 134 Cal.App.3d 1022 “There are literally thousands of Reasonable Alternatives to the proposed project…But, no one would argue the EIR is insufficient for failure to describe the 20,001-home alternative.”

While the Commenter is correct that the Gov. Section 65589.5(a) states that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California,” the commenter ignores the other substantive portions of that statutory section which explain “A local agency shall not disapprove a housing development project…or condition approval in a manner that renders the project infeasible…unless it makes written findings…as to one of the following.” (Gov. Code Section 65589.5(d).) As explained above the City was not “disapproving” or reducing the density of the proposal, the Property Owner/Applicant was the entity that requested development of 650 residential units.
Comment OR005-37

According to the City of Redondo Beach's General Plan Housing Element, the Project site has "the greatest potential for future residential development." It is located in Commercial Regional ("CR") zoning. The primary purpose of CR zoning is to:

Provide for the continued use of the Galleria at South Bay and surrounding properties as a primary center of regional-serving commercial uses, and provide for the development of mixed-use projects integrating residential with commercial uses; allowing for increases in development which enhance its economic vitality and contribute revenue to the City and improve its character as a pedestrian-oriented activity center, while minimizing impacts on adjacent streets and residential neighborhoods.  

88 DEIR, p. 5-14.
89 DEIR, p. 3.8-16; see also id. ("The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City "facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community" (Gov. Code§ 65580(d)).")

Response to Comment OR005-37

• Please see Response to Comment OR005-36.

Comment OR005-38

The commenter states the Project site could have as many as 812 residential dwelling units. But, the DEIR relies on the City's Housing Element to reduce this number to 650 units; thereby "developing less residential units than anticipated by the General Plan." The DEIR states that "[a]lthough up to 812 units can be accommodated on [sic], the Housing Element conservatively assumes that only about 80 percent of the units could be realized, which would total approximately 650 units on the project site." Based on this 80 percent assumption, the Project only considers a maximum build out of 650 units. But there are flaws in this assumption.

90 DEIR, p. 5-14.
91 DEIR, p. 3.10-6.

Response to Comment OR005-38

Please see Response to Comment OR005-36.

Comment OR005-39

The commenter states, the Housing Element describes a much larger South Bay Galleria site than the one described in this Project. According to the DEIR, "[t]he Housing Element considers Site #5, South Bay Galleria, to include the property south of 177th Street, and thus calculates the potential residential units for the entirety of the site at 1,172 units. The proposed project site has the capacity to add a maximum of 812 units to the City, under the Housing Element." So, there are two different projects: (1) a larger project described in the Housing Element that would accommodate 1,172 units (hereinafter "#1"), and (2) this Project, which is a subpart of #1, and can accommodate 812 units.
Response to Comment OR005-39

Please see Response to Comment OR005-36.

Comment OR005-40

The commenter states the DEIR's flaw lies in its calculation, which in turn impacts the maximum number of housing available on the site. With respect to the larger project (#1), the Housing Element states "[a]lthough up to 1,467 units can be accommodated on this site as part of a mixed use development, this site inventory conservatively assumes that only about 80 percent of the units will be realized (1, 172 units)." In other words, the DEIR believes that no more than 1,172 units can be accommodates in all of #1.

\[
\{1.467 \text{ units (#1)} \times 80\% \} = 1,173.6 \text{ units, rounded down to 1,172 units (realized)}
\]

However, the DEIR applies the 80 percent assumption that applies to the entire project (#1) to this Project, which is just a subpart of #1. This is erroneous because the 80 percent figure is an average for all of #1. It could be that the percent realized at this Project site is much higher, than the percent realized outside the Project site, but within #1. If the entirety of #1 can accommodate a maximum of 1,467 units, and this Project can accommodate a maximum of 812 units, then that leaves 655 units unaccounted for.

\[
\{1,467 \text{ units (#1)} - 812 \text{ units (Project)} \} = 655 \text{ units (unaccounted for)}
\]

The Housing Element states that 80% of the units at #1 will be realized, which results in 1,172 units.

\[
\{812 \text{ units (Project)} / 655 \text{ units (unaccounted for)} \} \times 80\% \text{ realized} = 1,172 \text{ units (#1)}
\]

However, the DEIR does not provide substantial evidence that 80% applies equally to the 812 units as it does for the 655 units. For example, the following scenarios also result in approximately 1,172 units:

\[
\{(812 \text{ units x 90\% realized)} / (655 \text{ units x 67\%}) \} = 1,172 \text{ units}
\]

\[
\{(812 \text{ units x 100\% realized)} / (655 \text{ units x 55\%}) \} = 1,172 \text{ units}
\]


Response to Comment OR005-40

Please see Response to Comment OR005-36.
Comment OR005-41

The commenter states he DEIR fails to provide substantial evidence that a percentage that applies to a larger project site (#1), also applies to the proposed Project. As a consequence of this flaw, the DEIR fails to consider building the maximum amount of residential units at the site. The City must study how many units can be realized at "one of the key housing sites in the City" and consider a maximum build out scenario of all 812 units. As is, the DEIR fails to provide adequate alternatives because it does not evaluate building more than 650 residential units. The proposed alternatives evaluate a Project with 480, 298, 300 residential units, all well below the Housing Element's objective for the site.

Response to Comment OR005-41

Please see Response to Comment OR005-36.

Comment OR005-42

Moreover, although the nature or scope of the alternatives is subject to the rule of reason, failing to evaluate an 812 dwelling unit alternative is unreasonable. An 812 dwelling unit alternative is consistent with the CR zoning, and meets the Project's objectives of "replacing expansive surface parking fields with mid-rise housing to increase synergy between residents and commercial needs, promote pedestrian traffic, reduce regional vehicular travel, and increase project revenue to applicant and City.

Response to Comment OR005-42

Please see Response to Comment OR005-36.

Comment OR005-43

The commenter states, the second factor- inability to lessen significant and unavoidable impacts - would not render the full build out housing option as an unreasonable alternative. As the DEIR acknowledges, all the alternatives have tradeoffs. Some of the commercial, developer, and retail stores could have been reduced, just as residential and retail units were reduced in the proposed alternatives. For example, the project allocates up to 650,000 square feet for residential units. If, for example, 162,000 square feet of the 303,890 square feet of "mall stores" were converted to housing, then (using the same conversion the DEIR uses) this would yield 162 dwelling units. The total number of dwelling units would rise to 812, as the General Plan anticipated.

Response to Comment OR005-43

Please see Response to Comment OR005-36.
Response to Comments

2. Response to Comments


102 See, e.g., DEIR, p. 2-22 (650,000 square feet/650 units); DEIR, p. 4-8 (480 square feet/480 units); DEIR, p. 4-16 (298,000 square feet/298 units); DEIR, p. 4-24 (300,000 square feet/300 units).

Response to Comment OR005-43

Please see Response to Comment OR005-36.

Comment OR005-44

The commenter states, the California legislature has concluded that "the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California."103 The City must revise and recirculate the DEIR and include an evaluation of a project alternative that contains 812 units, or provide substantial evidence on the maximum allowable units on the site. With that revision, the DEIR will need to assess and compare the alternatives' impacts (e.g., traffic, emissions, water supply) to the proposed Project and other alternatives.

103 DEIR, p. 3.8-16.

Response to Comment OR005-44

Please see Response to Comment OR005-36.

Comment OR005-45

The commenter states the DEIR fails to include analysis pursuant to CEQA Guidelines, section 15065, the Mandatory Findings of Significance.

The City fails to include Mandatory Findings of Significance, pursuant to CEQA Guidelines, section 15065, in the Project's DEIR. Section 15065 is necessary to ensure that an EIR is prepared under proper circumstances (a threshold decision as to whether an EIR is needed). But once an agency decides to prepare an EIR, the Mandatory Findings of Significance guide a lead agency to (1) analyze environmental effects in depth, (2) make detailed findings on the feasibility of alternatives or mitigation measures, (3) make changes to the project, and, (4) where necessary, adopt statements of overriding considerations.104

104 CEQA Guidelines, § 15065(c)(1-4).

Response to Comment OR005-45

The commenter asserts that the Draft Environmental Impact Report fails to comply with CEQA Guidelines Section 15065(a)(2) ["The project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals."].)

As an initial matter CEQA Guidelines Section 15065(a)(2) is applicable to the determination of whether an EIR is needed in the first instance (i.e. “A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where…the following conditions may occur…”). The City elected to prepare an EIR
through the issuance of an Initial Study/Notice of Preparation. While the Initial Study did not explicitly include this precise language under 15065(a)(2) as a threshold, the Initial Study did in fact consider “short-term” and “long-term” environmental impacts consistent with this subsection (Draft EIR Appendix A1, pp. 6, 11, 20, 33). The City also utilized the Mandatory Findings of Significance from CEQA Guidelines Appendix G, which also do not explicitly reference this as a stand-alone threshold. Clearly OPR, who drafted both provisions, contemplated incorporation of such discussion into the resource area analyses, as was performed here. Furthermore, the decision to prepare an Initial Study is optional. (CEQA Guidelines Section 15063(a).)

The commenter also implies that this section is applicable to a Draft EIR and implies that this must be used as a threshold of significance. However, the commenter provides no legal support for this assertion. In the context of an EIR, “CEQA grants agencies discretion to development their own thresholds of significance (CEQA Guidelines, Section 15064, subd. (d)).” (Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal.App.4th 1059, 1068.) Under CEQA, the impact analysis must be based upon “changes in the existing physical conditions” (i.e. “Baseline”). (CEQA Guidelines Sections 15126.2(a), 15064(d), 15125(a), 15360, 15382.) As explained 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.)

As further discussed by the California Supreme Court in Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.4th 310, the CEQA baseline is not based upon hypothetical future conditions, as implied in the comment:

By comparing the proposed project to what could happen, rather than to what was actually happening, the District set the baseline not according to “established levels of a particular use,” but by “merely hypothetical conditions allowable” under the permits. Like an EIR, an initial study or negative declaration “must focus on impacts to the existing environment, not hypothetical situations.” An approach using hypothetical allowable conditions as the baseline results in “illusory” comparisons that “can only mislead the public as to the reality of the impacts and subvert full consideration of the actual environmental impacts,” a result at direct odds with CEQA’s intent. The Districts use of the prior permits maximum operating levels as a baseline appears to have had that effect here, providing an illusory basis for a finding of no significant adverse effect despite an acknowledged increase in NOx emissions exceeding the Districts published significance threshold. (Internal citations omitted.)

Aside from the commenter’s allegations in Comments OR005-1 through OR005-44, the commenter does not cite to any specific physical changes in the existing environment that were not already analyzed in the Draft EIR. Furthermore, the Draft EIR provided substantial discussion regarding short term and long term environmental goals. For example, as discussed on Draft EIR page 3.5-9:

In April 2016, the SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2016-2040 RTP/SCS has the primary goal of reducing [long-term] emissions from transportation sources to comply
with Senate Bill (SB) 375, improving public health and meeting the National Ambient Air Quality Standards (NAAQS) as set forth by the federal Clean Air Act. The proposed project would be a redevelopment project that would be located within walking distance to public transportation as well as existing residential uses within the city. The proposed project is within close proximity to transit, existing and new residences, and falls within a transit priority area (under SB 743) … The key goal of the SCS is to achieve [long-term] GHG emission reduction targets through integrated land use and transportation strategies. The focus of these reductions is on transportation and land use strategies that influence vehicle travel. The proposed project would be a redevelopment project that would be located within walking distance to public transportation as well as existing residential uses within the city. The location of the project in close proximity to both transit and existing residences would reduce transportation emissions within the region. As detailed in the project-specific traffic study (Fehr & Peers 2016), the project’s VMT are expected to be lower than a regionally comparable use. Further detail on the project’s consistency with SB 375 and SB743 is provided in the project’s transportation study, Appendix L (Fehr & Peers 2016) and Draft EIR Section 3.13, Transportation and Traffic.

Similar discussion was also included in the Alternatives chapter. For example, Draft EIR page 4-32 explains:

Alternative 1 [No Project] would not include any residential units on site, which would mean potential residents would continue to reside at alternative residential units outside of the project site, continuing regional effects associated with urban sprawl and regional air quality emissions. While localized impacts at the project site would be less in comparison to the proposed project and therefore would be less than significant, implementation of this alternative would preclude attainment of the regional air quality operational emission benefits from reduced vehicle miles traveled (VMT) associated with the proposed project. As noted in Chapter 3.5, the project site has reduced VMT in comparison to the regional average. Los Angeles County has built fewer housing units in comparison to existing demand, particularly in the coastal communities thereby requiring individuals to commute greater distances (State Legislative Office 2015). Consequently, if the 1,008 residents do not live at the project site, they will continue to reside elsewhere in the SCAG region with greater VMT and the associated regional air quality emissions.

Comment OR005-46

The commenter states, in the Initial Study for this Project, the City identified three out of the four Mandatory Findings of Significance as "potentially significant impact."105 It failed to evaluate and analyze if "[t]he project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals."106 Because the threshold decision to prepare an EIR was reached due to other factors, the omission did not impact the decision to prepare an EIR. However, its and the other three's absence in the DEIR has rendered the DEIR flawed.

105 DEIR, Appendix A-1, Initial Study/Notice of Preparation, pp. 44-46.
106 CEQA Guidelines, § 15065(a)(2).

Response to Comment OR005-46

Please see Response to Comment OR005-45.
Comment OR005-47

All four Mandatory Findings of Significance should have been included in the DEIR to ensure that the lead agency analyzed all impacts, made all necessary findings, made all feasible changes, and, if necessary, adopt statements of overriding considerations. By failing to discuss the Mandatory Findings of Significance in the DEIR, the lead agency has failed to comply with CEQA and assure an apprehensive citizenry that the City has fully analyzed and considered the Project's environmental consequences.

Response to Comment OR005-47

The commenter is referred to Response to Comment OR005-45 above.

Comment OR005-48

The commenter states that the DEIR fails to adequately disclose, evaluate, and mitigate the Project's impacts, resulting in a legally deficient CEQA document. The City must prepare a revised DEIR that addresses these inadequacies and recirculate the revised DEIR for public review.

Response to Comment OR005-48

Please refer to Response to Comments OR005-1 through 47.

Comment Letter OR005A: Coalition for Responsible Equitable Economic Development (CREED) – SWAPE Letter Attachment A

Comment OR005A-1

We have reviewed the July 2017 Draft Environmental Impact Report (DEIR) for the South Bay Galleria Mixed-Use Project (“Project”) located in the City of Redondo Beach (“City”). The proposed Project would consist of modifications and additions to the existing South Bay Galleria. The Project proposes to modify and expand portions of the existing development by combining expanded retail and dining venues with open-air promenades, hotel, and residential development. The Project site is currently occupied with 971,101 square feet of commercial retail and entertainment land uses. The Project proposed to develop 650 residential units (townhomes, condominiums, and/or apartment homes), which would be approximately 650,000 square feet at buildout, and to construct a 150-room hotel. Lastly, the Project would include the construction of three parking structures and make modifications to the existing parking structures on site. The proposed Project would increase the total building square footage to approximately 1,950,565 square feet and would result in a total of 6,450 parking spaces on a 29.85-acre site.

Response to Comment OR005A-1

The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. The Comment letters from Mr. Hagemann (SWAPE) have consistently misapplied the basic analytical tenants under the California Environmental Quality Act. Mr.
Hagemann should be readily aware of these requirements, as the Court of Appeal has rejected his arguments on several occasions. (See *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, the Court of Appeal rejected Mr. Hagemann’s argument “that an EIR was required because the MND’s mitigation measures failed adequately to address the health threat of the toxic soil contamination to construction workers and future residents of the project.”); see also *Sierra Club v. City and County of San Francisco* (2015, 1st Dist. Case No. A140891) 2015 WL 5724809:

> [P]etitioners argue that the EIR violated CEQA by failing to disclose and mitigate significant health risks associated with the styrene butadiene rubber crumb infill component of the proposed synthetic turf, and by failing to analyze and consider alternatives to the project that would have met most of the project goals while eliminating significant environmental impacts…. Petitioners next challenge the EIR’s conclusion that the cancer risks posed by SBR infill are less than significant. It is undisputed that the draft EIR discussed numerous studies that examined the cancer risks posed by SBR infill. These studies generally found that synthetic turf using recycled rubber presented either a de minimis or an acceptably low risk of cancer. Petitioners argue, however, that they presented studies and expert reports, postdating those discussed in the EIR, that establish that the carbon black, dioxins, and polycyclic aromatic hydrocarbons (PAHs) contained in the SBR infill present a significant risk of cancer. Petitioners contend that the EIR fails to present substantial evidence to rebut these later studies. The City responds that the EIR addresses the presence of these substances in SBR infill and discusses studies evaluating the risks they pose. It contends that substantial evidence supports the EIR’s ultimate conclusion that SBR infill does not present a significant cancer risk.

In rejecting Mr. Hagemann’s arguments the Court of Appeal noted:

> Hagemann’s letter addressed the 2009 OEHHA study discussed above. According to his letter, summing the cancer risks presented from the eight carcinogenic chemicals identified in the air above indoor synthetic fields resulted in a total cancer risk of 19 in 1 million – which is greater than the 1 in 1 million standard. However, as we discussed above, the 2009 OEHHA study was addressed in the EIR, and both the EIR and the study itself acknowledged that the study overstated the cancer risks due to its reliance on air sampling data taken from above indoor synthetic fields. Additionally, the Planning Department, in recommending that the Board uphold the certification of the final EIR, addressed the substance of Hagemann’s analysis, by pointing out that petitioners argued “incorrectly that the cancer risks presented for 5 chemicals identified in the 2009 OEHHA study, and disclosed in the EIR, are ‘cumulative’ (i.e., additive). However, this calculation method is not correct, not representative of the results of the 2009 report, and does not accurately represent cancer risks.”

Similar to these cases, Mr. Hagemann (SWAPE) continues to make similar errors. As outlined in the response to comments in OROO5A-2 through 35, the commenter has made numerous legal and analytical errors in reaching improper significance conclusions. This includes (1) incorrectly attributing baseline conditions as impacts of the project, contrary to CEQA’s legal framework, (2) failing to recognize that the proposed project Air Quality and GHG scenarios include emissions

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48 Available online at: www.courts.ca.gov/opinions/nonpub/A140891.DOC
from both the new and existing structures, (3) and making numerous analytical errors and incorrect assumptions.

**Comment OR005A-2**

The commenter states their review concludes that DEIR fails to adequately evaluate the Project’s Air Quality and Greenhouse Gas (GHG) Impacts. As a result, emissions and health impacts associated with construction and operation of the proposed Project are underestimated and inadequately addressed. Our analysis, as described herein, demonstrates that there are potentially significant impacts that were not disclosed, and new mitigation measures that were not considered in the DEIR that could reduce the Project’s impacts to a less than significant level. An updated DEIR should be prepared to adequately assess and mitigate the potential air quality, health risk, and GHG impacts that the Project may have on the surrounding environment.

**Response to Comment OR005A-2**

The commenter is referred to the Draft EIR Section 3.1, *Air Quality*, and Section 3.5, *Greenhouse Gases*, for an evaluation of the project’s environmental impact analysis which adequately disclosed and analyzed the proposed project’s air quality, health risk and GHG impacts. Please refer to Response to Comment OR005-12, above, and Response to Comment OR005A-3, below, regarding why Air Quality emissions are not underestimated or inadequately addressed. Please refer to Response to Comment OR005-20, above, and Response to Comment OR005A-29, below, regarding why project GHG emissions are not underestimated or inadequately addressed. All potentially significant impacts were adequately disclosed, evaluated, and any significant impacts identified were mitigated to less than significant with implementation of mitigation measures in compliance with CEQA requirements. As such, the City disagrees with the comment that an updated Draft EIR should be prepared.

**Comment OR005A-3**

The commenter states:

The DEIR determines the significance of the Project’s operational air quality impact by taking the net difference in emissions between the Project’s proposed land uses and the site’s existing land uses, and concludes that “the proposed Project would not violate any air quality standard” (p.ES-19). However, this conclusion is incorrect as it is based on a flawed analysis that greatly underestimates the Project’s operational emissions, and therefore, should not be relied upon to determine the Project significance.

**Response to Comment OR005A-3**

The commenter’s conclusions in Comments are either based upon a (1) misapplication of CEQA’s analytical requirements, and/or (2) based upon the commenter’s misunderstanding of the

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49 Heather Dubois has more than thirteen years of experience as an environmental scientist/planner with local and regional jurisdictions in CA. The last eight years have been focused on air quality impact analysis, including health risk assessments, and global climate change impacts in compliance with CEQA and NEPA processes and regulations. She has a wide range of environmental experience, including composition of complex planning documents that require comprehensive knowledge of land use planning, transit and transportation planning, and environmental planning.
Air Quality analysis scenarios. As noted in Response OR005A-1, the commenter has previously made similar errors in applying CEQA.

The methodology used in the Draft EIR is consistent with CEQA’s impact analysis methodology, which is based upon an increase above existing conditions. (CEQA Guidelines Sections 15125(a), 15126.2(a) “In assessing the impact of a proposed project on the environment, the Lead Agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published.” This is also consistent with SCAQMD’s 1993 CEQA Handbook, which states “As part of the impact analysis…the existing level of background emissions and local air quality need also be taken into account.” (SCAQMD 1993 CEQA Handbook, Section 7.2.) In fact, the State Air Resources Board (“ARB”) utilizes the same methodology in their own CEQA documents. For example, the Draft EIR Operational Air Quality analysis for ARB’s Consolidation Project (Testing Facility) stated:

To evaluate the potential environmental impacts of employee commuting changes associated with moving the testing functions from Los Angeles and El Monte to Riverside…Using the traffic analysis and current commutes for employees, the net mobile vehicle mileage (project less existing conditions) at opening day was estimated to be 4,003,440 miles per year. (ARB Consolidation Project FEIR 50 pp. 5.3-33 through 5.3-36

(See also Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal.App.4th 1059 [“The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope”].)

The Draft EIR adequately analyzed the proposed project’s operational criteria air pollutant emissions as demonstrated in the Draft EIR, Section 3.1, Air Quality. As summarized in Section 3.1 and detailed in Appendix D of the Draft EIR, Air Quality Calculations, the existing emissions calculations included all current operations at the project site, at the time of the NOP, whose operation would continue if the proposed project is not approved. The proposed project emissions included all new buildings that would be constructed and older buildings that would be renovated under the proposed project and all existing South Bay Galleria buildings currently in operation, that would not be demolished under the proposed project. As shown in the analysis, proposed project emissions were not just calculated for the buildings being constructed or renovated under the proposed project. Thus, to get a realistic picture of the total emissions that would be generated under the proposed project, the existing emissions were subtracted from the proposed project emissions (which included proposed new uses and existing uses) to arrive at net emissions from the new uses as shown in Table 3.1-8 of the Draft EIR, Proposed Project Unmitigated Operational Emissions. This approach is consistent with the definition of baseline conditions pursuant to CEQA and is not flawed, nor does it underestimate the project’s operational emissions. The air quality analysis in the DIER can, therefore, be relied upon to determine project significance.

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Daily regional and annual construction and operational emissions were estimated using the California Emissions Estimator Model (CalEEMod) software, an emissions inventory software program recommended by the SCAQMD. As shown in Table 3.1-8, net project operational emissions were determined to be below SCAQMD daily thresholds. The Draft EIR Air Quality analysis correctly calculated the operational emissions (proposed project + existing emissions – existing emissions = net emissions) and correctly assessed them against the SCAQMD significance thresholds with a finding of less than significant impacts. As shown in the Draft EIR Appendix D, page 24, “Existing Land Use” for the project site existing air quality scenario included 1,062,751 KSF of development for mall use and 64.01 KSF for the theater. As shown in Draft EIR Appendix D, page 27, the “Project Assumptions’ Air Quality scenario included both “Mall Uses” including the “Future Retail” and “Future Department Stores” as well as “Existing Mall Uses.” Thus, the analysis was not flawed and the project’s operation emissions were not underestimated. As was the case in Parker Shattuck the commenter has misapplied the basic legal framework for environmental impact analysis under CEQA.

**Comment OR005A-4**

The commenter states, the proposed Project “consists of modifications, improvements, and the existing 29.85-acres of the South Bay Galleria enclosed mall property (p. 2-1). According to the DEIR, the Project site is currently developed with an approximately 1,062,751 square foot regional shopping center, a 1,287-seat movie theater, and 4,041 parking spaces (p 3.1-13). In order to determine the potential air quality impact resulting from the operation of the proposed Project, the DEIR estimates the existing on-site and proposed Project’s criteria air pollutant emissions using the CalEEMod.2016.3.1 (“CalEEMod”)1 (p. 3.1-20). CalEEMod provides recommended default values based on site specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values but the California Environmental Quality Act (CEQA) requires that such changes by justified by substantial evidence.2 Once all of the values are inputted into the model, the Project’s construction and operational emissions are calculated and “output files” are generated. These output files, which can be found in Appendix D of the DEIR, disclose to the reader what parameters were utilized in calculating the Project’s air pollutant emissions, and make know which default values were changed as well as provide a justification for the values selected.3

The DEIR explains the methodology used to assess the Project’s air quality impact, stating,

“Because the proposed project would remove some existing uses, the emissions from the existing uses were also calculated using CalEEMod. The emissions from the discontinued existing uses are subtracted from the emissions of the proposed project to provide a net increase in pollutants that would occur from the implementation of the proposed project. The resulting net long-term operational emissions were than compared with the applicable SCAQMD thresholds for determination of significance” (p. 3.1-21 – 3.1-22).

The table below demonstrates the CalEEMod model’s estimation of the existing criteria air pollutant emissions generated by the Project site’s existing land uses (see excerpt below) (p. 3.1-14).
TABLE 3.1-4
EMISSIONS FROM EXISTING USES

<table>
<thead>
<tr>
<th>Emissions Source</th>
<th>ROG</th>
<th>NO\textsubscript{2}</th>
<th>CO</th>
<th>SO\textsubscript{2}</th>
<th>PM\textsubscript{10}</th>
<th>PM\textsubscript{2.5}</th>
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<tr>
<td>Existing Area Sources</td>
<td>25.56</td>
<td>0.01</td>
<td>0.78</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Energy Sources</td>
<td>0.10</td>
<td>0.90</td>
<td>0.78</td>
<td>0.01</td>
<td>0.07</td>
<td>0.07</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>76.76</td>
<td>300.85</td>
<td>954.61</td>
<td>2.00</td>
<td>139.06</td>
<td>39.56</td>
</tr>
<tr>
<td>Total Existing Emissions</td>
<td>102.42</td>
<td>301.76</td>
<td>956.13</td>
<td>2.00</td>
<td>139.13</td>
<td>39.63</td>
</tr>
</tbody>
</table>

As stated in the excerpt above, since only a portion of the Project site’s existing land uses will be demolished, only a portion of the existing criteria air pollutant emissions that are currently being generated on the Project site will be eliminated, and therefore, the DEIR should have only subtracted a fraction of the Project site’s existing emissions from the proposed Project’s operational emissions. However, review of the DEIR’s Air Quality Analysis and associated CalEEMod output files demonstrate that this is not the case. Specifically, we found that the entirety of the Project site’s existing emissions criteria air pollutant emissions were subtracted from the proposed Project’s emissions and then were compared to the SCAQMD significance thresholds (see table below) (Appendix D, pp.32).

**Response to Comment OR005A-4**

Please refer to Response to Comment OR005A-3 for a discussion of how the project’s net air quality emissions were calculated and why they represent the project’s total increase in air quality emissions above baseline. All air quality emissions were adequately analyzed. As stated in Response to Comments OR005A-3, the existing air quality emissions would continue to occur whether or not the proposed project is approved. This approach is consistent with the definition of baseline conditions pursuant to CEQA and is not flawed, nor does it underestimate the project’s operational emissions. The air quality analysis in the Draft EIR can, therefore, be relied upon to determine project significance.

The existing emission calculations included all current operations at the project site, at the time of the NOP, whose operation would continue if the proposed project is not approved. The proposed project emissions included all new buildings that would be constructed and older buildings that would be renovated under the proposed project and all existing South Bay Galleria buildings currently in operation, that would not be demolished under the proposed project. As shown in the analysis, proposed project emissions were not just calculated for the buildings being constructed or renovated under the proposed project. Thus, to get a realistic picture of the total emissions that would be generated under the proposed project, the existing emissions were subtracted from the proposed project emissions (which included proposed new uses and existing uses) to arrive at net emissions from the new uses.

Nevertheless, to better clarify the language in the Draft EIR, the text on pages 3.1-21 and 3.1-22, under the heading Operations, will be changed to read:
Long-term (i.e., operational) regional emissions of criteria air pollutants and precursors associated with the proposed project were calculated for the proposed project and include all new buildings that would be constructed, older buildings that would be renovated, and all existing building currently in operation at the site that would not be demolished under the proposed project, including mobile- and area-source emissions, were also quantified using the CalEEMod computer model. (See Draft EIR Appendix D, page 27.) Area-source emissions, which are widely distributed across the project site and made up of many small emissions sources (e.g., building heating and cooling units, electricity, landscaping equipment, consumer products, painting operations, etc.), were modeled according to the size and type of land use proposed. Mass mobile-source emissions were modeled based on the daily vehicle trips that would result from the proposed project and include vehicle trips of all new buildings that would be constructed, older buildings that would be renovated, and all existing building currently in operation at the site that would not be demolished under the proposed project51. Vehicle fleet mix and fuel efficiencies for mobile-source emissions were based on the CalEEMod default assumptions. Project trip generation rates and VMT assumptions were obtained from the proposed project’s traffic analysis (Section 3.13, Transportation and Traffic, and Appendix L). Because the proposed project would removed some existing uses, the emissions from the existing uses were also calculated using CalEEMod. (See Draft EIR Appendix D, page 24.) The emissions from the discontinued existing uses are subtracted from the emissions of the proposed project to provide a net increase in pollutants that would occur from the implementation of the proposed project. The resulting net long-term operational emissions were then compared with the applicable SCAQMD thresholds for determination of significance. Modeling Assumptions, input and output files are provided in Appendix D.

51 Exiting emissions were calculated for the year 2015. Energy use assumes 2013 Title 24 compliance (Appendix D – Air Quality). Project emissions were calculated with 2016 Title 24 requirements which are an additional 5% reduction versus 2013 requirements. See Appendix D, Project Assumptions.
Comment OR005A-5

South Bay Galleria
Operational CalEEMod Summary
CalEEMod: 6/21/2017: SBG – Alternative A – Operational Only

<table>
<thead>
<tr>
<th>Max lbs/day</th>
<th>ROG</th>
<th>NO₂</th>
<th>CO</th>
<th>SO₂</th>
<th>PM₁₀</th>
<th>PM₂.₅</th>
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<tr>
<td>Existing</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Area</td>
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<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

The commenter states that as seen in the table above, the DEIR subtracts all of the existing criteria pollutant emissions generated on the Project site from the proposed Project’s estimated operational emissions, and concludes that because the Project’s net emissions are below SCAQMD thresholds, the Project would have a less than significant air quality impact. This, however, is entirely incorrect, as the DEIR specifically states that only a portion of the Project site’s existing emissions sources will be eradicated by the proposed Project. By subtracting all of the Project site’s existing emissions from the proposed Project’s operational emissions, the project’s operational air quality impact is significantly underestimated. As such, we find the DEIR’s air quality analysis to be incorrect and unreliable and should not be relied upon to determine Project significance.

In an effort to more accurately estimate the proposed Project’s operation emissions, we conducted a simple analysis to determine the Project’s potential air quality impact. Because the DEIR fails to disclose or quantify how much of the Project’s site’s existing emissions will be eliminated by the proposed Project, we compared the proposed Project’s operational emissions, rather than net
emissions, to the SCAQMD’s significance thresholds to determine the significance of the Project’s emissions. It should be noted that our emissions estimates underestimate the actual emissions that would be generated on the Project site, as we did not add the existing Project site’s emissions to the proposed Project’s emissions. An updated air quality analysis must be prepared that more adequately evaluates the Project’s air quality impact by comparing the combined existing and proposed Project’s emissions to applicable thresholds.

1 CalEEMod website, available at http://www.caleemod.com/
3 CalEEMod User Guide, pp. 7, 12, available at http://www.caleemod.com/ (A key feature of the CalEEMod program is the “remarks” feature, where the user explains why a default setting was replaced by a “user defined” value. These remarks are included in the report.).

Response to Comment OR005A-5

As noted in Response to Comment OR005A-3, the commenter appears to assume that the proposed project scenario does not include emissions from the existing and renovated structures, however this is an incorrect assumption. As discussed above under Response to Comment OR005A-3, and OR005A-4 the proposed project emissions scenario included all new buildings that would be constructed and older buildings that would be renovated under the proposed project and all existing South Bay Galleria buildings currently in operation, that would not be demolished under the proposed project. Thus, to get a realistic picture of the new emissions that would be generated under the proposed project, the existing emissions were subtracted from the proposed project emissions (which included proposed new uses and existing uses) to arrive at net emissions from the new uses as shown in Table 3.1-8 of the Draft EIR, Proposed Project Unmitigated Operational Emissions. As shown in Table 3.1-8, net project operational emissions were properly assessed against SCAQMD daily thresholds resulting in a less than significant impact. Thus, the Draft EIR correctly concluded that the project’s net emissions are not underestimated and that they are below SCAQMD thresholds.

The commenters analysis is an incorrect portrayal of potential air quality impacts of the proposed project. The commenter stated that their analysis underestimates project emissions generated by operation of the project because it only considered the project’s emissions generated by the proposed project and did not take into account existing criteria air pollutant emissions generated by other land uses on the project site. However, the commenter compared the proposed project emissions, which includes all existing uses currently at the site (existing emissions) and new proposed uses/renovations resulting from the project to the SCAQMD significance thresholds which resulted in significant impacts for VOC, NOx, CO, and PM10. The commenters analysis is flawed, because the proposed project emissions include existing emissions which will continue at the site even if the proposed project is not approved. Therefore, existing emissions should be subtracted from the proposed project emissions, which include emissions from all currently existing buildings that will not be demolished, to determine net emissions of the project. See Response to Comments OR005A-3 and OR005-4, above, for more information on how the project net emissions were calculated. Thus, the Draft EIR accurately calculated the proposed project’s operational emissions and impacts. Since the Draft EIR accurately determined project operation air quality impacts, the City disagrees that the Draft EIR needs to be updated.
Comment OR005A-6

The commenter states, when the Project’s emissions are compared to SCAQMD thresholds, we find that the Project’s operational emissions increase significantly when compared to the criteria air pollutant emissions estimates provided in the DEIR. Furthermore, our analysis demonstrates that the Project’s VOC, NOx, CO, and PM10 emissions exceed SCQMD’s regional significance thresholds of 55 pounds per day (lbs/day), 55 lbs/day, 550 lbs/day, and 150 lbs/day, respectively (see table below).

<table>
<thead>
<tr>
<th>Maximum Daily Operational Emissions lbs/day</th>
</tr>
</thead>
<tbody>
<tr>
<td>Model</td>
</tr>
<tr>
<td>DEIR Net Emissions</td>
</tr>
<tr>
<td>SWAPE Proposed Project Emissions</td>
</tr>
<tr>
<td>Percent Increase</td>
</tr>
<tr>
<td>SCAQMD Regional Threshold (lbs/day)</td>
</tr>
<tr>
<td>Threshold Exceeded</td>
</tr>
</tbody>
</table>

The commenter states that as demonstrated in the table above, when the proposed Project’s emissions, rather than net emissions, are compared to thresholds, all the operational criteria air pollutant emissions increase. VOC emissions increase by approximately 909 percent and exceed the SCAQMD’s established threshold, CO emissions increase by approximately 1,071 percent and exceed the SCAQMD’s established threshold, SOx emissions increase by approximately 359 percent, PM10 emissions increase by approximately 308 percent and exceed the SCAQMD’s established threshold, and PM2.5 emissions increase by approximately 308 percent.

Response to Comment OR005A-6

As discussed above under Response to Comment OR005A-3, and OR005A-4 the proposed project emissions included all new buildings that would be constructed and older buildings that would be renovated under the proposed project and all existing South Bay Galleria buildings currently in operation, that would not be demolished under the proposed project. The SWAPE analysis is flawed, because the proposed project emissions include existing emissions which will continue at the site even if the proposed project is not approved. Therefore, existing emissions should be subtracted from the proposed project emissions, which include emissions from all currently existing buildings that will not be demolished, to determine net emissions of the project. The SWAPE Proposed Project Operational Emissions as outlined in the table are so much larger than the project’s net emissions because they include existing emissions from current operations, contrary to CEQA analytical methodology. (See also Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal.App.4th 1059 [“The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope”].) Thus, the Draft EIR accurately calculated the proposed project’s operational emissions and impacts. Since the Draft EIR accurately determined project operational air quality impacts, SCAQMD regional thresholds would not be exceeded.
Comment OR005A-7

The commenter states, our updated analysis demonstrates that when the Project’s operational emissions are compared to thresholds, the Project would result in a substantially more severe air quality impact that was not previously identified in the DEIR. As previously stated these emissions estimates only reflect emissions generated by operation of the proposed Project, and therefore do not take into account the existing criteria air pollutant emissions generated by other land uses on Project site. Thus, these emissions estimates likely underestimate the actual emissions that would be generated on the Project site. As a result, it is critical that an updated DEIR be prepared that includes an updated air quality analysis that adequately estimates emissions by adding the proposed Project’s operational emissions to the portion of the Project site’s existing emissions that will not be eliminated by the proposed project, and compares these combined emissions to applicable thresholds. Furthermore, mitigation measures should be identified and incorporated to reduce these emissions to a less than significant level.4

4 See section titles “Additional Feasible Mitigation Measures Available to Reduce Operational Emissions” on p. 21 of this letter. These measures would effectively reduce operational ROG, NOx, CO, and PM10, in addition to GHG emissions.

Response to Comment OR005A-7

Please refer to Response to Comments OR005A-3 through OR005A-6 for discussions of how the proposed project’s net emissions were calculated, why they are an accurate representation of project emissions, and why the SWAPE proposal for using the proposed project’s operation emissions instead of net operational emissions is flawed and incorrectly attributes existing emissions as impacts of the proposed project. As evidenced in Response to Comments OR005A-3 through OR005A-6, the Draft EIR accurately calculated the proposed project’s operational emissions and impacts. Contrary to the assertions in the comment, the methodology employed by the commenter is assessing impacts includes emissions from the existing uses. (Draft EIR Table 3.1-8 and definition of the project scenario under Appendix D, page 27.) Project emissions were not underestimated and thus, it is not necessary to update the Draft EIR. The Draft EIR accurately determined project operational air quality impacts, which are below SCAQMD regional thresholds, thus no mitigation is required.

Comment OR005A-8

The commenter states that the Draft conducts a health risk assessment (HRA) to determine the potential excess cancer risk posed to nearby sensitive receptors from diesel particulate matter (DPM) emissions generated during Project construction and concludes that the Project would not result in a significant construction-related health risk impact (p. 3.1-34). Although the DEIR falls to conduct an HRA to evaluate the Project’s health-related impact resulting from Project operation, the DEIR also concludes that the proposed Project would not expose sensitive receptors to substantial pollutant concentrations during operation (p. 3.1-35). These conclusions, however, are incorrect for three reasons. First, review of the DEIR’s HRA demonstrates that the assessment relied upon incorrect exposure frequency (EF) values when estimating the Project’s construction-related health risk, thus resulting in an underestimation of the Project’s health-related impact. Second, the DEIR’s construction HRA fails to evaluate the health risk posed to the closest sensitive receptor, instead it conducts as assessment of the excess cancer risk posed to
a receptor approximately 209 meters away from the nearest sensitive receptor to the Project site. Third, the DEIR cannot simply conclude that the Project would not result in a significant operational health-risk impact without conducting a quantified HRA. As a result, we find the conclusions made within the DEIR regarding the proposed Project’s health-related impact to nearby sensitive receptors to be incorrect and inadequately addressed. An updated DEIR must be prepared that includes an updated health risk assessment that more adequately estimates the excess cancer risk posed to nearby sensitive receptors as a result of emissions generated by construction and operation of the proposed Project. Until such an analysis is prepared, the Project should not be approved.

Response to Comment OR005A-8

Draft EIR Section 3.1 adequately disclosed and analyzed the project’s health risks to nearby sensitive receptors. As detailed in Appendix D of the Draft EIR, Air Quality Calculations, a construction DPM Health Risk Assessment was performed using AERSCREEN due to the potential for on-site construction emissions to present a health risk to nearby sensitive receptors. The AERSCREEN model produces estimates of "worst-case" 1-hour concentrations for a single source without taking into account site specific information such as weather patterns, elevation, and topography, which can dissipate and dilute emissions. For this highly conservative screening HRA, that maximum hour assumes that the worst case hour (highest emissions) of each construction phase is occurring simultaneously where construction subphases have the potential to overlap during the construction year. So, for example, in 2019 the grading phase (114 days), drainage phase (108 days), building phase (715 days (260 per year for the analysis)), and architectural coating phase (506 days (260 days per year for the analysis)) would potentially occur on the same days for a limited amount of time during this year. The total PM10 emissions for this year (adding emissions from each subphase together) were used to evaluate risk during that year. While building and architectural coating may occur for more than the 260 days, drainage and grading would occur for significantly less, but the analysis assumed 260 days of exposure to the total emissions (PM10 emissions from all four subphases added together).

Further, HRA assumed that worst case hour would occur throughout each day of each sub-phase, when experience based on real-life examples (see FWHA discussion above) show that activity and the resultant emissions vary hour-by-hour, and day-to-day. Also, this HRA projected these worst-case hourly emissions to a 260 workday year, which is based on 5 days a week, 52 weeks a year, and does not account for holidays, rain delays, etc. when there would be little to no activity on-site. This means that while the emissions throughout each year of construction would vary based on the construction phase, the analysis assumed a constant exposure throughout an entire construction year, therefore conservatively overestimating the exposure during that year. For example, while the demolition phase is only anticipated to occur for 231 days, the risk assessment assumed that exposure from that phase would occur for 260 days. These assumptions therefore result in conservative, overestimated exposure, and overestimated potential risk to the nearby sensitive receptors.

The commenter alleges that “the DEIR’s HRA should have utilized an EF value of 350 days/yr for the third trimester, infant, child and adult sensitive receptors…” The Exposure Frequency (EF) is the number of days per year of exposure for the given scenario (i.e. residential, worker).
OEHHA generally recommends use of 350 days/year for residential exposure (applicable to 30-year risk assessments), and 250 days/year for worker exposure, but further notes that emissions should be limited to the period or duration of activities associated with the proposed project. The HRA was for DPM during construction and emissions from the worst-case day were assumed to occur for the entire year, when these levels would only occur on a peak construction day. Exposure frequencies were calculated for the resident child 3rd trimester to birth, resident child birth to 2 years, resident child 2 to 16 years, and resident adult. An EF of 260 days, which is approximately 7/10ths of a year (the amount of time construction would occur during the year), was used for all scenarios except the resident child 3rd trimester to birth (Draft EIR Appendix D, p. 39, 40, and 41.). For the 3rd trimester to birth an EF of 66 days was used as construction would occur for 22 days per month for the three months left of gestation in the third trimester, which equates to 66 days; therefore, an EF of 66 days. Given that the third trimester only lasts for three months, it is unreasonable to assume that such a scenario lasts 350 days, as suggested in the comment. The analysis originally assumed that construction would occur 5 days per week for 260 days per year or approximately 22 days per month. An additional analysis was prepared in response to comments which assumed 6 days per week (312 days per year or 24 days per month) the analysis still remains conservative as presented, as described above. The EF was used with the maximum hourly emissions form AERSCREEN, which occurred at 225 meters from the project site. The emissions for distances from 1 meter to 225 meters were less than the emissions for 225. Therefore, the health risk would be lower at the closer distances.

As DPM is a subset component of PM_{10}, PM_{10} was used as a proxy for determining the screening level risk. Using the PM_{10} concentrations identified for each construction year, the maximum incremental increase in cancer risk for off-site receptors from construction is 9.24 in 1 million, which does not exceed the SCAQMD’s threshold of 10 in 1 million. The chronic hazard risk (non-cancer health risk) related to DPM for construction would be .0131, which does not exceed the SCAQMD’s threshold.

The commenter alleges that “the DEIR’s construction HRA fails to evaluate the health risk posed to the closes sensitive receptors, instead it conducts an assessment of the excess cancer risk posed to a receptor approximately 209 meters away.” AERSCREEN calculated the concentration of pollutants at 1 meter and then every 25 meters up to 975 meters from the source. (Draft EIR Appendix D, p. 38, 176, 180, 184.) As shown in Appendix D of the Draft EIR and discussed above, the maximum concentration of pollutants would occur at 225 meters from the Project site.

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52 OEHHA Air Toxics Hot Spots Program Guidance Manual, page 8-18 states that “Exposure from projects longer than 6 months should be evaluated for the duration of the project.”

53 With respect to receptor distance, pollutants are carried away from the site and “drop out” of the air or are deposited based on topography and wind speed. Therefore, while there may be receptors closer than the 225 meters, the greatest concentration of pollutants is deposited at the 225 meter distance from the site and therefore these receptors would be exposed to more risk than closer receptors.

54 With respect to chronic risk there are no units corresponding to risk. Therefore, chronic risk is simply the total concentration times the reference exposure level. The calculations of chronic health risk are separate from the calculation of cancer risk. The calculations for chronic health risk are also included in Appendix D.

55 Note that the DEIR contained typographical errors with respect to the risk levels. The DEIR represented health risk and chronic risk as 8.88 in one million and 0.0124 respectively. The actual values, as reported in the response to comments are 9.24 in one million and 0.0131 respectively. These changes do not change the significance findings as presented in the DEIR.
The closest sensitive receptors to the site would be exposed to less pollutants since their maximum concentration was less than that of 225 meters, as shown in Appendix D of the Draft EIR. The health risk used the maximum concentration to determine the greatest health risk for the proposed project. While the analysis is conservative as presented, additional analysis was conducted which represents the emissions from the project using a 6 day per week (312 day per year) exposure and taking into account the specific number of days each subphase would occur. While the updated analysis has exposure over more days per year, with the incorporation of total number of days of each subphase, the potential cancer risk drops to 6.7 per million, which is less than the risk reported in the Draft EIR. Therefore, even with this additional health risk analysis, the significance findings of the Draft EIR are not changed and further, impacts would be reduced from what was conservatively analyzed in the Draft EIR. The calculations for the revised health risk assessment are included in Appendix D1 of the Final EIR.

The commenter also alleges that “the DEIR fails to conduct an HRA to evaluate the Project’s health-related impact resulting from Project operation.” As an initial matter CEQA Guidelines Section 15204(a) states that “CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.” Additionally CEQA does not require a detailed Health Risk Assessment for every project. Similar arguments were raised and rejected in Beverly Hills Unified School District v. Los Angeles County Metropolitan Transportation Authority (2015) 241 Cal.App.4th 627, 667, wherein Petitioners alleged “that the EIS/EIR was legally inadequate because it failed to analyze localized air pollution and public health impacts from construction of the Project.” In Beverly Hills the Court of Appeal rejected Petitioners argument and upheld the air quality analysis because it utilized the mass daily thresholds established by SCAQMD, in combination with a technical report that identified the potential adverse health effects of exposure to each of the identified pollutants. Similar to Beverly Hills the construction and operational air quality analysis utilized the Mass Daily Thresholds from SCAQMD (South Bay Galleria Draft EIR Table 3.1-15), and provided in Table 3.1-1 which listed the health effects associated with each criteria pollutant. As described in greater detail below the proposed operations on the project site did not warrant a detailed Health Risk Assessment, furthermore, the Draft EIR provided additional health risk analysis above and beyond the mass daily thresholds.

The proposed project does not propose any typical land uses that are associated with sources of hazardous TACs (i.e., industrial manufacturing processes, automotive repair facilities, or dry-cleaning facilities). As such, the proposed project would not release substantial amounts of toxic contaminants, which constitute the focus of a Health Risk Assessment. The only minor source of potential air toxics associated with proposed project operations include diesel PM10 (Diesel Particulate Matter - DPM) from delivery trucks (e.g., truck traffic on local streets and on-site truck idling), which occur onsite under existing conditions. “The SCAQMD Governing Board Mobile Source Committee directed the SCAQMD staff to assess the health risks from truck stops and warehouse distribution facilities. Based on this analysis, technical guidance to interested
parties was provided (i.e., recommended procedures for preparing CEQA documents for applicable projects with mobile source diesel emissions)."56

The proposed project is not a truck stop or warehouse distribution facility and would have much less truck traffic than one of these facilities would have, therefore, it is not expected to be a substantial source of DPM. The proposed new uses at the project site are expected to generate approximately 8,020 new vehicle trips which would primarily be automobile trips. Diesel-related activity associated with the proposed project would be deliveries by trucks, which currently exist. Delivery trucks are required to obey ARB and SCAQMD rules and regulations, such as limiting idling times to 5 minutes or less, which would reduce DPM impacts. (Title 13, Cal. Code Regulations, Section 2485) As such, there would be no potential for meaningful DPM TAC emissions from the operation of the proposed project and a detailed operational health risk assessment would not be required.

Additionally, the operational air quality analysis included an LST analysis (Impact AIR-2). (Draft EIR, pp. 3.1-32 through 35.) This localized impact analysis is a screening-level health risk assessment. The LST analysis represents the maximum emissions (NOx, CO, PM10 and PM2.5) from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. (Draft EIR page 3.1-20.) If the emissions exceed the LST significance threshold, it is recommended that dispersion modelling be performed to assess potential impacts. As shown in the Draft EIR, Section 3.1, Air Quality, Table 3.1-11, Localized Operational Emissions, emissions did not exceed significance thresholds for a 5-acre site with nearest sensitive receptors at 25 meters, which is the most conservative scenario. The SCAQMD states, if the calculated emissions for the proposed construction or operational activities are below the LST emission levels found on the LST mass rate look-up tables, then the proposed construction or operation activity is not significant for air quality. Since the Draft EIR adequately addressed operational health risks to the closest sensitive receptors, the City disagrees with the comment that an additional operational HRA needs to be performed.

**Comment OR005A-9**

The commenter states that Appendix D of the DEIR discusses the assumptions and values utilized to determine the health risk posed to nearby sensitive receptors. According to Appendix D, the EF used to in the HRA calculations to determine the excess cancer risk to a resident child in the third trimester was 66 days per year (days/yr), while the EF used to estimate the excess cancer risk to infants (0<2), children (2<16), and adults (16<30) was 260 days/yr (Appendix D, pp. 39-41). Using the EF values, the DEIR determines that construction of Alternative A of the project would result in an excess cancer risk of 9.24 in one million (Appendix D, pp. 41). This conclusion, however is entirely incorrect, as it based on a flawed analysis and fails to follow guidance set forth by the Office of Environmental Health Hazard Assessment (OEHHA), the organization responsible for providing recommendations and guidance on how to conduct health risk assessment. The OEHHA guidelines state that the EF for the third trimester of pregnancy should be 50 days/yr, not 66 days/yr. This results in an excess cancer risk of 34.6 in one million for the third trimester. Therefore, the DEIR’s conclusions are not supported by the OEHHA guidelines and are not scientifically sound.

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assessments in California, and the SCAQMD, the lead air pollution agency for the proposed Project. As a result, we find the DEIR’s conclusion regarding the significance of the Project’s construction-related health risk to be incorrect and unreliable.

**Response to Comment OR005A-9**

Please refer to Response to Comment OR005A-8 for a discussion on why the results of the construction health risk assessment in the Draft EIR are correct and the potential threat to nearby sensitive receptors is adequately disclosed and addressed. The emission factors utilized in the health risk assessment were project specific, as described above, and follows OEHHA and SCAQMD guidelines. Since the Draft EIR adequately addressed construction-related health risks to the closest sensitive receptors, the City disagrees with the comment that the health risk is incorrect and unreliable.

**Comment OR005A-10**

The commenter states the DEIR fails to provide any explanation or details as to how an EF of 66 days/yr and 260 days/yr were derived; however, regardless of how the DEIR derived these numbers, the EF values are incorrect and inconsistent with OEHHA and SCAQMD guidance. According to OEHHA’s 2012 Hot Spots Exposure report, “a reasonable maximum exposure (RME) frequency for a residential scenario is 350 days/year for both adults and children.”

Furthermore, in its 2015 Risk Assessment Procedures for Rule 1401, 1401.1 and 212 report the SCAQMD notes OEHHA’s EF recommendation of 350 days/yr and subsequently uses this value in all of its health risks calculations throughout the report. Thus, per SCAQMD and OEHHA guidelines, the DEIR’s HRA should have utilized an EF value of 350 days/yr for the third trimester, infant, child, and adult sensitive receptors in order to accurately estimate the excess cancer risk posed by the Project. As a result of the DEIR’s use of a substantially underestimated EF value, we find the DEIR’s determination of a less than significant construction-related health risk impact to be incorrect and should not be relied upon to determine Project significance.

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**Response to Comment OR005A-10**

The explanation of the EF and RME frequency were explained in Appendix D, Air Quality Calculations, and are explained above in Response to Comment OR005A-8. SCAQMD and OEHHA’s EF recommendation of 350 days/yr is a recommendation, the numbers were changed to better reflect project specifics as outlined in Appendix D and do not underestimate the EF value. As a result, the Draft EIR’s determination of a less than significant construction related health risk is accurate and reliable. The construction health risk assessment follows OEHHA and SCAQMD guidelines. Since the Draft EIR adequately addressed construction-related health risks, the City disagrees with the comment that the health risk is incorrect and unreliable.
Comment OR005A-11

The commenter states, our review of the DEIR’s HRA demonstrates that the DEIR fails to evaluate the health risk posed to the nearest sensitive receptor. According to the HRA, the assessment’s conclusion that Project construction would result in a 9.24 in one million excess cancer risk to a nearby sensitive receptor was based on the health risk posed to a sensitive receptor located 225 meters from the Project site (Appendix D, pp.38). However, according to the DEIR, “the nearest residential developments are: (1) single- and multi-family residential located directly west of the project site across from Kingsdale Avenue (approximately 55 feet/16 meters)” (p.3.1-14). Because there are additional sensitive receptors that are more than 200 meters closer to the Project site, the DEIR’s HRA should have calculated the health risk posed to the residences located near Kingsdale Avenue, as the cancer risk posed to these residences could be much higher than the cancer risk posed to a receptor located 225 meters away, given how much closer these sensitive receptors are to the Project site. Because the Project’s construction-related HRA fails to conduct an assessment of the cancer risk posed to the nearest sensitive receptor, we find the HRA’s conclusion that Project construction would result in a less than significant risk impact to be incorrect and should not be relied upon to determine Project significance.

Response to Comment OR005A-11

The explanation of why the cancer risk was based on a sensitive receptor located at 225 meters, instead of the nearest sensitive receptor, was explained in Appendix D, Air Quality Calculations, and was explained above in Response to Comment OR005A-8, above. As the HRA determined the cancer risk for the highest concentration, which was 225 meters away, it represents the largest cancer risk. As shown in Appendix D, points closer and farther away would have less of a cancer risk. As a result, the Draft EIR’s determination of a less than significant construction related health risk is accurate and reliable. The construction health risk assessment follows OEHHA and SCAQMD guidelines. Since the Draft EIR adequately addressed construction-related health risks to the closest sensitive receptors, the City disagrees with the comment that the health risk is incorrect and unreliable and can be used to determine project significance.

Comment OR005A-12

The commenter states the DEIR concludes that the Project’s operational health risk impact would be less than significant, yet fails to prepare a quantified health risk assessment to support this conclusion (p. 3.1-35). The DEIR attempts to justify its significance determination and omission of a proper analysis by stating,

Typical land uses that are sources of acutely and chronically hazardous TACs include industrial manufacturing processes, automotive repair facilities, and dry-cleaning facilities using perchloroethylene (which has been banned for use in new dry-cleaning facilities). The proposed project would not include any of these potential sources, although minimal emissions may result from the use of consumer products (similar to existing conditions). Additionally, it is not anticipated that emergency back-up generators would be required for the new land uses associated with the proposed project. However, if a generator was implemented for a new land use, it would typically only be used during emergencies and may be turned on periodically for maintenance and inspection purposes. Further, emergency back-up generators are subject to SCAQMD regulatory requirements,
which limit the allowable TAC emissions to a level that would not result in a significant impact. As such, the periodic operation of the backup generator at the project site, should it be necessary, would not expose surrounding sensitive receptors to substantial pollutant or TAC emissions, and the impact would be less than significant.” (p. 3.1-35).

Therefore, since the DEIR asserts that toxic air contaminant (TAC) emissions would not be emitted from the Project’s proposed land uses or onsite generators, the DEIR concludes that the Project would have a less than significant health risk impact. This justification for failing to conduct a quantified operational health risk assessment, however, is incorrect for several reasons.

**Response to Comment OR005A-12**

An explanation of why an operational health risk assessment was not required was explained in Draft EIR Section 3.1, *Air Quality*, and above in Response to Comment OR005A-8, above. Operational uses are not associated with large emitters of DPM as described above in Response to Comment OR005A-8. Since the Draft EIR adequately addressed operation-related health risks to the closest sensitive receptors, the City disagrees with the comment that the health risk is incorrect and that a quantified health risk assessment is required.

**Comment OR005A-13**

The commenter states that just because the Project does not propose land uses that involve the use of “acutely and chronically hazardous TACS,” and simply because the Project Applicant asserts that sensitive receptors would not be exposed to substantial TACs does not mean that a health risk assessment for the operation of the Project is not needed. According to the SCAQMD, preparation of a health risk assessment is not restricted to specific land uses that may involve use of carcinogenic or non-carcinogenic TACs. Instead, the SCAQMD recommends performing a health risk assessment for any project that is expected to generate mobile emissions from diesel powered equipment and trucks. According to SCAQMD’s Mobile Source Toxics Analysis page on AQMD’s website (emphasis added),

“In August 2002, the SCQMD’s Mobile Source Committee approved the ‘Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions.’ This document provided guidance for analyzing cancer risks from diesel particulate matter from mobile sources at facilities such as truck stops and warehouse distribution centers. Subsequently, SCAQMD staff revised the aforementioned document to expand the analysis to provide technical guidance for analyzing cancer risk from potential diesel particulate emissions impacts from truck idling and movement (such as, but not limited to, truck stops, warehouse and distribution centers, or transit centers), ship hoteling at ports, and train idling. This revised guidance document titled, ‘Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis’ was presented to and approved by the SCAQMD’s Mobile Source Committee at its March 28, 2003 committee meeting. It is suggested that projects with diesel powered mobile sources use the following guidance document to quantify potential cancer risks from the diesel particulate emission’.”7

As you can see in the excerpt above, the SCAQMD explicitly states that in the event that the proposed Project generates or attracts vehicular trips, a mobile source health risk assessment must be prepared. The SCAQMD does not state that the preparation of a health risk assessment should be restricted to specific land uses, nor does it state that mixed-use projects are exempt from the
recommendation. Rather, all the SCAQMD states is that “it is suggested that projects with diesel powered mobile sources” use the SCAQMD’s Health Risk Assessment Guidance “to quantify potential cancer risks from the diesel particulate emissions.” Once operational, the Project’s commercial land uses, will result in frequent truck deliveries, generating large amounts of diesel exhaust over the duration of Project operation. As such, the DEIR should have conducted an operational health risk assessment, as long-term exposure to diesel particulate matter (DPM), a known human carcinogen, and other TACs may result in a significant health risk impact and therefore, should be properly assessed.


Response to Comment OR005A-13

An explanation of why a more detailed operational health risk assessment was not required was explained in the Draft EIR, Section 3.1, Air Quality, and above in Response to Comment OR005A-8, above. Operational uses are not associated with large emitters of DPM as described above in Response to Comment OR005A-8. The commenter says, the SCAQMD states the health risk should be performed for truck stops, warehouse distribution centers, transit centers, ship hoteling at ports and train idling. Based on the document mentioned by the commentator, the SCAQMD recommends health risk assessments for projects with diesel trucks that would emit DPM from activities that include:

- Truck traffic on local streets and arterials in transit to or from the facility (i.e., truck stop, warehouse/distribution center or transit center),
- Truck idling and movement on-site at the facility (i.e., truck stop, warehouse/distribution center or transit center), and
- Operation of Transportation Refrigeration Units (TRU’s) at the facility (i.e., truck stop, warehouse/distribution center or transit center).

Truck stops, warehouse/distribution centers, and transit centers have a lot of trucks which emit DPM or in the case of ships and trains, they and the trucks emit DPM. Additionally, delivery trucks are required to obey ARB and SCAQMD rules and regulations, such as limiting idling times to 5 minutes or less, to reduce DPM. Since the Draft EIR adequately addressed operation-related health risks to the closest sensitive receptors, the City disagrees with the comment that the health risk is incorrect and that a quantified health risk assessment is required and that the Draft EIR needs to be recirculated.

Comment OR005A-14

The commenter states the omission of a quantified operational health risk is inconsistent with the most recent guidance published by OEHAA. In February of 2015, OEHHA released its most recent Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments, which was formally adopted in March 2015. This guidance document describes the types of projects that warrant the preparation of a health risk assessment. Once construction is complete, Project operation will generate truck trips, which will generate additional exhaust emissions, thus continuing to expose nearby sensitive receptors to DPM emissions. The OEHHA document recommends that exposure from projects lasting more than 6 months should be evaluated for the duration of the project, and recommends that an exposure duration of 30 years be used to estimate individual cancer risk for the maximally exposed individual resident (MEIR). Even though we were not provided with the expected lifetime of the Project, we can reasonably assume that the Project will operate for at least 30 years, if not more. Therefore, per SCAQMD and OEHHA guidance, health risk impacts from the Project operation should have been evaluated by the DEIR. These recommendations reflect the most recent health risk assessment policy, and as such, an assessment of health risks to nearby sensitive receptors from operation should be included in a revised CEQA evaluation for the Project.


Response to Comment OR005A-14

An explanation of why an operational health risk assessment was not required was explained in the Draft EIR, Section 3.1, Air Quality, and above in Response to Comment OR005A-8, above. Operational uses are not associated with large emitters of DPM that would require an operational cancer risk assessment as described above in Response to Comment OR005A-8. Additionally, delivery trucks are required to obey ARB and SCAQMD rules and regulations, such as limiting idling times to 5 minutes or less, to reduce DPM. The OEHHA Guidelines were not prepared in the context of a CEQA analysis, as discussed therein “1.3 Who is Required to Conduct a Risk Assessment…The Hot Spots Act requires that each local Air Pollution Control District or Air Quality Management District… determine which facilities will prepare an HRA…Districts are to determine which facilities will prepare an HRA based on a prioritization process outlined in the law….Facilities designated by a District as ‘high priority’ are required to submit an HRA to the District within 150 days of designation.” Since the operational analysis follows SCAQMD guidelines and the project is not a permitted facility and would not be classified as “High Priority,” it conforms with OEHHA guidelines. Since the Draft EIR adequately addressed operation-related non-cancer health risks to the closest sensitive receptors as analyzed in the LST analysis (see Response to Comment OR005A-8), and an operational cancer risk assessment is not necessary, the City disagrees with the comment that the health risk is incorrect and that a quantified health risk assessment is required and that the Draft EIR needs to be recirculated.
Comment OR005A-15
The commenter states they find the DEIR’s evaluation of the Project’s health risk impact to be inadequate and unreliable. In an effort to demonstrate the potential health risk posed by Project construction and operation to nearby sensitive receptors, we prepared a simple-screening level health risk assessment. The results of our assessment, as described below, provide substantial evidence that the Project’s construction and operational DPM emissions may result in a potentially significant health risk impact that was not previously identified in the DEIR.

Response to Comment OR005A-15
Please refer to Response to Comment OR005A-8, above for a discussion regarding why the results of the construction health risk assessment in the Draft EIR are correct and the potential threat to nearby sensitive receptors is adequately disclosed and addressed. The proposed project does not pose a potentially significant health risk to sensitive receptors that was not identified in the Draft EIR. Additionally, Response to Comment OR005A-8 provides a discussion of why the construction-related health risk and cancer risks posed to sensitive receptors can be relied upon to determine project significance. Moreover, Response to Comment OR005A-8 provides the reasoning for why an operational health risk assessment is not required for the proposed project. All potentially significant health risk impacts were identified in the Draft EIR for construction and operation of the proposed project. Since the Draft EIR adequately addressed construction and operational health risks to the closest sensitive receptors, the City disagrees with the comment that potentially significant impacts were not identified in the Draft EIR and the Draft EIR does not require revision and recirculation.

Comment OR005A-16
The commenter states, in an effort to demonstrate the potential health risk posed to nearby sensitive receptors during Project construction and operation, we prepared a simple-screening level health risk assessment. The results of our assessment, as described below, provides substantial evidence that DPM emissions from Project construction and operation, when evaluated correctly using the most up to date guidance, may result in a potentially significant health risk impact. As such, an updated DEIR should be prepared to adequately evaluate the proposed Project’s health risk impacts during construction and operation, and additional mitigation measures should be identified and incorporated into the Project design, where necessary.

As of 2011, the Environmental Protection Agency (EPA) recommends AERSCREEN as the leading air dispersion model, due to improvements in simulating local meteorological conditions based on simple input parameters. The model replaced SCREEN3 and AERSCREEN is included in the OEHHA and the California Air Pollution Control Officers Associated (CAPCOA) guidance as the appropriate air dispersion model for Level 2 health risk screening assessments (“HRSA’s”). A Level 2 HRSA utilizes a limited amount of specific information to generate maximum reasonable downwind concentrations of air contaminants to which nearby sensitive receptors may be exposed. If an unacceptable air quality hazard is determined to be possible using AERSCREEN, a more refined modeling approach is required prior to approval of the Project.
2. Response to Comments


Response to Comment OR005A-16

The comment explains that they conducted a simple screening-level health risk assessment whose results suggest that a potentially significant health risk impact may occur. Please refer to Response to Comment OR005A-8 for a discussion on why the results of the construction health risk assessment in the Draft EIR are correct and the potential threat to nearby sensitive receptors is adequately disclosed and addressed. The proposed project does not pose a potentially significant health risk to sensitive receptors that was not identified in the Draft EIR. Additionally, Response to Comment OR005A-8 provides a discussion of why the construction-related health risk and cancer risks posed to sensitive receptors can be relied upon to determine project significance. Moreover, Response to Comment OR005A-8 provides the reasoning for why an operational health risk assessment is not required for the proposed project. The health risk performed for the proposed project, using AERSCREEN (Draft EIR p. 3.1021), was evaluated correctly using the most up to date guidance and did not result in a significant health risk to sensitive receptors. All potentially significant health risk impacts were identified in the Draft EIR for construction and operation of the proposed project. Please also see Response to Comment OR005A-17 for discussion of additional errors made by the commenter.

Comment OR005A-17

The commenter states they prepared a preliminary health risk screening assessment of the Project’s construction and operational impact to sensitive receptors using the PM10 exhaust estimates from the DIER’s CalEEMod output files for Alternative A. As previously stated, according to the DEIR, the closest sensitive receptor to the Project site is located approximately 55 feet, or approximately 16 meters away (p.3.1-14). Consistent with recommendations set forth by OEHHA, we used a residential exposure duration of 30 years, starting from the infantile stage of life. We also assumed that construction and operation of the Project would occur in quick succession, with no gaps between each Project phase. The Project’s CalEEMod model emissions estimates indicate that construction activities will generate approximately 1,704 pounds of DPM over the 3.7 years of construction (Appendix G, pp.37). The AERSCREEN model relies on a continuous average emission rate to simulate maximum downward concentration from a point, area, and volume emissions sources. To account for the variability in vehicle and truck trips over the Project operation we calculated an average DPM emission rate by the following equation.

\[
 \text{Emission Rate} = \left( \frac{\text{grams}}{\text{second}} \right) = \frac{1,704 \text{ lbs}}{1,350 \text{ days}} \times \frac{453.6 \text{ grams}}{1 \text{ lb}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ seconds}} = 0.0245 \text{ \frac{g}{s}}
\]
Using this equation, we estimated a construction emission rate of 0.0245 grams per second (g/s). The Project’s annual CalEEMod emissions estimates for Alternative A indicate that operational activities will generate approximately 1,346 pounds of DPM per year over the 26.3 years of operation (Appendix G, pp. 95). Applying the same equation used to estimate the construction DPM emission rate, we estimated the following emission rate for Project operation.

\[
\text{Emission Rate} = \frac{1,346 \text{ lbs}}{365 \text{ days}} \times \frac{453.6 \text{ grams}}{1 \text{ lb}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ seconds}} = 0.0194 \frac{g}{s}
\]

Using this equation, we estimated an operational emission rate of 0.0194 g/s. Operation activity was simulated as a 29.9-acre rectangular area source in AERSCREEN, with dimensions of 376 meters by 332 meters. A release height of three meters was selected to represent the height of exhaust stacks on operational equipment and other heavy-duty vehicles, and an initial vertical dimension of one and a half meters was used to simulate instantaneous plume dispersion upon release. An urban meteorological setting was selected with model-default inputs for wind speed and direction distribution.

14 The DEIR only prepared a health risk assessment for Alternative A, therefore, in order to compare the DEIR’s health risk assessment results to the results of our updated analysis, we used emissions from the DEIR’s Alternative A CalEEMod models.


**Response to Comment OR005A-17**

The comment provides an explanation of how the commenter calculated the emission rates they used in the AERSCREEN model for their health risk assessment. It also describes the size, dimension, release height, and other inputs used in the model.

A preliminary review of the analysis provided in SWAPE’s Emission Rate equations shows several errors. First, a calculation of the equation itself does not give an emission rate of 0.0245 g/s. As the equation is written, the emission rate would be 0.0066 g/s, which is much less than the emission rate that SWAPE used for their analysis. Second, SWAPE says that they used the project’s CalEEMod model emissions estimates for construction activities and that the Project would generate approximately 1,704 pounds of DPM over the 3.7 years of construction (Appendix G, pp. 37). If you look at Appendix G, pp. 37, the actual amount of DPM emissions for the 3.7 years would be 1,439 pounds assuming they used the highest concentration for every year, which was 1.0658 pounds per day. SWAPE also miscalculates the operational emissions for the project which would be 910 pounds if using the highest rate of 0.6733 tons per year as shown on Appendix G pp. 95.

Furthermore, as explained in Response to Comment OR005A-3 the commenter once again misapplies CEQA analytical procedures by attributing baseline emissions as impacts of the proposed project. The numbers utilized in the commenter’s analysis represent the entire emissions from current existing uses and those for the proposed project, which grossly overestimates the amount of DPM that would be emitted from the proposed project itself. To obtain a true representation of the proposed project emissions, one would need to subtract the existing emissions from these numbers as the existing emissions would continue without project approval.
Then one would use that amount for the health risk assessment. Thirdly, for construction SWAPE used 1,350 days, which is 365 days of construction for 3.7 years. Construction is assumed to occur for 260 days per year, which is approximately 7/10ths of a year (the amount of time construction would occur during the year) as they wouldn’t work on most weekends and holidays. This is an incorrect assumption as construction would not occur on weekends so construction would most likely only occur for 260 days per year, which would be 962 days for 3.7 years.

Additionally, construction would only occur for 8 to 10 hours a day, with equipment not operating for more than 8 hours per day (and likely substantially less\(^{58}\)), not for the full 24-hour period as SWAPE utilized. As shown above, there are numerous factual and legal errors in SWAPE’s analysis which would cause their screening assessment to be inaccurate and not reflective of the actual project or the analytical methodology under CEQA.

**Comment OR005A-18**

The commenter states they calculated the excess cancer risk to the residential receptors located closest to the Project site using applicable health risk assessment methodologies prescribed by OEHHA and the SCAQMD. Consistent with the construction schedule proposed by the DEIR, the annualized average concentration for construction was used for 2 years of the infantile state of life (0-2 years) and the beginning of the child stage of life (2 to 16 years). The annualized average concentration for operation was used for the remainder of the 30-year exposure period, which makes up the remainder of the child stages of life (2 to 16 years) and the adult stages of life (16 to 30 years). Consistent with OEHHA guidance, we used Age Sensitivity Factors (ASFs) to account for the heightened susceptibility of young children to the carcinogenic toxicity of air pollution.\(^{16}\)

According to the updated guidance, quantified cancer risk should be multiplied by a factor of ten during the first two years of life (infant) and should be multiplied by a factor of three during the child stage of life (2 to 16 years). Furthermore, in accordance with guidance set forth by OEHHA, we used 95th percentile breathing rates for infants.\(^{17}\) We used a cancer potency factor of 1.1 (mg/kg-day)-1 and an averaging time of 25,550 days. The results of our calculations are shown below.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Duration (years)</th>
<th>Concentration (µg/m³)</th>
<th>Breathing Rate (L/kg-day)</th>
<th>ASF</th>
<th>Cancer Risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction</td>
<td>2</td>
<td>0.672</td>
<td>1080</td>
<td>10</td>
<td>2.2E-04</td>
</tr>
</tbody>
</table>

\(^{58}\) The HRA assumes constant emissions at full power over an 8-hour work shift. However, it is not typical for all the equipment to be used all day, every day onsite. There may be days where a grader is running 5 hours, and a scraper running 6 hours, but you typically won’t have both a grader and a scraper operating simultaneously for 8 hours per day because they accomplish different tasks for the same area and cannot physically occupy the same space at the same time. Based on survey data from actual construction projects, the Federal Highway Administration (FHWA) developed equipment-specific usage factors for construction equipment, which has been incorporated into the noise analyses (refer to Table 3.9-9 Construction Equipment Noise Level Emissions on page 3.9-19 in the Noise Section of the Draft EIR). Based on the FHWA data, construction equipment is not used at full power consistently over a given work day, but rather for a portion of a workday generally ranging from approximately 10 percent to 50 percent depending on the equipment and activity type. Therefore, because the emissions modeling for the HRA assumes all equipment operates at full power on the same day continuously for 8 hours, and assumes that the construction equipment operations overlap, the modeling provides a highly conservative emissions and exposure estimate.
The excess cancer risk to adults, children and infants at a sensitive receptor located approximately 25 meters away, over the course of the Project construction and operation of Alternative A are approximately 29, 200 and 220 in one million, respectively. Furthermore, the excess cancer risk over the course of a residential lifetime (30 years) is approximately 450 in one million. Consistent with OEHHA guidance, exposure was assumed to begin in the infantile stage of life to provide the most conservative estimates of air quality hazards. The infantile, child, adult, and lifetime cancer risk all exceed the SCAQMD thresholds of 10 in one million, thus resulting in a potentially significant impact not addressed in the DEIR.


**Response to Comment OR005A-18**

Please see Response to Comment OR005A-17, above for discussion of the numerous analytical and legal errors in SWAPEs health risk assessment. Additionally, please refer to Response to Comment OR005A-8 for a discussion on why the results of the construction health risk assessment in the Draft EIR are correct and the potential threat to nearby sensitive receptors is adequately disclosed and addressed. The proposed project does not pose a potentially significant health risk to sensitive receptors that was not identified in the Draft EIR. Moreover, Response to Comment OR005A-8 provides a discussion of why the construction-related health risk and cancer risks posed to sensitive receptors can be relied upon to determine project significance. Moreover, Response to Comment OR005A-8 also provides the reasoning for why an operational health risk assessment is not required for the proposed project. The health risk performed for the proposed project, using AERSCREEN, was evaluated correctly using the most up to date guidance and did not result in a significant health risk to sensitive receptors. All potentially significant health risk impacts were identified in the DIER for construction and operation of the proposed project.

**Comment OR005A-19**

The commenter states that it should be noted that the results of our analysis demonstrate the health risk posed to the nearest sensitive receptor for Alternative A only. Prior to Project approval, an updated DEIR should be prepared that includes health risk assessments for all
possible Project alternatives. Additionally, our analysis represents a screening-level health risk assessment, which is known to be more conservative, and tends to err on the side of health protection. The purpose of a screening-level assessment, however, is to determine if a more refined health risk assessment, needs to be conducted. If the results of a screening-level health risk assessment demonstrate that construction and operation of the Project could result in a potentially significant health risk impact. As a result, a refined health risk assessment must be prepared to examine the air quality impacts generated by Project construction and operation. An updated DEIR must be prepared to adequately evaluate the Project’s health risk impact, and should include additional mitigation measures to reduce these impacts to a less-than-significant level. Without a refined health risk assessment and mitigation addressing the findings of such an assessment, substantial evidence supports a fair argument that the Project may lead to significant public health impacts due to DPM emissions.


19 See mitigation measures listed in section titled “Additional Feasible Mitigation Measures Available to Reduce Greenhouse Gas Emissions” on p. 21 of this comment letter. These measures would effectively reduce operational DPM emissions as well as GHG emissions.

20 See section titled “Additional Feasible Mitigation Measures Available to Reduce Greenhouse Gas Emissions” on p. 21 of this letter. These mitigation measures would effectively reduce operational DPM emissions, as well as other criteria air pollutant and GHG emissions.

Response to Comment OR005A-19

Please see Response to Comment OR005A-17 above for discussion of the numerous analytical and legal errors in SWAPEs health risk assessment. Please refer to Response to Comment OR005A-8 for a discussion on why the results of the construction health risk assessment in the Draft EIR are correct and the potential threat to nearby sensitive receptors is adequately disclosed and addressed. The proposed project does not pose a potentially significant health risk to sensitive receptors that was not identified in the Draft EIR. Additionally, Response to Comment OR005A-8 provides a discussion of why the construction-related health risk and cancer risks posed to sensitive receptors can be relied upon to determine project significance. Moreover, Response to Comment OR005A-8 provides the reasoning for why an operational health risk assessment is not required for the proposed project. The health risk performed for the proposed project, using AERSCREEN, was evaluated correctly using the most up to date guidance and did not result in a significant health risk to sensitive receptors. All potentially significant health risk impacts were identified in the DIER for construction and operation of the proposed project. A health risk assessment does not need to be conducted for each alternative, you only have to analyze if impacts will be less, the same, or worse than the proposed project. As demonstrated above, a refined health risk assessment is not required, nor are additional mitigation measures, as the project health risk is below SCAQMD significance thresholds.

Comment OR005A-20

The commenter provides:

Mitigation Measures Available to Reduce Construction Emissions
The commenter states our health risk assessment demonstrates that Project construction-related DPM emissions would result in a significant health risk impact. Therefore, additional mitigation measures must be identified and incorporated in and updated DEIR to reduce these emissions to a less than significant level.

Additional mitigation measures can be found in CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures*, which attempt to reduce Greenhouse Gas (GHG) levels, as well as reduce criteria air pollutants, such as particulate matter. Diesel particulate matter (“DPM”) is a byproduct of diesel fuel combustion, and is emitted by on-road vehicles and by off-road construction equipment. Mitigation for criteria pollutant emissions should include consideration of the following measures in an effort to reduce construction emissions.

Response to Comment OR005A-20

Please see Response to Comment OR005A-17 above for discussion of the numerous analytical and legal errors in SWAPEs health risk assessment. Please refer to Response to Comment OR005A-8 for a discussion on why the results of the construction health risk assessment in the Draft EIR are correct and the potential threat to nearby sensitive receptors is adequately disclosed and addressed. The proposed project does not pose a potentially significant health risk to sensitive receptors that was not identified in the Draft EIR, consequently no mitigation is required (CEQA Guidelines Section15126.4(a)(3)). Additionally, Response to Comment OR005A-8 provides a discussion of why the construction-related health risk and cancer risks posed to sensitive receptors can be relied upon to determine project significance. Moreover, Response to Comment OR005A-8 provides the reasoning for why additional analysis associated with operational health risk assessment is not required for the proposed project. The health risk performed for the proposed project, using AERSCREEN, was evaluated correctly using the most up to date guidance and did not result in a significant health risk to sensitive receptors. All potentially significant health risk impacts were evaluated in the Draft ER for construction and operation of the proposed project and were determined to be less than significant. As demonstrated above, a refined health risk assessment is not required, nor are additional mitigation measures, as the project health risk is below SCAQMD significance thresholds.

Comment OR005A-21

The commenter provides:

**Require Implementation of Diesel Control Measures**

The Northeast Diesel Collaborative (“NEDC”) is regionally coordinated initiative to reduce diesel emissions, improve public health, and promote clean diesel technology. The NEDC recommends that contracts for all construction projects require the following diesel control measures:

- All diesel on-road vehicles on site for more than 10 total days must have either (1) engines that meet EPA 2007 on-road emissions standards or (2) emission control technology verified...
by EPA\textsuperscript{23} or the California Air Resources Board (CARB)\textsuperscript{24} to reduce PM emissions by a minimum of 85 percent.

- All diesel generators on site for more than 10 total days must be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85 percent.
- All diesel nonroad construction equipment on site for more than 10 total days must have either (1) engines meeting EPA Tier 4 nonroad emission standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85 percent for engines 50 horse power (hp) and greater and by a minimum of 20 percent for engines less than 50 hp.
- All diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a biodiesel blend\textsuperscript{25} approved by the original engine manufacturer with sulfur content of 15 parts per million (ppm) or less.


\textsuperscript{23} For EPA’s list of verified technology: http://www3.epa.gov/otaq/diesel/verfication/verif-list.htm

\textsuperscript{24} For CARB’s list of verified technology: http://www.arb.ca.gov/diesel/verdev/cvt.htm

\textsuperscript{25} Biodiesel blends are only to be used in conjunction with the technologies which have been verified for use with biodiesel blends and are subject to the following requirements: http://www.arb.ca.gov/diesel/verdev/reg/biodieselcompliance.pdf

\textbf{Response to Comment OR005A-21}

Please see Response to Comment OR005A-20, which explains that the commenter’s calculations are in error and that mitigation is not required for impacts that are less than significant. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

\textbf{Comment OR005A-22}

The commenter provides:

Repower of Replace Older Construction Equipment Engines

The NEDC recognizes that availability of equipment that meets the EPA’s newer standards is limited.\textsuperscript{26} Due to this limitation, the NEDC proposes actions that can be taken to reduce emissions from existing equipment in the Best Practices for Clean Diesel Construction Report.\textsuperscript{27} These actions included, but are not limited to:

- Repowering equipment (i.e. replacing older engines with newer, cleaner engines and leaving the body of the equipment intact).

\textsuperscript{26} http://northeastdiesel.org/pdf/BestPractices4CleanDieselConstructionAug2012.pdf
Response to Comment OR005A-22

Please see Response to Comment OR005A-20, which explains that the commenter’s calculations are in error and that mitigation is not required for impacts that are less than significant. As noted in the Air Quality Appendix, Appendix D of the Draft EIR, Tier 4 engines were discussed under Project Construction Assumptions, which states that “all off-road equipment with a horsepower (HP) greater than 50 will be USEPA certified Tier 4 interim engines or engines that are certified to meet or exceed the NOx emission ratings for USEPA Tier 4 interim engines.” The project construction assumptions also state, “all hauling of soils and debris will use a vehicle fleet that consists of trucks with a manufacturer year of 2012 or newer, or meets or exceed the emissions standards of trucks manufactured in 2012.” For a more detailed discussion of these emissions reductions please see Response to Comment OR002-11. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. The proposed project will comply with all applicable EPA, CARB, and SCAQMD rules.

Comment OR005A-23

The commenter provides: Engine repower may be a cost-effective emissions reduction strategy when a vehicle or machine has a long useful life and the cost of the engine does not approach the cost of the entire vehicle or machine. Examples of good potential replacement candidates include marine vessels, locomotives, and large construction machines. Older diesel vehicles or machines can be repowered with newer diesel engine or in some cases with engines that operate on alternative fuels (see section “Use Alternative Fuels for Construction Equipment” for details). The original engine is taken out of service and a new engine with reduced emissions characteristics is installed. Significant emission reductions can be achieved, depending on the newer engine and the vehicle or machine’s ability to accept a more modern engine and emission control system. It should be noted, however, that newer engines or higher tier engines are not necessarily cleaner engines, so it is important that the Project Applicant check the actual emission standard level of the current (existing) and new engines to ensure the repower product is reducing emissions for PM10.

- Replacement of older equipment with equipment meeting the latest emission standards.

Engine replacement can include substituting a cleaner highway engine for a nonroad engine. Diesel equipment may also be replaced with other technologies or fuels. Examples include hybrid switcher locomotives, electric cranes, LNG, CNG, LPG or propane yard tractors, forklifts or loaders. Replacements using natural gas may require changes to fueling infrastructure. Replacements often require some re-engineering work due to differences in size and configuration. Typical there are benefits in fuel efficiency, reliability, warranty, and maintenance costs.

28 http://www3.epa.gov/otaq/diesel/technologies/engines.htm

29 Diesel Emissions Reduction Program (DERA): Technologies, Fleets and Projects Information, available at: http://nepis.epa.gov/Exe/ZyPDF.cgi/P100CVIS.PDF?Dockey+P100CVIS.PDF
Response to Comment OR005A-23

Please see Response to Comment OR005A-20, which explains that the commenter’s calculations are in error and that mitigation is not required for impacts that are less than significant. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment OR005A-24

The commenter provides:

Install Retrofit Devices on Existing Construction Equipment

PM emissions from alternatively-fueled construction equipment can be further reduced by installing retrofit devices on existing and/or new equipment. The most common retrofit technologies are retrofit devices for engine exhaust after-treatment. These devices are installed in the exhaust system to reduce emissions and should not impact engine or vehicle operation. It should be noted that actual emissions reductions and costs will depend on specific manufacturers, technologies and applications.

Response to Comment OR005A-24

Please see Response to Comment OR005A-20, which explains that the commenter’s calculations are in error and that mitigation is not required for impacts that are less than significant. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment OR005A-25

The commenter provides:

Use Electric and Hybrid Construction Equipment

CAPCOA’s Quantifying Greenhouse Gas Mitigation Measures report also proposes the use of electric and/or hybrid construction equipment as a way to mitigate criteria pollutant emissions, such as particulate matter. When construction equipment is powered by grid electricity rather than fossil fuel, direct emissions from fuel combustion are replaced with indirect emissions associated with the electricity used to power the equipment. Furthermore, when construction equipment is powered by hybrid-electric drives, emissions from fuel combustion are also greatly reduced and criteria air pollutants would be 100% reduced for equipment running on electricity. Electric construction equipment is available commercially from companies such as Peterson Pacific.
Corporation\textsuperscript{34} and Komptech USA\textsuperscript{35}, which specialize in the mechanical processing equipment like grinders and shredders. Construction equipment powered by hybrid-electric drives is also commercially available from companies such as Caterpillar\textsuperscript{36}. For example, Caterpillar reports that during an 8-hour shift, its D7E hybrid dozer burns 19.5 percent fewer gallons of fuel than a conventional dozer while achieving a 10.3 percent increase in productivity. The D7E model burns 6.2 gallons per hour compared to a conventional dozer which burns 7.7 gallons per hour.\textsuperscript{37} Fuel usage and savings are dependent on the make and model of the construction equipment used. The Project Applicant should calculate project-specific savings and provide manufacturer specifications indicating fuel burned per hour.


\textsuperscript{35} Komptech Green Efficiency Brochure, \textit{available at}: https://www.komptech.com/index.pjp?elD=tx\_nawsecuredl\&u=0\&g=0\&t=1499460496\&hash=629664449e3954477f6857f98ad1d73f8f2ec20d\&file=fileadmin/komptech/brochures/Green\_Efficiency\_eng\_2015.pdf

\textsuperscript{36} https://www.cat.com/en_US/products/new/power-systems/electric-power-generation.html

\textsuperscript{37} http://s7d2.scene7.com/is/content/Caterpillar/C811572

\textbf{Response to Comment OR005A-25}

Please see Response to Comment OR005A-20, which explains that the commenter’s calculations are in error and that mitigation is not required for impacts that are less than significant. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

\textbf{Comment OR005A-26}

The commenter provides:

Institute a Heavy-Duty Off-Road Vehicle Plan

CAPCOA’s Quantifying Greenhouse Gas Mitigation Measures\textsuperscript{38} report recommends that the Project Applicant provide a detailed plan that discusses a construction vehicle inventory tracking system to ensure compliance with construction mitigation measures. The system should include strategies such as requiring hour meters on equipment, documenting the serial number, horsepower, manufacture age, fuel, etc. of all onsite equipment and daily logging of operating hours of equipment. Specifically, prior to the construction of a Project the contractor should submit a certified list of all diesel vehicles, construction equipment, and generators to be used on site.\textsuperscript{39} The list should include the following:\textsuperscript{40}

- Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment.


\textsuperscript{39} https://www.cat.com/en_US/products/new/power-systems/electric-power-generation.html

\textsuperscript{40} http://s7d2.scene7.com/is/content/Caterpillar/C811572
2. Response to Comments

- Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation.
- For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.


Response to Comment OR005A-26

Please see Response to Comment OR005A-20, which explains that the commenter’s calculations are in error and that mitigation is not required for impacts that are less than significant. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment OR005A-27
The commenter provides:

Implement a Construction Vehicle Inventory Tracking System

CAPCOA’s Quantifying Greenhouse Gas Mitigation Measures report recommends that the Project Applicant provide a detailed plan that discusses a construction vehicle inventory tracking system to ensure compliance with construction mitigation measures. The system should include strategies such as requiring engine run time meters on equipment, documenting the serial number, horsepower, manufacture age, fuel, etc. of all onsite equipment and daily logging of the operating hours of the equipment. Specifically, for each on-road construction vehicle, nonroad construction equipment, or generator, the contractor should submit to the developer’s representative a report prior to bringing said equipment on site that includes:

- Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, and engine serial number.
- The type of emission control technology installed, serial number, make, model, manufacturer, and EPA/CARB verification number/level.
- The Certification Statement signed and printed on the contractor’s letterhead.

Furthermore, the contractor should submit to the developer’s representative a monthly report that, for each on-road construction vehicle, nonroad construction equipment, or generator onsite, includes:
- Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.
- Any problems with the equipment or emission controls.
- Certified copies of fuel deliveries for the time period that identify:
  - Source of supply
  - Quantity of fuel
  - Quality of fuel, including sulfur content (percent by weight).


42 Diesel Emission Controls in Construction Projects, available at:

43 Diesel Emission Controls in Construction Projects, available at:

44 Diesel Emission Controls in Construction Projects, available at:

**Response to Comment OR005A-27**

Please see Response to Comment OR005A-20, which explains that the commenter’s calculations are in error and that mitigation is not required for impacts that are less than significant. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

**Comment OR005A-28**

The commenter provides:

In addition to those measures, we also recommend that the City require the Applicant to implement the following mitigation measures, called “Enhanced Exhaust Control Practices,” that are recommended by the Sacramento Metropolitan Air Quality Management District (“SMAQMD”):

1. The project representative shall submit to the lead agency and District a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used in an aggregate of 40 or more hours during any portion of the construction project.
   - The inventory shall include the horsepower rating, engine model year, and projected hours of use for each piece of equipment.
   - The project representative shall provide the anticipated construction timeline including start date, and name and phone number of the project manager and on-site foreman.
2. Response to Comments

This information shall be submitted at least 4 business days prior to the use of subject heavy-duty off-road equipment.

The District’s Equipment List Form can be used to submit this information.

The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs.

2. The project representative shall provide a plan for approval by the lead agency and District demonstrating that the heavy-duty off-road vehicles (50 horsepower or more) to be used in the construction project, including owned, leased, and subcontractor vehicles, will achieve a project wide fleet-average of 20% NOx reduction and 45% particulate reduction compared to the most recent CARB fleet average.

This plan shall be submitted in conjunction with the equipment inventory.

Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.

The District’s Construction Mitigation Calculator can be used to identify an equipment fleet that achieves this reduction.

3. The project representative shall ensure that emissions from all off-road diesel powered equipment used on the project site do not exceed 40% opacity for more than three minutes in any one hour.

Any equipment found to exceed 40 percent opacity (or Ringelmann 2.0) shall be repaired immediately. Non-compliant equipment will be documented and a summary provided to the lead agency and District monthly.

A visual survey of all in-operation equipment shall be made at least weekly.

A monthly summary of the visual survey results shall be submitted throughout the duration of the project, except that the monthly summary shall not be required for any 30-day period in which no construction activity occurs. The monthly summary shall include the quantity and type of vehicles surveyed as well as the dates of each survey.

4. The District and/or other officials may conduct periodic site inspections to determine compliance. Nothing in this mitigation shall supersede other District, state or federal rules or regulations.

When combined together, these measures offer a cost-effective way to incorporate lower-emitting equipment into the Project’s construction fleet, which subsequently, reduces particulate matter emissions released during Project construction. An updated DEIR must be prepared to include additional mitigation measures, as well as include an updated air quality assessment to ensure that the necessary mitigation measures are implemented to reduce construction emission. Furthermore, the Project Applicant needs to demonstrate commitment to the implementation of these measures prior to Project approval to ensure that the Project’s construction related emissions are reduced to the maximum extent possible.
Response to Comment OR005A-28

The comment does not address an environmental issue, it is merely a list of possible mitigation measures, which aren’t required as the project results in less than significant air quality and health risk impacts without mitigation and GHG impacts with implementation of Mitigation Measure GHG-1. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Please see Response to Comment OR005A-17 for the reasons that SWAPEs health risk assessment is an inaccurate portrayal of the true health risk for the proposed project. Please refer to Response to Comment OR005A-8 for a discussion on why the results of the construction health risk assessment in the Draft EIR are correct and the potential threat to nearby sensitive receptors is adequately disclosed and addressed. The proposed project does not pose a potentially significant health risk to sensitive receptors that was not identified in the Draft EIR. Additionally, Response to Comment OR005A-8 provides a discussion of why the construction-related health risk and cancer risks posed to sensitive receptors can be relied upon to determine project significance. Moreover, Response to Comment OR005A-8 provides the reasoning for why an operational health risk assessment is not required for the proposed project. The health risk performed for the proposed project, using AERSCREEN, was evaluated correctly using the most up to date guidance and did not result in a significant health risk to sensitive receptors. All potentially significant health risk impacts were identified in the Draft EIR for construction and operation of the proposed project. As demonstrated above, a refined health risk assessment is not required, nor are additional mitigation measures, as the project health risk is below SCAQMD significance thresholds.

Comment OR005A-29

The commenter provides:

Greenhouse Gas

Failure to Adequately Evaluate Project’s Greenhouse Gas Emissions

The commenter states, according to the DEIR’s greenhouse gas (GHG) analysis, the proposed Project would result in a less than significant GHG impact with implementation of mitigation (p. 3.5-18). While we agree that the proposed Project would result in a significant GHG emissions, without mitigation, the methodology used to reach this conclusion is flawed and inconsistent guidance from the Office of Planning and Research, and as a result, underestimates the GHG emissions resulting from operation of the proposed Project. Thus, we find the DEIR’s GHG analysis to be incorrect and unreliable and should not be relied upon to determine Project significance. Furthermore, we find the mitigation measures provided in the DEIR to be insufficient in reducing the Project’s GHG emissions, since these measures would only reduce a fraction of the Project’s GHG emissions. Until such an analysis is prepared, the Project should not be approved.
Response to Comment OR005A-29

As noted in Response OR005A-3, the commenter makes the same errors in their GHG calculations as were made in their Air Quality calculations; such errors include attributing baseline emissions as impacts of the project. The Draft EIR adequately analyzed the proposed project’s greenhouse gas emissions as demonstrated in the Section 3.5, Greenhouse Gas Emissions. As detailed in Appendix G of the Draft EIR, Greenhouse Gas Emissions Calculations, the existing GHG emissions were calculated for all current operations at the project site, at the time of the NOP, whose operation would continue if the proposed project is not approved. The proposed project GHG emissions included all new buildings that would be constructed and older buildings that would be renovated under the proposed project plus all existing South Bay Galleria buildings currently in operation (existing emissions) that would not be demolished under the proposed project. As shown in the analysis, proposed project emissions were not just calculated for the buildings being constructed or renovated under the proposed project, but for all operations that will exist after the project is completed. (Draft EIR Appendix G, page 13 [noting that the “Project Assumptions” includes emissions from “Existing Mall Uses.”]) Thus, to get a realistic picture of the total GHG emissions that would be generated under the proposed project, the existing emissions were subtracted from the proposed project emissions (which included proposed new uses and existing uses) to arrive at net GHG emissions from the project under the per service population analysis. This approach is consistent with the definition of baseline conditions pursuant to CEQA. Therefore, only net new emissions, that the proposed project would generate, need to be compared to the SCAQMD significance thresholds.

The proposed project would have a net increase of 1,993 employees and residents. As shown Section 3.5, Greenhouse Gas Emissions, Table 3.5-3, Estimated Construction- and Operations-Related GHG Emissions for Calculating GHG Emissions per Service Population, the per service population emissions for 2022 would equal 5.4 MTCO₂e annually which would exceed the 2020 efficiency threshold of 4.4 MTCO₂e annually per service level population and the interim 2022 efficiency threshold of 4.2 MTCO₂e annually. The project’s per-service population emissions for 2035 would be 5.2 MTCO₂e which would exceed the 2035 efficiency thresholds of 2.5 MTCO₂e. Therefore, operational GHG impacts resulting from the project were considered to be significant without mitigation. Mitigation Measure GHG-1 sufficiently reduces GHG emissions to below the 2020, 2022, and 2035 thresholds, as shown in Table 3.5-5, Mitigated Construction and Operations Related GHG Emissions for Calculating GHG Emissions Per Service Population. As evidenced in Table 3.5-5, the project’s per-service population emissions would equal 4.1 MTCO₂e annually which would not exceed the 2020 efficiency threshold of 4.4 MTCO₂e annually or the interim 2022 efficiency threshold of 4.2 MTCO₂e annually. The project’s per-service emissions for 2035 would be 2.4 MTCO₂e, which would not exceed the 2035 threshold of 2.5 MTCO₂e annually. Therefore, operational GHG impacts resulting from project were considered to be less than significant with implementation of Mitigation Measure GHG-1. As shown above, GHG emissions were calculated correctly, are a reliable representation of the project’s impact and can be relied upon to determine project significance. An updated Draft EIR is not required, nor are additional mitigation measures.
Similar GHG methodology was upheld by the Court of Appeal in *San Francisco Tomorrow v. City and County of San Francisco* (2014) Case No. A137753 [Upholding a service population threshold of the 4.6 MTCO2e threshold for an urban mixed used development]:

Greenhouse gas production impact. Appellants challenge the FEIR conclusion that the project will not cause a significant impact due to greenhouse gas (GHG) emissions. Their argument appears to be focused not upon the determinative question whether the finding of insignificance is supported by substantial evidence, but rather, upon their claim that any increase in GHG emissions before 2020 must be deemed significant based on the target goals set forth in Assembly Bill No. 32 (AB 32). We disagree with appellants' approach and find that substantial evidence supports the City's finding of insignificance. There is no requirement that a lead agency must find a project causes a significant impact simply because it may not result in decreased GHG emissions by 2020. (*Martin v. City and County of San Francisco* (2005) 135 Cal.App.4th 392, 402 ["CEQA is not to be stretched beyond the "reasonable scope of the statutory language." [Citations.] CEQA is not to be interpreted 'in a manner which imposes procedural or substantive requirements beyond those explicitly stated in this division or in the state guidelines.' (Pub. Resources Code Section 21083.1 "]].) Pursuant to Guidelines section 15064.4, the lead agency has discretion to select the model or methodology it considers most appropriate to quantify GHGs and retains the discretion to determine the threshold of significance that applies to the project.17 (CEQA Guidelines Section 15064.4, subd. (a); *Citizens for Responsible Equitable Environmental Development v. City-of Chula Vista*, supra, 197 Cal.App.4th at p. 336 ... Thus, under the new guidelines, lead agencies are allowed to decide what threshold of significance it will apply to a project].)

The EIR here acknowledged that construction of the project would result in an increase in the amount of GHG emissions—approximately four times the amount produced annually by the project's operation. It included both an extensive quantitative and qualitative analysis of the greenhouse gas emissions expected to result from the proposed project. The EIR evaluated the increased GHG activity onsite during the 20-year construction phase and the GHG contributed annually by the new residential, commercial and retail services upon completion. It also considered the "quantifiable effects of reduced motor vehicle trips and increased mass transit service ... caused by the mixed-use and pedestrian-oriented nature of the Proposed Project." "As infill development, constructed in an urban area with high levels of transit access, the project would result in reducing regional vehicle trips and miles traveled…

The EIR anticipated the adoption by the Bay Area Air Quality Management District (BAAQMD) of thresholds of significance for GHG emissions, by analyzing the project operational GHG emissions under the proposed efficiency based threshold of significance option and concluded: “Because the Proposed Project-related operational emissions would be less than the BAAQMD draft guideline level of 4.6 MTCO2E per service population per year, project-related GHG emissions would result in a less-than-significant impact on climate change. No mitigation is required."

The EIR fully disclosed the increased GHG emissions from construction-related activities. Notwithstanding this increase, the EIR concluded that GHG emissions would not reach a threshold of significance for the reasons discussed above. The foregoing constitutes substantial evidence supporting the City’s determination that the GHG impacts of the project would be less than significant."
2. Response to Comments

Comment OR005A-30

The commenter states the DEIR estimates that the proposed Project would generate approximately 48,890 metric tons of carbon dioxide equivalents per year (MT CO₂e/yr) at full buildout (p. 3.5-18). The DEIR subtracts the Project site’s existing GHG emissions from the proposed Project’s GHG emissions to obtain a net GHG emissions estimate of approximately 10,269 MT CO₂e/yr. Then, dividing the proposed Project’s net GHG emissions by a net service population (SP) of 1,933 people, the DEIR concludes that the proposed Project would emit 5.5 metric tons of carbon dioxide equivalents per service population per year (MT CO₂e/yr /ap/yr), which exceeds the SCAQMD’s 2020 efficiency threshold of 4.8 MT CO₂e/yr /sp/yr and 2035 efficiency threshold of 3.0 MT CO₂e/yr /sp/yr (see table below) (Appendix G, pp. 19).

SOUTH BAY GALLERIA
UNMITIGATED OPERATIONAL CALEEMOD SUMMARY

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Amortized Construction 345
Operational Annual 10,269

**Total Project Annual** 10,614
Service Population 1,933

Annual Emissions per Service Population. 5.5
As demonstrated in the excerpt above, the DEIR relies upon the Project’s net GHG emissions to determine the significance of the Project’s GHG impact. This, however, is entirely incorrect. Relying on the proposed Project’s net GHG emissions, rather than the Project’s total GHG emissions, is incorrect and inconsistent with recent guidance set forth by the Office of Planning and Research (OPR). In the Final Statement of Reasons for the GHG-specific Guidelines, OPR concluded that lead agencies cannot simply consider whether a project increases or decreases GHG emissions at the project site, but must consider the effect that the project will have on the larger environment. Accordingly, if a lead agency wants to use a net approach by subtracting existing on-site emissions from the project emissions, it must support that decision with substantial evidence showing that those existing sources will be extinguished and not simply displaced.

Response to Comment OR005A-30

Please refer to Response to Comment OR005A-29, above for a discussion of how the project’s net GHG emissions were calculated and why they represent the project’s total GHG emissions.


47 See CEQA Guidelines § 15064.4, subd. (a) (“The determination of the significance of greenhouse gas emissions calls for a careful judgement by the lead agency consistent with the provisions in section 15064. A lead agency should make a good-faith effort, based on available information, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project.”).
extent the commenter is asserting the analysis should consider the physical environmental effects associated with climate change, that information was provided on Draft EIR page 3.5-2.

The analysis provides a service population estimate of GHG emissions for comparison against thresholds. All GHG sources were adequately analyzed. As stated in Response to Comments OR005A-29, the existing GHG emissions would continue to occur whether or not the proposed project is approved. Thus, those emissions are not impacts of the proposed project. The Draft EIR adequately analyzed the project’s GHG emissions and their impact on the environment.

**Comment OR005A-31**

The commenter states that a review of the Project’s GHG analysis, however, demonstrates that all existing GHG emissions sources on the Project site were subtracted from the Project’s estimated total GHG emissions, without substantial evidence showing that all of these existing GHG sources on the Project site will be extinguished as a result of the proposed Project, and not simply move elsewhere leading to increased total cumulative GHG emissions over the applicable thresholds. As a result, the Project’s GHG impact is underestimated and inadequately addressed. The GHG emissions generated by the Project site’s existing land uses should have been considered when assessing the Project’s GHG impact, since the DEIR fails to provide substantial evidence showing that the existing sources will be extinguished as a result of the proposed Project, and not simply displaced.

**Response to Comment OR005A-31**

Please refer to Response to Comment OR005A-29, above for a discussion of how the project’s net GHG emissions were calculated and why they represent the project’s total GHG emissions.

The analysis provides a service population estimate of GHG emissions for comparison against thresholds. All GHG sources were adequately analyzed. As stated in Response to Comments OR005A-29, the existing GHG emissions would continue to occur whether or not the proposed project is approved. Thus, those emissions are not impacts of the proposed project. As noted in Response OR005A-3 and 29, the commenter makes the same errors in their GHG calculations as were made in their Air Quality calculations; such errors include attributing baseline emissions as impacts of the project. The Draft EIR adequately analyzed the project’s GHG emissions and their impact on the environment.

**Comment OR005A-32**

The commenter states that in an effort to determine the GHG emissions that would be generated by the proposed Project, we conducted a simple analysis using the Project’s total GHG emissions. We used a total service population value of 3,262 people (Appendix G, pp.19). Therefore, dividing the Project’s GHG emissions of approximately 87,855 MT CO₂e/yr at build out, which is the sum of the amortized construction emissions, the operational emissions and the existing emissions by the SP, we find that the Project would emit approximately 26.9 MT CO₂e/sp/yr (Appendix G, pp. 19). As demonstrated below, this per service population emission rate greatly exceeds the 4.8 MT CO₂e/sp/yr project-level significance threshold for 2035 set forth by the SCAQMD (see table below).
The commenter states, our analysis demonstrates that when the Project’s total GHG emissions are compared to applicable thresholds, we find that the Project’s GHG per service population emissions increase by approximately 389 percent, and result in a substantially more severe GHG impact than what was identified in the DEIR. Our analysis and the OPR GHG-specific Guidelines demonstrate that it is inadequate to simply evaluate only new net sources of GHG emissions from the proposed Project and omit an analysis of all sources of GHG emissions from the Project sit unless substantial evidence shows that the existing emissions sources at the Project site will be extinguished and not simply displaced elsewhere. Until a revised GHG analysis is prepared in an updated DEIR that adequately evaluates the Project’s total GHG emissions from all sources, the DEIR should not be relied upon to determine Project significance. The DEIR should be revised and recirculated to include an updated GHG model to adequately estimate the Project’s GHG emissions, and additional mitigation measures should be incorporated, where necessary.

**Response to Comment OR005A-32**

The Draft EIR correctly calculated and estimated the project’s GHG emissions. Please refer to Response to Comment OR005A-29 for a discussion of how the project’s net GHG were calculated and why they represent the project’s total GHG emissions. Please refer to Response to Comment OR005-29 for a discussion of the project’s GHG emissions impact and how Mitigation Measure GHG-1 sufficiently reduces project impacts to a less than significant level.

The SWAPE analysis is an incorrect portrayal of potential GHG impacts of the proposed project, and ignores CEQA analytical methodology that impacts are based upon a comparison to existing conditions. SWAPE stated that their analysis found that the project’s Per Service Population Annual Emissions exceed 2020 and 2035 SCAQMD Project Level Efficiency Thresholds. The Draft EIR states that those levels would be exceeded as well without implementation of Mitigation Measure GHG-1. However, the difference lies in that SWAPE compared the proposed project emissions, which includes all existing uses currently at the site (existing emissions) and new proposed uses/renovations resulting from the project, to the SCAQMD significance thresholds which resulted in higher significant GHG impacts than those presented in the Draft EIR. The SWAPE analysis is flawed, because the proposed project GHG emissions SWAPE used...
include existing emissions which will continue at the site even if the proposed project is not approved. Therefore, existing emissions should be subtracted from the proposed project emissions, which include emissions from all currently existing buildings that will not be demolished, to determine net emissions of the project. Thus, the Draft EIR accurately calculated the proposed project’s GHG operational emissions and impacts. Since GHG impacts were significant, the Draft EIR proposed Mitigation Measure GHG-1, which mitigates the GHG impact to less than significant. Since the Draft EIR accurately determined project operational GHG impacts, and the mitigation measure sufficiently reduce the impact to less than significant, the City disagrees that the Draft EIR need to be updated nor do additional feasible mitigation measures need to be provided.

**Comment OR005A-33**

The commenter provides:

Additional Feasible Mitigation Measures Available to Reduce Operational Emissions

The commenter believes analysis demonstrates that the Project’s operation GHG emissions may present a potentially significant impact. Additionally, our air quality and health risk analyses also demonstrate that the Project’s operational VOC, NOx, CO, and PM10 emissions could result in significant impacts. In an effort to reduce these emissions, we identified several additional mitigation measures that are applicable to the Project. Additional mitigation measures that could be implement to reduce operational emissions include, but are not limited to, the following: 48, 49

- Use Zero-VOC emission paints;
- The Project Applicant should consider the use of zero-VOC emission paints, which has been required for numerous projects that have undergone CEQA review. Zero-VOC emission paints are commercially available. Other low-VOC standards should be incorporated into mitigation including use of “super-compliant” paints, which have a VOC standard of less than 10 g/L.
- Use material that does not require paint;
- Using materials that do not require painting is a common mitigation measure where VOC emissions are a concern. Interior and exterior surfaces, such as concrete, can be left unpainted.
- Use spray equipment with greater transfer efficiencies;
- Various coatings and adhesives are required to be applied by specified methods such as electrostatic spray, high-volume, low-pressure (HVLP) spray, roll coater, flow coater, dip coater, etc. in order to maximize the transfer efficiency. Transfer efficiency is typically defined as the ratio of the weight of coating solids adhering to an object to the total weight of coating solids used in the application process, expressed as a percentage. When it comes to spray applications, the rules typically require the use of either electrostatic spray equipment or HVLP spray equipment. The SCAQMD is now able to certify HVLP spray applicators and other application technologies at efficiency rates of 65 percent or greater. 50
- Use passive solar design, such as 51, 52
- Orient buildings and incorporate landscaping to maximize passive solar; heating during cool seasons, and minimize solar heat gain during hot seasons; and
• Enhance natural ventilation by taking advantage of prevailing winds.
• Reduce unnecessary outdoor lighting by utilizing design features such as limiting the hours of operation of outdoor lighting.
• Develop and follow a “green streets guide” that requires:
  • Use of minimal amounts of concrete and asphalt;
  • Installation of permeable pavement to allow for storm water infiltration; and
  • Use of groundcovers rather than pavement to reduce heat reflection.53
• Implement Project design features such as:
  • Shade HVAC equipment from direct sunlight;
  • Install high-albedo white thermoplastic polyolefin roof membrane;
  • Install high-efficiency HVAC with hot-gas reheat;
  • Install formaldehyde-free insulation; and
  • Use recycled-content gypsum board.
• Provide education on energy efficiency to residents, customers, and/or tenants. Provide information on energy management services for large energy users.
• Meet “reach” goals for building energy efficiency and renewable energy use.
• Maximize the use of solar energy including solar panels. The DIER states that “roof structures, electrical systems and conduits would be installed to accommodate future photovoltaic panels in selected areas” (p. II-27). We propose that the Project implement the maximum possible number of solar energy arrays on all building roofs on the Project site to generate solar energy for the facilities.
• Limit the use of outdoor lighting to only that needed for safety and security purposes.
• Require use of electric or alternatively fueled sweepers with HEPA filters.
• Include energy storage where appropriate to optimize renewable energy generation systems and avoid peak energy use.
• Plant low-VOC emitting shade trees, e.g., in parking lots to reduce evaporative emissions from parked vehicles.
• Use CARB-certified or electric landscaping equipment in project and tenant operations; and introduce electric lawn, and garden equipment exchange program.
• Install an infiltration basin to provide an opportunity for 100% of the storm water to infiltrate on-site.

Furthermore, additional mitigation measures to reduce VOC, NOx, CO, and PM10 emissions for the proposed Project include:

• Prior to the issuance of building permits, the Project applicant shall submit to the satisfaction of the Public Works Director, evidence that development comply with Title 24 of the California Code of Regulations (CCR) established by the CEC regarding energy conservation and green building standards. The Project applicant shall incorporate the following in building plans;
• Low-emission water heaters shall be used. Solar water heaters are encouraged.
• Exterior windows shall utilize window treatments for efficient energy conservation.
• Design all project buildings to meet or exceed the California Building Code’s (CBC) Title 24 energy standard, including, but not limited to, any combination of the following;
  • Increase insulation such that heat transfer and thermal bridging is minimized;
  • Limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption; and
  • Incorporate ENERGY STAR or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.
• Install efficient lighting and lighting control systems. Use daylight as an integral part of the lighting systems in buildings.
• Install “cool” roofs and cool pavements.
• Install energy-efficient heating and cooling systems, appliances and equipment, and control systems.
• Install solar lights or light-emitting diodes (LEDs) for outdoor lighting or outdoor lighting that meets the City of Redondo Beach’s code.
• Install solar photovoltaic or other technology to generate electricity on-site to reduce consumption from the electrical grid.
• Install electrical vehicle charging stations to promote the use of electrical vehicles.

50 http://www.aqmd.gov/hoe/permits/spray-equipment-transfer-efficiency
51 Santa Barbara Air Pollution Control District, Scope and Content of Air Quality Sections in Environmental Documents, September 1997.
53 See Irvine Sustainable Travelways “Green Street” Guidelines; www.ci.irvine.ca.us/civicca/filebank/blobdload.asp?BlobID=8934; and Cool Houston Plan;www.harc.edu/Projects/CoolHouston.

Response to Comment OR005A-33

Please see Response to Comment OR005A-20 and 29, which explains that the commenter’s calculations are in error and that additional mitigation is not required for impacts that have been reduced to less than significant. Furthermore, many of these provisions are already incorporated into the project. As noted in Response to Comment OR005-24 the project is already required to install cool roofs (i.e. “high-albedo…roof membrane) and comply with the California Energy Code and the California Building Code, mitigation measure GHG-1 already includes motion sensors for lighting and solar panels, the project already includes storm water infiltration facilities (Draft EIR page 3.7-9). The project is also subject to existing lighting regulations under Title 24,
Part 6, Section 130 et seq. of the California Energy Code, which include Light Emitting Diodes (LED). GHG-1 also already includes priority parking with electrical charging stations (see also Draft EIR page 2-21). This is not intended to be an exhaustive list of all of the design features referenced in the comment that have already incorporated into the project, but to demonstrate that the commenter has simply listed a number of general concepts without reviewing the specific Draft EIR or regulatory requirements applicable to this project. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

**Comment OR005A-34**

The commenter states additional, feasible mitigation measures can be found in CAPCOA’s Quantifying Greenhouse Gas Mitigation Measures, which attempt to reduce GHG levels. GHG emissions are produced during fuel combustion, and are emitted by on-road vehicles and by off-road equipment. Therefore, to reduce the Project’s mobile-source GHG emissions, consideration of the following measures should be made.

- **Neighborhood/Site Enhancements**
  - Providing a pedestrian access network to link areas of the Project site encourages people to walk instead of drive. This mode shift results in people driving less and thus a reduction in VMT. The project should provide a pedestrian access network that internally links all uses and connects to all existing or planned external streets and pedestrian facilities contiguous with the project site. The project should minimize barriers to pedestrian access and interconnectivity. Physical barriers such as walls, landscaping, and slopes that impede pedestrian circulation should be eliminated.

- **Incorporate Bile Lane Street Design (On-Site)**
  - Incorporating bicycle lanes, routes, and shared-use paths into street systems, new subdivisions, and large developments can reduce VMTs. These improvements can help reduce peak-hour vehicle trips by making commuting by bike easier and more convenient for people. In addition, improved bicycle facilities can increase access to and from transit hubs, thereby expanding the “catchment area” of the transit stop or station and increasing ridership. Bicycle access can also reduce parking pressure on heavily-used and/or heavily-subsidized feeder bus lines and auto-oriented park-and-ride facilities.

- **Limit Parking Supply**
  - This mitigation measure will change parking requirements and types of supply within the Project site to encourage “smart growth” development and alternative transportation choices by project residents and employees. This can be accomplished in a multi-faceted strategy:
    - Elimination (or reduction) of minimum parking requirement
    - Creation of maximum parking requirements
    - Provision of shared parking
    - Unbundle Parking Costs from Property Cost
  - Unbundling separates parking from property costs, requiring those who wish to purchase parking spaces to do so at an additional cost form the property cost. This removes the burden from those who do not wish to utilize a parking space. Parking should be priced separately from home rents/purchase prices or office leases.
2. Response to Comments

- Implement Commute Trip Reduction Program – Voluntary or Required
- Implementation of Commute Trip Reduction (CTR) program with employers will discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking. The main difference between a voluntary and a required program is:
  - Monitoring and reporting is not required.
  - No established performance standards (i.e. no trip reduction requirements)
  - The CTR program should provide employees with assistance in using alternative modes of travel, and provide both “carrots” and “sticks” to encourage employees. The CTR program, should include all of the following to apply the effectiveness reported by the literature:
    - Carpooling encouragement
    - Ride-matching assistance
    - Preferential carpool parking
    - Flexible work schedules for carpools
    - Half-time transportation coordinator
    - Vanpool assistance
    - Bicycle end-trip facilities (parking, showers and lockers)
    - Provide Ride-Sharing Programs
    - Increasing the vehicle occupancy by ride sharing will result in fewer cars driving the same trip, and thus a decrease in VMT. The project should include a ride-sharing program as well as a permanent transportation management association membership and funding requirement. The project can promote ride-sharing programs through a multi-faceted approach such as:
      - Designating a certain percentage of parking spaces for ride sharing vehicles
      - Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles
      - Providing a web site or message board for coordinating rides.
    - Implement Subsidized or Discounted Transit Program
    - This project can provide subsidized/discounted daily or monthly public transit passes to incentivize the use of public transport. The project may also provide free transfers between all shuttles and transit to participants. These passes can be partially or wholly subsidized by the employer, school, or development. Many entities use revenue from parking to offset the cost of such a project.
    - Provide End of Trip Facilities
    - Non-residential projects can provide “end-of-trip” facilities for bicycle riders including showers, secure bicycle lockers, and changing spaces. End-of-trip facilities encourage the use of bicycling as a viable form of travel to destinations, especially work. End-of-trip facilities provide the added convenience and security needed to encourage bicycle commuting.
    - Encourage Telecommuting and Alternative Work Schedules
- Encouraging telecommuting and alternative work schedules reduces the number of commute trips and therefore VMT traveled by employees. Alternative work schedules could take the form of staggered starting times, flexible schedules, or compressed work weeks.

- Implement Commute Trip Reduction Marketing
- The project can implement marketing strategies to reduce commute trips. Information sharing and marketing are important components to successful commute trip reduction strategies. Implementing commute trip reduction strategies without a complementary marketing strategy will result in lower VMT reductions. Marketing strategies may include:
  - New employee orientation of trip reduction and alternative mode options
  - Event promotions
  - Publications
- Implement Preferential Parking Permit Program
- The project can provide preferential parking in convenient locations (such as near public transportation or building front doors) in terms of free or reduced parking fees, priority parking, or reserved parking for commuters who carpool, vanpool, ride-share or use alternatively fueled vehicles. The project should provide wide parking spaces to accommodate vanpool vehicles.

- Implement Car-Sharing Program
- This project should implement a car-sharing project to allow people to have on-demand access to a shared fleet of vehicles on an as-needed basis. User costs are typically determined through mileage or hourly rates, with deposits and/or annual membership fees. The car-sharing program could be created through a local partnership or through one of many existing car-share companies. Car-sharing programs may be grouped into three general categories: residential- or citywide-based, employer-based, and transit station-based. Transit station-based programs focus on providing the “last-mile” solution and link transit with commuters’ final destinations. Residential-based programs work to substitute entire household based trips. Employer-based programs provide a means for business/day trips for alternative mode commuters and provide a guaranteed ride home option.

- Provide Employer-Sponsored Vanpool/Shuttle
- This project can implement an employer-sponsored vanpool or shuttle. A vanpool will usually service employees’ commute to work while a shuttle will service nearby transit stations and surrounding commercial centers. Employer-sponsored vanpool programs entail an employer purchasing or leasing vans for employee use, and often subsidizing the cost of at least program administration, if not more. The driver usually receives personal use of the van, often for a mileage fee. Scheduling is within the employer’s purview, and rider charges are normally set on the basis of vehicle and operating costs.

- Implement Bike-Sharing Program
- This project can establish a bike-sharing program to reduce VMTs. Stations should be at regular intervals throughout the project site.
- For example, Paris’ bike-share program places a station every few blocks throughout the city (approximately 28 bike stations/square mile).

- Price Workplace Parking
The project should implement workplace parking pricing at its employment centers. This may include: explicitly charging for parking for its employees, implanting above market rate pricing, validating parking only for invited guests, not providing employee parking and transportation allowances, and educating employees about available alternatives.

Though similar to the Employee Parking “Cash-Out” Strategy, this strategy focuses on implementing market rate and above market rate pricing to provide a price signal for employees to consider alternative modes for their work commute.

Implement Employee Parking “Cash-Out”

The project can require employers to offer employee parking “cash-out.” The term “cash-out” is used to describe the employer providing employees with a choice of forging their current subsidized/free parking for a cash payment equivalent to the cost of the parking space to the employer.

Response to Comment OR005A-34

Please see Response to Comment OR005A-20 and 29, which explains that the commenter’s calculations are in error and that additional mitigation is not required for impacts that have been reduced to less than significant. Furthermore, many of these provisions are already incorporated into the project. Please also see Response to Comment OR005-32, which explains that the project already incorporates enhancements associated with alternatives modes of transportation, and trip reduction measures. The project also already incorporates many of the measures referenced in the comment, for example shared parking (Draft EIR page 3.13-20), Transportation Demand Management measures, including preferred parking for carpools/vanpools (Draft EIR page 3.13-20 through 21). This is not intended to be an exhaustive list of all of the design features referenced in the comment that have already incorporated into the project, but to demonstrate that the commenter has simply listed a number of general concepts without reviewing the specific Draft EIR or regulatory requirements applicable to this project. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment OR005A-35

The commenter states, these measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduces emissions released during Project operation. An updated DEIR must be prepared to include additional mitigation measures, as well as include an updated air quality and GHG analysis to ensure that the necessary mitigation measures are implemented to reduce operational emissions to below thresholds. Furthermore, the Project Applicant also needs to demonstrate commitment to the implementation of these measures prior to Project approval, to ensure that the Project’s operational emissions are reduced to the maximum extent possible.

Response to Comment OR005A-35

Please refer to Response to Comments OR005-3 through OR005A-6 for discussions of how the proposed project’s net air quality emissions were calculated, why they are an accurate representation of project emissions, and why the SWAPE proposal for using the proposed...
project’s operation emissions, which includes baseline emissions, instead of net operational emissions is flawed. As evidenced in Response to Comments OR005A-3 through OR005A-6, the Draft EIR accurately calculated the proposed project’s operational air quality emissions and impacts. Project air quality emissions were not underestimated and thus, it is not necessary to update the Draft EIR. The Draft EIR accurately determined project operational air quality impacts, which are below SCAQMD regional thresholds, so no mitigation is required.

Please see Response to Comment OR005A-17 for the reasons that SWAPEs health risk assessment is an inaccurate portrayal of the true health risk for the proposed project. Please refer to Response to Comment OR005A-8 for a discussion on why the result of the construction health risk assessment in the Draft EIR is correct and the potential threat to nearby sensitive receptors is adequately disclosed and addressed. The proposed project does not pose a potentially significant health risk to sensitive receptors that was not identified in the Draft EIR. Additionally, Response to Comment OR005A-8 provides a discussion of why the construction-related health risk and cancer risk posed to sensitive receptors can be relied upon to determine project significance. Moreover, Response to Comment OR005A-8 provides the reasoning for why an operational health risk assessment is not required for the proposed project. The health risk performed for the proposed project, using AERSCREEN, was evaluated correctly using the most up to date guidance and did not result in a significant health risk to sensitive receptors. All potentially significant health risk impacts were identified in the Draft EIR for construction and operation of the proposed project. As demonstrated above, a refined health risk assessment is not required, nor are additional mitigation measures, as the project health risk is below SCAQMD significance thresholds.

Additionally, the Draft EIR correctly calculated and estimated the project’s GHG emissions. Please refer to Response to Comment OR005A-29 for a discussion of how the project’s net GHG emissions were calculated and why they represent the project’s total GHG emissions. Please refer to Response to Comment OR005-29 for a discussion of the project’s GHG emissions impact and how Mitigation Measure GHG-1 sufficiently reduces project impacts to a less than significant level. Please refer to Response OR-005A-32 for reasons why the SWAPE’s GHG analysis is flawed. The Draft EIR accurately determined project GHG impacts, which are below SCAQMD regional thresholds, with implementation of Mitigation Measure GHG-1. As a result, an updated Draft EIR does not need to be prepared and additional mitigation measures are not required. The project has committed to implementation of Mitigation Measures GHG-1. Prior to the issuance of building permits, the applicant shall provide to the Community Development Department a preliminary GHG Reduction plan specifying which mitigation and design features would be incorporated into the proposed project. A final GHG Reduction plan shall be submitted by the applicant and approved by the Community Development Department prior to the certificate of occupancy.

**Comment Letter OR006: Unite Here Local 11**

**Comment OR006-1**

The commenter states, on behalf of over 25,000 hospitality and restaurant members in Unite Here Local II in Los Angeles and Orange Counties and Phoenix, Arizona, we write to express our
concern about the South Bay Galleria Mixed-Use Project. Unite Here Local II seeks to raise the standards in the hospitality and tourism industry in Redondo Beach, and to transform Redondo Beach service jobs into good middle class jobs. In addition to fulfilling integral roles in the local economy, Unite Here Local II members also live, work and play the Redondo Beach community.

Response to Comment OR006-1

Although your comment does not address an environmental impact in the Draft EIR, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment OR006-2

The proposed South Bay Galleria Mixed-Use Project will include "an expansion of existing retail and dining venues with open-air promenades, hotel and residential development." We would like to express our concerns with the Draft Environmental Impact Report ("DEIR") for the South Bay Galleria Mixed-Use Project.

Response to Comment OR006-2

Although your comment does not address an environmental impact in the Draft EIR, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment OR006-3

Given the size and scope of this project, we are concerned about the potentially significant environmental impacts that this project, and its alternatives, will have on the surrounding Redondo Beach community. We are especially concerned about the significant and unavoidable traffic impacts due to this project. Additionally, we are concerned about the new traffic that this project will generate and its impact on air quality and greenhouse gas emissions. Should the City approve the project we ask that it approve the most environmentally sound alternative to the current proposed project.

Response to Comment OR006-3

Section 3.13, Transportation and Traffic, identifies significant traffic impacts to signalized intersections in the project vicinity. Implementation of Mitigation Measures MM TRA-1 through MM TRA-4 would reduce impacts to most intersections, but not fully mitigate impacts at Intersection # 17 (Prairie Avenue & Artesia Boulevard) under the Existing plus Project and Cumulative plus Project scenarios. Therefore, even with mitigation this intersection would still result in a significant and unavoidable impact. There were no feasible mitigation measures identified to address the significant impacts at Intersection #16 (Hawthorne Boulevard & Artesia Boulevard) and Intersection #19 (I-405 Northbound Ramps & Artesia Boulevard). Therefore, the impacts at these intersections under the Existing plus Project and Cumulative plus Project scenarios would remain significant and unavoidable. As such, significant traffic impacts would occur under the project and your concern will be noted.
Additionally, please see Draft EIR Section 3.13, *Transportation and Traffic*, for discussion of the projects transportation related impacts, Section 3.1, *Air Quality*, for discussion of Air Quality impacts, Section 3.5, *Greenhouse Gas Emissions*, for discussion of greenhouse gas emissions, and Draft EIR Section 4.0, *Alternatives*, for discussion of the project Alternatives. 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 OR007: South Bay Parkland Conservancy**

**Comment OR007-1**

The commenter states the South Bay Parkland Conservancy (SBPC) submits the following comments regarding representations made in the South Bay Galleria Project Draft EIR.

1. Using the numbers presented in the DEIR, the parks acreage in the City of Redondo Beach has declined by nearly 24 percent between 1990-2015, when parks were 2.995 acres per thousand residents. California deems anything less than 3 acres per thousand residents as "critically underserved." We know that these numbers are overstated, especially since City Staff have stated on the record that paved areas like Pier Plaza are included in their statistics. Regardless, actions should be taken, especially in light of this project, to provide additional park, open space and trails to enhance the access for Redondo Beach residents in this area of the community.

**Response to Comment OR007-1**

The commenter states concern regarding parkland dedication. As stated in the Draft EIR, Section 3.12, *Recreation*, requirements for park dedication in the City were adopted by the City in 2004 and are identified in Article 14, Chapter 1, Title 10 of the Redondo Beach Municipal Code (RBMC Section 10-1.1400 et seq.). These municipal code sections provide for either the dedication of land for recreational purposes or payment of an in-lieu fee which is used for either acquiring land or developing/rehabilitating existing parks or recreational facilities. As discussed in Draft EIR Section 3.12.3, the City’s Recreation Element explains that “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.” Consistent with this policy direction, the proposed project would incorporate new recreational/open space amenities such as a pool and spa, fitness center, conference room, residents lounge, catering kitchen, and outdoor lounge seating. Furthermore, the proposed project includes an open-air retail plaza (see Draft EIR Figure 2-7). In addition, the proposed project would pay the parkland dedication fees, in lieu of dedication of land, based on the RBMC. The fee or dedication of land is based upon the number of dwelling units.

**Comment OR007-2**

The commenter states that required setbacks should not be referred to as "linear parks;" green space within the site boundaries should not be referred to as "parks." We prefer that the Galleria areas in question be either activated through recreation or fitness or designed for other uses with drought tolerant plants, preferably native vegetation. It is unacceptable to use these labels in any attempt to equate these small spaces with parks, for fear of misleading the public.
**Response to Comment OR007-2**

Draft EIR Section 3.12, *Recreation*, states that no new on-site parkland is proposed; however, the proposed project would incorporate new recreational/open space amenities such as a pool and spa, fitness center, conference room, residents lounge, catering kitchen, and outdoor lounge seating with a fire pit or water feature, on site. The Draft EIR does not refer to setback spaces as “linear parks”. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Consistent with the City’s Zoning, the project will be required to comply with the City’s landscape regulations, which provide for the use of drought tolerant plants. (RBMC Section 10-2.1900(b)(2)(a).)\(^59\)

**Comment OR007-3**

The commenter states that comparisons were made to other commercial developments that are of significantly smaller dimensions. In fact, using the Metlox Shopping Center comparison, the Galleria development should have nearly 6 times the green space of that proposed at the Galleria site. Similarly egregious is the comparison of the subject project with The Point in El Segundo. With that point of reference, the Galleria should have 9 times the green space! This further reinforces our rejection of any notion that these green spaces are actually parks.

**Response to Comment OR007-3**

The Draft EIR makes no reference or comparison to the Metlox Shopping Center or The Point. The proposed project would pay parkland dedication fees, in lieu of dedication of land, based on the RBMC. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Please also note that the state legislature adopted Senate Bills 375 and 743 which promote infill development in transit priority areas to reduce Vehicle Miles Traveled (VMT) and the associated GHG emissions. (See Draft EIR Section 3.0.3.) As discussed therein, the project site meets the definition of a transit priority area, and results in a reduction in regional VMT. While the Draft EIR analyzed reduced density alternatives in Draft EIR Section 4, these Alternatives do not provide the same regional GHG/VMT benefits.

**Comment OR007-4**

The commenter states that for these reasons, SBPC must take a position in opposition to the development as presented, due the lack of parks acreage per thousand residents that already exists in Redondo Beach. The increased residential density will further aggravate an already onerous inadequacy of parks and open space.

**Response to Comment OR007-4**

The commenter states opposition for the project due to a lack of parkland dedication on-site. As detailed in Response to Comment OR007-1, the proposed project would pay the parkland dedication fees, in lieu of dedication of land, in accordance with the Redondo Beach Municipal

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\(^59\) City of Redondo Beach List of Recommended Trees and Water Conserving Plants: http://www.redondo.org/civica/filebank/blobdload.asp?BlobID=4979
2. Response to Comments

2.3.6 Public Comment

Comment Letter PC001: Bruce Szeles

Comment PC001-1

“No significant impact” is the mantra in the Galleria DEIR regarding traffic. I've been driving Inglewood Ave. to go to work for 30 years. There is a major real world disconnect between reality and government measure. Real world common sense is thrown out and replaced with bureaucratic metrics that will leave the area around the Galleria to be avoided at all cost by the common folk in the South Bay. I challenge the validity of the term "no significant impact" as it to adding 300 housing units to an already gridlock condition currently in the surrounding area.

Response to Comment PC001-1

The commenter’s summary of the South Bay Galleria Draft EIR’s conclusions is incorrect. The Draft EIR concluded that the proposed project would have six (6) significant intersection impacts before implementation of mitigation measures. (Draft EIR pp. 3.13-32 and 38.) After implementation of recommended mitigation measures, the Draft EIR concluded that there would be three (3) significant and unavoidable intersection impacts. (Draft EIR p. 3.13-55.)

The commenter also asserts that “there is a major real word disconnect between reality and government measure.” It is not the purpose of CEQA to fix or mitigate existing environmental problems. The purpose of CEQA is to analyze changes in comparison to existing conditions resulting from implementation of the proposed project. Consequently, the commenter’s opinion on “real world” conditions, i.e. existing baseline conditions, are conditions which are not attributable to the impacts of this project.

Comment PC001-2

As a former resident of the 2400 block of Vanderbilt Lane for almost 20 years I experienced living in the densest area of the city without 300 additional housing units being built. If instead of creating 300 more housing units there were 300 new opportunities for high paying jobs maybe people like myself and many in the city would not have to travel elsewhere to earn a living.

Response to Comment PC001-2

While the comment does not directly address an environmental issue, 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 PC002: James Light

Comment PC002-1

The Galleria Project DEIR traffic trip generation uses factors to decrement the trip generation. Request all Information related to the values assigned to the factors applied in this DEIR and the assessment justifying the values assigned to each factor.
The DEIR for the Galleria Project uses factors to discount the trip generation. I have found the study that says doing this is valid but cannot find where the DEIR defines the specific discount for each factor or the justification for the discount for each factor. Please help me find it in the DEIR or supply the missing data.

**Response to Comment PC002-1**

The commenter submitted these requests on August 2, 2017. The City responded to the commenter’s Public Records Act Request on or about August 10-11, 2017, the response stated in part:

The information that you requested is contained in documents made available online at the links provided below. This information is made available consistent with Gov. Code 6253(f):

1. The South Bay Galleria Draft EIR, Section 3.13, *Transportation and Traffic*, available online at:  

2. The South Bay Galleria Draft EIR, Appendix L, Transportation, available online at:  

If you have any difficulty accessing these electronic files, please contact the City Clerk’s office. If desired, the records above can be made available to you in hard copy. Please note that the City charges ten cents ($0.10) per 8.5” x 11” page for duplication of records, which is the direct cost of making paper copies.

Regarding the commenters’ request to identify “where the Draft EIR defines the specific discount for each factor or the justification for the discount for each factor.” Trip generation and “discount trip factors” are discussed in Draft EIR Section 3.13, *Transportation and Traffic*, specifically in Section 3.13.4. The specific trip reduction information is provided in Draft EIR Table 3.13-7, which shows the MXD+ Model trip reduction values (i.e. “MXD+ Model calibration of base ITE rates reflecting project and site-specific characteristics”). As outlined in greater detail below, the MXD+ model calibrates the trip generation for the totality of the project (i.e. all of the proposed land uses). Consequently to the extent the commenter is requesting a reduction factor for each individual use/ITE rate, that is not the type of information that is created by the MXD+ model. The MXD+ model was summarized in Draft EIR, Appendix L, Section 1.4.

More detailed information on the MXD+ model is included Draft EIR Appendix L ("Appendix A – MXD Model Documentation"). The MXD Model Documentation includes approximately 20 pages of support information related to the creation of the MXD+ trip generation modeling. As discussed therein, the MXD+ model is based upon two earlier trip generation studies including (1) the National Cooperative Highway Research program (NCHRP) Report 684, and (2) the US EPA sponsored Report “Traffic Generated by Mixed-Use Developments – A Six-Region Study Using Consistent Built Environmental Measures” which in turn was based upon a study of 239 Mixed Use Developments and verified through 27 mixed use sites across the U.S. (Appendix L, Appendix A, p. 10-11.) The MXD+ model combines the datasets and factors from both of these models. (Appendix L, Appendix A, p. 12-16.)
Project-specific outputs and calculations are provided in Chapter 3, Modifications to the Draft EIR, of the Final EIR. The MXD+ model utilized trip generation rates from *Trip Generation, 9th Edition*, but through the statistical processes of the model, calibrates the combined ITE rates to reflect the site specific and area contexts of the project, including size of the project, land uses of the project, intersection density around the project, average household size and vehicle ownership in Redondo Beach, employment within 1 mile of the project, and employment within 30 minutes via transit. Input variables and sources utilized in the MXD+ model are provided below.

<table>
<thead>
<tr>
<th>Project</th>
<th>Value</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Size of Site (acres)</td>
<td>34.76</td>
<td>GIS</td>
</tr>
<tr>
<td>Household Size (persons per HH)</td>
<td>2.43</td>
<td>ACS 2012 - 5 Year Average</td>
</tr>
<tr>
<td>Vehicle Ownership (per DU)</td>
<td>1.85</td>
<td>ACS 2012 - 5 Year Average</td>
</tr>
<tr>
<td>Intersection Density (per square mile)</td>
<td>92</td>
<td>EPA Smart Location Database</td>
</tr>
<tr>
<td>Employment within 1 mile</td>
<td>9,045</td>
<td>SCAG 2012 RTP Model</td>
</tr>
<tr>
<td>Employment within 30 min transit (share)</td>
<td>0.02</td>
<td>SCAG 2012 RTP Model</td>
</tr>
</tbody>
</table>

In addition to the MXD+ trip reductions, pass-by credits were applied to the commercial components of the project. A 10 percent pass-by trip credit was applied to the retail land use, a 10 percent pass-by credit was applied to the theater land use, a 10 percent pass-by credit was applied to the quality restaurant land use, and a 20 percent pass-by credit was applied to the high-turnover restaurant land-use use to account for patrons making an intermediate stop on the way to and from other locations (pass-by trips are trips that are attracted from traffic passing the site on adjacent roadways and are not new trips generated by the project). These credits were derived from surveys published in the *Trip Generation Handbook, 3rd Edition* (Institute of Transportation Engineers, 2014).

**Comment Letter PC003:  M. Narain**

**Comment PC003-1**

The commenter states, my comment relates to the impact on RBUSD. In Section 3.11, the impact of the lowest density option increased the amount of elementary school children by 35 (300 units*0.1167 elementary student per unit). According to table 3.11-3 the elementary schools were already over capacity in the 2015-2016. For the most impacted school this number will likely grow as many parents seek out our district and single-family homes are turned into 2 on 1 or 3 on 1 lots. In addition, Washington Elementary has the largest student population in the district. These units and additional students will definitely impact the school. If these units are built, Forest City should pay an annual fee to the District to fund the teachers and rooms needed for the students they will add. Many other cities have implemented fees on new developments to fund additional schools needs or other services.

**Response to Comment PC003-1**

The commenter expresses concern regarding school capacities, which were analyzed in Draft EIR, Section 3.11, *Public Services*. The comment does not raise any specific issue related to the
adequacy of this analysis as provided in the EIR. Nevertheless, as discussed in Section 3.11.4, Impact PUB-3, pursuant to state law “the project would pay statutory fees which are ‘...deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization’. (Gov. Code Section 65995(h) and 65996.) With regards to the shortfall in capacity at Washington Elementary School, the RBUSD school district would likely install portable classrooms, which are anticipated to not result in significant adverse physical environmental effects. Therefore, impacts are considered less than significant. Similar school fee issues arose in a recent Mixed Use Residential project case in the City of Fremont. (See Stand Up for Fremont v. City of Fremont (2017 Alameda County Superior Court Case No RG17844308) [“Finally, we respect to Petitioner’s claim that the project may risk overcrowding the schools, the Court finds that by law this cannot be asserted as a substantial impact on the environment under CEQA because that claim is barred by Government Code section 65996.”]

Comment Letter PC004: Janice Boyd

Comment PC004-1

The commenter states the alternatives proposed by Forest City for the Galleria, Alternative 4-1 should be advanced due to the inclusion of office space and the reduced number of apartment dwellings. The inclusion of office space needs to be a component of the final solution.

Response to Comment PC004-1

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

Comment Letter PC005: Jeanette McGuire

Comment PC005-1

The commenter states they are a resident near to the SB Galleria property. I know that many residents near to me are lobbying against the improvement proposals. I attended a couple of information letting meeting in this area, which were intended to inform and hear feedback from the community. It seems that the residents who are negative are the most vocal. One man left the meeting after shoving one of the presenters!

I want to let you know that I am a proponent of the project, and I would like to be informed of any meeting where I could be maybe not heard, but at least represent the positive contingent.

Response to Comment PC005-1

The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.
Comment PC005-2
The commenter states it is the responsibility of the planners to address traffic considerations. This is the one area of concern. However, assuming this is addressed and solved, the project will be a huge enhancement for the area. It is a huge swath of land, and it deserves to lead North Redondo to a progressive future, serving the entire city, commerce and nearby residents. I look forward to the change.

Response to Comment PC005-2
Traffic impacts were considered in Draft EIR 3.13, Transportation and Traffic and in the Transportation Impact Study (TIS), Appendix L of the Draft EIR. These studies were prepared in accordance with the requirements of CEQA and the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. In consultation with City of Redondo Beach staff, the transportation study area was selected to include intersections likely to be affected by traffic generated by the proposed project, specifically major intersections located within roughly a one-mile radius of the project site. The Draft EIR identifies all traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible.

Comment Letter PC006: Melissa White

Comment PC006-1
I just want to submit my comments regarding the South Bay Galleria development. I am strongly opposed to any residential buildings (apartments) being built as part of this project, unless a solution is put in place to deal with the many new RBUSD students that will arrive as a result. The area feeds directly into Washington Elementary School, which already has the largest student population of all the elementary schools and a reputation for being the worst elementary school in Redondo.

Why the new Galleria needs to add housing to the area is beyond me. There is already a hotel proposed, as well as restaurants, and this should result in many people frequenting and shopping in the area. If you look at the new centers being built in Manhattan Beach and El Segundo, none of these have apartments added to them. The Point is thriving, as are the shops, just because the good restaurants and entertainment features it has. The Galleria will be fine without the apartments and extra students flooding into Washington Elementary School, Adams Middle School, and Redondo Union.

To dismiss the increase in students by saying that only single people without kids will live in the apartment is preposterous. In the apartment building in the area where I live, north of Artesia, there are items for kids everywhere – all over the patios, handing out the windows, etc. There are many families with kids and single parents who will move into the apartments to avail themselves of the school district, as the apartments in Redondo as well as Manhattan Beach, where tons of kids reside, prove.
I am a big fan of the new Galleria development, but I hope that the planning commission takes into account my comments, as well as the comments of others who agree with me, and get rid of the new apartments or else come up with an excellent and workable solution for Washington Elementary School and RBUSD in general, which will be significantly impacted by any new residential complex.

**Response to Comment PC006-1**

The comment opposes the residential component of the project “unless a solution is put in place to deal with many new RBUSD students that will arrive as a result.” The comment also states that “[t]o dismiss the increase in students by saying that only single people without kids will live in the apartments is preposterous.”

School capacities were analyzed in the Draft EIR, Section 3.11, *Public Services*. Contrary to the assertions in the comment, the Draft EIR did not assert that “only single people without kids will live in the apartments.” Additionally, Draft EIR Section 3.11, Table 3.11-4 made reasonable assumptions about Student Generation factors based upon RBUSD’s 2016 Enrollment Impact Analysis. This included Elementary School Student Generation factors of 0.1284 Elementary School students per unit, 0.0489 Middle School students per unit, and 0.051 High School students per unit. As further discussed in Section 3.11.4, Impact PUB-3, pursuant to state law “the project would pay statutory fees which are ‘…deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.” (Gov. Code Section 65995(h) and 65996.) With regards to the shortfall in capacity at Washington Elementary School, the RBUSD school district would likely install portable classrooms in the short term, which are anticipated to not result in significant adverse physical environmental effects. Therefore, impacts are considered less than significant. Similar school fee issues arose in a recent Mixed Use Residential project case in the City of Fremont. (See *Stand Up for Fremont v. City of Fremont* (2017 Alameda County Superior Court Case No RG17844308) [“Finally, we respect to Petitioner’s claim that the project may risk overcrowding the schools, the Court finds that by law this cannot be asserted as a substantial impact on the environment under CEQA because that claim is barred by Government Code section 65996.”]

The comment also states, “Why the new Galleria needs to add housing to the area is beyond me.” As discussed on Draft EIR page 3.8-16:

As noted under Government Code 65589.5(a), the legislature has concluded that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California.” The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City “facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community” (Gov. Code Section 65580(d)). More specifically, the Legislature’s stated intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal” (Gov. Code Section 65581). Also under the Redondo Beach Housing Element, the project site represents the greatest potential for future residential development in the City, to meet the City’s
Regional Housing Needs Assessment (RHNA), as well as the high regional demand for housing in the County (see also Circulation Element, Goal 8). Furthermore, as discussion in Section 3.0.3 of the Draft EIR, the proposed project provides mixed use development in a transit priority area, and is consistent with the regional RTP goals as well as the City’s goals of encouraging mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance and supporting transit-oriented development (Redondo Beach Circulation Element, G6, G7, and G8).

As further discussed in Draft EIR Section 3.10.3:

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. In cooperation with HCD, local governments and councils of government are charged with determining the cities or regions existing and projected housing needs as their share of the statewide housing need. The current Regional Housing Needs Allocation (RHNA) identifies housing needs in each SCAG jurisdiction and allocates a fair share of that need to every community. Redondo Beach’s RHNA for the 2013–2021 planning period has been determined by SCAG at 1,397 housing units, including 186 units for extremely low-income households, 186 units for very-low-income households, 223 units for low-income households, 238 units for moderate-income households, and 564 units for above-moderate-income households.

Comment Letter PC007: Alisha C. Pember

Comment PC007-1

Good afternoon, please see the attached correspondence. If you have any questions, please contact Linda Sobczynski and Sheila Sannadan. Thank you.

[The “attached correspondence” referenced in Comment PC007 was a copy of Comment OR003.]

Response to Comment PC007-1

The comment does not address an environmental issue. Responses to the attached correspondence were prepared; please see Response to Comment OR003.

Comment Letter PC008: Lara Duke

Comment PC008-1

The commenter states this plan is a worthwhile one, except for one thing: there should be no residential elements of this project. Redondo Beach is dense enough, and the project is already a natural "mixed use" project with residential homes already existing in the area. There's your mixed use! It's clearly a money grab by the developer, and who can blame them--they want money. But the impacts are far-reaching and negative and our city representatives must recognize and fight this residential element for the sake of residents' quality of life. It is clear that traffic impacts cannot be mitigated and it takes a brief drive up and down Hawthorne now to see that traffic is already bad. Do we want it to go to the next step and be horrendous? This isn't even considering the issue of infrastructure and resources (school, water, electric), where we already face frequent shortages. So, how is more housing a sensible move?
Response to Comment PC008-1

The commenter asserts that there should be no residential and asserts that the impacts of residential development are far reaching. As discussed on Draft EIR, Section 3.8, Land Use, on page 3.8-16:

As noted under Government Code 65589.5(a), the legislature has concluded that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California.” The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City “facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community” (Gov. Code Section 65580(d)). More specifically, the Legislature’s stated intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal” (Gov. Code Section 65581). Also under the Redondo Beach Housing Element, the project site represents the greatest potential for future residential development in the City, to meet the City’s Regional Housing Needs Assessment (RHNA), as well as the high regional demand for housing in the County (see also Circulation Element, Goal 8). Furthermore, as discussion in Section 3.0.3 of the Draft EIR, the proposed project provides mixed use development in a transit priority area, and is consistent with the regional RTP goals as well as the City’s goals of encouraging mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance and supporting transit-oriented development (Redondo Beach Circulation Element, G6, G7, and G8).

As further discussed in Draft EIR Section 3.10.3:

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. In cooperation with HCD, local governments and councils of government are charged with determining the cities or regions existing and projected housing needs as their share of the statewide housing need. The current Regional Housing Needs Allocation (RHNA) identifies housing needs in each SCAG jurisdiction and allocates a fair share of that need to every community. Redondo Beach’s RHNA for the 2013–2021 planning period has been determined by SCAG at 1,397 housing units, including 186 units for extremely low-income households, 186 units for very-low-income households, 223 units for low-income households, 238 units for moderate-income households, and 564 units for above-moderate-income households.

As further discussed in Draft EIR Section 3.5 page 3.5-13, the California State Legislative Analyst’s office has concluded that Los Angeles County has built fewer housing units in comparison to existing demand, particularly in coastal communities, thereby requiring individuals to commute greater distances, which in turn results in urban sprawl and increased GHG and Air Quality Emissions.

Impacts associated with schools, water, and electricity are addressed in Draft EIR Section 3.11, Public Services, Section 3.14, Utilities, Section 3.1, Air Quality, which considered electricity consumption, Section 3.5, Greenhouse Gases, which also considered electricity consumption, and Section 5.4, Energy. For example, as described in Section 3.14, there is not anticipated to be electricity shortages as asserted in the comment.
The proposed project would be served by Southern California Edison. The existing regulatory requirements and planning requirements set by the California Public Utilities Commission and the California Energy Commission are constantly assessing population growth, electricity demand, and reliability. As discussed on the CEC’s website, the CEC is tasked with conducting assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand and prices. The CEC uses these assessments and forecasts to develop energy policies, that conserve resources, protect the environment, ensure energy reliability, enhance the state’s economy, and protect public health and safety (Pub. Res. Code Section 25301(a)). As noted in the Draft EIR, the proposed project would be consistent with population projections for the City of Redondo Beach. The proposed project would use energy efficient lighting, and is replacing older existing structures, with facilities that meet modern more stringent energy efficiency requirements in Title 24 of the California Building Code. The project site is within Edison’s existing service area and there is no evidence to suggest that the proposed project would impact regional power supply. Furthermore, the commenter provides no evidence that the non-specific references to frequent power shortages were related an insufficient power supply. Many power outages in the area, such as those that occurred in 2012 were a result of weather conditions, or other emergency scenarios such as fires.

Further, the commenter is referred to Response to Comment PC005-2, which discusses the TIS and project impacts, cumulative impacts and mitigation measures.

Comment PC008-2

The commenter states that the other aspects of the project appear to be good, as this is a mall area already, so mall-type uses are appropriate. In this case, many restaurants are a good idea given the studies the developer conducted showing how people eat out so often. And communal park space seems nice, that can be used for yoga, or live music and art in the green belt areas. Their idea of "experiential" elements that draw people away from their homes and personal devices and to the mall seem ambitious, but also a little nebulous. And if these experiential events are too expensive for people, that will be a problem.

Response to Comment PC008-2

Thank you for your comment. While the comment does not directly address an environmental issue, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

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61 Redondo Beach Patch, Power Outages Hit Redondo Beach, Dated March 26, 2012, noting that “At least four blackouts hit Redondo Beach on Sunday afternoon as a storm battered the area. North Redondo Beach was hit hardest, with more than 1,800 customers in the area without power at some point during the afternoon...All three outages were caused by storm conditions, and crews were working “around the clock” to restore power, according to SCE’s website. The estimated power restoration times were 24 hours after each outage started.”
62 http://kltla.com/2017/12/06/over-13000-affected-by-power-outages-across-socal-amid-wildfires-burning-over-100-square-miles/
Comment PC008-3

The commenter states they are skeptical that the Green Line will be very accessible to residents there, or even whether residents there would use it, given the social stigma. L.A. residents are wired with that says mass transit equals what poor or homeless people use/ride. There would have to be some extreme outreach plans by Metro to convince people to use it, and it would need to be extremely convenient. A representative of Forest City today said it would be a good ten years before the Green Line even will be up and running at this location, which is a long way off to be touting the service.

Response to Comment PC008-3

Your comment with respect to the appeal of transit in Los Angeles County is noted. However, per the requirements of CEQA, the focus of the Draft EIR is to address project-generated impacts, not to address regional opinions on the perceptions of transit. The Draft EIR made reasonable assumptions about trip generation pursuant to the MXD+ model, as outlined in greater detail in Draft EIR Section 3.13.

Comment Letter PC009:

Colleen Otash

Comment PC009-1

The commenter states, as a 30+ years Huntington Lane resident of Redondo Beach who lives just three blocks from Kingsdale, I have more than an adequate understanding of the needs of the residents in this area and especially with regards to Kingsdale. I daily use Kingsdale to go to Target, the Galleria, Sprouts, Ralph's, etc., and I am very concerned about the lack of obviously needed changes to Kingsdale to accommodate all the new development planned for the Galleria and the Metro green train/bus station.

Here are my concerns which I would appreciate your officially recording and taking into consideration.

(I) Kingsdale needs to be straightened and will also need additional lanes to accommodate all the new traffic with the proposed boutique hotel, apartments, additional visitors to an upgraded Galleria, and the new Metro green train station and bus transit center with a parking structure, scheduled for Kingsdale and 182nd street.

Response to Comment PC009-1

Traffic impacts were considered in Draft EIR Section 3.13, Transportation and Traffic, and in the Transportation Impact Study (TIS), Appendix L of the Draft EIR. These studies were prepared in accordance with the requirements of CEQA and the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. In consultation with City of Redondo Beach staff, the transportation study area was selected to include intersections likely to be affected by traffic generated by the proposed project, specifically major intersections located within roughly a one-mile radius of the project site. Four of the study intersections are located along Kingsdale Avenue at: Artesia Boulevard (Intersection 14), Grant Avenue (Intersection 20), Target Drive (Intersection 24), and 182nd Street (Intersection 27). Beginning on page 3.13-29 of the Draft EIR,
the significance thresholds use to determine whether the proposed project’s contribution to delay experienced at the 32 study intersections and five mainline freeway segments, are described. The Draft EIR identifies all traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible. No impacts were identified at the four study intersections located on Kingsdale Avenue; therefore, no mitigation measures were required. (CEQA Guidelines Section 15126.4(a)(3).) While the Galleria project’s intersection impacts along Kingsdale are less than significant, the Transit Center Relocation Project, included the following Conditions of Approval related to Kingsdale roadway improvements:

TR1. The applicant shall be required to restripe and re-establish a second west bound travel lane, on 182nd Street between Hawthorne Boulevard and Kingsdale Avenue after the bus layover zones on 182nd Street are abandoned. The plans and construction specifications for these changes shall be included in the construction document bid set.

TR2. In conjunction with the land exchange with Forest City for the South Bay Galleria Transit Terminal parcel, twenty (20) feet of land to the east of the existing westerly edge of the Transit Terminal parcel adjacent to Kingsdale Avenue shall be dedicated for street widening purposes. The street widening will allow the construction of an additional northbound, 250-feet Tong right turn only lane, curb and gutter, parkway, and sidewalk. The street widening will also require the demolition of the existing Transit Terminal bus bays and reconstruction of the east side of Kingsdale Avenue for the length of the Transit Terminal parcel. The improvement of the street shall occur as part of the demolition of the existing transit terminal once the new Transit Center is operational. The plans and construction specifications for these changes shall be included in the construction document bid set.

Comment PC009-2

2. Eliminating the Galleria Metro bus stop on Kingsdale, as Kingsdale is becoming a bus street and cars can't easily move about. Ask Metro to negotiate with Torrance or another city for their Southbay transit center until the new Metro station is built off 182nd St.

Response to Comment PC009-2

Thank you for your comment. The purpose of CEQA is to address impacts of the proposed project, not to fix existing environmental concerns. Nevertheless, as noted in Draft EIR Section 2.4.2, the existing Transit Center was approved for relocation back in 2010 to the parcel below the existing Target Store (just north of 182nd along the west-side of Kingsdale Avenue). The Draft EIR further explained that the transit center relocation was scheduled to take place within 18 months of release of the South Bay Galleria Draft EIR. Construction bids for the Transit Center Relocation are proposed to be considered by City Council in February 2018 or shortly thereafter.

63 Planning Commission, February 2010 Administrative Report:
http://laserweb.redondo.org/WebLink/PDF/gbc5oi5jgkksvp0uprgs0/19/AG%20PKT%202010-02-18%20PC%208.pdf. Subsequent Administrative Report noted that the City of Lawndale Community Services
Manger consulted on this project. (City Council Admin Report, June 4, 2013, p 2:
http://lserweb.redondo.org/WebLink/PDF/gbc5oi5jgkksvp0uprgs0/18/AG%20PKT%202013-06-04%20CC%20Rpt%20%20H%20GALLERIA%201.pdf.
Comment PC009-3

3. Closing entrance to the open mall south of the Galleria from Kingsdale across Target's south entrance, as it's getting dangerous for people walking to Sprouts and the other stores from the parking lot with cars driving in front of the stores turning to park into or exit the parking lot.

Response to Comment PC009-3

This comment is referring to existing traffic circulation at the South Bay Marketplace, to the south of the South Bay Galleria project site. Per the requirements of CEQA, the focus of the Draft EIR is to address project-generated impacts, which are not expected to affect local circulation within the parking lot of the adjacent retail site. Any existing deficiencies associated with other planned or proposed projects are not within the scope of the Draft EIR. (Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal.App.4th 1059 [“The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope”].) Furthermore, as discussed in Draft EIR Section 3.13, Transportation and Traffic, under Impact TRA-3, the project would not have significant traffic safety impacts and does not have a driveway access point located south of the existing Target on Kingsdale Avenue. Nevertheless, the recommendation will be forwarded to the City’s decision-making body and considered by City Staff as part of its traditional planning process.

Comment PC009-4

4. The new scheduled apartments are only allotted 1 1/2 parking spots per apartment and since there are 350 studio, one bedroom and two bedroom total apartments scheduled to be built, there should be at least two parking spaces per apartment unit, otherwise the tenants will be driving around our streets looking for a place to park and taking up the current residents' street parking, which is already very tight especially when our guests visit. Please acknowledge receipt of my official comments.

Response to Comment PC009-4

As noted in Section 3.0.3 of the Draft EIR, parking is not considered an environmental impact under CEQA for this project. (Public Resources Code Section 21099(d)(1).) Nevertheless, the commenter is referred to Section 3.13, Transportation and Traffic, as stated on page 3.13-20 of the Draft EIR, the proposed project would provide off-street parking to satisfy the City’s parking requirements. The Draft EIR shared parking analysis assumed that one parking space will be reserved for each residential unit. (Draft EIR Appendix L, Appendix I: Shared Parking Analysis, p. 3.) The residential parking demand not accommodated by these reserved spaces would be accommodated in the proposed project’s shared parking spaces. A shared parking evaluation is provided beginning on page 3.13-27. This evaluation concluded that the proposed project’s supply of 6,450 parking spaces would be adequate to meet the estimated peak parking demand. More specifically, the analysis concluded that peak parking demand of 6,428 spaces would occur on a weekend day at 2 p.m. with weekday peak demand estimated at 5,965 at 1:00 p.m. The proposed project’s supply of 6,450 parking spaces would be adequate to meet the estimated peak parking demand during typical conditions. Furthermore, Firmona Avenue, Condon Avenue, and Kingsdale Avenue are subject to a preferential parking program during the holidays (11/15 –
12/31), which only allows permanent residents to park on the respective streets with a valid permit.⁶⁴

Further detail on the methodology used to evaluate the parking supply and demand is provided in the Transportation Impact Study (Appendix L). Since the proposed project is not anticipated to result in parking demand that exceeds the supply of off-street parking, no parking overflow is anticipated on neighboring streets.

Comment Letter PC010: Alex Makarczyk

Response to Comment PC010-1

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

Comment Letter PC011: Carol Aguas

Response to Comment PC011-1

Your comment with respect to parking and pedestrian safety on Condon Avenue and Firmona Avenue “right now” is noted for the record and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. However, per the requirements of CEQA, the focus of the Draft EIR is to address project-generated impacts, not existing deficiencies. (Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal.App.4th 1059 (“The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope”).)

Traffic impacts were considered in Draft EIR 3.13 and in the Transportation Impact Study (TIS), Appendix L of the Draft EIR. These studies were prepared in accordance with the requirements of the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. In consultation with City of Redondo Beach staff, the transportation study area was selected to include intersections.

likely to be affected by traffic generated by the proposed project, specifically major intersections located within roughly a one-mile radius of the project site. An analysis of the Condon Avenue/Grant Avenue and Firmona Avenue/Grant Avenue intersections was not required by the lead agency, as these are not considered to be major intersections. In addition, since the Draft EIR did not identify a significant project impact at the Kingsdale Avenue/Grant Avenue and Inglewood Avenue/Grant Avenue intersections, which are the study intersections located to the east and west of the intersections in question, significant project impacts would not be expected to occur at the Condon Avenue/Grant Avenue and Firmona Avenue/Grant Avenue intersections.

Additionally, as the Condon Avenue/Grant Avenue and Firmona Avenue/Grant Avenue intersections would not be expected to be affected by the proposed project, they were excluded from consideration in the analysis. The Condon Avenue/Grant Avenue and Firmona Avenue/Grant Avenue intersections are adequately represented by the Kingsdale Avenue/Grant Avenue and Inglewood Avenue/Grant Avenue intersections. Furthermore, Condon and Firmona Avenue are not anticipated to be reasonably foreseeable routes to the project site. For example, Grant Avenue east leads directly to the project site’s driveway. An alternative left down Condon or Firmona would result in a very circuitous route which is not considered reasonably foreseeable. Similar conclusions apply to individuals heading east or west down Artesia Blvd. and Grant Avenue.

The commenter also asserts “The residential aspect of the plan is going to add congestion.” As described in Draft EIR Section 3.13, Transportation and Traffic, specifically, 3.13.4, Impacts and Mitigation Measures, the residential component of the proposed project was included in the trip generation, trip distribution, and trip assignment process; as such, residential trips made to and from the project site were adequately accounted for in the traffic analysis. Therefore, the Draft EIR adequately addressed the impact of the residential component of the proposed project on traffic conditions near the project site.

The commenter also states “The impacts on the streets on Condon and Firmona are unimaginable …Crime…” The Draft EIR discussed police protection and crime prevention in Draft EIR Section 3.11, Public Services, and determined that impacts are less than significant. Existing crime rates were analyzed through crime classification and incident numbers in the South Bay Galleria area and surrounding streets (Table 3.11-1 and Table 3.11-2), including Condon Avenue and Firmona Avenue. The analysis provided in the Draft EIR states that the anticipated activity level at the site may deter some crime, as greater numbers of people can typically deter criminal activity. Additionally, the proposed project incorporates strategies for Crime Prevention Through Environmental Design (CPTED) aimed at deterring criminal behavior by designing the physical environment in ways that reduce identifiable crime risks. The proposed project would include the installation of the Code Blue security and emergency communication system, that would provide emergency signaling, mass notification systems, and help points (e.g., emergency blue light phones and call boxes) which offer a level of security without the cost and expense of patrolling officers (CodeBlue.com 2016). Further, the proposed project would introduce residential units on the project site, which would require increased security on site. The project would increase security staff in proportion to the amount of new residential and commercial square footage.
While impacts in Section 3.11 were determined to be less than significant, the project is proposing Condition of Approval PS-1, which is a Fire, Life-Safety and Security Plan.

The commenter also states “The impacts on the streets on Condon and Firmona are unimaginable …Noise, Pollution…” Draft EIR Section 3.1 discussed air quality emissions, and determined that regional and localized air quality impacts (including near Condon Avenue and Firmona Avenue) are less than significant for construction and operation. As discussed in Section 3.9, Noise, construction impacts regarding noise and vibration were mitigated to less than significant with implementation of Mitigation Measures MM NOI-1 through MM NOI-6. Operational noise impacts were found to be less than significant and so were traffic noise impacts. Additionally, the Draft EIR discussed pedestrian safety in Draft EIR Section 3.13, Transportation and Traffic, and determined that impacts are less than significant.

Moreover, a parking evaluation is provided beginning on page 3.13-27. This evaluation concluded that the proposed project’s supply of 6,450 parking spaces would be adequate to meet the estimated peak parking demand. The Draft EIR shared parking analysis assumed that one parking space will be reserved for each residential unit. (Draft EIR Appendix L, Appendix I: Shared Parking Analysis, p. 3.) The residential parking demand not accommodated by these reserved spaces would be accommodated in the proposed project’s shared parking spaces. Further detail on the methodology used to evaluate the parking supply and demand is provided in the TIS (Appendix L). Furthermore, Firmona Avenue, Condon Avenue, and Kingsdale Avenue are subject to a preferential parking program during the holidays (11/15 – 12/31), which only allows permanent residents to part with a valid permit. Since the proposed project is not anticipated to result in parking demand that exceeds the supply of off-street parking, no parking overflow is anticipated on neighboring streets, including on Condon Avenue and Firmona Avenue.

Please refer to Draft EIR Chapter 4.0, Alternatives Analysis, for a discussion of alternatives to the proposed project that would develop fewer residential units.

Comment Letter PC012: Doug Boswell

Comment PC012-1

Mixed use development on the mall property, etc.

Response to Comment PC012-1

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

Comment Letter PC013: Lara Duke

Comment PC013-1

Blank Comment Card

Response to Comment PC013-1
The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment Letter PC014: Elizabeth Espinosa
Comment PC014-1
Blank Comment Card

Response to Comment PC014-1
The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment Letter PC015: Tom Liess
Comment PC015-1
Traffic Plan

Response to Comment PC015-1
Traffic impacts were considered in Draft EIR Section 3.13, Transportation and Traffic, and in the Transportation Impact Study (TIS), Appendix L of the Draft EIR. These studies were prepared in accordance with the requirements of the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities and to propose mitigation measures. In addition, the City of Redondo Beach is proposing that the applicant prepare and implement a Construction Management Plan as a Condition of Approval.

Comment Letter PC016: Tiffany Maloch
Comment PC016-1
Blank Comment Card

Response to Comment PC016-1
The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment Letter PC017: Hailey Ogle
Comment PC017-1
Schools are all ready overflowing, every (nearly) school in Redondo Has Trailer-park classrooms. Washington, the school the 39 elementary students from this build will be attending has had the trailer classrooms since the 90’s. More housing in Redondo is absurd.
Response to Comment PC017-1
Please see Response to Comment PC006-1.

Comment Letter PC018: Colleen Otash
Comment PC018-1
Blank Comment Card

Response to Comment PC018-1
The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment Letter PC019: Andre Pegus
Comment PC019-1
Blank Comment Card

Response to Comment PC019-1
The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment Letter PC020: Suzy Royds
Comment PC020-1
Community

Response to Comment PC020-1
The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment Letter PC021: Suzy Royds
Comment PC021-1
Traffic

Response to Comment PC021-1
The Transportation Impact Study (TIS), Appendix L of the Draft EIR and Draft EIR Section 3.13, were prepared in accordance with the requirements of CEQA and the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. Beginning on page 3.13-29 of the Draft EIR, the significance thresholds use to determine whether the proposed project’s contribution to delay experienced at the 32 study intersections and five mainline freeway segments, are described. The
Draft EIR identifies all traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible.

**Comment Letter PC022:** Tom Royds

**Comment PC022-1**

Review Date & New Mtg

**Response to Comment PC022-1**

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

**Comment Letter PC023:** Tom Royds

**Comment PC023-1**

Emissions and Impact on Kingsdale

**Response to Comment PC023-1**

Thank you for your comment. Air quality emissions and impacts on the residents on Kingsdale Avenue were addressed in Section 3.1, *Air Quality*, of the Draft EIR. To determine if project construction and or operational emissions would have a localized significant impact on residents along Kingsdale Avenue, the SCAQMD localized significance thresholds (LSTs) methodology was used to determine whether or not construction and operation activities would create a significant adverse localized air quality impact on nearby sensitive receptors. The LSTs developed by the SCAQMD are based on the pounds of emissions per day that can be generated by a project without causing or contributing to adverse localized air quality impacts, and only applies to the following criteria pollutants: CO, NOx, PM_{10}, and PM_{2.5}. For the purpose of analyzing localized air quality impacts, the SCAQMD has developed LSTs values for distances of 82, 164, 328, 656, and 1,640 feet from the emissions source for three project site sizes: 1 acre, 2 acres, and 5 acres. The project localized air quality analysis used the most conservative screening analysis of a 1-acre site for construction activities and a 5-acre site for operational activities with receptors at a distance of 82 feet. Additionally, the SCAQMD LST methodology states that projects with boundaries located closer than 82 feet (25 meters) to the nearest sensitive receptors should use the LSTs for receptors located at 25 meters. As shown in Tables 3.1-10 and 3.1-11, localized construction and operational emissions, respectively, would not exceed SCAQMD LST thresholds and impacts would be less than significant. Therefore, the sensitive receptors located west of the project site across Kingsdale Avenue would not be exposed to emission levels from construction or operation that would result in a significant localized air quality impact.

The comment does not address a specific comment on the adequacy on the Draft EIR. However, your comment is acknowledged and will be included in the Final EIR presented for review and

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consideration by the City’s decision-making body. All impacts associated with Air Quality were
determined to be less than significant, including Localized Significance Thresholds (LST) and
CO hotspots.

Comment Letter PC024: Sheila Lamb

Comment PC024-1

Unmitigated traffic

Response to Comment PC024-1

Traffic impacts were considered in Draft EIR 3.13 and in the Transportation Impact Study (TIS),
Appendix L of the Draft EIR, was prepared in accordance with the requirements of the City of
Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to
methodologies used to assess potential impacts to transportation facilities. In the Draft EIR,
Section 3.13, Transportation and Traffic, beginning on page 3.13-29 of the Draft EIR, the
significance thresholds use to determine whether the proposed project’s contribution to delay
experienced at the 32 study intersections and five mainline freeway segments, are described. The
Draft EIR identifies all traffic impacts resulting from the proposed project, and physical
intersection mitigation measures were developed to address these impacts, where feasible. The
Draft EIR concluded that the proposed project would have three significant and unavoidable
localized intersection impacts. (See Draft EIR Section 3.13.) However, as discussed on Draft EIR
page 3.13-45, the proposed project would have reduced per capita Vehicle Miles Traveled in
comparison to the SCAG region, and would therefore have a regional traffic benefit by reducing
the number and length of regional vehicle trips. (See also Draft EIR page 4-46.)

Comment Letter PC025: Bruce Szeles

Comment PC025-1

Blank Comment Card

Response to Comment PC025-1

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

Comment Letter PC026: Alisha C. Pember

Comment PC026-1

Good afternoon, Please see the attached correspondence. If you have any questions, please
contact Linda Sobczynski. Thank you.

[The “attached correspondence” referenced in Comment PC026 was a copy of Comment Letter
OR004]
Response to Comment PC026-1

The comment does not address an environmental issue. Responses to the attached correspondence were prepared; please see Response to Comment OR004.

Comment Letter PC027: Carol & Oscar Aguas

Comment PC027-1

We attended the meeting at the mall on the 26th August 2017. Our home in Firmona Ave is so close to the redevelopment project that we would like to raise our concerns and provide suggestions as part of homeowners' input. It's good that there will finally be improvement at the mall.

1. The utmost concern of those present at that meeting was the proposed number of apartment dwellings to be included in the project. We share this concern very much indeed. We don't think we need that many more apartments! However, if the city strongly feels that some housing needs to be incorporated, please scale it down to a few upscale apartments. The almost 30 acres of land available for the project is not really a whole lot of space for the proposed large scale residential, hotel, and shops development, in our opinion.

Response to Comment PC027-1

Thank you for your comment. While the comment does not directly address an environmental issue, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, in order to respond to the comment, it should be noted that the applicant has applied to construct Alternative 4/4-1, which reduces the amount of residential development to 300 units (down from 650 units) and includes office space. However, as discussed on Draft EIR page 3.8-16:

As noted under Government Code 65589.5(a), the legislature has concluded that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California.” The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City “facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community” (Gov. Code Section 65580(d)). More specifically, the Legislature’s stated intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal” (Gov. Code Section 65581). Also under the Redondo Beach Housing Element, the project site represents the greatest potential for future residential development in the City, to meet the City’s Regional Housing Needs Assessment (RHNA), as well as the high regional demand for housing in the County (see also Circulation Element, Goal 8). Furthermore, as discussion in Section 3.0.3 of the Draft EIR, the proposed project provides mixed use development in a transit priority area, and is consistent with the regional RTP goals as well as the City’s goals of encouraging mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance and supporting transit-oriented development (Redondo Beach Circulation Element, G6, G7, and G8).
As further discussed in Draft EIR Section 3.10, *Population and Housing*, in Section 3.10.3:

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. In cooperation with HCD, local governments and councils of government are charged with determining the cities or regions existing and projected housing needs as their share of the statewide housing need. The current Regional Housing Needs Allocation (RHNA) identifies housing needs in each SCAG jurisdiction and allocates a fair share of that need to every community. Redondo Beach’s RHNA for the 2013–2021 planning period has been determined by SCAG at 1,397 housing units, including 186 units for extremely low-income households, 186 units for very-low-income households, 223 units for low-income households, 238 units for moderate-income households, and 564 units for above-moderate-income households.

**Comment PC027-2**

The commenter states 1) the environmental impact to the surrounding area is going to be enormous as people and vehicles are moving and doing about their business in such a dense place! In the meantime, the homes on Firmona Ave will be the parking spot of last resort for people who cannot find space at the mall grounds. It already is. During the Thanksgiving and Christmas holidays, vehicles need parking permits but the lack of enforcement makes it difficult for even homeowners to park on the street side! On the other hand, the suggestion by some homeowners to build high end office spaces is pretty sensible. Office workers can certainly add to the patronage of restaurants and stores.

**Response to Comment PC027-2**

As noted in Section 3.0.3 of the Draft EIR, parking is not considered an environmental impact under CEQA for this project. (Public Resources Code Section 21099(d)(1).) Nevertheless, the commenter is referred to Section 3.13, *Transportation and Traffic*, as stated on page 3.13-20 of the Draft EIR, the proposed project would provide off-street parking to satisfy the City’s parking requirements. Moreover, a shared parking evaluation is provided beginning on page 3.13-27. This evaluation concluded that the proposed project’s supply of 6,450 parking spaces would be adequate to meet the estimated peak parking demand under typical conditions. More specifically, the analysis concluded that peak parking demand of 6,428 spaces would occur on a weekend day at 2 p.m. with weekday peak demand estimated at 5,965 at 1:00 p.m. The proposed project’s supply of 6,450 parking spaces would be adequate to meet the estimated peak parking demand during typical non-holiday conditions. As discussed on Draft EIR pages 3.13-6 and 28, the traffic analyses under the CMP and the City’s guidance analyze impacts during non-holiday periods, which also applies to parking. Similar issues arose in *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 614 [Rejecting argument that traffic analysis needed to assume super-capacity crowds which only occur 0.3 percent of the time]; see also *Huntington Beach Neighbors v. City of Huntington Beach* (2012 4th Dist. Case No. G045732) 2012 WL 5330887 [rejecting argument
that Huntington Beach needed to base its traffic analysis upon “weekend traffic, particularly summer weekends, and special events.”] 67

Further detail on the methodology used to evaluate the parking supply and demand is provided in the TIS (Appendix L). Since the proposed project is not anticipated to result in peak (non-holiday) parking demand that exceeds the supply of off-street parking, no parking overflow is anticipated on neighboring streets during typical conditions. Furthermore, Firmona Avenue, Condon Avenue, and Kingsdale Avenue are subject to a preferential parking program during the holidays (11/15 – 12/31), which only allows permanent residents to part with a valid permit.68

The Draft EIR identifies traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible. Please refer to Draft EIR Chapter 4.0, Alternatives Analysis, for a discussion of alternatives to the proposed project that would develop fewer residential units. Moreover, the Draft EIR explained that the existing transit center located on the western border of the project site was scheduled for relocation within 18 months of release of the South Bay Galleria Draft EIR. Consistent with that discussion, bidding for the transit center construction activities is set to begin in February 2018 or shortly thereafter with construction anticipated to take a year, to a year and a half to complete.

Comment PC027-3

We must admit that we have not read the very thick environmental report on this project. We don't need to. The City of Redondo is responsible for reviewing the study done by the experts. We, citizens rely on the City leaders' wisdom to weigh the pros and cons and to change/alter/incorporate the homeowners input and suggestions.

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

Response to Comment PC027-3

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

Comment PC027-4

3. The tiny enclave of single family homes in the immediate area needs to be protected. The warranted concerns of citizens on this project cannot be overstated enough. What we expect is a high end environmentally conscious family friendly oriented development where children can play and be safe when they visit the mall. There is nothing like the sounds of laughter of young and innocent children to tell the world that the place is clean, safe, friendly and aesthetically pleasing to the entire neighborhood and the surrounding area. This is a 'once in a lifetime' redevelopment project that the City can approve that will become a showcase of the latest mall design concepts incorporating what is new, modern, innovative and most of all environmentally friendly and most importantly conscious in reducing the carbon footprint.

Response to Comment PC027-4

Thank you for your comment. While the comment does not directly address an environmental issue, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Please also note that the Draft EIR includes Measure GHG-1, which includes installation solar photovoltaics capable of producing a minimum of 37 MWh per year of electricity, compliance with the new Title 24 Energy Code, and numerous other measures to create an energy efficient development.

Comment PC027-5

Now, talking about the neighborhood - although this is not part of the mall development, it might as well be because of its proximity to the mall. We would like to take this opportunity to complain about the house at the corner of Firmona & Grant Ave. The previous owners and now the new owners do not seem to care that their property looks like a dump!! Why is the City tolerating this one single house to degrade the entire neighborhood? Please send a letter to the new owners to clean up their act or the city can undertake the clean-up and charge the owners for the expense. We are also aware of the little green spaces by the cemetery side of Grant Ave from Kingsdale Ave to Inglewood Ave. Can the City please revisit the plan and landscape those two spaces with drought tolerant plants and make it pleasing to look at rather than just a patch of green with no character! How about a small playground that is fenced and landscaped?

Response to Comment PC027-5

Thank you for your comment. While the comment does not directly address an environmental issue with the project your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC027-6

Which brings me to the last point to the homes on Firmona Ave and Condon Ave located on the right side of Grant Ave (as you go towards Inglewood Ave from Kingsdale).
4. We suggest, as part of the redevelopment plan that the City install gates on both streets to restrict access to residents only to protect the few homes from too much vehicular traffic. Needless to say, such restrictive access will make the neighborhood safe and kid friendly. Lastly, a concrete wall needs to be built by the new owner or by the city to match the other concrete fence wall at the Firmona Ave corner property to make the place aesthetically balanced.

Response to Comment PC027-6

The commenter’s suggestion to “install gates on both streets to restrict access to residents only” is considered legally infeasible. The state has plenary power and has preempted the field of traffic control. (Vehicle Code Section 21.) More specifically, California Vehicle Code Section 21101.6 states “local authorities may not place gates or other selective devices on any street which deny or restrict the access of certain members of the public to the street, while permitting others unrestricted access to the street.” Furthermore, the Draft EIR has not identified any significant noise, traffic, or other significant impacts specific to Firmona Avenue and Condon Avenue that such a suggestion would mitigate. Please also see Response to Comment PC011-1 for discussion of the proposed project’s trip distribution related to Firmona and Condon. Please also see Draft EIR Section 3.0.3, which explains that Aesthetics are not considered environmental impacts for this project by statute. Nevertheless, the commenter’s suggestions have been included in the Final EIR for consideration by the decision-makers.

Comment PC027-7

As an aside since we are writing this letter anyway, we would like to call the attention of the City of Redondo Beach of the filth that has accumulated at both Bus Stops on Artesia Blvd and Kingsdale Ave corner. Urine smell is so strong and it is so unsanitary! The place can be hosed down from a water truck so that the sidewalks/bus stops are clean! Do we need to mention that these bus stops are heavily utilized because of the bus terminals?

Response to Comment PC027-7

Thank you for your comment. As noted in Draft EIR Section 2.4.2, the existing Transit Center was approved for relocation back in 2010 to the parcel below the existing Target Store (just north of 182nd along the west-side of Kingsdale Ave).69 The Draft EIR further explained that the transit center relocation was scheduled to take place within 18 months of release of the Galleria Draft EIR. Consistent with that discussion, bidding for the transit center construction activities is set to begin in February 2018 or shortly thereafter. While the comment does not directly address an environmental issue with the project your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

69 Planning Commission, February 2010 Administrative Report:
http://laserweb.redondo.org/WebLink/PDF/gbe5oi5jgk5vpm0upgrste0/19/AG%20PKT%202010-02-18%20PC%208.pdf. Subsequent Administrative Report noted that the City of Lawndale Community Services Manger consulted on this project. (City Council Admin Report, June 4, 2013, p 2:
http://laserweb.redondo.org/WebLink/PDF/gbe5oi5jgk5vpm0upgrste0/18/AG%20PKT%202013-06-04%20CC%20Rpt%20%20H%20GALLERIA%201.pdf.
Comment PC027-8
We trust that the City of Redondo Beach will have the foresight and the wisdom and the vision to make the mall redevelopment a 'winner' and be a showcase for other cities to emulate!!

Response to Comment PC027-8
Thank you for your comment. While the comment does not directly address an environmental issue with the project your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment Letter PC028: Carol & Oscar Aguas
Comments PC028-1 to PC028-8
These comments are the same as PC027-1 to PC027-8.

Response to Comment Letter PC028
These are duplicate comments to Comment Letter PC027, they were just sent via different methods of communication. See Response to Comment Letter PC027.

Comment Letter PC029: Joe Bourgeois
Comment PC029-1
The commenter states, I am requesting under Public Resource Code Section 21092.2 to add the email addresses and mailing address below to the notification list, regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project.

Response to Comment PC029-1
Thank you for your comment, your contact information has been included. The commenter is the Chief Executive Officer of the Golden State Environmental Justice Alliance. The commenter is also referred to Response to Comments from the Golden State Environmental Justice Alliance (Responses OR002-1 through 25). While the comment does not directly address an environmental issue, 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 PC030: Carol & Oscar Aguas
Comment PC030-1
The commenter states, I have attached our letter/suggestions regarding the mall redevelopment project. Please print the 2-page letter. We are of the opinion that the immediate area next to Kingsdale on Grant and Firmona be included in the overall plan. We'd truly appreciate if the few residential homes are protected. We own a house at 1907 Firmona and our daughter and husband

https://businesssearch.sos.ca.gov/CBS/SearchResults?SearchType=CORP&SearchCriteria=golden+state+environmental+justice+alliance&SearchSubType=Keyword
and young daughter are living there. This is our second home and we love this area even though our primary residence is here in Roseville, California.

**Response to Comment PC030-1**

The commenter’s letter was bracketed above as Comment Letter PC027, and the response to the letter can be found above as Response to Comment PC027-1 through PC027-8. The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

**Comment Letter PC031: Carol & Oscar Aguas**

**Comment PC031-1**

The commenter states please open the attachment. Our home is located at 1907 Firmona Ave. We would like to submit our suggestions to the City of Redondo Beach. We have attended the meeting at the mall on 26th August 2017.

**Response to Comment PC031-1**

The commenter’s attachment was bracketed above as Comment Letter PC027, and the response to the letter can be found above as Response to Comment PC027-1 through PC027-8. The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

**Comment Letter PC032: Matt Kappadakunnel**

**Comment PC032-1**

The commenter states, below are my concerns with the Forest City South Bay Galleria Project:

- Impact of air quality

**Response to Comment PC032-1**

Thank you for your comment. While the comment does not directly address the contents of the Draft EIR, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, the commenter is referred to Draft EIR Section 3.1, *Air Quality*, for information concerning proposed project implementation and impacts on air quality. As shown in Section 3.1, regional and localized air quality impacts are less than significant for construction and operation. The project would not result in significant impacts from CO hotspots or odors. As shown by the construction screening health risk assessment, the project would not result in TAC impacts for construction. Additionally, the project operations are not associated with TAC emissions and the project would not result in significant operational TAC impacts. As analyzed in Section 3.1, air quality impacts from the project would be less than significant.
2. Response to Comments

Comment PC032-2
- Impact on traffic, which is already heightened even though entry into the existing Galleria is minimal

Response to Comment PC032-2

Thank you for your comment. While the comment does not directly address the contents of the Draft EIR, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, the commenter is referred to the Draft EIR, Section 3.13, Transportation and Traffic, for information concerning proposed project implementation and impacts on traffic. Moreover, beginning on page 3.13-29 of the Draft EIR, the significance thresholds use to determine whether the proposed project’s contribution to delay experienced at the 32 study intersections and five mainline freeway segments, are described. The Draft EIR identifies all traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible. Please also see Draft EIR Figure 2-7 which shows that the project site would have eight entrances which lead directly into the site’s interior, and seven exits from the site’s interior (not including Hawthorne/177th or Kingsdale/177th).

Comment PC032-3
- The addition of mixed-use residential will impact traffic and school overcrowding, as well as add residential units in an already dense city.

Response to Comment PC032-3

Thank you for your comment. While the comment does not directly address the contents of the Draft EIR, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, the commenter is referred to Draft EIR Section 3.13, Transportation and Traffic, for information concerning proposed project implementation and impacts on traffic. Moreover, beginning on page 3.13-29 of the Draft EIR, the significance thresholds use to determine whether the proposed project’s contribution to delay experienced at the 32 study intersections and five mainline freeway segments, are described. The Draft EIR identifies all traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible. In addition, the commenter is referred to Response to Comment PC006-1, which provides a response concerning the availability of school classrooms, which was analyzed in Section 3.11, Public Services. The comment does not raise any specific issue related to the adequacy of this analysis as provided in the EIR. As discussed in Section 3.11.4, Impact PUB-3, “the project would pay statutory fees which are ‘…deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization’’. With regards to the shortfall in capacity at Washington Elementary School, the RBUSD school district would likely install portable classrooms in the short term, which are anticipated to not result in significant adverse physical environmental effects. Therefore, impacts are considered less than significant related to schools.
**Comment PC032-4**

The commenter states: below are my concerns with the Forest City South Bay Galleria Project:

- Moreover, the buyer profile of a mixed-use condo is likely to be a first-time buyer and likely prone to stretching to purchase this unit. In the event of a recession, these buyers have a higher likelihood of defaulting and having their home foreclosed. This would be detrimental to the Redondo housing market.

**Response to Comment PC032-4**

Thank you for your comment. While the comment does not directly address an environmental issue, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Furthermore, the applicant has indicated that the residential units would be for rent, not for purchase as assumed in the comment.

**Comment PC032-5**

The commenter states: below are my concerns with the Forest City South Bay Galleria Project:

- The buyer profile of a mixed-use condo generally has a shorter tenor of ownership relative to owners of single family and townhome residences, and likely less than 7 years. As such, when these units go back on the market, there is a limited buyer pool interested in such units, and this would send the market price down as well as affect Redondo residential valuations.

**Response to Comment PC032-5**

Thank you for your comment. While the comment does not directly address an environmental issue, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Furthermore, the applicant has indicated that the residential units would be for rent, not for purchase as assumed in the comment.

**Comment PC032-6**

The commenter states: below are my concerns with the Forest City South Bay Galleria Project:

- In a recessionary environment, since there is a limited buyer pool for mixed-use units, any vacancies would further drive down the market price, and this would affect overall housing prices in Redondo Beach.

**Response to Comment PC032-6**

Thank you for your comment. While the comment does not directly address an environmental issue, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Furthermore, the applicant has indicated that the residential units would be for rent, not for purchase as assumed in the comment.

**Comment Letter PC033: Laura D. Zahn**

**Comment PC033-1**

Stacey, I am writing an email with comments for this project/EIR. I am 64 years old. I was born and raised on Grant Avenue across from Perry Park. Five generations of my family are buried at
Pacific Crest Cemetery on the corner of Inglewood and Grant Avenue. Thirteen family members graduated from Redondo Union High. Mom met dad there. My sister, brother and myself had some of their same teachers. My brother and his wife and their three sons graduated from there. My dad was raised in Manhattan Beach. It was just sand dunes and small homes back then. I would walk with a few girlfriends when we were ten to the "original" shopping center. There was a May Company, a JJ Newberry, a Thrifty Drug Store, a fabulous bakery called Bake Masters, and various other retail shops. We never "bought" anything but pop corn because we all came from rather poor families. But, we still felt special and proud to be so..."grown-up" to have the money to buy pop corn, and walk around and window shop. My concerns with the new vision for this property begins with the name...

Response to Comment PC033-1

Thank you for your comment. While the comment does not directly address an environmental issue, 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 PC033-2

South Bay Galleria IMPROVEMENT Project...REALLY?? An "improvement" is like someone getting a face lift. OR a house or business getting a new paint combination and some fresh up dated landscaping. What is designed for this project is such a drastic change similar to a man transitioning into a woman. Its' much more than an "improvement" its an outward transformation.

Response to Comment PC033-2

Thank you for your comment. While the comment does not directly address an environmental issue, 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 PC033-3

The next concern is the residential component. It is one thing to say to friends, family and coworkers, lets go TO the mall vs...I live AT the mall.

Response to Comment PC033-3

Thank you for your comment. While the comment does not directly address an environmental issue, 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 PC033-4

The commenter states that: We also know that the "market rent" will be cost prohibitive to any employees who will work AT the mall. Even IF a few low-income units are included, those rents are too high for a part time retail worker's salary. I have known of other projects that were able to increase the density cap because they "were" going to provide a certain number of low income units only to reduce or eliminate those low income units because the development would not pencil-out without ALL the units renting/selling for market rents or market value.
Response to Comment PC033-4

Thank you for your comment. As noted under Impact LUP-1, the South Bay Galleria project furthers the City’s General Plan Housing goals. While the project may not ultimately meet the definition of an affordable housing project, providing such housing reduces the market demand for other housing categories, including affordable housing. As noted in the 2015 State Legislative Report:

A collection factors drive California’s high cost of housing. First and foremost, far less housing has been built in California’s coastal areas that people demand. As a result, households bid up the cost of housing in coastal regions. In addition, some of the unmet demand to live in coastal areas spills into inland California, driving up process there too. (State Legislative Analyst’s Office, March 17, 2015, California’s High Housing Costs Causes and Consequences. Page 10.)

While the comment does not directly address an environmental issue, 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 PC033-5

I was wondering what population calculation was used to extrapolate 1,008 residents from 650 units. That would Mathematically be 1.5 persons per unit. When I was taking my Master's classes in Urban and Regional Planning we used 2.3 people per unit. These are going to be two bedroom units so...it would be safe to use these mathmatical extrapolations:

- 650 x 2 = 1,300 say...two adults
- OR one adult and one child= 650 kids
- 650 x 3 = 1,950 say...three adults
- OR two adults and one child= 650 kids
- OR one adult and two children=.1,300

- 650 x 4 = 2,600 say all adults
- OR three adults and one child=650 kids
- OR two adults and two kids=1,300 kids
- OR one adult and three kids=1,950

Of course that "child" count does not mean all first graders, but it would mean a heavy up-tick in enrollment at the elementary school(s) and the Junior High School. Even if the potential children attended different schools within the district, it would still be a BIG impact.

Once these housing units are built you can not discriminate on whether the renters have children or not. SO... To put out there a number such as, 1,008 occupants does not explain the REALITY of that demographic by age break down.

Response to Comment PC033-5

Occupancy is related to the design and number of bedrooms per unit, and is based on similar types of development. As stated, the assumptions made for average occupancy rates are
consistent with similarly situated mixed use housing developments, with different unit options (studio, one and two-bedroom). Three of the applicant’s other properties were used to determine consistency with the analysis associated with occupancy rates. These three properties were Metro 417, AXIS, and Blossom Plaza. Out of the three properties included in the assumption, Metro 417 and AXIS are both located in Downtown Los Angeles, and do not include affordable housing units. The third property, Blossom Plaza, which is located in the Chinatown area of Los Angeles, does include affordable housing units. The breakdown of occupant data for each of these properties is as such for each of the studio, one-bedroom, and two-bedroom units respectively; Metro 417 has an average of 1.16 occupants per studio, 1.4 occupants per one-bedroom, and 2.1 occupants per two bedrooms; AXIS has an average of 1, 1.5, and 2.30 occupants per unit; and Blossom Plaza has an average of 1.16, 1.46, and 2 occupants per unit. The project made reasonable assumptions, based upon these and similar developments of 130 studio units (one occupant per unit), 390 one-bedroom units (1.5 occupants per unit), and 130 two-bedroom units (2.25 occupants per unit). Therefore, it is estimated that the proposed project would generate approximately 1,008 new residents. (Draft EIR Section 2.7.1.)

As stated in Section 3.11, Public Services, student generation rates for the proposed project are based on the Redondo Beach Unified School District Enrollment Impact Analysis. As shown in Table 3.11-4, the student generation rates include 0.1284 students per unit for elementary school (grades K to 5), 0.0489 students per unit for middle school (grades 6 to 8), and 0.0501 students per unit for high school (grades 9 to 12). Based upon these rates the proposed project would introduce approximately 83 new elementary school students, 32 middle school students, and 33 high school students.

The commenter also asserts that there would be a “BIG impact” to schools. As discussed in Section 3.11.4, Impact PUB-3, pursuant to state law “the project would pay statutory fees which are ‘…deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.’” (Gov. Code Section 65995(h) and 65996.) Similar school fee issues arose in a recent Mixed Use Residential project case in the City of Fremont. (See Stand Up for Fremont v. City of Fremont (2017 Alameda County Superior Court Case No RG17844308) [“Finally, we respect to Petitioner’s claim that the project may risk overcrowding the schools, the Court finds that by law this cannot be asserted as a substantial impact on the environment under CEQA because that claim is barred by Government Code section 65996.”]

Comment PC033-6

The commenter states, it would perhaps be a social “experiment” to say… how that many potential children/youth/high schoolers would behave in “their” own backyard mall. Because, again there can be no controls over where those potential rent paying youngsters can and can not go in this proposed “open air mall” design.

The argument that youngsters GO to the mall now, is not a valid argument. It is quite different as I mentioned before, going TO the mall Vs LIVING AT THE MALL.
Response to Comment PC033-6

The City acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. While the comment does not directly address an environmental issue, 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 PC033-7

The commenter states, not trying to be all gloom and doom here... BUT, as "planners" we need to be professionally responsible for the social spaces, and projects, that we design OR approve to be built!

Response to Comment PC033-7

Thank you for your comment. While the comment does not directly address an environmental issue, 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 PC034: Sheila Lamb

Comment PC034-1

The commenter requests any documentation regarding the derivation of the MDX+ factors for the Galleria DEIR from the Fehr and Peers study. If you do not have this information, please let me know.

Response to Comment PC034-1

The City responded to the commenter’s PRA request on September 22, 2017. The response stated:

The information that you requested is contained in documents within the Draft EIR, and also made available via the links provided below. This information is made available consistent with Gov. Code 6253(f).

1. The South Bay Galleria Draft EIR, Section 3.13, Transportation and Traffic, available online at:

2. The South Bay Galleria Draft EIR, Appendix L Transportation, available online at:

If you have any difficulty accessing these electronic files, please contact the City Clerk’s office. If desired, the records above can be made available to you in hard copy at a charge of ten cents ($0.10) per 8.5” x 11” page for duplication of records, or it can be stored electronically on a CD at a cost of $1.00 per disk.

As part of the CEQA Final Environmental Impact Report (EIR) preparation process, the City will prepare responses to environmental issues, consistent with CEQA Guidelines Section 15088. The Draft EIR comment period has now ended and the Final EIR has not yet been prepared. As such, your communication and any information requested, as stated
in the Community Development/Planning Department’s email communication to you of September 8 (provided below for your reference) will be addressed.

Community Development Department/Planning Division Email Response of September 8: “Subject: RE: City of Redondo Beach - Customer Service case number 28256 Thank you for your comment submittal on the Galleria project Draft EIR. Your comment and any information requested will be addressed in the Response to Comments prepared subsequent to the public review period of the Draft EIR.”

Trip generation and MXD+ factors are discussed in Draft EIR Section 3.13.4. The specific trip reduction information is provided in Draft EIR Table 3.13-7, which shows the MXD+ Model trip reduction values (i.e. “MXD+ Model calibration of base ITE rates reflecting project and site-specific characteristics”). Additionally, the MXD+ model was summarized in Draft EIR, Appendix L, Section 1.4.

More detailed information on the MXD+ model is included Draft EIR Appendix L (“Appendix A – MXD Model Documentation”). The MXD Model Documentation includes approximately 20 pages of support information related to the creation of the MXD+ trip generation modeling. As discussed therein, the MXD+ model is based upon two earlier trip generation studies including (1) the National Cooperative Highway Research program (NCHRP) Report 684, and (2) the US EPA sponsored Report “Traffic Generated by Mixed-Use Developments – A Six-Region Study Using Consistent Built Environmental Measures” which in turn was based upon a study of 239 Mixed Use Developments and verified through 27 mixed use sites across the U.S. (Appendix L, Appendix A, p. 10-11.) The MXD+ model combines the datasets and factors from both of these models. (Appendix L, Appendix A, p. 12-16.) The last page of Appendix A includes the MXD+ Model References and Additional Resources along with weblinks to those materials, including but not limited to “Description, documentation, and spreadsheet tools for the NCHRP 684 method” as well as “Description, documentation, and spreadsheet tools for the EPA MXD Trip Generation Tool.” The MXD+ trip generation calculations, and the assumptions associated with the calculations are included as Appendix L5, of the Final EIR Modifications to the EIR.

The MXD+ model utilized trip generation rates from *Trip Generation, 9th Edition*, but through the statistical processes of the model, calibrates the ITE rates to reflect the site specific and area contexts of the project including size of the project, land uses of the project, intersection density around the project, average household size and vehicle ownership in Redondo Beach, employment within 1 mile of the project, and employment within 30 minutes via transit. Input variables and sources utilized in the MXD+ model are provided below.

<table>
<thead>
<tr>
<th>Project</th>
<th>Value</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Size of Site (acres)</td>
<td>34.76</td>
<td>GIS</td>
</tr>
<tr>
<td>Household Size (persons per HH)</td>
<td>2.43</td>
<td>ACS 2012 - 5 Year Average</td>
</tr>
<tr>
<td>Vehicle Ownership (per DU)</td>
<td>1.85</td>
<td>ACS 2012 - 5 Year Average</td>
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<tr>
<td>Intersection Density (per square mile)</td>
<td>92</td>
<td>EPA Smart Location Database</td>
</tr>
<tr>
<td>Employment within 1 mile</td>
<td>9,045</td>
<td>SCAG 2012 RTP Model</td>
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<tr>
<td>Employment within 30 min transit (share)</td>
<td>0.02</td>
<td>SCAG 2012 RTP Model</td>
</tr>
</tbody>
</table>
Comment Letter PC035: Alex Makarczyk

Comment PC035-1
The commenter states, as a lifelong Redondo Beach resident of 53 years, within view of the Galleria, I am extremely troubled by the new Galleria plans!

Response to Comment PC035-1
Thank you for your comment. While the comment does not directly address an environmental issue, 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 PC035-2
The commenter states, I live in North Redondo where it is vibrant and growing. New families with kids are moving in replacing older people leaving. It is a thriving neighborhood.

Response to Comment PC035-2
Thank you for your comment. While the comment does not directly address an environmental issue, 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 PC035-3
The commenter states, a few blocks away, there is new plan in the works that seems excessive. It appears as if the "plan" had one objective: let's try to maximize the profit without care or concern for how it fits together with the existing community. This Plan is not only Overbuilt, but a plan without a heart or soul!

Response to Comment PC035-3
The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC035-4
The commenter states, it is as if: what could not be tolerated by the citizens of Redondo at the waterfront, just moved a little east at the other end of the city. It is like shoving a Square Peg into a round hole.

Response to Comment PC035-4
The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC035-5
The commenter asserts that the new plan maxes out the 30-acre site: It has the Mall, Movie theatre, Parking structure--above ground 4 stories and additional underground levels, a 150 room
Hotel, Major retail -- 4 Locations, small retail- 2 locations, 2 Residential Buildings -- 300 to 600 residences, a Six story structure (taller than the former May Co. building) and a 3 story structure.

**Response to Comment PC035-5**

Thank you for your comment. The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. As discussed on Draft EIR, Section 3.8, *Land Use*, page 3.8-16:

As noted under Government Code 65589.5(a), the legislature has concluded that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California.” The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City “facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community” (Gov. Code Section 65580(d)). More specifically, the Legislature’s stated intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal” (Gov. Code Section 65581). Also under the Redondo Beach Housing Element, the project site represents the greatest potential for future residential development in the City, to meet the City’s Regional Housing Needs Assessment (RHNA), as well as the high regional demand for housing in the County (see also Circulation Element, Goal 8). Furthermore, as discussion in Section 3.0.3 of the Draft EIR, the proposed project provides mixed use development in a transit priority area, and is consistent with the regional RTP goals as well as the City’s goals of encouraging mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance and supporting transit-oriented development (Redondo Beach Circulation Element, G6, G7, and G8).

As further discussed in Draft EIR Section 3.10, *Population and Housing*, Section 3.10.3:

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. In cooperation with HCD, local governments and councils of government are charged with determining the cities or regions existing and projected housing needs as their share of the statewide housing need. The current Regional Housing Needs Allocation (RHNA) identifies housing needs in each SCAG jurisdiction and allocates a fair share of that need to every community. Redondo Beach’s RHNA for the 2013–2021 planning period has been determined by SCAG at 1,397 housing units, including 186 units for extremely low-income households, 186 units for very-low-income households, 223 units for low-income households, 238 units for moderate-income households, and 564 units for above-moderate-income households.

**Comment PC035-6**

The commenter states they are familiar with these types of mixed use sites popping up all over Hollywood and Santa Monica. They create unwanted congestion. Please do not bring downtown Hollywood to beautiful Redondo Beach!
2. Response to Comments

Response to Comment PC035-6

Thank you for your comment. The comment does not address the contents of the Draft EIR. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

As discussed on Draft EIR, Section 3.13, Transportation and Traffic, page 3.13-45, the proposed project would have reduced per capita Vehicle Miles Traveled in comparison to the SCAG region, and would therefore have a regional traffic benefit by reducing the number and length of regional vehicle trips. (See also Draft EIR page 4-46.) This is consistent with statewide planning efforts to reduce greenhouse gases, as discussed in Draft EIR Section 3.5:

[T]he state legislature and regional planning agencies have been tasked with different planning efforts to reduce GHG emissions. Pursuant to the provisions of Senate Bill (SB) 375 and SB 743, regional land use planning efforts have focused upon infill development, development in transit priority areas [such as the project site], and reducing per capita Vehicle Miles Traveled (VMT). As discussed in the 2016 SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), “The 2016 RTP/SCS plans for focusing new growth around transit, which is supported by the following policies: identifying regional strategic areas for infill and investment; structuring the Plan on centers development; developing “Complete Communities”; developing nodes on a corridor; planning for additional housing and jobs near transit planning for changing demand in types of housing; continuing to protect stable, existing single-family areas; ensuring adequate access to open space and preservation of habitat; and incorporating local input and feedback on future growth” (2016 SCAG RTP/SCS, pages 7 and 8). Additionally, the underlying purpose behind the RTP/SCS is to outline “growth strategies that better integrate land use and transportation planning and help reduce the state’s greenhouse gas emissions from cars and light trucks.” (2016 SCAG RTP/SCS, page 15).

The proposed project would be a redevelopment project that would be located within walking distance to public transportation as well as existing residential uses within the city. The location of the project is in close proximity to transit, and existing residences.

Comment PC035-7

The commenter states, traffic in Redondo Beach has become congested in the past years. I drive in it to and from work every day. Today traffic is somewhat bearable. Now add 4 years of construction traffic and after that 300 to 600 more residences adding 1,000 plus more cars daily. There will be no going back. Residences are permanent. Severe traffic will be permanent.

Response to Comment PC035-7

As described in Draft EIR Section 3.13, Transportation and Traffic, Section 3.13.4, Impacts and Mitigation Measures, the residential component of the proposed project was included in the trip generation, trip distribution, and trip assignment process; as such, residential trips made to and from the project site were adequately accounted for in the traffic analysis. Therefore, the Draft EIR adequately addressed the impact of the residential component of the proposed project on traffic conditions. The Draft EIR identifies all traffic impacts resulting from the proposed project (including the residential component), and physical intersection mitigation measures were developed to address these impacts, where feasible.
The commenter also asserts that “Severe traffic will be permanent.” As discussed on Draft EIR page 3.13-25, while the Draft EIR conservatively assumed traffic growth would match the population growth rate of 0.38 percent per year in the short term, this assumption is conservative. The SCAG travel demand model was used to compare the model-assigned traffic on roadways in the City of Redondo Beach citywide between the year 2012 and the forecast year (2040). The net change in SCAG’s projected traffic volumes projects a decline of about three percent, due to the transportation infrastructure improvements, land use changes, and policy strategies associated with the [Regional Transportation Plan] and the [Sustainable Communities Strategy]. See Response to Comment PC035-6 for additional details.

Comment PC035-8

The commenter state that traffic will be a nightmare! Not just for my area of North Redondo but South Redondo as well. The area of the Galleria is the center of several great arteries (Hawthorne, Artesia, and Inglewood Ave) that connect and feed the entire City. These thoroughfares will become intolerable!

Response to Comment PC035-8

Your comment with respect to congested traffic conditions on Hawthorne Boulevard, Artesia Boulevard, and Inglewood Boulevard is noted. However, per the requirements of CEQA, the focus of the Draft EIR is to address project-generated impacts, not existing deficiencies. Draft EIR, Section 3.13, Transportation and Traffic, and the TIS, Appendix L of the Draft EIR, were prepared in accordance with the requirements of CEQA and the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. Beginning on page 3.13-29 of the Draft EIR, the significance thresholds use to determine whether the proposed project’s contribution to delay experienced at the 32 study intersections and five mainline freeway segments, are described. The Draft EIR identifies all traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible.

Comment PC035-9

Beyond this, as a parent with child in the elementary school system, I am acquainted with Redondo schools and the limited resources that are at capacity now. Adding 300 to 600 residences will negatively impact the quality of education, adding more students, putting undue stress on the schools.

Response to Comment PC035-9

The commenter expresses concern regarding school capacities, which were analyzed in the Draft EIR, Section 3.11, Public Services. The comment does not raise any specific issue related to the adequacy of this analysis as provided in the EIR. As discussed in Section 3.11.4, Impact PUB-3, “the project would pay statutory fees which are ‘…” deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization’”. With regards to the shortfall in capacity at Washington Elementary School, the RBUSD school district would likely install portable classrooms in the short term, which are
anticipated to not result in significant adverse physical environmental effects. Therefore, impacts are considered less than significant related to schools.

**Comment PC035-10**

The commenter states, who benefits from this project? Beyond Forest City, it would be the potential new residents who come from outside the City. Who suffers from this project? The existing residents of the community will suffer unwanted congestion.

**Response to Comment PC035-10**

Thank you for your comment. The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Please also see Response to Comments PC035-5 and PC035-6.

**Comment PC035-11**

The commenter states, I am asking the officials of the City of Redondo Beach to respect and protect the quality of life in our community, specifically in my neighborhood, by severely curtailing or better eliminating the Residential aspect of the New Galleria Plan.

**Response to Comment PC035-11**

Thank you for your comment. The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. However, it should be noted that the applicant has applied to construct Alternative 4/4-1, which reduces the amount of residential development to 300 units (down from 650 units) and includes office space. Please also see Response to Comment PC0035-5 for discussion of state law regarding housing.

**Comment PC035-12**

The commenter states, my thoughts about the new plan are not alone, but are shared wholeheartedly by my family and numerous neighbors on my street.

**Response to Comment PC035-12**

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

**Comment Letter PC036: Alex Makarczyk**

**Comments PC036-1 to PC036-12**

These comments are the same as PC035-1 to PC035-12.

**Response to Comment Letter PC036**

These are duplicate comments to Comment Letter PC035, they were sent via different methods of communication. See Response to Comment Letter PC035.
Comment Letter PC037: Holly Osborne

Comment PC037-1
The commenter addresses the Mayor and Councilmember Emdee: Attached are some comments I have on the Galleria draft EIR. (I could not make it to the meeting they had at the end of August.) Could one of you please make sure they get to the right place by 5:00 tomorrow?

Response to Comment PC037-1
The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC037-2
The commenter states because I was unable to be at the August general meeting on the EIR for the Galleria, I am submitting my questions/concerns by email. (I understand that questions submitted by Sept 11 at 5:00PM will still be part of the record.)

Response to Comment PC037-2
The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC037-3
The commenter asks "Open Space": In the power point presentation that Forest City has made, they make the point that they have included 54% more open space than required. Would Forest City please explicitly state the amount of open space required, and the amount of open space they are providing. (Especially for Options 4 and 4-1, if those are the ones they are seriously considering.)

a. Of that "open space", how much is green space, and how much is concrete?

Response to Comment PC037-3
Thank you for your comment. Based on the analysis found in Section 3.12, Recreation, of the Draft EIR, the proposed project would not result in impacts associated with recreational facilities or require the construction or expansion of recreational facilities that would have an adverse physical effect on the environment not already addressed as part of the proposed project.

As described in the Draft EIR, in Section 3.12, Recreation, pursuant to RBMC Section 10-2.919(h), because the proposed project is located within the Regional Commercial (CR) zone it would be required to include usable open space areas, such as public plazas, public walkways, and other public spaces of at least 10 percent of new construction. The proposed project would include approximately 979,464 sf of new development, and would therefore be required to include 97,946 sf of usable public open space in order to comply with the RBMC. As shown on Figure 3.12-1, the proposed project would include at least 199,530 sf of usable public open space in the form of public walkways and open space throughout the project site. Of the public open
space, you can see in Figure 3.12-1 that the areas outlined in red are included in the open space calculations in accordance with RBMC Section 10-2.919(h), and the figure also shows the proposed green spaces.

With the same methodology being used for Alternative 4, the gross zoning floor area square footage used in the Draft EIR analysis, Section 4.5.4, Table 4-5 shows that under Alternative 4, there would be 622,043 sf of new development, and therefore would be required to include 62,204.3 sf of usable public open space in order to comply with the RBMC. The same would be true for Alternative 4-1 as the total amount of new development proposed for Alternative 4-1 would remain the same as Alternative 4. Therefore, Alternative 4-1 would also be required to include 62,204.3 sf of usable public open space in order to comply with the RBMC. As shown on Figure 3.12-1, the proposed project would include at least 199,530 sf of usable public open space in the form of public walkways and open space throughout the project site.

**Comment PC037-4**

The commenter asks, of the "green space", is the green space "connected" to the ground, so that water will actually drain into the ground, or is the "green space" on top of an underground parking structure, or other underground building.

**Response to Comment PC037-4**

Of the proposed public open spaces, the amount of green space can be seen in Figure 3.12-1. With regards to the comment about on-site drainage, the analysis found in Section 3.7, *Hydrology and Water Quality*, finds that the proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Drainage from the project site is captured by a network of existing storm drains, and the system would comply with City drainage control requirements. Once operational, the proposed project would decrease the total amount of impervious surfaces on site by approximately 335,369 sf, thereby increasing the capacity of the site to infiltrate surface water runoff prior to it reaching storm drains.

As also discussed on Draft EIR page 2-24, “The project proposes to develop a 2,567-space subterranean parking structure under the proposed residential and retail structures on the east side of the project site. A 915-space subterranean parking structure would be located at the proposed southwest residential building.” Consequently, portions of the site will be located above underground parking. Regardless of the location of underground parking, the project must comply with the local MS4 stormwater capture requirements, as discussed on Draft EIR, Section 3.7, *Hydrology and Water Quality*, page 3.7-9, which include retaining 0.75 inches of rainwater within 24 hours on-site.

**Comment PC037-5**

The commenter asks, for Kingsdale Avenue: As part of traffic mitigation, can some of the 29+ acres for the project be used for widening Kingsdale? (Has our traffic engineer worked with Forest City on that?)
**Response to Comment PC037-5**

The Draft EIR identifies all traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible. No impacts were identified at the four study intersections located on Kingsdale Avenue; therefore, no mitigation measures were required. (CEQA Guidelines Section 15126.4(a)(3).) Per the requirements of CEQA, the focus of the Draft EIR is to address project-generated impacts. While the Galleria project’s intersection impacts along Kingsdale are less than significant, the Transit Center Relocation Project, included the following Conditions of Approval related to Kingsdale roadway improvements:

TR1. The applicant shall be required to restripe and re-establish a second west bound travel lane, on 182nd Street between Hawthorne Boulevard and Kingsdale Avenue after the bus layover zones on 182nd Street are abandoned. The plans and construction specifications for these changes shall be included in the construction document bid set.

TR2. In conjunction with the land exchange with Forest City for the South Bay Galleria Transit Terminal parcel, twenty (20) feet of land to the east of the existing westerly edge of the Transit Terminal parcel adjacent to Kingsdale Avenue shall be dedicated for street widening purposes. The street widening will allow the construction of an additional northbound, 250-feet Tong right turn only lane, curb and gutter, parkway, and sidewalk. The street widening will also require the demolition of the existing Transit Terminal bus bays and reconstruction of the east side of Kingsdale Avenue for the length of the Transit Terminal parcel. The improvement of the street shall occur as part of the demolition of the existing transit terminal once the new Transit Center is operational. The plans and construction specifications for these changes shall be included in the construction document bid set.

**Comment PC037-6**

The commenter asks about density: (Background: Other areas, such as Lomita, have proposed a 220-unit complex over 2.7 acres, at a density of 88 units/acre; this exceeds their code and they will have to get a variance if the project is approved, etc.)

**Response to Comment PC037-6**

Thank you for your comment. The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Please see comment response PC037-7 for further information.

**Comment PC037-7**

The commenter states that someone on the council at the last meeting cited this density statistic, and said that by contrast the 300 unit Galleria project is about 10.1 units acre (300 units, total 29.9 acre lot), and much less dense! THIS IS A BLATANT MISUSE of statistics and calculations. The footprints of the stores, hotel, office buildings, etc in the Galleria project that are standalone buildings should in no way be used for a meaningful calculation of "density."
(People are not going to be playing tennis on the roof top of Macy's.) The 300 units are all cramped together in a 5 or 6 story high rise! Now, I do believe that some (maybe all) of the open space can and should be used to compute a "density", but to use the whole 29+ acres to compute density and try to sell the project on that basis is ludicrous. So, my question is, what is the actual footprint of the residential complex building (in acres), and what is the size of the open space + residential complex footprint.

Response to Comment PC037-7

Thank you for your comment. The comment appears to be referencing the Public Hearing associated with the proposed CR Zone Moratorium held on September 5, 2017, not a Public Hearing on the South Bay Galleria Project. The Administrative Report for that hearing stated:

The proposals for the Galleria site currently includes densities of residential development significantly below what is permitted by the existing zoning (35 DU/acre). The current options proposed by the applicant for the site range from a maximum of 21.8 DU/acre to a minimum of 10 DU/acre. Given the current densities proposed at the Galleria Site, it may be difficult for the City to make substantive changes to the residential density in the CR Zone. As noted above, to make a permanent change in the CR zoning, the City would need to make a finding that “the remaining sites identified in the housing element are adequate to accommodate the jurisdiction’s share of the regional housing needs pursuant to Section 65584.”

In the context of Planning, there are two primary land use measurements which include (1) Population Density, and (2) Building Intensity. (Gov. Code Section 65302(a); see also RBMC Sections 10-2.919(b) [Residential Density] and 10-2.919(a) [Building Intensity].) Population Density is typically related to residential Dwelling Units per acre (DU/Acre), which was the primary topic of conversation associated with the quote, which explained “to make a permanent change in the CR zoning, the City would need to make a finding that ‘the remaining sites identified in the housing element are adequate to accommodate the jurisdiction’s share of the regional housing needs pursuant to Section 65584.” Such a finding would be based upon the number of permissible residences (i.e. DU/Acre).

The commenter implies that the quote was misleading because it did not account for other non-residential development. The calculation referenced by the commenter relates to the second measurement (i.e. Building Intensity), which is often associated with Floor Area Ratios or FAR (i.e. the total amount of structural development on the project site in comparison to the total land area). While this FAR information is important in other contexts, and was disclosed in Draft EIR Section 3.8, it was not pertinent to the matter being discussed in the Administrative Report/Public Hearing referenced in the comment (i.e. whether there were sufficient locations within the City to handle the remaining Regional Housing Needs Allocation or RHNA). The RHNA calculation is based upon the permissible Residential Density (DU/acre) and the total

71 As discussed in Draft EIR Table 3.8-1 “The overall FAR for the proposed project would be 1.5 (1,950,565 sf of zoning floor area / 29.85 acres of building area = 1.5 FAR)."
acreage of the project site. The information was not intended to be misleading, rather it was specific the legal question being addressed at that time.)

In response to the second portion of the comment, the Draft EIR states in Table 2-3 that the residential building complex for the proposed project would include 650,000 square feet of dwelling units.

**Comment PC037-8**

The commenter states, I believe that in building mixed use in the CR zone, where commercial development will dominate, a MEANINGFUL method must be used to compute density. Right now, I do not know what the formula should be; surely our planning department, and hopefully the GPAC can come up with something meaningful.

**Response to Comment PC037-8**

Thank you for your comment. Please see Response to Comment PC037-7.

**Comment PC037-9**

Has anyone in the city done a comparison of Alternatives 4 and 4-1 to see which is better financially for the city. (This is assuming one goal of this project is to somehow replace the approximate $1 million loss of income when Nordstrom's left.)

**Response to Comment PC037-9**

Thank you for your comment. Based on the analysis found in the Draft EIR Section 4.5, *Alternatives Considered and Further Evaluated*, both Alternative 4 and 4-1 mentioned in your comment have been evaluated as part of the Draft EIR analysis. While the Draft EIR works to analyze any possible environmental impacts from the proposed project and project alternatives, the analysis does not include an economic analysis. Therefore, your comment does not directly address an environmental issue, however your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

**Comment PC037-10**

The commenter states, thank you to Forest City for not proposing a 1000 unit plan!

**Response to Comment PC037-10**

Thank you for your comment. While the comment does not directly address an environmental issue, 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 PC038: Cynthia Ogle**

**Comment PC038-1**

The commenter states, I am Cynthia Ogle and I live in District 4 in the 3 block are that will be adversely impacted by the proposed Galleria residential building plan.
Response to Comment PC038-1

The comment asserts that there are “3 blocks…that will be adversely impacted.” The Draft EIR did disclose three significant and unavoidable intersection impacts at Intersection 16 (Hawthorne Blvd/Artesia), Intersection 17 (Prairie Ave/Artesia Blvd, and Intersection 19 (I-405 Northbound Ramp/Artesia Blvd); however, there were no other significant and unavoidable impacts for the proposed project.

Comment PC038-2

In the DEIR the bike lanes along Grant Avenue are depicted incorrectly as running all the way to the Galleria. In reality both east and west bound bike lanes stop abruptly at Firmona Avenue.

Response to Comment PC038-2

The commenter states that the bike lanes along Grant Avenue stop at Firmona Avenue. Figure 3.13-2 of the Draft EIR was prepared based on a combination of field visits and information from The South Bay Bicycle Master Plan. Information regarding the location of the bike lanes does not affect the results or findings of the Draft EIR. An updated figure identifying the bike lanes on Grant Avenue is provided in Chapter 3, Modifications to the Draft EIR, Appendix L3, of the Final EIR.

Comment PC038-3

The commenter asks, why does the DEIR show no significant unavoidable traffic impact along Kingsdale or Grant Avenues? I remember last year (not 2015 as stated in the DEIR and not during any holiday) when there were hoses and tape all over our streets and sidewalks, that there were none on Kingsdale south of Grant Avenue and none on Grant and Kingsdale. Does the DEIR show no impact because there was no study or was this study for another project? If so I would like to know what it was for. I do recall emailing the city when whoever was doing the traffic study finished and left their tape and cut off hoses on our streets and sidewalks … not very environmentally friendly, especially in a city where the storm drains lead directly to the ocean.

Response to Comment PC038-3

As stated on page 3.13-6 of the Draft EIR, traffic counts were collected in November 2014 at 32 study intersections and five mainline freeway segments. Supplemental weekday holiday PM peak hour turning movement counts were conducted at eight of the 32 study intersections around the project site in December 2015. Traffic counts conducted at any other time were not associated with the proposed project, and therefore, any concerns about those counts are not within the scope of the Draft EIR.

Traffic impacts were considered in Draft EIR 3.13 and in the Transportation Impact Study (TIS), Appendix L of the Draft EIR. These studies were prepared in accordance with the requirements of CEQA and the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. In consultation with City of Redondo Beach staff, the transportation study area was selected to include intersections likely to be affected by traffic generated by the proposed project, specifically major intersections located within roughly a one-mile radius of the project site. Four
of the study intersections are located along Kingsdale Avenue at: Artesia Boulevard (Intersection 14), Grant Avenue (Intersection 20), Target Drive (Intersection 24), and 182nd Street (Intersection 27). Beginning on page 3.13-29 of the Draft EIR, the significance thresholds use to determine whether the proposed project’s contribution to delay experienced at the 32 study intersections and five mainline freeway segments are described. The Draft EIR identifies all traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible. No impacts were identified at the four study intersections located on Kingsdale Avenue; therefore, no mitigation measures were required. (CEQA Guidelines Section 15126.4(a)(3).)

Comment PC038-4
The commenter states, we already have more than enough traffic on Grant and Kingsdale ... both of which would be negatively impacted by 300 + new residences on Kingsdale Avenue regardless of what the DEIR states.

Response to Comment PC038-4
The commenter states that “We already have more than enough traffic on Grant and Kingsdale.” As shown in Draft EIR Table 3.13-10, the Intersection of Grant and Kingsdale (Intersection 20) currently operates at LOS A during the AM and PM Peak hours with and without the proposed project. Consequently, impacts would be less than significant. While there would be a slight reduction to LOS B during the PM peak hour under cumulative conditions, impacts would still be less than significant. (See Draft EIR Table 3.13-13.) Please also see Response PC038-3.

Comment PC038-5
Why does the DEIR state Redondo Beach City Schools can absorb any new students that may appear as a result of new residences at the Galleria? This is an out and out LIE!

Response to Comment PC038-5
The Draft EIR expressly acknowledged that Washington Elementary School is over capacity. More specifically Draft EIR page 3.11-12 states “Based on their existing capacity (see Table 3.11-3), RBUSD is experiencing a shortage of capacity at the elementary school level by approximately 97 seats (RBUSD 2016).” (See also Draft EIR Table 3.11-3.) Furthermore, Draft EIR page 3.11-16 acknowledges that “While Adams Middle School and Redondo Beach Union High School are not currently at capacity, they would be over capacity under future cumulative conditions.”

As further discussed in Section 3.11.4, Impact PUB-3, pursuant to state law “the project would pay statutory fees which are ‘...deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.’” (Gov. Code Section 65995(h) and 65996.) With regards to the shortfall in capacity at Washington Elementary School, the RBUSD school district would likely install portable classrooms in the short term, which are anticipated to not result in significant adverse physical environmental effects. Therefore, impacts are considered less than significant. Similar school fee issues arose in
a recent Mixed Use Residential project case in the City of Fremont. (See Stand Up for Fremont v. City of Fremont (2017 Alameda County Superior Court Case No RG17844308) [“Finally, we respect to Petitioner’s claim that the project may risk overcrowding the schools, the Court finds that by law this cannot be asserted as a substantial impact on the environment under CEQA because that claim is barred by Government Code section 65996.”]

**Comment PC038-6**

Are you aware that according to the RBUSD Accountabilities Report Card that every single school in Redondo Beach has at least one classroom that is over the legal limit in number of students as set by the State of California? In fact both Washington Elementary and Adams Middle School have many classes over the legal student limit.

**Response to Comment PC038-6**

Thank you for your comment. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Please see Section 3.11, Public Services, as well as Comment Response PC038-5 for additional information.

**Comment PC038-7**

This brings me to my next question. Do we currently have enough bathroom stalls for the children currently in attendance as outlined by the state of California?

**Response to Comment PC038-7**

Thank you for your comment. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. However, the comment related to an existing issue unrelated to the proposed project. Please see Section 3.11, Public Services, as well as Comment Response PC038-5 for additional information.

**Comment PC038-8**

The commenter states, they have heard the City Council is hoping Air Force personnel will rent these proposed Galleria apartments. According to Military One Source 2015 Demographics Profile of The Military Community, 42.3% of active Duty Air Force families have an average of 2 minor children. If even one half of the proposed 300 Galleria units are rented to Air Force families that works out to 127 additional children we need to find classrooms for when our schools are already over legal limits (150 X 42.3% X 2 = 127). Are you aware schools not in compliance with the State of California limits are penalized in a reduction of revenue per child? This means less money for learning, less resources, overworked educators and overstimulated children from overcrowded classrooms. Please explain how this benefits the kids of Redondo Beach. Simply, as anyone can see, we can not and must not absorb students from new housing.

**Response to Comment PC038-8**

Thank you for your comment. Draft EIR Section 3.11, Table 3.11-4 made reasonable assumptions about Student Generation factors based upon RBUSD’s 2016 Enrollment Impact Analysis. This included Elementary School Student Generation factors of 0.1284 Elementary School students per unit, 0.0489 Middle School students per unit, and 0.051 High School students per unit. As
discussed in the November 2016 RBUSD Study, these student generation rates are based upon data specific to the Redondo Beach Unified School District. (RBUSD November 2016 Enrollment Impact Analysis, Section II.) Whereas the report referenced by the commenter, appears to be based upon a National Military profile. Furthermore, that older 2015 report states that the number of children across all active duty averages at 0.8, which includes children up to the age of 22 enrolled as full-time students. The City notes the commenter’s point of disagreement, however, the document referenced by the commenter is not specific to the City of Redondo Beach, and the City believes the November 2016 RBUSD study more accurately reflects student generation rates for the jurisdiction.

Furthermore, as discussed in Response to Comment Response PC038-5, the project would pay statutory fees which are ‘…deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.’ (Gov. Code Section 65995(h) and 65996.)

Comment PC038-9

Additionally I would like to say I have lived in my home for 50 years. When we moved here I could see the mountains from my living room. Now I have a view of a 5 story parking structure that is slated to grow with the proposed Galleria project. There was a nice breeze that blew through my house from the west. Now it is blocked by a 3 story Senior Citizen housing complex. My home backs up to the railroad tracks. I love the freight trains, but soon I will have all of the building noise and dirt from the metro rail construction and then metro railcars passing by every 15 minutes, 24 hours a day. My sleep will be extremely compromised and my home, my legacy to my kids will become worthless. I understand that some have to give up some things for the good of most, but why is it always this 3 block area of Redondo Beach? Why do we always have to give? We pay taxes too.

Response to Comment PC038-9

Thank you for your comment. As described in detail in Section 3.0.3, ‘‘Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment,’’ (Public Resources Code Section 21099(d)(1)).’’ Air Quality Impacts were addressed in Draft EIR Section 3.1 and were determined to be less than significant. The commenter references a number of existing structures and projects, however CEQA focuses upon impacts caused by the proposed project, not existing environmental conditions or other existing facilities. While the commenter asserts “my sleep will be compromised.” It is unclear if the commenter is asserting that this is an impact of the South Bay Galleria Project, or other existing developments. However, as discussed in Draft EIR Section 3.9, Noise, the project construction would not occur during hours of sleep, and the project would not result in changes to existing on-site operational noise. (See Draft EIR page 3.9-15 and 22.)

Comment PC038-10

The commenter states, stop ... Please .... Just STOP chronic construction in North Redondo
Response to Comment PC038-10
The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment Letter PC039: Dave Amato

Comment PC039-1

The commenter states, 1) Traffic:

According to the DEIR, Kingsdale Avenue has an (A) rating. Kingsdale Avenue is one of the busiest streets in this area in terms of volume (for its size) within close proximity to the project area, a traffic counter is not needed to measure as this as it is a well-known fact.

Response to Comment PC039-1
Thank you for your comment. While the comment does not directly address an environmental issue with the project your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC039-2
According to the DEIR 3.13-3, on page 321, "Kingsdale Avenue Provides two lanes in each direction", when in fact southbound is only two lanes from Artesia Ave to Grant Ave (one Block). It then becomes one lane southbound from Grant Avenue to 182nd St. This misrepresentation results in flawed data in the DEIR.

Response to Comment PC039-2
Please see Response to Comment PC047-1.

Comment PC039-3
The commenter states, as a resident on Kingsdale Ave I feel this street needs to be reconfigured along with traffic calming speed control devices. As well as congestion and gridlock, Kingsdale Ave also has a vehicle speeding problem which includes busses and trucks. This adversely affects the quality of life for neighboring residences by creating increasingly higher levels of air pollution, noise, traffic congestion, grid-lock and safety degradation by causing delays for first responders.

Response to Comment PC039-3
Traffic impacts were considered in Draft EIR 3.13, Transportation and Traffic and in the Transportation Impact Study (TIS), Appendix L of the Draft EIR. These studies were prepared in accordance with the requirements of CEQA and the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. In consultation with City of Redondo Beach staff, the transportation study area was selected to include intersections likely to be affected by traffic generated by the proposed project, specifically major intersections located within roughly a one-mile radius of the project site. Four of the study intersections are located along Kingsdale Avenue.
at: Artesia Boulevard (Intersection 14), Grant Avenue (Intersection 20), Target Drive (Intersection 24), and 182nd Street (Intersection 27). Beginning on page 3.13-29 of the Draft EIR, the significance thresholds use to determine whether the proposed project’s contribution to delay experienced at the 32 study intersections and five mainline freeway segments are described. The Draft EIR identifies all traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible. No impacts were identified at the four study intersections located on Kingsdale Avenue; therefore, no mitigation measures were required. (CEQA Guidelines Section 15126.4(a)(3).) While the Galleria project’s intersection impacts along Kingsdale are less than significant, the Transit Center Relocation Project, included the following Conditions of Approval related to Kingsdale roadway improvements:

1. The applicant shall be required to restripe and re-establish a second west bound travel lane, on 182nd Street between Hawthorne Boulevard and Kingsdale Avenue after the bus layover zones on 182nd Street are abandoned. The plans and construction specifications for these changes shall be included in the construction document bid set.

2. In conjunction with the land exchange with Forest City for the South Bay Galleria Transit Terminal parcel, twenty (20) feet of land to the east of the existing westerly edge of the Transit Terminal parcel adjacent to Kingsdale Avenue shall be dedicated for street widening purposes. The street widening will allow the construction of an additional northbound, 250-feet Tong right turn only lane, curb and gutter, parkway, and sidewalk. The street widening will also require the demolition of the existing Transit Terminal bus bays and reconstruction of the east side of Kingsdale Avenue for the length of the Transit Terminal parcel. The improvement of the street shall occur as part of the demolition of the existing transit terminal once the new Transit Center is operational. The plans and construction specifications for these changes shall be included in the construction document bid set.

As noted in Draft EIR Section 2.4.2, the existing Transit Center was approved for relocation back in 2010 to the parcel below the existing Target Store (just north of 182nd along the west-side of Kingsdale Ave). The Draft EIR further explained that the transit center relocation was scheduled to take place within 18 months of release of the Galleria Draft EIR. Consistent with that discussion, bidding for the transit center construction activities is set to begin in February 2018 or shortly thereafter.

Please also see Draft EIR Sections 3.1, 3.9, 3.11, and 3.13 for discussion of Air Quality, Noise, Emergency Services, and Traffic Safety. Regarding the commenter’s assertions about congestion and emergency services, as also noted in Draft EIR Section 3.13.3, during construction in rights of way, there are existing regulations for coordination with local emergency services, including

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72 Planning Commission, February 2010 Administrative Report:
http://laserweb.redondo.org/WebLink/PDF/gbc5oi5jgiksvpn0uprgste0/19/AG%20PKT%202010-02-18%20PC%208.pdf. Subsequent Administrative Report noted that the City of Lawndale Community Services Manger consulted on this project. (City Council Admin Report, June 4, 2013, p 2:
http://laserweb.redondo.org/WebLink/PDF/gbc5oi5jgiksvpn0uprgste0/18/AG%20PKT%202013-06-04%20CC%20Rpt%20_h%20GALLERIA%201.pdf.)
training for flagmen for emergency vehicles traveling through the work zones, temporary lane separators that have sloping sides to facilitate crossover by emergency vehicles, and vehicle storage and staging areas for emergency vehicles. While construction traffic impacts were determined to be less than significant in Section 3.13, the City has also proposed, as a standard condition of approval, a requirement to coordinate and ensure emergency access during construction activities. (See Draft EIR pages 3.13-45.) Furthermore, emergency vehicles are not controlled by local congestion as such trips are also not required to obey traffic controls, may bypass traffic queues by crossing over the double-yellow lines.

Vehicular access to the project site is proposed to be provided at eight locations along Artesia Boulevard, Hawthorne Boulevard, 177th Street, and Kingsdale Avenue. The access locations will consist of various access types such as full access, right-turn in/right-turn out, and right-turn in only. The existing truck driveways along Kingsdale Avenue will continue to provide truck access to the site; however alternative truck access will no longer be provided from 177th Street. All access points would be accessible to large emergency vehicles such as fire engines. This would comply with California Fire Code requirements for provision of at least two access points. As noted above, while no street closures are currently anticipated, any construction activities would conform to existing access standards, including coordination with emergency service providers in accordance with the City’s temporary street closure requirements and the California Fire Code (Title 24, California Code of Regulations, Section 9). Furthermore, as noted above, Caltrans’ MUTCD requirements include coordination with local emergency services, training for flagmen for emergency vehicles traveling through the work zone, temporary lane separators that have sloping sides to facilitate crossover by emergency vehicles, and vehicle storage and staging areas for emergency vehicles. MUTCD requirements also provide for construction work during off-peak hours and flaggers.

Moreover, as described in the Draft EIR, Section 3.11, Public Services, Condition of Approval PS-1, requires the applicant to fund and implement a Fire, Life-Safety and Security Plan, which may include fair-share staffing for the police department.

**Comment PC039-4**

In the previous public comment period in fall of 2016, Ideas were submitted that engineering should consider. I believe these Ideas or some combination of these ideas would provide better safety and assure a better quality of life for local residents.

**Response to Comment PC039-4**

Comments received on the Notice of Preparation (NOP) and Initial Study were considered in the preparation of the Draft EIR. As noted on page 1-3 of the Draft EIR, the Draft EIR addressed the environmental issues determined to be potentially significant in the Initial Study, input from agencies and interested individuals provided during the Scoping Meetings, and comment letters on the NOP.

**Comment PC039-5**

Here are my questions:
Question 1: Will the City conduct a traffic study with specific focus on Kingsdale Ave. for the purpose of traffic mitigation measures to implement?

Question 2: Can this Traffic Study for Kingsdale Ave. be conducted independent of the DEIR?

Question 3: What traffic mitigating measures are planned for Kingsdale Ave?

Question 4: Will Kingsdale Ave be widened to accommodate future traffic?

Question 5: What measures will be taken to mitigate the speeding vehicles on this street, which includes busses and trucks?

Question 6: What direction and route will the busses be traveling on Kingsdale when the new Metro Bus location south of Target is finished?

Response to Comment PC039-5
Please see Response to Comment PC039-3 for questions 1 through 5. Please also see Response to Comment PC039-10 for discussion of cumulative traffic assumptions associated with Kingsdale.

Comment PC039-6
Question 7: Will the City be implementing permit-only parking for the surrounding neighborhood; i.e. the residents of Kingsdale, Firmona and Condon Ave?

Response to Comment PC039-6
A parking evaluation is provided beginning on page 3.13-27. This evaluation concluded that the proposed project’s supply of 6,450 parking spaces would be adequate to meet the estimated typical peak parking demand. Please see Response to Comment PC027-2 for additional details regarding existing preferential parking programs.

Comment PC039-7
1. Noise/Disturbances:

Table 3.9-3 Pg. 255, DEJR current noise level on Kingsdale Ave (67.0 dBA) from Artesia Avenue to Grant Avenue. At this section of roadway (where the study was performed) busses have decelerated and turned into the bus terminal. Trucks have also decelerated and turned in to the delivery driveway adjacent to the bus terminal for deliveries. Therefore the dBA levels recorded at this section of Kingsdale are an inaccurate depiction of the street as a whole.

*Please Note: The majority of busses and trucks on Kingsdale travel south to north.

**Due to the location of the testing equipment for this DEIR the data is flawed and needs to be reevaluated.

Response to Comment PC039-7
As discussed in Section 3.9, Noise, the roadway segments selected for analysis are considered to be those that are expected to be the most directly impacted by project-related traffic, which, for
the purpose of this analysis, includes the roadways that are located near and immediately adjacent to the project site. These roadways, when compared to roadways located further away from the project site, would experience the greatest percentage increase in traffic generated by the project; as distances are increased from the project site, traffic is spread out over a greater geographic area, and its effects are reduced. Therefore, the location of the noise measurement along Kingsdale Avenue between Artesia Avenue and Grant Avenue was picked because project traffic is expected to utilize Kingsdale between Artesia and Grant. Thus, the dBA levels recorded at this section of Kingsdale are an accurate depiction of the noise level at the part of Kingsdale Street that will be most affected by project related traffic.

The commenter also implies that the noise measurement location R3 is not an accurate depiction of noise along Kingsdale because it is alleged to be located adjacent to the existing transit center. The commenter is incorrect. As shown in Draft EIR Figure 3.9-2, the noise measurement location along Kingsdale is approximately 350 feet south of the closest point of the existing transit center and approximately 210 feet south of the existing Galleria entrance along Kingsdale. As stated on Draft EIR page 3.9-10 "The results of the short-term noise measurements are shown in Table 3.9-2 and are representative of sensitive receptors in proximity to these locations." To the extent the commenter is referencing the roadway noise analysis under Impact NOI-3, this analysis was based upon the Federal Highway Administration’s (FHWA’s) Highway Noise Prediction Model (FHWA-RD-77-108) which is based on traffic volumes, average speeds [which would account for any reduced speeds referenced by the commenter], and site environmental conditions, as discussed on Draft EIR page 3.9-11.

**Comment PC039-8**

For example: There is a slight incline on Kingsdale Ave (northbound) from I 77th (Target) to Grant Avenue causing vehicles to accelerate, generating excessive dBA up to 87 dBA levels at this section of roadway that was not measured nor included in the study. Kingsdale Avenue is located 55' from the proposed construction area which is expected to generate up to 90 dBA; due to the distance it would be reduced to 67 dBA according to the DEIR.

**Response to Comment PC039-8**

Thank you for your comment. Please see Response to Comment PC039-7 for discussion of noise measurement locations and roadway noise conditions.

The comment also states “Kingsdale Avenue is located 55' from the proposed construction area which is expected to generate up to 90 dBA; due to the distance it would be reduced to 67 dBA according to the Draft EIR.” The commenter is correct in that some pieces of construction equipment can generate noise up to 90 dBA. As shown in Table 3.9-10, Estimate of Maximum Construction Noise Levels at Off-Site Sensitive Receiver Locations, maximum construction noise levels at residences along Kingsdale Avenue, R3, would be exposed to temporary construction noise levels ranging from 78 to 89 dBA. The Draft EIR states that as construction equipment moves away from the project boundary and towards the center of the site, construction noise would be reduced to 70 dBA at residences along Kingsdale Avenue, R3. The mitigate these impacts that Draft EIR has proposed five mitigation measures, as discussed on Draft EIR page 3.9-29.
Comment PC039-9

Question 8: Does this calculation take into consideration the sound wave reflections from the existing concrete and stucco structures such as the West wall of the Galleria, the existing parking structure and the already existing homes along Kingsdale? *All which are hard surfaces not sound absorbing surfaces.

Response to Comment PC039-9

The commenter does not clarify which calculation is being referenced in the Draft EIR Noise analysis. Given the context of the letter, the commenter may be referencing the roadway noise analysis. As discussed on Draft EIR page 3.9-11, this analysis was based upon the Federal Highway Administration’s (FHWA’s) Highway Noise Prediction Model (FHWA-RD-77-108) which is based on traffic volumes, average speeds, and site environmental conditions.

To the extent the commenter is referencing the noise measurements discussed in Response PC039-7, sound reflections from the existing structures were not considered in the traffic noise calculations. According to California Department of Transportation (Caltrans) Technical Noise Supplement (TeNS), high median barriers (e.g., 5-foot-high concrete glare screens) are typically not considered an issue. Because of barriers’ limited height, reflections most likely are scattered and interrupted by the traffic stream.73 In addition, the existing parking structure along Kingsdale Avenue has many openings, which would be acoustically absorption surfaces. Therefore, potential noise reflections are anticipated to be negligible by the existing structures along Kingsdale Avenue.

To the extent the commenter is discussing construction noise levels, such calculations were estimated based on an industry standard sound attenuation rate of 6 dB per doubling of distance for point sources (e.g., construction equipment). Noise reduction by existing structures between the project site and noise-sensitive receptors was considered. Within the analysis, all construction equipment was conservatively assumed to operate simultaneously at the construction area nearest to potentially affected residential receptors. These assumptions represent a worst-case noise scenario, as construction activities would routinely be spread throughout the construction site further away from noise-sensitive receptors and typically not located at the site boundary as was assumed in the Draft EIR calculations in Table 3.9-10. In addition, noise from different construction stages that have the potential to occur simultaneously were added together to provide a composite construction noise level.

Comment PC039-10

Question 9: With the intended start date for this project to be in 2020 and with the new Mega Bus Terminal beginning construction and be finishing in the first quarter of 2018, has the City taken into consideration the increased bBA levels that will be created with the increase in bus traffic on Kingsdale Ave?

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73 Technical Noise Supplement (TeNS), A Technical Supplement to the Traffic Noise Analysis Protocol, California Department of Transportation (September 2013), pp. 5-42
Response to Comment PC039-10

The Draft EIR explained that the transit center relocation was scheduled to take place within 18 months of release of the Galleria Draft EIR. Consistent with that discussion, bidding for the transit center construction activities is set to begin in February 2018 or shortly thereafter, and is expected to take a year to two and a half to complete. The purpose of the Draft EIR is to analyze the impacts of the proposed project, not the impacts of other projects. Given that the Transit Center is being relocated from its current location on Kingsdale, to a location further removed from existing residential sensitive receptors, this relocation is anticipated to slightly improve existing roadway noise conditions along Kingsdale.

Additionally, the Draft EIR roadway noise analysis elected to use the cumulative growth projections approach, rather than the list of projects approach (impliedly used in the comment). (CEQA Guidelines Section 15130.) As discussed on Draft EIR page 3.13-25, while the Draft EIR conservatively assumed traffic growth would match the population growth rate of 0.38 percent per year in the short term, this assumption was conservative. The SCAG travel demand model was used to compare the model-assigned traffic on roadways in the City of Redondo Beach citywide between the year 2012 and the forecast year (2040). The net change in SCAG’s projected traffic volumes projects a decline of about three percent, due to the transportation infrastructure improvements, land use changes, and policy strategies associated with the [Regional Transportation Plan] and the [Sustainable Communities Strategy].

The Draft EIR analyzed noise resulting from cumulative growth and the proposed project in Table 3.9-13. Cumulative long-term operations-related noise impacts for this proposed project pertain to changes in roadway noise levels that could result from future traffic associated with anticipated regional growth along with traffic from the proposed project. Existing 2014 roadway noise levels were compared to future 2023 traffic noise levels that would occur with implementation of the projects. As indicated in Table 3.9-13, the project’s incremental noise increase under cumulative future Ldn traffic noise levels at project buildout, would be 0.8 dBA along Kingsdale Avenue between Artesia Boulevard and Grant Avenue or less in areas that can potentially be affected by the project. The project’s contribution in sound level would not exceed significance threshold in an area with existing noise exposure from 65 dBA to 75 dBA Ldn. Therefore, cumulative impacts due to traffic noise increases would be less than significant.

Comment PC039-11

Question 10: In the DEIR Alternative 4, there is a Parkette being placed on the West side of the parking structure on Kingsdale Ave. and I ask what mitigation will be implemented to deal with the increased dBA that will be generated by this Parkette immediately adjacent to a 23 foot tall concrete structure?

Response to Comment PC039-11

The analysis for Alternative 4 is located in Section 4, Alternatives. Under Alternative 4, a new 516 space proposed parking structure would be located next to the existing parking structure in the southwest corner of the project site. As shown in Table 4-37, Off-Site Traffic Noise Impacts – Future Baseline Conditions Under Alternative 4, project-related traffic noise would not
substantially increase the existing traffic noise levels. Kingsdale Avenue is projected to have an increase of 0.5 dBA which is less than the significance threshold. All other operational noise would be similar to that of the proposed project. No significant impacts were identified as a result of the Alternative 4 for operations, therefore, no mitigation measures were required. Please also see Response to Comment PC039-9.

**Comment PC039-12**

Question 11: Street racing currently takes place in the existing Galleria Mall Parking structure as well as in the parking lot at Living Spaces (off hours in the evening). What mitigation steps are in place to deal with the noise pollution and quality of life affected by this?

**Response to Comment PC039-12**

Thank you for your comment. To the extent such activities are occurring, they are existing conditions, which are not impacts of the proposed project. Nevertheless, as discussed in Draft EIR Section 3.11, the City has proposed Condition of Approval PS-1 which includes a Fire, Life-Safety and Security Plan. Additionally, as discussed on Draft EIR page 3.11-9 and 10, the project is proposing installation of security cameras and license plate readers which would address any such existing issues.

**Comment PC039-13**

Question 12: What specific investment will be made in the surrounding homes i.e. sound-proof windows, doors etc that will mitigate the increased noise (dBA), vibrations and dust resulting from construction of this project?

**Response to Comment PC039-13**

As discussed in Draft EIR Section 3.9, construction noise was determined to be significant without mitigation under Impact NOI-4. Six Mitigation Measures were recommended to reduce impact to less than significant, which include MM NOI-2 (Residential grade mufflers), MM NOI-3 (Limits on construction equipment proximity to noise-sensitive receptors), MM NOI-4 (Staging area shielding and setback limits), MM NOI-5 (Electrical power tools), MM NOI-6 (Temporary sound barriers). Construction vibration was addressed under Impact NOI-2, and was determined to be significant without mitigation. The Draft EIR recommended MM NOI-1 to reduce vibration impacts to less than significant. This mitigation includes prohibitions on certain types of construction equipment within 100 feet of sensitive receptors.

Impacts associated with Air Quality (including dust, i.e. particulate matter), were determined to be less than significant as discussed in Draft EIR Section 3.1. As explained therein, the project is required to comply with the South Coast Air Quality Management District Rule 403, which includes, but it not limited to, periodic watering (or soil stabilizers), application of environmentally safe soil stabilization materials, and/or roll compaction. (Draft EIR page 3.1-18.)

**Comment PC039-14**

As traffic volume increases vehicle emissions increase and degrade the air quality. Additional residences, businesses, hotel, employees, shoppers, delivery vehicles, emergency vehicles and
busses will create a significant increase in all of the following: ozone, particulate matter, nitrogen oxides, carbon monoxide and sulfur dioxide, all of which pose a serious health risk for residents living in such close proximity to the project/affected areas. 2-3 years of construction will have its own pollution issues that local residents will have to endure with no mitigation or compensation. The DEIR states there will be no significant impact! Common sense dictates otherwise: Anyone living 55' from a major construction site will experience significant impact. This data is flawed.

Response to Comment PC039-14

The commenter asserts that “as traffic volumes increase vehicle emissions increase and degrade air quality.” However, this assumption is incorrect. As discussed in Draft EIR page 3.1-11:

> [A]ir quality within the Basin has generally improved since the inception of air pollutant monitoring in 1976. This improvement is mainly due to lower-polluting on-road motor vehicles, more stringent regulation of industrial sources, and the implementation of emission reduction strategies by the SCAQMD. This trend toward cleaner air has occurred in spite of continued population growth. As discussed in the 2012 Air Quality Management Plan (AQMP) for the SCAB as a whole:

> Despite this growth, air quality has improved significantly over the years, primarily due to the impacts of the region’s air quality control program … PM10 levels have declined almost 50% since 1990, and PM2.5 levels have also declined 50% since measurements began in 1999… the only air monitoring station that is currently exceeding or projected to exceed the 24-hour PM2.5 standard from 2011 forward is the Mira Loma station in Western Riverside County. Similar improvements are observed with ozone, although the rate of ozone decline has slowed in recent years… Since the end of World War II, the Basin has experienced faster population growth than the rest of the nation. The annual average percent growth has slowed but the overall population of the region is expected to continue to increase through 2023 and beyond… Despite this population growth, air quality has improved significantly over the years, primarily due to the impacts of air quality control programs at the local, state and federal levels….PM2.5 levels in the Basin have improved significantly in recent years. By 2013 and again in 2014 and 2015, there were no stations measuring PM2.5 in the Basin violating the former 1997 annual PM2.5 NAAQS (15.0 μg/m3) for the 3-year design value period with the filter-based federal reference method (FRM).5 On July 25, 2016 U.S. EPA finalized a determination that the Basin attained the 1997 annual (15.0 μg/m3) and 24-hour PM2.5 (65 μg/m3) NAAQS, effective August 24, 2016.

The Draft EIR Air Quality analysis considers all of the project’s operational trips. As noted on Draft EIR page 3.1-21 “Project trip generation rates and VMT assumption [for the Air Quality analysis] were obtained from the proposed project’s traffic analysis (Section 3.13, Transportation and Traffic, and Appendix L).” As shown in Draft EIR Table 3.13-7, the project’s operational trips account for all of the land uses. As also explained in Section 3.13.4, the trip generation rates are based upon the Institute for Transportation Engineers (ITE). “These rates are based on
empirical data at survey sites, which includes all trips entering and exiting the site during a specified period of time.” (Emphasis added.) This includes employees, delivery vehicles, shoppers, etc. However, the commenter’s suggestion that the air quality analysis should account for emergency vehicles is considered too speculative to analyze, and would not change the Draft EIR significance conclusions.74 As noted above, the trip generation for the project site is based upon the typical trip generation from similar types of developments. Emergency services occur so infrequently they would not affect the air quality analysis or conclusions. Similar issues arose in Saltonstall v. City of Sacramento (2015) 234 Cal.App.4th 614 [Rejecting argument that traffic analysis needed to assume super-capacity crowds which only occur 0.3 percent of the time]. Furthermore, as noted noted in Draft EIR Appendix L1, page 9, the trip generation assumptions and model methodologies are conservative and overestimate of trips by approximately 4 percent on average compared with empirically collected traffic counts at mixed use sites. Consequently, any infrequent emergency vehicle would be readily covered by this overestimation. The commenter also asserts that “Common sense dictates” there will be significant Air Quality construction impacts. Construction Impacts were addressed under Impact Analyses AIR-1 and AIR-2, which utilized the construction significance thresholds set by the South Coast Air Quality Management District (SCAQMD). The proposed project did not exceed these significance thresholds; therefore, impacts are considered less than significant. While the commenter asserts the analysis is flawed, no evidence is provided to support this assertion.

Comment PC039-15

Question 13: What steps is Forest City prepared to take to create a separate fund to deal specifically with repairs and mitigation resulting from this project construction?

Response to Comment PC039-15

Any mitigation measures that are proposed or adopted by City Council will be made Conditions of Approval, and implemented through a Mitigation Monitoring and Reporting Program (MMRP). Implementation and monitoring will be specific to the nature of each mitigation measure. For example, MM NOI-6, which calls for temporary sound barriers, will be installed as part of the applicant’s construction work, and would not require a specific fund to implement. If the project is approved, a MMRP will be proposed and adopted concurrently with project approval. (CEQA Guidelines Section 15097.)

Comment PC039-16

Redondo Beach City Ordinance states time restrictions on the hours of construction within the city; i.e. 7:00AM-7:00PM. As a resident of Kingsdale Ave, I have repeatedly experienced violations to this Ordinance by the Galleria performing construction during off hours after 7:00 PM and before 7:00AM. There are Police Reports to verify this.

Response to Comment PC039-16

Thank you for your comment. As stated in the Project Description, Section 2, and in Section 3.9, Noise, construction hours would be limited to 7:00 a.m. to 6:00 p.m. Monday to Friday and 9:00

74Furthermore, the extent emergency vehicles trips occurred during ITE trip generation rate studies, such trips would have been included in the ITE trip generation rates utilized in this EIR.
a.m. and 5:00 p.m. on Saturdays. Please see Response to Comment PC039-15 for discussion of the project’s MMRP and Conditions of Approval. Furthermore, the City construction code provides for the posting of contact information pursuant to RBMC §§ 4-22.11 and 9-1.25: Construction information, [E]very holder of a building permit or demolition permit shall post a temporary, weatherproof sign of not less than twelve (12”) by eighteen (18”) inches, readily visible from the street containing the name, street address, telephone number and an emergency telephone number of the individual(s) or firm responsible for the construction or demolition.

Comment PC039-17

Question 14: To insure the quality of life for local residents, will there be an on-site code enforcement officer to enforce these regulations?

Response to Comment PC039-17

Please see Response to Comment PC039-15 and 16.

Comment PC039-18

Thank you for your time and consideration of my questions and concerns.

Please reply to:

Dave Amato (I probably spelled your name wrong!!ZA
(your address)
(your cell#)
(your email address)

Response to Comment PC039-18

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

Comment Letter PC040: Hailey Ogle

Comment PC040-1

Listed below are my comments, questions, and concerns regarding the DEIR for the Galleria’s proposed projects.

Traffic During Construction: How can this document ignore the impact to traffic in the surrounding neighborhood on Kingsdale ave when there will obviously be increased traffic? DEIR states estimated 50 truck loads of building material being removed from the site daily, for over a year, during construction. That is 100 haul trucks added to the existing surrounding traffic during demo period alone. During the excavation trip it bumps up to 160 daily trips taking soil away adding 320 trucks to the existing surrounding traffic for a year period. Additionally, though the DEIR states the route the trucks will take to exit the site, it does not state the route the trucks will take to enter the site. As it states trucks will enter via west 177th I can only assume they are taking west 182nd, and turning right on to North Kingsdale ave. The severe impacts to the road, surrounding nature, wildlife, and quality of life for residents of adding 420 large-haul diesel
Response to Comments

2. Response to Comments

2.1 South Bay Galleria Final EIR 2-270 File No. 2015-09-EIR-001

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2.2 Response to Comments

trucks daily over a more than two year span on small residential streets is notably absent and needs to be taken into consideration. This deteriorating asphalt street would require further traffic analysis due to these absences.

Response to Comment PC040-1

Designated truck routes in the City of Redondo Beach are generally defined in Section 3-7.903 of the Redondo Beach Municipal Code. As stated on page 2-28 in the Draft EIR, Hawthorne Boulevard and Artesia Boulevard will be used for truck travel between regional facilities (e.g., SR 91, I-605) and the project site. Neither 182nd Street nor Kingsdale Avenue are planned for use by project-related construction trucks traveling to or from the project site.

An evaluation of potential construction-related transportation impacts is provided beginning on page 3.13-44 through 45 in the Draft EIR. The evaluation concludes that construction traffic impacts would be less than significant. In addition, the City is proposing a Construction Management Plan (CTMP) as a standard Condition of Approval (consistent with MUTCD regulations), which includes but is not limited to the use of flagman and limits on deliveries and pickups during off-peak hours. Similar construction traffic measures were upheld in Endangered Habitats League, Inc. v. County of Orange (2005) 131 Cal.App.4th 777. Details of the CTMP are provided on p. 3.13-45 of the Draft EIR.

The commenter also implies that the project will result in “deteriorating asphalt street.” The City’s streets that would be utilized by construction traffic handle substantially greater traffic on a daily basis. For example, in 2016, the Average Daily Traffic Volume (ADT) for Hawthorne Boulevard just south of Artesia Blvd. was 70,000 vehicles.75 As shown in Table 3.13-16 on page 3.13-44 of the Draft EIR, the proposed project would generate up to 1,375 daily passenger car equivalents (PCEs) during the peak of construction activities, which would only constitute a small proportion (less than 2 percent) of the total ADT on Hawthorne Boulevard. Furthermore, the City’s roadways are subject to resurfacing and maintenance. The City monitors roadway pavement conditions through its Pavement Management Study, which identifies streets in need of repair to prioritize improvements.76 As discussed in the City’s April 18, 2017 Administrative Report, the City’s policy is to maintain an average citywide street rating of 80 or better. The average rating for the City streets was 83.6 during the last survey. Roadway pavement improvements (also referenced as “resurfacing”) are funded through the City’s Capital Improvements program, which currently includes $860,000 for resurfacing of Kingsdale Ave from 182nd Street to Grant.77

Comment PC040-2

Additionally, with the residential component of the project new sewer lines will need to be placed under Kingsdale ave. and Hawthorne blvd. as stated in the DEIR. This will severely disrupt and exacerbate traffic in the surrounding neighborhoods and on the main intrench and exit routs for

75 http://www.dot.ca.gov/trafficops/census/volumes2016/.
the construction trucks. Again, to say that traffic on Kingsdale will be unaffected is absurd and a new traffic study should be done to include this issue.

**Response to Comment PC040-2**

Infrastructure improvements were analyzed as part of the proposed project in each individual resource section of the Draft EIR. As described on Draft EIR, Chapter 2.0, *Project Description*, page 2-23:

Implementation of the proposed project would relocate several of the existing main pipelines to accommodate the proposed design. The storm drain pipeline on the west would have portions relocated to the 177th Street drive and Kingsdale Avenue heading north. The pipeline along the northerly edge will need to be relocated into Artesia Boulevard or be designed to remain under the building expansion at the north. The storm drain main pipeline on the west side would require portions to be relocated and an extension constructed in Hawthorne Boulevard to accommodate the proposed buildings along the frontage.

The project would develop additional on-site sewer pipelines and laterals for the proposed new buildings and land uses. The on-site sewers would connect to off-site sewers in Hawthorne and Kingsdale. The project would increase the existing sewer load and, therefore, upsizing of off-site sewers would be required. The off-site sewers in Kingsdale Avenue and Hawthorne Boulevard would be upsized from the existing sizes.

As discussed in Response to Comment PC040-1, the project would be subject to the City’s standard construction traffic Condition of Approval (and MUTCD provisions), which includes minimizing lane closures, providing detours, and maintaining unobstructed access to land uses in proximity to the project site. While some trenching in the right of way may be required to implement these infrastructure improvements, such construction work would be performed in phases to maintain access, consistent with the Conditions of Approval. Furthermore, such infrastructure work is anticipated to only take 3 to 5 days, based upon similar infrastructure improvements in the City of Redondo Beach. Please also see Response to Comment PC040-1 for discussion of haul routes.

**Comment PC040-3**

Air Quality: How can the DEIR state the project will not contribute substantially to air quality violations? Table ES2 states the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation, however I do not see how that can be the case when the project has not studied how many diesel vehicles will be on site daily beyond the 320 listed above for the 3 years it will take to complete the project nor how much pollutants they will be expelling into the surrounding neighborhood and near by schools and how that in addition to the dust, dirt, building particles, and pollution kicked up during demolition and construction will impact both residents and elementary and middle school children at play and PE.
Response to Comment PC040-3

The Commenter is referred to Section 3.1, *Air Quality*, for a discussion and analysis on Air Quality impacts from the proposed project. As shown in Section 3.1, regional and localized air quality impacts are less than significant for construction and operation. The project would not result in significant impacts from CO hotspots or odors. As shown by the construction screening health risk assessment, the project would not result in significant TAC impacts for construction. Additionally, the project operations are not associated with TAC emissions and the project would not result in significant operational TAC impacts. As analyzed in Section 3.1, air quality impacts from the project would be less than significant.

While the commenter implies that the EIR’s Air Quality analysis did not disclose the amount of “pollutants [construction vehicles] will be expelling,” this is incorrect. Draft EIR Section 3.1 modeled construction emissions, as outlined in Section 3.1.4, and applied the South Coast Air Quality Management District’s Construction significance thresholds, including Localized Significance Thresholds (LSTs). Construction Air Quality Impacts were addressed under Impact Analyses AIR-1 and AIR-2, and were determined to be less than significant. The commenter implies that there will be more than 320 diesel vehicles on-site daily. The Draft EIR made reasonable assumptions regarding construction trips, as outlined in Draft EIR Section 2.6. The commenter does not explain why they believe these assumptions are in error; therefore, no additional response on this issue is feasible.

Impacts associated with dust (i.e. particulate matter) were determined to be less than significant as discussed in Draft EIR Section 3.1. As explained therein, the project is required to comply with the South Coast Air Quality Management District Rule 403, which includes, but it not limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction. (Draft EIR page 3.1-18.)

Comment PC040-4

Population and Housing: How can this DEIR ignore the impact of population growth from the proposed projects? Table ES2 states the proposed project would not induce substantial unanticipated population growth in an area directly or indirectly. This is false as minimum of 465 new residents and maximum of 1,008 residents are stated earlier in the DEIR. 465 new residents to an area currently housing less residents than this in the wider surrounding neighborhood is a massive influx of population in the immediate area. This population growth needs to be taken into account, addressed, and considered for the school and local area, not simply written off as it is in Table ES2. According to redondo beach unified school district's school annual report cards every school in redondo district is currently over the maximum allotted student to teacher ratio of 29: 1. Legally, for every student over the maximum 29, schools are required to be penalized via a reduction in per-student revenue meaning the school is losing money it should be receiving. Most notable are the two affected schools, Washington elementary and Adams middle school. Forrest Cities representative Jeff Mailman stated that with the smallest amount of residents (465) redondo (Washington elementary due to school zoning) would gain an additional 39 elementary students and Adams (due to school zoning) would gain an additional 15 students (he also mentioned that the high school would gain 15 students for a total of roughly 70 students). At the elementary alone that is more than the allotted 29 students meaning Redondo would need to add another
classroom and teacher to Washington elementary or risk further over crowding classrooms, further exhausting teachers, harming students safety, and continuing cutting supplies in addition to losing money they would so desperately need for the increase in students. Currently Adams middle school is in excess of 33 students in every single core class for a minimum of 5 periods per subject. Redondo Beach Unified School District is already fully impacted with students, to add even 15 more is unacceptable and results in severe impacts of population growth directly caused by this project. because of this population growth and it's effects on the surrounding community need to be considered, taken into account and not dismissed as has been done according to Table ES2.

Response to Comment PC040-4

The commenter states that the Draft EIR ignores the impact of population growth and implies that Impact POP-1 should be considered significant because there will allegedly be 465 new residents. As an initial matter the commenter did not apply the actual significant thresholds utilized in Draft EIR Section 3.10, which asks whether the project would “Induce a substantial unanticipated population growth in an area, either directly or indirectly.” As also explained in Section 3.10.4, under this threshold “the project would have to result in physical environmental impacts that have not already been addressed in the other resource sections of this EIR.”

The CEQA Guidelines explain that population growth, in and of itself, is not necessarily indicative of a significant adverse physical impact (i.e. an impact under CEQA). As noted under CEQA Guidelines Section 15126.2(d) “It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.” As further explained in that subsection, the purpose behind looking at growth inducement is to determine whether “Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.” Such potential effects were addressed in detail in Draft EIR Sections 3.11, 3.12, and 3.14.

As shown in Table 3.10-7, by 2040, the City is expected to grow to 74,400 persons from the existing population of 68,095 in 2015 shown in Table 3.10-1. This is an increase of approximately 6,305 persons. Based on the City’s population growth anticipated for 2040, the development of the proposed residential uses would constitute approximately 16 percent of the population growth expected in the City between 2015 and 2040. Further, the 2013–2021 Housing Element of the General Plan projected approximately 812 residential units could be built on the project site (City of Redondo Beach 2014). The proposed project would develop approximately 650 residential units, which is well within the maximum allowable residential buildout of the project site. Therefore, the project would not result in unanticipated growth.

Further, the City’s RHNA goal for the 2013–2021 planning period is 1,387 housing units. The Housing Element has identified the project site as one of the key housing sites in the City for future housing development. The proposed project would include 650 residential units, which would contribute to the City’s housing inventory and help the City meet its goals as established by the RHNA.
The commenter also implies that there would be a significant impact associated with School Facilities. The Draft EIR expressly acknowledged that Washington Elementary School is over capacity. More specifically Draft EIR page 3.11-12 states “Based on their existing capacity (see Table 3.11-3), RBUSD is experiencing a shortage of capacity at the elementary school level by approximately 97 seats (RBUSD 2016).” (See also Draft EIR Table 3.11-3.) Furthermore, Draft EIR page 3.11-16 acknowledges that “While Adams Middle School and Redondo Beach Union High School are not currently at capacity, they would be over capacity under future cumulative conditions.”

As discussed in Section 3.11.4, Impact PUB-3, pursuant to state law “the project would pay statutory fees which are ‘...deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.” (Gov. Code Section 65995(h) and 65996.) With regards to the shortfall in capacity at Washington Elementary School, the RBUSD school district would likely install portable classrooms in the short term, which are anticipated to not result in significant adverse physical environmental effects. Therefore, impacts are considered less than significant. Similar school fee issues arose in a recent Mixed Use Residential project case in the City of Fremont. (See Stand Up for Fremont v. City of Fremont (2017 Alameda County Superior Court Case No RG17844308) [“Finally, we respect to Petitioner’s claim that the project may risk overcrowding the schools, the Court finds that by law this cannot be asserted as a substantial impact on the environment under CEQA because that claim is barred by Government Code section 65996.”]

Comment PC040-5

Noted Absences from the DEIR: How can this document pretend to be honest and truthful in fulfilling it's duty to predict impacts when it has not taken the data necessary to predict future impacts to the community? Currently missing from the DEIR are data on daily trips for the local emergency response vehicles (McCormick Ambulance Station 13 on 182nd and Kingsdale), current number of workers in the mall and surrounding area and their daily number of car trips to predict the future number of workers and daily car trips, current number of daily delivery trucks to and from the mall and surrounding area and restaurants to predict future number of delivery trucks to and from the mall and surrounding area and restaurants, current daily resident visitor trips to predict future increased mall resident visitor trips, current daily mall shopper trips to predict future mall shopper trips, exact holiday dates studied in the DEIR for holiday traffic, current daily diner trips to predict future daily diner trips to additional new restaurants, daily patient visitors to local medical complex to predict future impacts and influx of medical complex visitors and there for increased staff, current number of bus trips per day to Kingsdale ave and future plans of metro for the new station re-location if increased bus trips are likely and the impact that will have on traffic, neighbors, public safety and the road, current annual number of accidents at noted intersections such as Grant ave and Kingsdale blvd, 182nd and Kingsdale blvd, 177th and Kingdale blvd, and Artesia and Kingsdale blvd to anticipate future accidents with increased traffic flow, population, large-haul trucks, and buses, and current annual number of bus breakdowns along 182nd and Kingsdale where buses obstruct the current one lane west on 182nd and one lane north on Kingsdale. Without this information the studies on traffic, air quality,
quality of life, sound, and nature and resources impacts are inadequate, useless, and unpredictable.

**Response to Comment PC040-5**

The commenter alleges that the Draft EIR does not provide information on existing and proposed trip generation.

As stated on page 3.13-6 of the Draft EIR, the Existing Conditions analysis was based on traffic counts collected in November 2014 at 32 study intersections and five mainline freeway segments. Traffic counts record all vehicles moving through an intersection or across freeway lanes, and do not discriminate by trip origin or destination, or whether a vehicle trip is made by an employee, resident, or visitor. Further, the traffic counts include all vehicle types, which include automobiles, delivery trucks, buses and emergency response vehicles. The other traffic analysis scenarios presented in the Draft EIR build upon the Existing Conditions scenario and include all planned and/or programmed changes to transportation facilities under cumulative conditions, including changes to the roadway network; and transit services and facilities. Therefore, the Draft EIR properly accounts for the full vehicle trip generation potential of the proposed project and its potential impact on traffic conditions.

As shown in Draft EIR Table 3.13-7, the project’s operational trips account for all of the land uses under existing conditions. As also explained in Section 3.13.4, the trip generation rates for existing uses are based upon guidance provided by the Institute for Transportation Engineers (ITE) in the 9th Edition of the *Trip Generation Manual.* These rates for the existing uses are based on the categories of “820-Shopping Center”, “932-High-Turnover (Sit-Down) Restaurant”, and “445-Multiplex Movie Theater” in the *Trip Generation Manual.* As stated in the *Trip Generation Manual,* “These rates are based on empirical data at survey sites, which includes all trips entering and exiting the site during a specified period of time.” This includes employees, delivery vehicles, shoppers, etc. To the extent that emergency vehicles were present at the time the traffic volumes were collected as part of the *Trip Generation Manual’s* rate calculations, such trips would have been accounted for, and therefore would be reflected in the rates utilized in the Draft EIR. Any further analysis of emergency vehicles that may or may not travel in the vicinity of the project site at any given time is considered too speculative to analyze, and would not change the Draft EIR significance conclusions.

As noted above, the trip generation for the project site is based upon the typical trip generation from similar types of developments. Emergency response vehicles are not present on a regular basis, and would therefore not affect the traffic analysis or conclusions. Similar issues arose in *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 614 [Rejecting argument that traffic analysis needed to assume super-capacity crowds which only occur 0.3 percent of the time]. Furthermore, as noted further noted in Draft EIR Appendix L1, page 9, the trip generation assumptions and model methodologies are conservative and overestimate of trips by approximately 4 percent on average compared with empirically collected traffic counts at mixed use sites. Consequently, the presence of any infrequent emergency vehicle would be readily covered by this overestimation.
2. Response to Comments

Please see Response to Comment PC039-10 for discussion of bus trips and the transit center relocation. The commenter also faults the EIR for not providing the “exact holiday dates” associated with the traffic analysis. As discussed on Draft EIR pages 3.13-6 and 28, the CEQA traffic analyses follows the guidance of the Congestion Management Program (CMP) and the City’s guidance, which analyze impacts during non-holiday periods. Similar issues arose in Saltonstall v. City of Sacramento (2015) 234 Cal.App.4th 614 [Rejecting argument that traffic analysis needed to assume super-capacity crowds which only occur 0.3 percent of the time]; see also Huntington Beach Neighbors v. City of Huntington Beach (2012 4th Dist. Case No. G045732) 2012 WL 5330887 [rejecting argument that Huntington Beach needed to base its traffic analysis upon “weekend traffic, particularly summer weekends, and special events.”]. Nevertheless, given the public’s interest, Draft EIR page 3.13-6 noted that additional information on holiday traffic was included in Draft EIR Appendix L for informational purposes.

As stated in the Transportation Impact Study (TIS), Appendix L of the Draft EIR, weekday holiday PM peak hour turning movement counts were conducted at eight study intersections around the project site on December 17, 2015.

The commenter states that data regarding the number of patient visitors to local medical complexes is not included in the Draft EIR to determine future impacts and influx of the medical complex visitors. The commenters comment is unclear. The proposed project is not associated with medical complex visitors. The proposed project is a mixed-use project that will generate new employment opportunities and residential living opportunities. As stated above, the traffic counts collected for the project traffic analysis record all vehicles moving through an intersection or across freeway lanes, and do not discriminate by trip origin or destination, or whether a vehicle trip is made by an employee, resident, or visitor. The other traffic analysis scenarios presented in the Draft EIR build upon the Existing Conditions scenario and include all planned and/or programmed changes to transportation facilities, including changes to the roadway network; and

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

The commenter alleges that data regarding the current annual number of accidents, the current number of bus breakdowns along 182nd Street and Kingsdale Avenue was not provided in the Draft EIR. A collision history analysis identifying citywide collisions from 2008 to 2012 is provided on pages 3.13-10 through 3.13-13 and in Figure 3.13-3 of the Draft EIR. As discussed therein, the latest records available from the California Highway Patrol Statewide Integrated Traffic Records System were reviewed to identify collisions in which a vehicle struck a bicyclist or a pedestrian in the study area over a 5-year period from 2008 to 2012. These data were used as a screening process to determine if there are any locations adjacent to the project site that have a greater frequency of multi-modal conflicts compared with other areas in Redondo Beach. Collisions in the study area were found to follow a similar frequency distribution compared to the City as a whole. Furthermore, as discussed under Impact TRA-3, the project would not have significant traffic safety impacts; please see Draft EIR Section 3.13 for additional details.

As also discussed, the roadway along Kingsdale Avenue has adequate sight lines to ensure drivers existing the driveways have adequate views of oncoming vehicles, bicycles, and pedestrians. A supplemental evaluation of line-of-sight at the two major project site access points along Kingsdale Avenue (Grant Avenue and 177th Street) was conducted. Following guidance provided in *A policy on Geometric Designs of Highways and Streets, 6th Edition* (American Association of State Highway and Transportation Officials [AASHTO]), at signalized intersections the first vehicle stopped on an approach should be visible to first vehicle stopped on the other approaches and left-turning vehicles should have sufficient distance to select gaps in traffic to complete turns. Otherwise, generally no other approach or departure sight triangles are needed for signalized intersections. A right-turn sight triangle was prepared per AASHTO standards for westbound vehicles exiting the project driveways as right-turns on red are permitted. The diagrams provided below indicate that the sight distance meets the safety standards for right-turning vehicles.
The selection of the study intersections and scope of the Transportation Impact Study was done in coordination with the City of Redondo Beach, which was the lead agency for the Draft EIR. The lead agency did not request information regarding the number of bus breakdowns along 182nd Street and Kingsdale Avenue, as that is a not a CEQA related issue, nor would the project affect the likelihood of bus breakdowns.

**Comment Letter PC041: Bruce Szeles**

**Comment PC041-1 to PC041-2**

I filled out a card but that has not been documented as well. Where is that documentation?

The verbal comments that were given October 2015 at the Galleria scoping meeting are missing from your EIR document. Only the written are part of your document.

**Response to Comment PC041-1 to PC041-2**

On November 7, 2017 the City of Redondo Beach sent the following email to Mr. Szeles in response to this comment:

Good afternoon, Mr. Szeles.

On September 11, 2017, you sent an email to the City of Redondo Beach regarding the Galleria Project. More specifically, this correspondence stated:

“The verbal comments that were given in October 2015 at the Galleria scoping meeting are missing from your EIR document. Only the written are part of your document.”

“I filled out a card but that has not been documented as well. Where is that documentation?”

As the City discussed in the Notice of Preparation/Initial Study (NOP/IS), the City was “solicit[ing] written comments…” (Draft EIR, Appendix A1, p. 6.) Consequently, there would be no oral comments from the NOP/IS process. At that meeting the City did solicit written comments, which were included in Draft EIR Appendix A2. Unfortunately, the City does not have a record of you submitting written comments during the 2015 NOP/IS comment period. However, if you have a copy of these materials or can summarize your concerns, the City would be happy to add those comments to the Galleria Final Environmental Impact Report.

I note that the City does have the written comments you submitted on July 31, 2017 [Comment PC001] on the Galleria Draft Environmental Impact Report (Draft EIR) and a transcript of your oral comments from the August 26, 2017 Public Workshop on the Galleria Draft EIR [Comment PT001-1], which will be responded to as part of the Galleria Final EIR process. Consequently, if your Galleria NOP/IS comments overlapped with your Galleria Draft EIR oral and written comments, such comments are already slated for a response.
In Response, Mr. Szeles stated in an email from November 10, 2017:
I’ll go with whatever statements you have from the second round. Thank you!

The commenter is directed to Response to Comments PC001, PC025, PT001-1, and PT002-9.

**Comment Letter PC042:** Mallory Sheldon

**Comment PC042-1**

My name is Mallory Sheldon, I currently live near El Camino College. I grew up on the 1900 block of Condon Ave less than 100 yards from the mall property. My parents and sister still live there and I am there multiple times a week. My grandmother bought the house in the mid-sixties before there was a mall. My family has seen the changes from individual stores to strip mall to enclosed mall with various additions and changes to the local commercial properties over the years. I do not believe the EIR accurately represents what will happen to our neighborhood if the planned Galleria mall projects are green-lit.

**Response to Comment PC042-1**

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

**Comment PC042-2**

Every time retail square footage has increased, there has been an increase in traffic. After the enclosed mall was built there was a huge increase in traffic especially around the Christmas shopping season; mall employees and shoppers were parking in the neighborhood and residents weren't able to find parking. This led to the residents asking the city do something; the city instituted permitted parking. Permitted parking alleviated some of the problem, but some shoppers don't care about a ticket. It is also an inconvenience for the residents. It is laughable for the EIR to assert that there will be a negligible increase in traffic. Especially when putting in hundreds of new apartments and a million more square feet of retail space.

**Response to Comment PC042-2**

The commenter asserts that “It is laughable for the EIR to assert that there will be a negligible increase in traffic.” The Draft EIR did not conclude that traffic impacts would be “negligible” as asserted in the comment. As discussed in Draft EIR Section 3.13, the project would increase localized traffic by 8,020 trips daily, and that this increase in trips would result in six significant intersection impacts before implementation of mitigation, and three significant and unavoidable impacts after implementation of mitigation. Draft EIR Section 3.13 and the Transportation Impact Study (TIS), Appendix L of the Draft EIR, were prepared in accordance with the requirements of CEQA and the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. While the project would result in localized intersection impacts, as discussed on Draft EIR page 3.13-45, the proposed project would have reduced per capita Vehicle Miles Traveled in comparison to the SCAG region, and would therefore have a regional traffic benefit by reducing the number and
length of regional vehicle trips. (See also Draft EIR page 4-46.) Please see Response to Comment PC027-2 for additional discussion of parking.

**Comment PC042-3**

The neighborhood is small because there isn't much space down here and the streets are correspondingly small. The galleria owners propose pouring in hundreds of new apartments and a hotel with at least one hundred beds. We live in Los Angeles where people get around by cars. It's fine for the galleria owners to say that they hope new residents will use the Green Line extension, but it doesn't currently exist. Hundreds of new residents means hundreds of new cars on a street that was never designed to handle that much traffic. The streets are already being regularly destroyed under the weight of all the buses and increased traffic due to Target and the strip mall.

**Response to Comment PC042-3**

As discussed in greater detail in Response to Comment PC042-2, the Draft EIR determined there would be an increase in 8,020 daily trips. Furthermore, the trip generation assumptions in the Draft EIR did not assume the benefits of the Green Line extension. While the Green line extension has not been approved, the project site is considered a Transit Priority Area given the amount of access to transit service, as described in greater detail in Draft EIR pages 3-6 and 3-7. While the comment asserts that “Streets are already being regularly destroyed” the intended meaning of the comment is not clear. To the extent the commenter is asserting degradation in pavement, please see Response to Comment PC040-1, to the extent the commenter is referring to traffic in general please see Response to Comment PC042-2. The comment also asserts that “streets are correspondingly small.” The Draft EIR considered the size of the streets when calculating the “Capacity” in the Volume to Capacity (V/C) calculations in Draft EIR Section 3.13.

**Comment PC042-4**

The EIR did not count the current daily trips of residents, the daily trips of mall employees, the daily trips of other retail employees, the daily trips of mall and retail consumers, the daily trips of all the buses, the daily trips of all the people who use the medical buildings on Kingsdale. It did not count the daily trips of emergency service personnel and how an increase in traffic would affect first response time. Without all of the current and historical data, it is impossible to make a prediction with anything close to accuracy on how traffic will be impacted.

**Response to Comment PC042-4**

Please see Response to Comment PC040-5, which discusses the existing intersection trips counts and trip generation for the existing project site and the proposed project. Please also see Response to Comment PC039-3 for discussion of emergency vehicles.

**Comment PC042-5**

The EIR team did not request data on the Greenline and it is therefore impossible to predict what sort of traffic will come with that extension.
Response to Comment PC042-5
The Draft EIR evaluated transportation conditions for Year 2023, which is the year the proposed project is expected to be operational. As stated on page 38 of the TIS (see Appendix L), no substantial physical changes to the transit system are expected by 2023, apart from the transit center relocation. The South Bay Metro Light Rail Extension is a potential regional project on the east side of the City of Redondo Beach, but is not expected to be operational by 2023. Metro has not finished studying the Extension, nor has it determined when the Extension will be constructed. Please also see Response to Comment AL003-1 for additional discussion regarding Metro’s long-term planning associated with a potential green-line extension.

Comment PC042-6
Kingsdale is a three (3) lane street. Not 4 as in the EIR. There is one lane south and two north.

Response to Comment PC042-6
Please see Response to Comment PC047-1.

Comment PC042-7
The EIR states that larger sewer pipes will need to be put in on Artesia and Hawthorne. The construction will severely negatively impact traffic.

Response to Comment PC042-7
Please see Response to Comment PC040-1 and PC040-2 for discussion of infrastructure improvements and construction traffic.

Comment PC042-8
The EIR says that 39 elementary children will be added to RBUSD. This is unacceptable. For over twenty years now, since the early 1990s, Washington Elementary School has had mobile "temporary" classrooms. Washington is the school that this neighborhood is assigned to and it cannot handle two more full classrooms of students. The EIR also calls for 15 more middle schoolers and 15 more high schoolers. The district doesn't have the money to put in two more "temporary" classrooms nor to hire at least four more full time teachers in an already over crowded district.

Response to Comment PC042-8
Please see Response to Comment PC038-5 for discussion of school capacity and payment of statutory school fees.

Comment PC042-9
The EIR was not conducted appropriately and does not accurately reflect the impact that hundreds of new residents, a hotel, and a million more square feet of retail space will have on our neighborhood, city, infrastructure, and quality of life.
Response to Comment PC042-9
Please see Response to Comments PC042-1 through 8.

Comment Letter PC043: Ray Gedert

Comment PC043-1
After careful review of the South Bay Galleria Draft EIR document and attending several MS PowerPoint presentations by Geoff Maleman, representative for Forest City it was important to me, as a longtime resident of North Redondo Beach, who will be directly impacted by any redevelopment, to comment on this project before any final approval by either the Redondo Beach Building Department, Redondo Beach Planning Commission and or the Redondo Beach City Council.

Response to Comment PC043-1
Thank you for your comment. While the comment does not directly address an environmental issue, 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 PC043-2
It is undeniable that both the South Bay Galleria and City of Redondo Beach need our mall to be updated to provide a better shopping experience for visitors, revenue for the tenants and Forest City, and revenue for the City. This being said I see several issues with the re-development plans. Per Geoff Maleman, representative for Forest City, it appears Forest City is only pushing to build the final Alternative 4, the Reduced Density, Alternative Residential Location and not any of the other three options described in draft EIR.

Response to Comment PC043-2
Thank you for your comment. Based on the analysis found in the Draft EIR Section 4.5, Alternatives Considered and Further Evaluated, Alternatives 1, 2, 3, 4 and 4-1 have been evaluated as part of the Draft EIR analysis. Forest City has submitted applications to construct Alternative 4/4-1, however the City has not made a decision to approve or deny the proposed project, an alternative, or a variation thereof. Such decisions will be made at a subsequent date, subject to a public hearing.

Comment PC043-3
I take exception to several of the re-development design plans and findings of the Draft EIR.

2. Traffic: It is unimaginable that the current fully built out plans for Alternative 4 or any of the plans will not have a dramatic impact on the traffic on our local roads for Hawthorne Blvd, Artesia Blvd and Inglewood Blvd. Currently traffic on Artesia Blvd and Inglewood Blvd are impassable during rush hour traffic. It is normal for traffic to be backed up from Marine to the 405 Freeway, all the way to Artesia Blvd and the reverse is true in the morning traffic.
Response to Comment PC043-3

The commenter asserts that “I take exception to…findings of the Draft EIR…[that] built out plans for Alternative 4 or any of the plans will not have a dramatic impact on traffic for Hawthorne Blvd, Artesia Blvd and Inglewood Blvd.” Contrary to the assertions in the comment, Draft EIR Section 3 disclosed that the proposed project would result in six significant intersection impacts before implementation of mitigation which included significant impacts at Intersection 13 (Inglewood Ave/Artesia), Intersection 15 (Redondo Beach Blvd/Artesia), Intersection 16 (Hawthorne Blvd/Artesia), Intersection 17 (Prairie Ave/Artesia Blvd), Intersection 18 (I-405 Southbound Ramps/Artesia Blvd), Intersection 19 (I-405 Northbound Ramps/Artesia Blvd). Three of these impacts would be reduced to less than significant, and three intersections would remain significant and unavoidable after implementation of mitigation. Please see Draft EIR Section 3.13 for additional details. For discussion of traffic impacts for the alternatives, please see Draft EIR Section 4.0, which includes traffic for Alternative 4 on page 4-176.

The commenter also asserts that “currently traffic on Artesia Blvd and Inglewood Blvd are impassable during rush hour traffic.” It is not the purpose of CEQA to fix or mitigate existing environmental problems. The purpose of CEQA is to analyze changes in comparison to existing conditions resulting from implementation of the proposed project. Consequently, the project’s significance conclusions are based upon increases in traffic caused by the project. As also noted in the previous paragraph, the Draft EIR did disclose a significant impact at Intersection 13 (Inglewood Ave/Artesia). However, impacts at this intersection would be mitigated to less than significant with implementation of Mitigation Measure MM TRA-1.

Comment PC043-4

Also, now that the Del Amo Fashion Center Mall has been re-developed Hawthorne Blvd is impassable as traffic is back up in both directs with mall visitors coming and going. This is what we should all expect when the South Bay Galleria re-development is completed for our major arteries.

Response to Comment PC043-4

The Draft EIR made reasonable assumptions about the project’s trip generation in Section 3.13. As discussed in Draft EIR Section PC043-3, significant impacts were identified, and mitigation measures were proposed were feasible. However, as discussed on Draft EIR page 3.13-45, the proposed project would have reduced per capita Vehicle Miles Traveled in comparison to the SCAG region, and would therefore have a regional traffic benefit by reducing the number and length of regional vehicle trips. (See also Draft EIR page 4-46.)

Comment PC043-5

Furthermore, it should be noted that the South Bay Galleria is operating at a fraction of its normal mall visitors per day with the loss of its major anchor store Nordstroms. Both trips and revenue are down. The city currently has a loss of almost a $1,000,000. in tax revue which translates into over $10,000,000. in taxable sales.
Response to Comment PC043-5

The City acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment states that the South Bay Galleria is operating at a fraction of its normal mall visitors per day. The transportation analysis of the Draft EIR utilized weekday AM and PM peak hour turning movement counts collected in November 2014. This collection date was prior to the closure of the Nordstrom’s store at the South Bay Galleria. As discussed on Draft EIR page 3.13-24 “While the prior Nordstrom building was vacated after the Notice of Preparation was published, the City has found that this constitutes a temporary lull in operations, and that the existing baseline conditions contained in this scenario [Existing Conditions] appropriately include operation of the square footage previously associated with Nordstrom.” Similar discussion was also provided in Draft EIR Section 3.0. The Nordstrom tenant space did not cease operations until October 6, 2015 at 6 p.m. The project’s traffic counts were conducted in November 2014 when Nordstrom was still operational, as discussed in Draft EIR Section 3.13.4.

The City’s traffic guidance for the South Bay Galleria Improvement Project define significant traffic impacts based on changes in weekday AM and PM peak hour conditions caused by a project, as weekday conditions, which are typically worse than the weekend peak hour conditions due to the effects of weekday work commute and school related activity. This is also consistent with the LA County Congestion Management Program (CMP) which notes that “Both ‘peak hour’ and ‘daily’ refer to average weekdays, unless special seasonal variations are expected” and states that “traffic counts must exclude holidays…[and are] taken on days when local schools or colleges are in session.” (2010, LA County Congestion Management Program.) Therefore, the transportation analysis accounts for Nordstrom’s being in operation at the South Bay Galleria and no further response is required. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

To the extent the commenter is raising an economic issue, this is beyond the scope of the environmental impact analysis.

Comment PC043-6

The traffic models presented were built with current crippled car visits at South Bay Galleria operating at a fraction of the normal capacity of its current footprint. We should expect the new fully re-developed South Bay Galleria to regain all its lost daily visitor trips plus additional trips based in the new additional footage for a total build out of 1,593,144 square feet as noted on Page 432 of the Draft EIR.

Response to Comment PC043-6

As stated on page 3.13-6 of the Draft EIR, the Existing Conditions analysis was based on traffic counts collected in November 2014 when Nordstrom was still operational. While the Nordstrom building was vacated after the Notice of Preparation was published, the City has found that this constitutes a temporary lull in operations, and that the existing baseline conditions contained in this scenario appropriately include operation of the square footage previously associated with Nordstrom. The other traffic analysis scenarios presented in the Draft EIR build upon the Existing
Conditions scenario; therefore, the Draft EIR properly accounts for the full vehicle trip generation potential of the proposed project. Please also see Response to Comment PC043-5.

**Comment PC043-7**

I highly recommend that Forest City make their space a tiny bit smaller and add two lanes of traffic {one in each direction) on Hawthorne Blvd, Artesia Blvd and Kingsdale Ave to mitigate some of the additional traffic coming into and out of their mall.

**Response to Comment PC043-7**

The Draft EIR identifies all traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible. These include improvements to several intersections along Artesia Boulevard. Please see page 3.13-46 of the Draft EIR for further detail on these mitigation measures.

Please refer to Draft EIR Chapter 4.0, Alternatives Analysis, for a discussion of alternatives to the proposed project that would reduce the amount of development at the project site.

The commenter also suggests “add two lanes of traffic (one in each direction) on Hawthorne Blvd, Artesia Blvd and Kingsdale Ave to mitigate some of the additional traffic coming into and out of their mall.” No impacts were identified at the four study intersections located on Kingsdale Avenue; therefore, no mitigation measures were required. (CEQA Guidelines Section 15126.4(a)(3).) While the Galleria project’s intersection impacts along Kingsdale are less than significant, the Transit Center Relocation Project, included the following Conditions of Approval related to Kingsdale roadway improvements:

- **TR1.** The applicant shall be required to restripe and re-establish a second west bound travel lane, on 182nd Street between Hawthorne Boulevard and Kingsdale Avenue after the bus layover zones on 182nd Street are abandoned. The plans and construction specifications for these changes shall be included in the construction document bid set.

- **TR2.** In conjunction with the land exchange with Forest City for the South Bay Galleria Transit Terminal parcel, twenty (20) feet of land to the east of the existing westerly edge of the Transit Terminal parcel adjacent to Kingsdale Avenue shall be dedicated for street widening purposes. The street widening will allow the construction of an additional northbound, 250-feet Tong right turn only lane, curb and gutter, parkway, and sidewalk. The street widening will also require the demolition of the existing Transit Terminal bus bays and reconstruction of the east side of Kingsdale Avenue for the length of the Transit Terminal parcel. The improvement of the street shall occur as part of the demolition of the existing transit terminal once the new Transit Center is operational. The plans and construction specifications for these changes shall be included in the construction document bid set.

Please see Responses to Comments AS001-8, AS003-7, and AL002-21 which explain that no additional feasible traffic mitigation measures have been identified for the significant and
unavoidable traffic impacts at Intersection 16 (Hawthorne/Artesia), Intersection 17 (Prairie/Artesia), or Intersection 19 (I-405 Northbound Ramp/Artesia).

**Comment PC043-8**

Apartments: Apartments are a net revenue loss for the City as they do not provide any sales or TOT Tax and drag additional and ongoing City services including a direct impact on our schools and more police and fire / ambulance services etc. Adding between 298 and 650 apartments unfortunately will not solve the housing shortage in the South Bay.

**Response to Comment PC043-8**

Thank you for your comment. Please see Draft EIR Section 3.11, Public Services, 3.12, Recreation, and 3.14, Utilities. The commenter asserts that the project “will not solve the housing shortage in the South Bay.” As discussed on Draft EIR page 3.8-16:

As noted under Government Code 65589.5(a), the legislature has concluded that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California.” The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City “facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community” (Gov. Code Section 65580(d)). More specifically, the Legislature’s stated intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal” (Gov. Code Section 65581). Also under the Redondo Beach Housing Element, the project site represents the greatest potential for future residential development in the City, to meet the City’s Regional Housing Needs Assessment (RHNA), as well as the high regional demand for housing in the County (see also Circulation Element, Goal 8). Furthermore, as discussion in Section 3.0.3 of the Draft EIR, the proposed project provides mixed use development in a transit priority area, and is consistent with the regional RTP goals as well as the City’s goals of encouraging mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance and supporting transit-oriented development (Redondo Beach Circulation Element, G6, G7, and G8).

As further discussed in Draft EIR Section 3.10.3:

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. In cooperation with HCD, local governments and councils of government are charged with determining the cities or regions existing and projected housing needs as their share of the statewide housing need. The current Regional Housing Needs Allocation (RHNA) identifies housing needs in each SCAG jurisdiction and allocates a fair share of that need to every community. Redondo Beach’s RHNA for the 2013–2021 planning period has been determined by SCAG at 1,397 housing units, including 186 units for extremely low-income households, 186 units for
very-low-income households, 223 units for low-income households, 238 units for moderate-income households, and 564 units for above-moderate-income households.

The commenter’s opinions on alleged revenue loss do not pertain to an environmental issue, therefore no further response is required.

**Comment PC043-9**

These additional apartments will be open market price rents and anyone in California will compete for them, not just teachers, millennials, or engineers. As our Redondo Beach Schools are the best in the South Bay I would expect parents living outside Redondo would compete for these apartments adding additional students to our already impacted schools.

**Response to Comment PC043-9**

The commenter expresses general concern regarding impacts to schools. The Draft EIR acknowledged that Washington Elementary School is over capacity. More specifically Draft EIR page 3.11-12 states “Based on their existing capacity (see Table 3.11-3), RBUSD is experiencing a shortage of capacity at the elementary school level by approximately 97 seats (RBUSD 2016).” (See also Draft EIR Table 3.11-3.) Furthermore, Draft EIR page 3.11-16 acknowledges that “While Adams Middle School and Redondo Beach Union High School are not currently at capacity, they would be over capacity under future cumulative conditions.”

As further discussed in Section 3.11.4, Impact PUB-3, pursuant to state law “the project would pay statutory fees which are ‘…deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.” (Gov. Code Section 65995(h) and 65996.) With regards to the shortfall in capacity at Washington Elementary School, the RBUSD school district would likely install portable classrooms in the short term, which are anticipated to not result in significant adverse physical environmental effects. Therefore, impacts are considered less than significant. Similar school fee issues arose in a recent Mixed Use Residential project case in the City of Fremont. (See Stand Up for Fremont v. City of Fremont (2017 Alameda County Superior Court Case No RG17844308) “[Finally, we respect to Petitioner’s claim that the project may risk overcrowding the schools, the Court finds that by law this cannot be asserted as a substantial impact on the environment under CEQA because that claim is barred by Government Code section 65996.”]

**Comment PC043-10**

Redondo Beach is in the top 3% highest density per capital in the entire state of California. Conversely 97% of other cities in California have a lower density per capital then Redondo Beach. Additionally, Redondo Beach will be facing a Public Employee Pension Tsunami in the near term. Now is the time to look for additional revenues and reduce expenses for the City and not add to them.
Response to Comment PC043-10

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

Comment PC043-11

Finally, I know Forest City is insistent that any and all of their redevelopment MUST include apartments for two reasons: A) Folks onsite around the clock and all year provide additional security. B) Folks onsite around the clock and all year provide built in restaurant and shopping guests. Unfortunately, these two arguments defy basic logic or credulity. They already have guest onsite around the clock with their 120 room hotel. Also, I have looked high and low and have yet to find one apartment onsite at wildly successful newly redeveloped Del Amo Fashion Center Mall.

Response to Comment PC043-11

Thank you for your comment. The project site does not currently have an existing hotel as stated in the comment. For discussion of the No Project Alternative, please see Draft EIR Section 4.0. Please also see Response to Comment PC043-8 for discussion of housing. The comment does not directly address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC043-12

I would like to recommend a second boutique hotel so Forest City can both have the revenue they need and additional guest onsite 24 by 7 by 365 to eat and shop at their mall and the City can have the additional TOT tax revenue

Response to Comment PC043-12

Thank you for your comment. The Draft EIR provided a reasonable range of alternatives, and is not required to analyze multiple variations of different alternatives. (Village Laguna of Laguna Beach, Inc. v. Board of Supervisors (1982) 134 Cal.App.3d 1022, 1029.) Furthermore, such a suggestion would not meet the project objective “to further the City of Redondo beach Housing Element policies…” or allow the City to meet is Regional Housing Needs Allocation (RHNA), as discussed in Response to Comment PC043-8. However, the commenter’s suggestion is noted and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC043-13

Density: In a word, the South Bay Galleria Draft EIR Alternative 4 is HUGE! When completed, the Total Project will be 1,593,144 square feet. This is more than the Alternative 4 and nearly identical in size to Alternative 2. Also, you will have to look up from every entrance to see the South Bay Galleria. It will be 94' Feet 9" Inches on the North Side, 70' Feet 3" Inches on the West Side, 65' Feet on the West Side and 57' Feet 9" Inches on the South Side as noted Figure 4-13 on page 433 of the Draft EIR.
Response to Comment PC043-13

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

Comment PC043-14

The newly updated South Bay Galleria will be built out to the edges of their property and have no real setback unlike the newly completed Del Amo Fashion Center Mall. I believe the new South Bay Galleria will dwarf any other retail shopping in Redondo Beach.

Response to Comment PC043-14

Thank you for your comment. As discussed in Section 3.0.3. “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment,” (Public Resources Code Section 21099(d)(1)).” Nevertheless, please see Response to Comment AL003-2 which describes the various setbacks associated with the proposed project and Alternative 4. The comment does not directly address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment Letter PC044: Ellen Gedert

Comments PC044-1 to PC044-14

These comments are the same as PC043-1 to PC043-14.

Response to Comment Letter PC044

These are duplicate comments to Comment Letter PC043, they were sent via different individuals who share the same last name. See Comment Letter PC043 comment responses.

Comment Letter PC045: Michael Garlan

Comment PC045-1

Stacy, The DEIR does not adequately address the effect of the addition of residential units at the Galleria site on traffic levels at the intersection of Inglewood Ave. and 182nd St. and the streets near this intersection.

Response to Comment PC045-1

Draft EIR Section 3.13 and the TIS, Appendix L of the Draft EIR, were prepared in accordance with the requirements of CEQA and the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. In consultation with City of Redondo Beach staff, the transportation study area was selected to include intersections likely to be affected by traffic generated by the proposed project, specifically major intersections located within roughly a one-mile radius of the project site. The intersection of Inglewood Avenue and 182nd Street was one of the selected study intersections (Intersection No. 26). As described in Draft EIR Section 3.13.4, Table 3.13-7,
the residential component of the proposed project was included in the trip generation, trip
distribution, and trip assignment process; as such, residential trips made to and from the project
site were adequately accounted for in the traffic analysis. Therefore, the Draft EIR adequately
addressed the impact of the residential component of the proposed project on traffic conditions in
and around Inglewood Avenue and 182nd Street. Intersection 26 would operate between LOS B
and C under existing and cumulative with the proposed project, consequently impacts were
determined to be less than significant. (See Draft EIR Tables 3.13-10 and 3.13-13.)

Comment PC045-2
The following issues must be considered:

3. Most school age children of future Galleria residents would pass by car through this
intersection at peak hours to access Washington Elementary, Adams Middle School and
Redondo Union High School. The DEIR does not address this.

Response to Comment PC045-2
The commenter asserts that the children of residents would travel by car through intersections
to access school facilities, and asserts that Draft EIR did not address this. Contrary to this
assertion, the Draft EIR expressly considered such trips. As discussed in Draft EIR Section 3.13.4:

Standard trip generation methodologies typically use the Trip Generation Manual, 9th
Edition (Institute of Transportation Engineers [ITE] 2012) manual to establish trip rates
for each individual land use in isolation. These rates are based on empirical data at survey
sites, which includes all trips entering and exiting the site during a specified period. For
example, the residential ITE trip generation rate would include residential-oriented trips,
such as trips to and from school, supermarket, etc. (Emphasis added.)

Consequently, the trip generation associated with the proposed residential units includes trips to
and from school.

Comment PC045-3
4. Due to space constraints at this intersection there is little opportunity for mitigating the
effects of any increase in peak level traffic.

Response to Comment PC045-3
The commenter appears to be referencing the Intersection of Inglewood Ave. and 182nd Street, as
noted in Comment PC045-1. As shown in Table 3.13-12 (Existing plus Project Conditions
Intersection Level of Service) and Table 3.13-13 (Cumulative plus Project Conditions
Intersection Level of Service), a significant project impact was not identified at the Inglewood
Avenue/182nd Street intersection during either the AM or PM peak hours. Therefore, no
mitigation measures were deemed necessary at this location. (CEQA Guidelines Section
15126.4(a)(3).)
Comment PC045-4

5. The DEIR uses traffic data from 2014 as a baseline. The peak level traffic has gotten much worse in the 3 years hence. Heavy volume has made it difficult for residents of 182nd PL, Firmona Ave and 183rd St. east of Inglewood Ave. to turn safely onto Inglewood Ave. especially during peak hours as this is their only outlet and does not have a traffic signal. There are many accidents and close calls at these intersections. Not all accidents there have been reported. The DEIR does not even address these intersections. Perhaps Forrest City can pay to have a traffic signal installed at Inglewood Ave. and 183rd St.

Response to Comment PC045-4

The commenter states that traffic has gotten worse in the three years since the traffic data was collected in 2014 and that the Draft EIR does not address the intersections of 182nd Place, 183rd Street, and 184th Street. The commenter suggests that the developer pay for a traffic signal to be installed at Inglewood Avenue and 183rd Street.

The traffic counts collected for the project and used in the Draft EIR comply with CEQA. State CEQA Guidelines provide guidance in establishing the existing baseline conditions a CEQA document should use. An EIR must include a description of conditions in the project’s vicinity at the time the Notice of Preparation (NOP) is published. The existing traffic counts used in the Draft EIR were collected from Fall 2014 to Fall 2015, within the same general timeframe as the NOP release date of October 1, 2015. Thus, those traffic counts provide a reasonable basis for evaluating the baseline conditions as they include information both before and after the NOP release date.

The selection of the study intersections was done in coordination with the City of Redondo Beach, the lead agency for the Draft EIR. Study intersections were selected based on locations where the project would add at least ten net new trips per lane, or where the project could significantly impact the intersection. An analysis of 182nd Place, 183rd Street, and 184th Street at Inglewood Avenue was not required by the lead agency, and the intersections of Inglewood Avenue and 182nd Street and Inglewood Avenue and 190th Street (intersections to the north and south of the identified intersections) were not identified as reasonably foreseeable travel routes for the project’s trip distribution and would not be significantly impacted by the project. Therefore, the intersections of 182nd Place, 183rd Street, and 184th Street at Inglewood Avenue were not included as study intersections. The request for a traffic signal at the intersection of Inglewood Avenue and 183rd Street is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body, however no impacts are identified at this location. Please also see Response to Comment PC011-1 for additional discussion of the geographic scope of the traffic analysis and why Firmona and Condon are not considered reasonably foreseeable routes for the project’s trip distribution.

The Baseline traffic counts were collected in November 2014 when Nordstrom was still operational. The Nordstrom tenant space did not cease operations until October 6, 2015 at 6 p.m. If counts were conducted thereafter, there would have been a reduction in trips at the project site associated with the elimination of Nordstrom’s operations. Furthermore, the Draft EIR made conservative assumptions about traffic growth under cumulative conditions (i.e. conditions between 2014 and 2023). The Draft EIR conservatively assumed traffic growth would match the
SCAG population growth rate of 0.38 percent per year in the short term. However, assuming a
direct relationship between population growth and vehicular traffic growth is conservative. The
SCAG travel demand model was used to compare the model-assigned traffic on roadways in the
City of Redondo Beach citywide between the year 2012 and the forecast year (2040). The net
change in SCAG’s projected traffic volumes projects a decline of about three percent, due to the
transportation infrastructure improvements, land use changes, and policy strategies associated
with the [Regional Transportation Plan] and the [Sustainable Communities Strategy]. (See Draft
EIR page 3.13-25 for additional details).

The commenter is referred to Response PC040-5 above concerning accidents in the proposed
project vicinity.

**Comment PC045-5**

6. The DEIR does not address the noise and air pollution generated by the increased volume of
pass through and idling cars backed up at this intersection as well as surrounding streets. It
does not address the health risk this increase in peak traffic would present to nearby residents.

**Response to Comment PC045-5**

Noise impacts were analyzed in the Draft EIR Section 3.9, *Noise*. As discussed in Response to
Comment PC039-7, the location of noise measurements for the roadway segments selected for
analysis were considered to be those that were expected to be the most directly affected by
project-related traffic; roadways that are located near and immediately adjacent to the project site.
These noise measurements were taken as the traffic noise for the baseline analysis. The noise
analysis addresses increased traffic noise that would result from the proposed project, which
would include pass through and idling cars. Impact from traffic noise were found to be less than
significant.

Additionally, air pollution resulting from increased traffic from the project was also analyzed in
the Draft EIR in Section 3.1, *Air Quality*. As shown in Section 3.1, regional and localized air
quality impacts are less than significant for construction and operation. The project would not
result in significant impacts from CO hotspots or odors. As shown by the construction screening
health risk assessment, the project would not result in TAC impacts for construction.
Additionally, the project operations are not associated with TAC emissions and the project would
not result in significant operational TAC impacts. As analyzed in Section 3.1, air quality impacts,
from increased traffic resulting from the project, would be less than significant.

The Draft EIR Air Quality analysis considers all of the project’s operational trips. As noted on
Draft EIR page 3.1-21 “Project trip generation rates and VMT assumption [for the Air Quality
analysis] were obtained from the proposed project’s traffic analysis (Section 3.13, *Transportation
and Traffic*, and Appendix L).” As shown in Draft EIR Table 3.13-7, the project’s operational
trips account for all of the land uses. As also explained in Section 3.13.4, the trip generation rates
are based upon the Institute for Transportation Engineers (ITE). “These rates are based on
empirical data at survey sites, which includes all trips entering and exiting the site during a
specified period of time.” (Emphasis added.) This includes employees, delivery vehicles,
sellers, etc. The regional thresholds set by the SCAQMD indicate the emission levels that
would need to be exceeded by a project to result in a potential exceedance of air quality standards. These thresholds take into account the existing and projected ambient air quality within the region. Therefore, while traffic generated by other activities within the area is not specifically identified in the analysis, the thresholds take these emissions into account.

Furthermore, impact analysis AIR-2 also expressly considered the total number of vehicles (from the project as well as existing and cumulative traffic) at studied intersections in determining whether there would be any CO Hotspots; such impacts were determined to be less than significant. (See Draft EIR page 3.1-31.) Furthermore, many modern cars do not idle when they come to a complete stop, and therefore cease emitting criteria pollutants (also known as “start/stop engine systems”)

The commenter also asserts there would be health risks associated with emissions from peak traffic. The operational air quality analysis included an LST analysis. This localized impact analysis (LST) is a screening-level health risk assessment. The LST analysis represents the maximum emissions (NOx, CO, PM10 and PM2.5) from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. If the emissions exceed the LST significance threshold, it is recommended that dispersion modelling be performed to assess potential impacts. As shown in Table 3.1-11, Localized Operational Emissions, emissions did not exceed significance thresholds for a 5-acre site with nearest sensitive receptors at 25 meters, which is the most conservative scenario. The SCAQMD states, if the calculated emissions for the proposed construction or operational activities are below the LST emission levels found on the LST mass rate look-up tables, then the proposed construction or operation activity is not significant for air quality. Similar to regional thresholds, the LST thresholds were designed to take into account existing and projected ambient air quality within the region.

The approach utilized for projects air quality operational analysis under AIR-1 has been expressly upheld by the Court of Appeal as adequately addressing Health effects. (Beverly Hills Unified School District v. Los Angeles County Metropolitan Transportation Authority (2015) 241 Cal.App.4th 627, 667.) Similar to the analysis in Beverly Hills the Galleria Draft EIR provided an overview of the health effect associated with operational criteria pollutants (Draft EIR Table 3.3-1, in addition to the criteria pollutant analysis (Impact AIR-1).

Comment PC045-6

7. The DEIR underestimates the number of new students that the Galleria plan would bring into RBUSD. The school district was surprised that the enrollment at the high school for fall 2017 was much larger than anticipated. If the school district cannot accurately estimate enrollment from year to year they could not possibly predict what the increase in enrollment would be when the Galleria project is completed.

Response to Comment PC045-6

Draft EIR Section 3.11, Table 3.11-4 made reasonable assumptions about Student Generation factors based upon RBUSD’s November 2016 Enrollment Impact Analysis. This included
Elementary School Student Generation factors of 0.1284 Elementary School students per unit, 0.0489 Middle School students per unit, and 0.051 High School students per unit. As discussed in the November 2016 RBUSD Study, these student generation rates are based upon data specific to the Redondo Beach Unified School District. (RBUSD November 2016 Enrollment Impact Analysis, Section II.) Furthermore, as discussed in Response to Comment Response PC038-5, the project would pay statutory fees which are ‘…deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.” (Gov. Code Section 65995(h) and 65996.) The statement made by the commenter regarding the school district being surprised by enrollment rates at the high school for fall 2017 is not substantiated and was not found to be accurate based on RBUSD meeting minutes and agendas items. Specifically, the Local Control Accountability Plan (LCAP) provided at the June 6, 2017 hearing79 provides data as to the enrollment at each school for each school year. While enrollment has increased, there does not seem to be any indication that the school district was surprised by the enrollment increase at the high school or with the overall consistent increase of enrollment throughout the district.

**Comment Letter PC046: Sheila Lamb**

**Comment PC046-1a**

Last but not least, my final comments. Thanks Stacey!

**Response to Comment PC046-1a**

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

**Comment PC046-1b**

Hi Stacey, Here it is as a PDF....let me know if this works.

**Response to Comment PC046-1b**

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

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79 RBUSD Regular Board of Education Meeting - PUBLIC HEARING - Regarding the Redondo Beach Unified School District (RBUSD) Local Control Accountability Plan (LCAP). Jun 06, 2017
https://www.boarddocs.com/ca/rbusd/Board.nsf/Public
**Comment PC046-2**

**The Galleria DEIR Comments**

<table>
<thead>
<tr>
<th>Traffic Impacts</th>
<th>Statement</th>
<th>Response</th>
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<tbody>
<tr>
<td>Document: Appendix J-Page 8</td>
<td>Fehr and Peers used the MDX+ mixed use trip generation rate instead of the Trip Generation Manual, 9th Edition (ITE 2012) rate.</td>
<td>While the proposed Galleria improvement plan proposes a land development change from CR to &quot;mixed use&quot;, the geographic area for the development is within the context of R1, R2, R3 land use in the surrounding areas. The DEIR does not explain the variables Fehr and Peers’ MDX+ model used to calculate the conditions in Redondo Beach, which are different from an exclusively mixed use land use. The DEIR states that it assumes the area within and around the proposed development is &quot;a density, scale, and design that can facilitate walking and biking.&quot; What data does Fehr and Peers have to support this? What data did they include in their variables?</td>
</tr>
</tbody>
</table>

**Response to Comment PC046-2**

The commenter asserts that the proposed project “proposed a land development change from CR to “mixed use.” The proposed project does not propose any land use designation or zoning changes. The project site is currently designated/zoned CR, Regional Commercial (Draft EIR page 3.8-2), and the proposed uses are consistent with these designations/zoning.

The commenter also states that the Draft EIR does not explain the variables Fehr & Peers MXD+ model and what data was in the variables to estimate traffic conditions in Redondo Beach. The MXD+ model relies upon trip generation rates from *Trip Generation, 9th Edition* (Institute of Transportation Engineers [ITE], 2012), but through the statistical processes of the model, calibrates the ITE rates to reflect the site specific and area contexts of the project, including size of the project, land uses of the project, intersection density around the project, average household size and vehicle ownership in Redondo Beach, employment within 1 mile of the project site, and employment within 30 minutes of the project site via transit. Input variables and sources utilized in the MXD+ model are provided below.

<table>
<thead>
<tr>
<th>Project</th>
<th>Value</th>
<th>Source</th>
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<tbody>
<tr>
<td>Size of Site (acres)</td>
<td>34.76</td>
<td>GIS</td>
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<tr>
<td>Household Size (persons per HH)</td>
<td>2.43</td>
<td>ACS 2012 - 5 Year Average</td>
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<tr>
<td>Vehicle Ownership (per DU)</td>
<td>1.85</td>
<td>ACS 2012 - 5 Year Average</td>
</tr>
<tr>
<td>Intersection Density (per square mile)</td>
<td>92</td>
<td>EPA Smart Location Database</td>
</tr>
<tr>
<td>Employment within 1 mile</td>
<td>9,045</td>
<td>SCAG 2012 RTP Model</td>
</tr>
<tr>
<td>Employment within 30 min transit (share)</td>
<td>0.02</td>
<td>SCAG 2012 RTP Model</td>
</tr>
</tbody>
</table>

The comment questions the data Fehr & Peers have to support the assertion that density, scale, and design can facilitate walking and biking. Detailed information on the MXD+ model is included Draft EIR Appendix L (“Appendix A – MXD Model Documentation”). The MXD
Model Documentation includes approximately 20 pages of support information related to the creation of the MXD+ trip generation modeling. The MXD+ model is based upon two earlier trip generation studies including (1) the National Cooperative Highway Research program (NCHRP) Report 684, and (2) the US EPA sponsored Report “Traffic Generated by Mixed-Use Developments – A Six-Region Study Using Consistent Built Environmental Measures” which in turn was based upon a study of 239 Mixed Use Developments and verified through 27 mixed use sites across the U.S. (Draft EIR Appendix L, Appendix A, p. 10-11.) The MXD+ model combines the datasets and factors from both of these models. (Draft EIR Appendix L, Appendix A, p. 12-16.)

Additionally, traffic data used for validation of the MXD model from sites located only within California was summarized and is provided in Chapter 3, Modifications to the Draft EIR, Appendix L4, of the Final EIR. These sites represent a variety in terms of density, scale and design. As shown in the attachment, trip generation estimates using the MXD methodology, on average, indicate the least amount of deviation from actual observed counts, i.e., within 1 percent of observed daily counts, 6 percent of observed morning peak hour counts, and 3 percent of observed evening peak hour counts.

**Comment PC046-3**

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<tr>
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<tbody>
<tr>
<td>Page 4-179-4-181</td>
<td>TRA-1, TRA-3, TRA-4: Alternative 4 would conflict with vehicular level of service criteria. After implementation of Mitigation Measures TRA-1, TRA-3, and TRA-4, Alternative 4 would result in similar significant and unavoidable intersection impacts as compared to the proposed project for Existing plus Project and Cumulative plus Project conditions. Significant and unavoidable intersection impacts would remain at 16 Hawthorne Boulevard and Artesia Boulevard, 17 Prairie Avenue Artesia Boulevard, and 19 1-405 Northbound Ramps/Artesia Boulevard.</td>
<td>These unmitigated impacts are out of compliance with 2012-2035 RTP/SCS performance goals. As a result of the traffic impacts, person delay, travel time increase, increased collision rates, increase in work trips more than three miles, increase in pollutant and greenhouse gas emissions will occur. The RTP/SCS indicates that the performance target for these indicators will show improvement by 2035. Therefore this project as presented would hinder the community's move towards increased health/safety, mobility, and location efficiency. See table 5.1, page 166 RTP/SCS.</td>
</tr>
</tbody>
</table>

**Response to Comment PC046-3**

The commenter alleges that because the project has unmitigated Level of Service Intersection impacts, and would therefore be “out of compliance with the 2012-2035 RTP/SCS performance goals” and would result in increased greenhouse gas emissions. The commenter provides no evidence to support this assertion and does not cite to a specific goal or policy in the current 2016 RTP/SCS (the 2012 RTP/SCS is not the current RTP).80

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80 Furthermore, Section 5 referenced by the commenter in the 2012 RTP/SCS does not represent Goals and Policies of the RTP/SCS, which were included in Chapters 1 and 4.
As discussed in Draft EIR Section 3.8, Impact LUP-1, the project would be consistent with SCAG’s 2016-2040 RTP/SCS. As partially discussed in that analysis, one of the goals of the 2016 RTP/SCS is to “encourage land use and growth patterns that facilitate transit and non-motorized transportation.” As discussed in Draft EIR Section 3.0.3, the project is located in a Transit Priority Area, due to its access to multiple forms of transit service. Furthermore, the commenter’s equates Level of Service (LOS) intersection impacts as being directly related to increases in GHG’s. However, this is not a correct comparison. The State of California is moving away from vehicular Level of Service (LOS) as a traffic metric, because it can potentially promote personal vehicle use and increased greenhouse gas emissions. Consequently, the legislature adopted Senate Bill 743 (2013), with the goal of “encouraging land use and transportation planning decisions and investments that reduce vehicle miles traveled [VMT] and contribute to the reductions in greenhouse gas emissions.” The legislature explained in that bill that “there is a need to balance the need for level of service standards for traffic with the need to build infill housing and mixed use commercial developments within walking distance to mass transit facilities, downtowns, and town centers and to provide greater flexibility to local governments to balance these sometimes competing interests.”

The Legislature in that Bill expressly found that “New methodologies are needed for evaluating transportation impacts that are better able to promote the state’s goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multimodal transportation system.” To implement these concepts the legislature stated that “automobile delay, as described solely be level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment…” Similar statements were made by Caltran’s letter (AS001-4), which explains that they “encourage the Lead Agency to integrate transportation and land use in a way that reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use.”

As discussed on Draft EIR pages 3.13-45 and the project would have reduced Vehicle Miles Traveled (VMT) in comparison to the regional average, and would provide GHG benefits in comparison to baseline conditions. (See the GHG Baseline Comparison starting on Draft EIR page 3.5-17.) Concerning accidents in the project vicinity, the commenter is referred to Response to CommentPC040-5.

**Comment PC046-4**

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<tr>
<td>Page 4-179-4-181</td>
<td>TRA-1, TRA-3, TRA-4: Alternative 4 would conflict with vehicular level of service criteria. After implementation of Mitigation Measures TRA-1, TRA-3, and TRA-4, Alternative 4 would result in similar significant and unavoidable intersection impacts as compared to the proposed project for Existing plus Project and Cumulative plus Project conditions. Significant and unavoidable intersection impacts</td>
<td>The DEIR does not show an alternative development in which the 2012-2035 RTP/SCS goals could be met, i.e., a development that would not create unmitigated impacts.</td>
</tr>
</tbody>
</table>
Response to Comment PC046-4

Please see Response to Comment PC046-3.

Comment Letter PC047: Tom and Suzy Royds

Comment PC047-1

8. Traffic:

According to the DEIR Kingsdale Avenue has an (A) rating.

According to the DEIR 3.13-3, on page 321, "Kingsdale Avenue Provides two lanes in each direction", when in fact southbound is only two lanes from Artesia Ave to Grant Ave (one Block). It then becomes one lane southbound from Grant Avenue to 182nd St. This misrepresentation results in flawed data in the DEIR.

As Kingsdale residents we can attest to the fact that as a "collector street" it is already a very heavily traveled street, and that the traffic flow backs up from Target to around the corner of Grant avenue during peak hours.

This data was not included in the DEIR because the study was performed in the section of Kingsdale between Grant and Artesia.

Response to Comment PC047-1

The commenter states that 1) the number of lanes on Kingsdale Avenue is misrepresented in the Draft EIR asserting that Kingsdale Avenue is only four lanes between Artesia Boulevard and Grant Avenue, three lanes between Grant Avenue and 177th Street, and two lanes between 177th Street and 182nd Street, and 2) that traffic along Kingsdale back’s up from 177th Street to Grant Avenue during peak hours.

The Draft EIR text cited by the commenter on page 3.13-3 was intended to be a general summary of the roadways, it was not intended to provide the level of detail discussed in the comment and did not serve as the basis for the intersection analysis.\(^{81}\) Rather, the detailed intersection configurations are included in Draft EIR Appendix L, in the sub-appendix titled “Appendix B: Intersection Land Configuration” (page 110). The Intersection 24 lane configuration for Kingsdale Avenue/Target Driveway (177th Street), correctly matches the existing lane configuration\(^{82}\) with one southbound right turn lane, and one southbound through lane/left turn

\(^{81}\) Cities are not required to perform a vehicular segment analysis. (East Sacramento Partnership for a Livable City v. City of Sacramento (2016) 5 Cal.App.5th 281.

\(^{82}\) https://www.google.com/maps/place/South+Bay+Galleria/@33.8698303,-118.3569352,100a,35y,358.79h/data=!3m1!1e3!4m5!3m4!1s0x80c2b4f97a0167a3:0xe4e4b4b9a5ed02618m213d33.8712777!4d-118.3550423?hl=en
The Intersection 27 lane configuration (Kingsdale and 182nd Street) is shown on the same page. While there are not two officially demarcated left and right turn lanes heading southbound on Kingsdale at Intersection 27, the consultants observed the southbound portion of the intersection operating in a de facto two lane configuration due to the width of the southbound side of the street (approximately 20 feet across). Making this assumption based upon existing operational conditions is consistent with CEQA. (South County Citizens for Smart Growth v. County of Nevada (2013) 221 Cal.App.4th 316 [County could rely on current actual use of road rather than its current traffic designation.]

While not utilized in the Intersection analysis, the description of Kingsdale Avenue is hereby revised on pages 3.13-3 of the Draft EIR and page 20 of the Transportation Impact Study as follows (underline shows the additional text and strikethrough shows the deletions):

- **Kingsdale Avenue** – Kingsdale Avenue is a collector in the study area and runs west of the project site. Kingsdale Avenue provides two lanes in each direction between Artesia Boulevard and Grant Avenue, two northbound lanes and one southbound lane between Grant Avenue and 177th Street, and one lane in each direction between 177th Street and 182nd Street, with left-turn channelization provided at most of the intersections.

This modification does not change the analysis or significance conclusions in the Draft EIR; as noted above, the analysis was not dependent upon the text on Draft EIR page 3.13-3. An analysis of AM and PM peak hour intersection operations was conducted along Kingsdale Avenue. The selection of the analysis locations was done in coordination with the City of Redondo Beach, the lead agency for the Draft EIR.

Intersection counts were conducted in November 2014, and are representative of conditions that were observed at that time. The existing intersection level of service (LOS) was determined based on the lane configuration at the intersection, the number of vehicles counted at the intersection, and the analysis methodology required by the City of Redondo Beach. This analysis was conducted along Kingsdale Avenue from Artesia Boulevard to 182nd Street. This included the intersections of Kingsdale Avenue and Artesia Boulevard, Kingsdale Avenue and Grant Avenue, Kingsdale Avenue and 177th Street/Target Driveway, and Kingsdale Avenue and 182nd Street. The existing LOS at all of the intersections studied along Kingsdale Avenue varied between LOS A, B, or C during the AM or PM peak hour.

**Comment PC047-2**

Question #1 : What Traffic Mitigation Measures are currently planned for Kingsdale Ave. during, and after, the 3 year construction period for the Renovation of the Galleria?

Question #2: Why wasn't Kingsdale Traffic studied between 182"d Street and Grant Ave?

Question #3: Will the City Traffic Engineer perform a separate Traffic Study for Kingsdale Ave. analyzing the traffic flow between 182"d Street and Grant Ave for the purpose of defining mitigation measures to improve the flow of traffic in this corridor?
Question #4: Could a Traffic Study be conducted to analyze the reduction in traffic density on Kingsdale Ave. between Grant and 182"d resulting from A) A No-Right-Turn-On-Red Stipulation at the Grant and Kingsdale Intersection; and B) Speed bumps installed between 177th and Grant along Kingsdale Ave?

Response to Comment PC047-2

The commenter questions what traffic mitigation measures are planned for Kingsdale Avenue during and after the construction period. The commenter is referred to Response to Comment PC040-1. Moreover, the intersection analysis conducted for the Draft EIR determined that traffic generated by the proposed project would not result in a significant impact at any of the study intersections along Kingsdale Avenue. Therefore, no mitigation measures were proposed at the study intersections along Kingsdale Boulevard. While the Galleria project’s intersection impacts along Kingsdale are less than significant, the Transit Center Relocation Project included the following Conditions of Approval related to Kingsdale roadway improvements:

TR1. The applicant shall be required to restripe and re-establish a second west bound travel lane, on 182nd Street between Hawthorne Boulevard and Kingsdale Avenue after the bus layover zones on 182nd Street are abandoned. The plans and construction specifications for these changes shall be included in the construction document bid set.

TR2. In conjunction with the land exchange with Forest City for the South Bay Galleria Transit Terminal parcel, twenty (20) feet of land to the east of the existing westerly edge of the Transit Terminal parcel adjacent to Kingsdale Avenue shall be dedicated for street widening purposes. The street widening will allow the construction of an additional northbound, 250-feet Tong right turn only lane, curb and gutter, parkway, and sidewalk. The street widening will also require the demolition of the existing Transit Terminal bus bays and reconstruction of the east side of Kingsdale Avenue for the length of the Transit Terminal parcel. The improvement of the street shall occur as part of the demolition of the existing transit terminal once the new Transit Center is operational. The plans and construction specifications for these changes shall be included in the construction document bid set.

The City of Redondo Beach is proposing a Construction Management Plan for the project; details of the construction management plan can be found on page 3.13-45 of the Draft EIR.

The commenter questions why Kingsdale Avenue traffic was not studied between 182nd Street and Grant Avenue. As an initial matter, the only other major intersection on Kingsdale between 182nd Street and Grant Avenue, was analyzed, i.e. Intersection 24, Kingsdale/Target Drive [177th Street]. (See Draft EIR Figure 3.13-1.) An analysis of AM and PM peak hour intersection operations was conducted at intersections along Kingsdale Avenue between 182nd Street and Grant Avenue. The selection of the analysis locations was done in coordination with the City of Redondo Beach, the lead agency for the Draft EIR. The existing intersection level of service

83 While there is an additional driveway entrance to target located along Kingsdale Avenue, this is not a major intersection, and given the LOS and the major intersections along Kingsdale Avenue, this driveway location would not be significantly impacted by the proposed project.
LOS was determined based on the lane configuration at the intersection, the number of vehicles counted at the intersection, and analysis methodology required by the City of Redondo Beach. This analysis included the intersections of Kingsdale Avenue and Grant Avenue, Kingsdale Avenue and 177th Street/Target Driveway, and Kingsdale Avenue and 182nd Street. The existing LOS at all of the intersections studied along Kingsdale Avenue was calculated at LOS A, B, or C during the AM or PM peak hour.

The commenter requests a separate traffic study for Kingsdale Avenue between 182nd Street and Grant Avenue for the purpose of defining mitigation measures to improve traffic flow. The intersection analysis conducted for the Draft EIR determined that traffic generated by the proposed project would not result in a significant impact at any of the study intersections along Kingsdale Avenue. Therefore, no mitigation measures are necessary. However, the comment will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

The comment questions if a traffic study could be conducted to analyze the reduction in traffic density on Kingsdale Avenue between Grant Avenue and 182nd Street due to a no-right-turn-on-red at Kingsdale Avenue and Grant Avenue and due to speed bumps installed on Kingsdale Avenue between 177th Street and Grant Avenue. The intersection analysis conducted for the Draft EIR determined that no study intersection along Kingsdale Avenue would be impacted with the project traffic. Therefore, no mitigation measures are necessary. However, the comment will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC047-3

Question #5: To preserve the integrity and quality of life in the neighboring residences on the west side of the Galleria, would the City of Redondo Beach be willing to put in a "Residential Set-Back Barrier" of a one lane width on Kingsdale Ave. between Grant and 177th Street?

Response to Comment PC047-3

The commenter requests the installation of a residential set-back barrier of one lane width on Kingsdale Avenue between Grant Avenue and 177th Street. The intersection analysis conducted for the Draft EIR determined that traffic generated by the proposed project would not result in a significant impact at any of the study intersections along Kingsdale Avenue. Therefore, no mitigation measures were proposed at the study intersections along Kingsdale Avenue. Please Response to Comment PC047-2 for discussion of other planned roadway improvements to Kingsdale.

Comment PC047-4

Question #6: As a Traffic Mitigating Measure for the Kingsdale "Collector," would the City of Redondo Beach consider widening Kingsdale to 2 lanes of traffic in each direction (North and South) between 182nd Street and Grant Avenue?
Response to Comment PC047-4

The commenter requests that the City of Redondo Beach consider widening Kingsdale to two lanes of traffic in each direction between 182nd Street and Grant Avenue. No significant impacts were identified at the four study intersections located on Kingsdale Avenue; therefore, no mitigation measures were required. (CEQA Guidelines Section 15126.4(a)(3).) Please see Response to Comment PC037-5 for information regarding the widening Kingsdale, and PC047-2 for discussion of other planned roadway improvements to Kingsdale.

Comment PC047-5

Question #7: What direction and route will the busses be traveling on Kingsdale when the new Metro Bus Terminal on the south-west side of Kingsdale next to Target is finished?

Response to Comment PC047-5

Thank you for your comment. Please see Response to Comment PC039-10 for discussion of the Transit Center Relocation and cumulative growth assumptions.

Comment PC047-6

Question #8: Will the City be implementing permit-only parking for the surrounding neighborhood; i.e. the residents of Kingsdale, Firmona and Condon Ave?

Response to Comment PC047-6

Please see Response to Comment PC027-2 for discussion of the proposed project’s parking and the existing preferential parking program on Firmona and Condon during the holidays.

Comment PC047-7

9. Noise/Disturbances:

The City of Redondo Beach Municipal Code9-1-06 clearly states that "All construction activity shall be prohibited except between the hours of 7:00 a.m. and 6:00 p.m. on Mondays, Tuesdays, Wednesdays, Thursdays and Fridays, and between the hours of 9:00 a.m. and 5:00 p.m. on Saturdays.

Response to Comment PC047-7

Thank you for your comment. The correct Municipal Code reference is 9-1.12, Construction noise. Additionally, the commenter is correct, as stated in the Chapter 2.0, Project Description, and in Section 3.9, Noise, construction hours would be limited to 7:00 a.m. to 6:00 p.m. Monday to Friday and 9:00 a.m. and 5:00 p.m. on Saturdays.

Comment PC047-8

Question #9: What measures will be taken by the City of Redondo Beach to insure compliance with this Municipal Code during the Construction of this Project?
Response to Comment PC047-8

Any mitigation measures that are proposed or adopted by City Council will be made Conditions of Approval, and implemented through a Mitigation Monitoring and Reporting Program (MMRP). Implementation and monitoring will be specific to the nature of each mitigation measure. If the project is approved, a MMRP will be proposed and adopted concurrently with project approval. (CEQA Guidelines Section 15097.) As for Conditions of Approval, they are monitored through the City’s Building Department and Code Enforcement.

Comment PC047-9

Question #10: What Financial Accountability will Forest City have to remedy residents enduring the stress and noise of such infractions should they occur?

Response to Comment PC047-9

As discussed in Section 3.9, Noise, construction impacts regarding noise and vibration were mitigated to less than significant with implementation of Mitigation Measures MM NOI-1 through MM NOI-6. As such, no other mitigation is required and residents should not have any significant impacts. Additionally, as discussed in Response PC047-8, the project’s mitigation measures would be subject to a Mitigation Monitoring and Reporting Program.

Comment PC047-10

Referencing Table 3.9-3 Pg. 255 of the DEIR, the current noise level on Kingsdale Ave is (67.0 dBA) from Artesia to Grant Avenue. This is already higher than the Redondo Beach municipal code 4-24.301 which has established an acceptable and safe dBA level of 65.

Response to Comment PC047-10

Thank you for your comment. The table the commenter is referring to is Table 3.9-3, Existing Roadway Noise Levels, is representative of roadway noise in the area and not ambient noise levels at a specific sensitive receptor. These existing roadway noise calculations are based upon a “Calculation of the existing roadway noise levels was accomplished using the Federal Highway Administration’s (FHWA’s) Highway Noise Prediction Model (FHWA-RD-77-108).” Additionally, Table 3.9-3 utilizes a specific noise metric, $L_{dn}$, which as discussed on Draft EIR page 3.9-4, adds a penalty for nighttime noise. This existing roadway noise data was utilized for the roadway noise impact analysis under Impact NOI-3.

Table 3.9-2, Summary of Short-Term Noise Measurements, provides measured ambient noise levels in Leq (a different noise metric) for the areas around the project site, which was utilized in Impact analyses NOI-1 and NOI-4. For the residents along Kingsdale Avenue, R3, the ambient noise measurement is 63.9 dBA. This is below the Redondo Beach Municipal Code 4-24.301, which has established an acceptable and safe dBA level of 65. Furthermore, as outlined below the regulations cited by the commenter are not applicable to roadway noise or construction activities.

As discussed on Draft EIR page 3.9-15, the operational noise regulations cited by the commenter “are not applicable to motor vehicles operating on public rights-of-way (RBMC Section 4-24.630).” However, roadway noise was addressed under Impact NOI-3, which shows that
Kingsdale Avenue is below the significant threshold of 1 dBA. Furthermore, even if the City were to apply the Noise ordinance, those regulation state where the land use borders another land use category, the lower land use category limit is increased by 5 dB. (Draft EIR page 3.9-15; RBMC 4-24.301(b).) Consequently, even if the City were to apply the Noise Ordinance to roadway noise, impacts would still be less than significant, as noise levels would be below 70 dBA. (Draft EIR Table 3.9-12.) Additionally, the operational noise regulations do not apply to construction noise levels, which are regulated exclusively by hour of operation limitations contained in RBMC Section 4-24.503.

**Comment PC047-11**
The City of Redondo Beach Municipal Code 4-24.301 clearly limits the max dBA for the adjoining residential homes located West of the project to no more than 60-65 dBA.

**Response to Comment PC047-11**
Please see Response to Comment PC047-10

**Comment PC047-12**
Currently the dBA analysis from the DEIR on Kingsdale Ave. is 2 points above the acceptable allowance. Referencing the DEIR, the dBA count will be well in excess of 90 dBA for the 3 year construction period.

**Response to Comment PC047-12**
Thank you for your comment. As discussed in Response to Comment PC047-10, construction work is not subject to the operational noise limits cited in the comment. Nevertheless, in order to respond to the comment, as discussed above, under Response to Comment PC047-10, the ambient noise for residents across Kingsdale Avenue was measured at 63.9 DBA, which is below the 65 dBA limit in the Municipal Code. As shown in Table 3.9-14, Estimate of Maximum Ambient Noise Levels at Off-Site Sensitive Receiver Locations During Construction, ambient noise levels during construction at the residences across Kingsdale Avenue were estimated to range between 79 and 87 dBA. It was concluded that construction of the proposed project would cause a substantial temporary and periodic increase in ambient noise levels in the project vicinity above levels existing without the project; resulting in a significant impact without mitigation (Impact NOI-4.). With implementation of Mitigation Measures MM NOI-2 through MM NOI-6, construction noise impacts would be reduced to less than significant.

**Comment PC047-13**
Again, referencing 3.9-12, the DEIR states that Kingsdale Avenue is currently at a dBA level of 67, however, this DEIR is flawed in that it did not include a full street analysis; only the section that is widest and four lanes, between Grant and Artesia. An Independent dBA surveys has already identified the current dBA level at the 1800 block of Kingsdale to be 79 (dBA).

**Response to Comment PC047-13**
Thank you for your comment. As discussed in Response to Comment PC047-10, there were two tables containing existing noise information (1) associated with roadways along Kingsdale (Table
3.9-3), and (2) noise associated with sensitive receptors located along Kingsdale (Draft EIR Table 3.9-2.) Consistent with the commenter’s request, Draft EIR Table 3.9-2 includes noise measurement location R3 which was taken in proximity to the sensitive receptors at the 1800 block of Kingsdale Ave. (See Draft EIR Figure 3.9-2.) Noise measurement location R3 was measured at 63.9 dBA Leq.

Additionally, the roadway segments selected for the roadway noise analysis (Impact NOI-3) are considered to be those that are expected to be the most directly affected by project-related traffic, which, for the purpose of this analysis, includes the roadways that are located near and immediately adjacent to the project site. These roadways, when compared to roadways located further away from the project site, would experience the greatest percentage increase in traffic generated by the project; as distances are increased from the project site, traffic is spread out over a greater geographic area, and its effects are reduced. Therefore, the location of the noise measurement along Kingsdale Avenue between Artesia Avenue and Grant Avenue was picked because a greater amount of project traffic is expected to utilize Kingsdale Avenue between Artesia and Grant. Thus, the dBA levels recorded at this section of Kingsdale Avenue are conservative depiction of the noise level at the part of Kingsdale Avenue that will be most affected by project related traffic. Impacts at other street segments, such as the segment referenced by the commenter would be reduced in comparison to this worst case scenario.

**Comment PC047-14**

The majority of busses and trucks on Kingsdale travel south to north. The section that was tested for the dBA analysis is at the end of this street where the busses are parking and the trucks are either going into the underground tunnel for the Mall, or slowing to turn right onto Artesia.

**Response to Comment PC047-14**

Thank you for your comment. Please see Response to Comment PC047-13 for the rationale behind where the noise measurements were taken and why.

**Comment PC047-15**

Due to the location of the testing equipment for this DEIR the data is flawed and needs to be reevaluated.

**Response to Comment PC047-15**

Thank you for your comment. Please see Response to Comments PC047-9 through PC047-13 for the rationale behind where the noise measurements were taken and why.

**Comment PC047-16**

Please note: There is a slight incline on Kingsdale Ave (northbound) from 177th (Target) to Grant Avenue which results in vehicle acceleration which is generating excessive levels of dBA up to 87. Traveling South from Grant on Kingsdale, the rate of speed is in excess of the Speedlimit in approaching Target.
Response to Comment PC047-16

Thank you for your comment. Please see Response to Comment PC047-10 and 13 for discussion of existing noise conditions.

Comment PC047-17

As stated in the DEIR, the conclusion is that there will be a reduction in dBA on Kingsdale to 64 (3.9-28) after the project is finished.

Response to Comment PC047-17

Thank you for your comment. The commenter is incorrect. The Draft EIR does not show a reduction in ambient noise levels on Kingsdale Avenue. As discussed in Response to Comment PC047-10, the initial table the commenter is referring to is Table 3.9-3, Existing Roadway Noise Levels, which are representative of roadway noise in the area and not ambient noise levels. Table 3.9-2, Summary of Short-Term Noise Measurements, provides ambient noise levels for the areas around the project site. For the residents along Kingsdale Avenue, R3, the ambient noise measurement is 63.9 dBA Leq (or 64 dBA Leq when rounded up). The table the commenter is referring to in this comment is Table 3.9-14, Estimate of Maximum Ambient Noise Levels at Off-Site Sensitive Receiver Locations During Construction, ambient noise levels during construction at the residences across Kingsdale Avenue were estimated to range between 79 and 87 dBA. As is shown in Table 3.9-14, ambient noise levels are not reduced, but increased from 63.9 to a maximum of 87 dBA. As such, the analysis concluded that construction of the proposed project would cause a substantial temporary and periodic increase in ambient noise levels in the project vicinity above levels existing without the project due to construction activity; resulting in a significant impact without mitigation. With implementation of Mitigation Measures MM NOI-2 through MM NOI-6, construction noise impacts would be reduced to less than significant.

Comment PC047-18

Question #11: How can this not be flawed data to suggest that after completion of the project, the increase in traffic and congestion will result in reduced dBA levels?

Response to Comment PC047-18

Thank you for your comment. Please see the Response to Comment PC047-17 for the reason why the commenters conclusion is incorrect. The project does not show a reduction in ambient noise levels. The data in the analysis is not flawed.

Comment PC047-19

Question #12: Based on the inaccurate data referenced in this document, would Forest City cooperate with an independent dBA investigation/survey report?

Response to Comment PC047-19

Thank you for your comment. Please see Response to Comment PC047-17 for the reason why the commenters conclusion is incorrect. The project does not show a reduction in ambient noise levels. The data in the analysis is not flawed and additional analysis is not necessary.
Comment PC047-20

*Please Note: Kingsdale (considered a "Collector") is located 55' from the proposed construction area which is expected to generate up to 90 dBA.

Response to Comment PC047-20

Thank you for your comment. As disclosed in Table 3.9-1, Distance Between Project Site and Nearby Noise-Sensitive Receptors, the residential development located west of the project site along Kingsdale Avenue is located 55 feet from the edge of the project site. The noise analysis was conducted with this distance in mind and all impacts were assessed with this distance for the R3 sensitive receptor location.

Comment PC047-21

Question #13: How can the DEIR data come to the conclusion that due to the distance it would be reduced to 67 dBA. When all the noise generated will bounce off the concrete face of the mall and echo as far back as Condon Ave?

Response to Comment PC047-21

Thank you for your comment. For a discussion on noise attenuation, the commenter is referred to Section 3.9.1, Introduction, under the Noise Attenuation heading. The Draft EIR does not state the noise along Kingsdale Avenue would be reduced to 67 dBA. While not specified in the comment, the reference to 67 dBA, appears to reference the existing roadway noise calculation utilized for the roadway noise analysis under Impact NOI-3. As shown in Table 3.9-14, Estimate of Maximum Ambient Noise Levels at Off-Site Sensitive Receiver Locations During Construction, ambient noise levels during construction at the residences across Kingsdale Avenue would increase from the existing ambient level of 64 dBA to between 79 and 87 dBA during construction. As discussed in Response to Comment PC047-17, the Draft EIR proposed numerous construction mitigation measures to reduce this impact to less than significant.

Comment PC047-22

Question #14: With the intended start date for this project to be in 2020 including plans prior to that to begin construction on the new location (southwest side) of Kingsdale for a new Mega Bus Terminal, what will the proposed future dBA Levels be for Kingsdale Ave between 182nd Street and Artesia Blvd.?

Response to Comment PC047-22

Thank you for your comment. Please see Response to Comment PC039-10 for discussion of noise and the Transit Center Relocation. As shown in Table 3.9-15, Off-Site Traffic Noise Impacts – Future 2023 Cumulative Increment, traffic noise along Kingsdale Avenue between Artesia and Grant is expected to increase from 67 dBA to 68 dBA, this includes the project (0.8 dBA cumulative contribution) and cumulative growth projections for traffic. The proposed project’s contribution is not considered cumulatively considerable. For a discussion of why Kingsdale Avenue between Artesia Boulevard and Grant Avenue was chosen for the traffic noise measurement, please see Response to Comment PC047-13.
Comment PC047-23
Regarding current noise levels affecting the neighborhood and residences West of the Galleria, STREET RACING and DRIFTING has been and continues to take place in the Galleria Parking structure as well as in the parking lot at Living Spaces (during off hours late in the evening).

Response to Comment PC047-23
Thank you for your comment. To the extent such activities are occurring, they are existing conditions, which are not impacts of the proposed project. Nevertheless, as discussed in Draft EIR Section 3.11, the City has proposed Condition of Approval PS-1 which includes a Fire, Life-Safety and Security Plan. Additionally, as discussed on Draft EIR page 3.11-9 and 10, the project is proposing installation of security cameras and license plate readers which would address any such existing issues.

Comment PC047-24
This ever increasing dBA Noise Pollution is affecting the quality of life for residents on Kingsdale, Firmona and Condon Ave. This noise echoes and is magnified by the cement surfaces of the Galleria and the parking structure.

Given that a 2nd Parking Structure is planned on the West side parking lot adjacent to Kingsdale Ave., it is anticipated that the dBA noise levels during and after hours will increase.

Response to Comment PC047-24
Thank you for your comment. The proposed project does not include “a 2nd Parking Structure on the West side parking lot adjacent to Kingsdale Ave.” The parking structure in the northwest corner of the project site is an existing facility (see Figure 2-3 and compare to Figure 2-7), which will have two additional stories. However, Alternative 4-1 does include a second parking structure, but would not increase operational noise levels.

For a discussion of noise impact resulting from the project please refer to Section 3.9.4, Impacts and Mitigation. Noise increases resulting from project operations, including the parking structure, were analyzed and operational noise impacts are expected to be less than significant. For a discussion on noise attenuation, the commenter is referred to Section 3.9.1, Introduction, under the Noise Attenuation heading. The commenter is also referred to Response to Comment PC047-21, above.

Comment PC047-25
Question 15: How will this type of illegal activity be controlled and stopped, especially after 7:00 PM?

Response to Comment PC047-25
Thank you for your comment. Please see Response to Comment PC047-23.
Comment PC047-26

Question 16: What specific investment will be made in the surrounding homes i.e. sound-proof windows, doors etc that will mitigate the increased dBA, Vibrations and Air Pollution resulting from the construction of this project?

Response to Comment PC047-26

Please see Response to Comment PC039-13. As discussed in the Draft EIR, Section 3.9, Noise, construction impacts regarding noise and vibration were mitigated to less than significant with implementation of Mitigation Measures MM NOI-1 through MM NOI-6. As such, no other mitigation is required. Dust generation from construction is regulated by the SCAQMD in Rule 403. Compliance with this rule would ensure that impacts from construction dust would be less than significant and no mitigation is required. (See Draft EIR Section 3.1.)

Comment PC047-27

As traffic volume increases vehicle emissions increase and degrade the air quality. Additional residences, businesses, hotel guests, employees, shoppers, delivery vehicles, emergency vehicles and buses will create a significant increase in all of the following:

- ozone, particulate matter, nitrogen oxides, carbon monoxide and sulfur dioxide, all of which pose a serious health risk for residents living in such close proximity to the project/affected areas.
- 2-3 years of construction will have its own pollution issues that local residents will have to endure. The DEIR, however, states there will be no significant impact! Common sense dictates otherwise: Anyone living 55’ from a major construction site will experience significant impact. We believe the DEIR data is flawed.

Response to Comment PC047-27

Thank you for your comment. Please see Response to Comment PC039-14 which explains that the commenter’s assumption is incorrect that “As traffic volume increases vehicle emissions increase and degrade the air quality.” Please also see Response to Comment PC045-5 which explains that the Draft EIR Air Quality analysis considers all of the project’s operational trips.

To determine if project construction and or operational emissions would have a localized significant impact on residents along Kingsdale Street, the SCAQMD localized significance thresholds (LSTs) methodology was used to determine whether or not construction and operation activities would create a significant adverse localized air quality impact on nearby sensitive receptors. The LSTs developed by the SCAQMD are based on the pounds of emissions per day that can be generated by a project without causing or contributing to adverse localized air quality impacts, and only applies to the following criteria pollutants: CO, NOx, PM_{10}, and PM_{2.5}. For the purpose of analyzing localized air quality impacts, the SCAQMD has developed LSTs values for distances of 82, 164, 328, 656, and 1,640 feet from the emissions source for three project site sizes: 1 acre, 2 acres, and 5 acres. The project localized air quality analysis used the most conservative screening analysis of a 1-acre site for construction activities and a 5- acre site for operational activities with receptors at a distance of 82 feet. Additionally, the SCAQMD LST methodology states that projects with boundaries located closer than 82 feet (25 meters) to the
nearest sensitive receptors should use the LSTs for receptors located at 25 meters. As shown in Tables 3.1-10 and 3.1-11, localized construction and operational emissions, respectively, would not exceed SCAQMD LST thresholds and impacts would be less than significant. Therefore, the sensitive receptors located west of the project site across Kingsdale Avenue would not be exposed to emission levels from construction or operation that would result in a significant localized air quality impact.

**Comment PC047-28**

Thank you for your time and consideration in addressing our Concerns and Questions surrounding the DEIR for the Galleria Improvement Project.

**Response to Comment PC047-28**

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

**Comment Letter PC048: Doug Boswell**

*Comment PC048-1*

Why can’t we have an improved, updated and upgraded mall at the South Bay Galleria without the residential component?

**Response to Comment PC048-1**

The analysis related to the various project alternatives including any residential and/or office space components is provided in the Draft EIR Section 4.5, *Alternatives Considered and Further Evaluated*. The Draft EIR provides an analysis for Alternative 4-1, Reduced Density, Office Location, that can be found in Section 4.5.5. As discussed on Draft EIR page 3.8-16:

As noted under Government Code 65589.5(a), the legislature has concluded that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California.” The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City “facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community” (Gov. Code Section 65580(d)). More specifically, the Legislature’s stated intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal” (Gov. Code Section 65581). Also under the Redondo Beach Housing Element, the project site represents the greatest potential for future residential development in the City, to meet the City’s Regional Housing Needs Assessment (RHNA), as well as the high regional demand for housing in the County (see also Circulation Element, Goal 8). Furthermore, as discussion

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in Section 3.0.3 of the Draft EIR, the proposed project provides mixed use development in a transit priority area, and is consistent with the regional RTP goals as well as the City’s goals of encouraging mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance and supporting transit-oriented development (Redondo Beach Circulation Element, G6, G7, and G8).

As further discussed in Draft EIR Section 3.10.3:

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. In cooperation with HCD, local governments and councils of government are charged with determining the cities or regions existing and projected housing needs as their share of the statewide housing need. The current Regional Housing Needs Allocation (RHNA) identifies housing needs in each SCAG jurisdiction and allocates a fair share of that need to every community. Redondo Beach’s RHNA for the 2013–2021 planning period has been determined by SCAG at 1,397 housing units, including 186 units for extremely low-income households, 186 units for very-low-income households, 223 units for low-income households, 238 units for moderate-income households, and 564 units for above-moderate-income households. Nevertheless, Draft EIR Section 4.0 considered the No Project Alternative, which does not include new residential development.

Comment PC048-2

I know the replies that the Galleria representatives use when they discuss the DEIR. They say that prospective retail tenants like the idea of a 24/7 presence. These people will go to work in the morning, come home at night and there is no guarantee they will buy anything at the stores that do stay open well into the evening. Frankly, if they are the Millennials I've been told are the target market, they will only be going to the store to try stuff on, or otherwise inspect it, before offering it from Amazon, or some other online retailer, for less and perhaps avoiding the sales tax too. And Millennials aren't the only ones to wise up to this form of cost-effective shopping. It's one of the biggest reason why retail is dying. But surely Forest City must already know of this behavior. What is the real reason for the residential? Is it that this is typically the most profitable type of development? Or, are they really just using it as bait for naive retailers?

Response to Comment PC048-2

Please see Response to Comment PC048-1 for discussion of state housing law. The City acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. Therefore, no further response is required. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC048-3

Another thing about Millennials, and other such young singles to keep in mind; they don't want to live at the mall, or some future rail-transit hub to be built some 10 years off, if at all. They want to live where the night life is. Either they are going to live near the Hermosa Pier Plaza, or if they do
rent an apartment at the mall, are they going to turn those new fine dining restaurants' bars into a rowdy night life? That's not good for the surrounding communities and it's not for good attracting families and other older shoppers to the mall. I think it is risky to include 80% of the residential units as either one-bedroom or studio apartments. After the first generation of leases are up, who moves in next? If the retail stores are not thriving, and it's very possible, as that's the national and regional trend, they will be rented to a more and more transient, and less and less discerning, type of tenant. Who probably won't shop or eat much at the mall either.

**Response to Comment PC048-3**

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

**Comment PC048-4**

Most of the DEIR makes good sense with the way they are modernizing the Galleria, and I'm for it. And if you really can walk or bike there, then even better. But the residential component is, in my opinion, not only unnecessary, but will detract from the quality of life of all our surrounding neighborhoods, mainly by increased traffic, furthering the congestion of our already over utilized streets. Other than Kingsdale, no streets leading into the mall area can be widened. And widening Kingsdale would be futile. The mall itself will create a massive increase in traffic, and apartments will just add insult to injury, so to speak. Oddly, the DEIR claims otherwise. Can we get a revised traffic study from a different, and certifiably independent, consulting firm?

**Response to Comment PC048-4**

Please see Response to Comment PC048-1 for discussion of state housing law. Draft EIR Section 3.13, *Transportation and Traffic*, and the Transportation Impact Study (TIS) for the proposed project were prepared by Fehr & Peers, Inc., a national firm that specializes in transportation analyses. They have many years of experience working with local and regional agencies in Southern California. As stated in Appendix L of the Draft EIR, the TIS was prepared in accordance with the requirements of the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities.

The comment also implies that the Draft EIR did not disclose any significant traffic impacts. This implication is incorrect. The Draft EIR does identify significant traffic impacts resulting from the proposed project (as acknowledged in Comment PC048-6), and physical intersection mitigation measures were developed to address these impacts, where feasible. The traffic analysis considered traffic associated with the residential component of the project. (See Draft EIR Table 3.13-7.) While the traffic analysis concluded there would be three significant and unavoidable intersection impacts, as discussed on Draft EIR page 3.13-45, the proposed project would have reduced per capita Vehicle Miles Traveled in comparison to the SCAG region, and would therefore have a regional traffic benefit by reducing the number and length of regional vehicle trips. (See also Draft EIR page 4-46.)
Comment PC048-5
I guess the tens of thousands of locals in the surrounding residential areas of North Redondo, Lawndale and North Torrance can't be relied upon enough to encourage the lease of these retail and restaurant spaces? Frankly, I believe these neighborhoods would much prefer to shop and dine right here as opposed to the Del Amo Mall or anywhere in Manhattan Beach or El Segundo. As long as the South Bay Galleria has what they want. The simple economics of supply and demand will ensure the success of the Galleria, not on-site residential units. If they have the merchandise we want, the good sit-down restaurants we are in short supply of, and they can solve their crime and "sleaze" reputation with the proposed police sub-station, then this will be a win-win project for everyone

Response to Comment PC048-5
The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC048-6
So they want us to believe that after a major re-development and expansion of a 30-acre site, it will have no additional impact on these streets and intersections from what is there now; a seriously declining mall? Although they admit that intersections at Hawthorne & Atresia, Prairie & Artesia and the 1-405 northbound ramps and Artesia Blvd will be significantly impacted even after mitigation, I expect that every street and alley for miles around will be impacted unfavorably as drivers search out new cut-through routes to get around the grid-lock. The best "mitigation" Forest City can do is to drop the residential component entirely, as these new residents will all be joining us on our morning and evening commutes.

Response to Comment PC048-6
Please see Response to Comment PC048-1 for discussion of state housing law. The Draft EIR Section 3.13 and the TIS, Appendix L of the Draft EIR, were prepared in accordance with CEQA and the requirements of the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. In consultation with City of Redondo Beach staff, the transportation study area was selected to include intersections likely to be affected by traffic generated by the proposed project, specifically major intersections located within roughly a one-mile radius of the project site. As described in Draft EIR Section 3.13.4, Impacts and Mitigation Measures, the residential component of the proposed project was included in the trip generation, trip distribution, and trip assignment process; as such, residential trips made to and from the project site were adequately accounted for in the traffic analysis. Further, the distribution of residential traffic generated by the proposed project considered roadway congestion that might cause vehicles to seek alternative travel routes. As discussed under Vehicle Trip Distribution in Draft EIR Section 3.13.4 “[t]he SCAG model assignment accounts for congested travel time on roadways and iteratively assigns trips until equilibrium is reached.”
Therefore, the traffic impacts identified in the Draft EIR fully consider the residential component’s contribution. Please refer to Draft EIR Chapter 4.0, Alternatives Analysis, for a discussion of alternatives to the proposed project that would develop fewer residential units.

**Comment PC048-7**

As mentioned above, if the mall project is successful, and I hope it is, traffic will be far greater than the bad congestion we have now. The mall adds very little traffic in its current state of decline. So a successful mall will be a traffic mess of huge proportions. Any additional at all will only make it worse, and yet that will be unavoidable should people want to shop there as I expect they will. Eliminating the residential component is about the only thing you can do to minimize the coming grid-lock.

**Response to Comment PC048-7**

The Draft EIR identifies traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible. Please refer to Draft EIR Chapter 4.0, Alternatives Analysis, for a discussion of alternatives to the proposed project that would develop fewer residential units. Please see Response to Comment PC043-5, which explains that the traffic counts for the impact analysis were taken when Nordstrom was fully operational. Please also see Response to Comment PC048-1 for discussion of state housing law.

**Comment PC048-8**

In the DEIR, Section 4.2.1 - Less Than Significant Impacts with Mitigation, lists 6 evaluated impacts, the last one on the list titled, "Impact TRA-1 ", says, "The proposed project would not conflict with vehicular level of service criteria at the following three intersections:

- #13 - Inglewood Avenue & Artesia Boulevard (both peak hours)
- #15 - Redondo Beach Boulevard & Artesia Boulevard (PM peak hour)
- #18 - 1-405 Southbound Ramps & Artesia Boulevard (PM peak hour)

**Response to Comment PC048-8**

Draft EIR Section 3.13 and the TIS, Appendix L of the Draft EIR, was prepared in accordance with the requirements of CEQA and the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. Beginning on page 3.13-29 of the Draft EIR, the significance thresholds use to determine whether the proposed project’s contribution to delay experienced at the 32 study intersections and five mainline freeway segments, are described. The Draft EIR identifies all traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible.
Comment PC048-9

In addition, the more detailed traffic impact evaluations listed by street/intersection in various tables throughout Chapter 4, mostly claim that almost none will have significant impacts. Really?

Response to Comment PC048-9

The comment does not accurately summarize the conclusion of the Alternatives analysis. For example, Impact TRA-1 for Alternative 2 states “Alternative 2 would result in the same number of significant and unavoidable intersection impacts as the proposed project for Existing plus Project and Cumulative plus Project conditions.” (Draft EIR page 4-81.) However, as the commenter does not cite to a specific Alternative, the commenter is referred to the individual Alternatives analysis under Impact TRA-1 in Draft EIR Section 4 for further details. Please also see the response for Comment PC048-8.

Comment PC048-10

Why is the following not a better idea? Although still not officially added to the DEIR as Alternative 4.1, the last 3 presentations by Forest City representatives I have been to say they are seriously considering adding 50,000 square feet of professional office space, and that this 4.1 alternative is the most likely one to be developed. They say that any more than that will be a traffic impact and would require them to scale back the retail space. I believe this is untrue and just excuse-making. Can I see the study or other evidence this claim is based upon? And why would the retail space have to be sacrificed to make room for office space? It's the residential space that needs to be replaced to make this project successful, and to not cause any more reduction in the quality-of-life in the surrounding neighborhoods that the increased sized, scope and revitalization of the mall will do all by itself.

Response to Comment PC048-10

The commenter asserts that Alternative 4-1 was not officially added to the Draft EIR. This assertion is incorrect. Based on the analysis found in the Draft EIR Section 4.5, Alternatives Considered and Further Evaluated, Alternatives 1, 2, 3, 4 and 4-1 have been evaluated as part of the Draft EIR analysis. Please see Section 4.5 for information regarding proposed project alternatives. Analysis provided in the Draft EIR for Alternative 4-1, Reduced Density, Office Location can be found in Section 4.5.5.

Please see Section 3.13, Transportation and Traffic, for additional information regarding specific project alternatives and the subsequent Draft EIR analysis. In addition, Appendix L, the Transportation Impact Study, provides more detail for information used in the Draft EIR analysis.

The comment also suggests Alternatives with a different mix of uses. CEQA does not require an EIR to consider multiple variations on the alternatives analyzed. “What is required is the production of information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned.” (Village Laguna of Laguna Beach, Inc. v. Board of Supervisors of Orange County (1982) 134 Cal.App.3d 1022.) 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].” (Village Laguna (supra) 134 Cal.App3d at 1028.) The Draft EIR provided
a reasonable range of Alternatives in Section 4. However, the commenter’s suggestion is included in the Final EIR for review and consideration by the decision-makers. The City has not made a decision to approve or deny the proposed project, an alternative, or a variation thereof. Such decisions will be made at a subsequent date, subject to a public hearing. Please also see Response to Comment PC048-1 for discussion of the state housing law.

Comment PC048-11

Most people who would work there that come from outside the area would travel against the main flow of traffic. The Redondo, Hermosa, and the Torrance locals to the south and the west, who would work there, would end their commutes at the mall instead of continuing on to the freeway onramps north on Inglewood or Hawthorne, or east on Artesia, thus reducing commuter traffic. Plus, professional office space with CPAs, law firms, architects, chiropractors, software developers, ad agencies, etc., would bring much more economic benefit to the retail component than residential due to their far greater disposable income and late work hours. They would often eat lunch at the new restaurants (and dinners too, on late work nights), and would surely take advantage of nearby retail shopping to save time.

Response to Comment PC048-11

Vehicle trip distribution, which is described in detail beginning on page 3.13-24 of the Draft EIR, takes into account the origins and destinations of residents and employees that would travel to/from the project site. Further, the mixed-use trip generation model (MXD+) used by the traffic consultant specifically accounts for the interplay between the different land uses, which results in fewer vehicle trips overall than if the land uses were sited independent from one another. The MXD+ model is further described in the TIS (Appendix L).

Comment PC048-12

I believe that dropping the residential units and going with office space in that same Hawthorne location mapped out in Alternative 4, would be best for the success of all the tenants in the mall, and unlike residential, they would not necessarily be adding to the weekend crowds. Consider that as people show up on a Saturday afternoon to shop, to find the residents of 300 to 650 apartments taking up all the green-space, and wandering through the mall. No one likes to fight their way through crowds, so a return to the mall becomes a decision on which mall to go to, not necessarily the closest one, but the one with the best shopping experience to offer. Professional office employees would have done their shopping on their lunch breaks or as they get off work, and not add to the weekend crowds when most working locals would want to go there. Evening out the customer crunch, would also be better traffic mitigation.

Response to Comment PC048-12

Thank you for your comment. Please also see Response to Comment PC048-1 for discussion of the City’s housing requirements. The analysis related to the various project alternatives including any residential and/or office space components is provided in the Draft EIR Section 4.5, Alternatives Considered and Further Evaluated, Alternatives 1, 2, 3, 4 and 4-1 have been evaluated as part of the Draft EIR analysis. The Draft EIR provides an analysis for Alternative 4-1, Reduced Density, Office Location, that can be found in Section 4.5.5. In addition, please see
Comment Response PC048-10 above for more information. Moreover, the proposed project maxes out the 1.0 FAR for commercial uses, and therefore it is not possible to trade a reduction in residential units for increasing commercial uses.

**Comment PC048-13**

The reasoning for this 50,000 square limit is also flawed in the claim it's a 9 to 5 economic opportunity for the main tenants (retail & dining), as opposed to the longer 24/7 span for residents. But in all likelihood residents will only be there to spend money on weekends & evenings (if they even spend it in the store as opposed to at Amazon), while attorneys, CPAs, architects, and other professionals will be there all day and well into the evening, often eating lunch and even dinner at the mall. There will also be far greater catering opportunities for the restaurants as these kinds of companies have lunch meetings, client entertainment events, and during crunch-time they keep everyone working by have meals brought in.

**Response to Comment PC048-13**

The commenter expresses general opposition to the residential component, preferring office spaces instead due to weekend crowds and economic opportunities. The City acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. Please see Response to Comment PC048-10 for discussion of Alternatives.

**Comment PC048-14**

Potential retail tenants apparently are very receptive to the residential component. My position is that if given the choice, retail and restaurants would take the professional over the apartment dweller any day. They just need to be told of the option. Will they? With that in mind, why not replace the entire apartment building with professional office space. Vacancy rates in Redondo for such are among the lowest in LA/OC counties as there has been almost no new office development here in some 20 years.

**Response to Comment PC048-14**

The commenter expresses general opposition to the residential component, preferring office spaces. The analysis related to the various project alternatives including any residential and/or office space components is provided in the Draft EIR Section 4.5, *Alternatives Considered and Further Evaluated*. The Draft EIR provides an analysis for Alternative 4-1, Reduced Density, Office Location, that can be found in Section 4.5.5. The City acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. Therefore, no further response is required. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Please also see Response to Comment PC048-1 for discussion of state housing law.

**Comment PC048-15**

Would you also consider reducing the reliance on a declining brick & mortar retail segment, by converting the top floor (or 2) from retail space to professional office suites? If the mall is to have
its best chance of long term success, then less retail and more office space would be a smart move.

Response to Comment PC048-15

Please see Response to Comment PC048-10 for discussion of Alternatives. The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC048-16

Can't we have improvement without additional residential? Redondo Beach, and especially that particular area is already too dense and since the mall sits on major commuter arteries, additional residential there will just exasperate the problem, backing traffic up behind it for quite some long distance.

Response to Comment PC048-16

Please also see Response to Comment PC048-1 for discussion of the state housing law. Please refer to Response to Comment PC048-4 for discussion of the City’s trip generation, which included residential uses.

Comment PC048-17

We need the Galleria project to be successful, and not at the expense of the quality-of-life of the surrounding neighborhoods. It can be done, but Forest City has to be flexible, and listen to our feedback. Please don't make this another CenterCal dog-and-pony show. Let's really take a hard look at what it takes to get this project off the ground and successfully implemented without another huge back-lash from angry residents. Please.

Response to Comment PC048-17

Thank you for your comment. While the comment does not directly address an environmental issue, 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 PC049: Ashley Bayati and Norma Paez

Comment PC049-1

I'm writing you in regards to the South Bay Galleria improvement project. My name is Ashley Bayati, and I am a certified asbestos and lead consultant. AAA Asbestos Inspections is a state certified woman owned business since 2000. We are very interested in performing work for this big project. Could you please help steer us in the right direction so that our company can be considered for the asbestos and lead inspections for this project? Thank you very much.
Response to Comment PC049-1

Thank you for your comment. While the comment does not directly address an environmental issue your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

2.3.6 Public Testimony

For the oral/public testimony comments, a copy of the text from the meeting transcripts for each of the two public meetings is provided, and responses to each comment follow: Where commenters also submitted written correspondence, the responses below should be read in conjunction with responses to their written comments.

Comment Letter PT001: August 26th, 2017 Public Meeting

Comment PT001-1 Bruce Szeles/Ms. Gleichman

Okay. So the first speaker is Bruce -- is it Szeles?

BRUCE SZELES: Yes.

JASON RICKS: Szeles.

BRUCE SZELES: The traffic --

JASON RICKS: Please state your name for the record.

BRUCE SZELES: Bruce Szeles, resident of Torrance, 20-year resident around the block on Vanderbilt Lane. The EIR for the traffic study is basically a creative writing project. It has no basis in reality. I have been driving to the -- either the west side or to Burbank for 30 years, and no -- there was no significant impact on Inglewood Avenue either at 182nd Street in the EIR or at the 405 Freeway and Inglewood Avenue. It's -- it's a myth, number one. That's my first comment. Number two is the other myth being perpetrated by certain City Council members that somehow this area needs to fulfill some kind of need for Air Force housing. It's incorrect. The Air Force has many -- hundreds of -- of units that are actually closer to the L.A. Air Force base that are vacant currently right now over on La Cienega and the 405 Freeway. So that's another myth that's being perpetrated.

The third myth that's being perpetrated is by the current council member here in this district about that he wants the very best project. If he wanted the very best project, what he left out was the very best project that suits this neighborhood. And currently, the amount of infill in District 4 -- I've only been gone for four years, and I drive down my street -- my old street now, and I don't even recognize the amount of infill that's been happening in the last four years, and there are other lots being scraped for more infill.

This district doesn't need any more residential. What it needs is a quality commercial office complex that will -- it will reverse the traffic flow back from going out of the City, going to the City by the residents here.
It will -- how much time do I have?

JASON RICKS: You have 20 seconds.

MS. GLEICHMAN: Okay. It will far exceed project success if there is no residential and the commercial is upgraded so that people cannot leave the City for their jobs.

Thank you.

Response to Comment PT001-1

Contrary to the assertions in the comment, Draft EIR Section 3.13 disclosed that the proposed project would result in six significant intersection impacts before implementation of mitigation which included significant impacts at Intersection 13 (Inglewood Ave/Artesia), Intersection 15 (Redondo Beach Blvd/Artesia), Intersection 16 (Hawthorne Blvd/Artesia), Intersection 17 (Prairie Ave/Artesia Blvd), Intersection 18 (I-405 Southbound Ramps/Artesia Blvd), Intersection 19 (I-405 Northbound Ramps/Artesia Blvd). Three of these impacts would be reduced to less than significant, and three intersections would remain significant and unavoidable after implementation of mitigation. Please see Draft EIR Section 3.13 for additional details.

Additionally, please refer to Response to Comment PC001-1, which notes that existing conditions under CEQA are not impacts of the proposed project.

The commenter also states “This district doesn't need any more residential,” and “It will far exceed project success if there is no residential…” As discussed on Draft EIR page 3.8-16:

As noted under Government Code 65589.5(a), the legislature has concluded that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California.” The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City “facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community” (Gov. Code Section 65580(d)). More specifically, the Legislature’s stated intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal” (Gov. Code Section 65581). Also under the Redondo Beach Housing Element, the project site represents the greatest potential for future residential development in the City, to meet the City’s Regional Housing Needs Assessment (RHNA), as well as the high regional demand for housing in the County (see also Circulation Element, Goal 8). Furthermore, as discussed in Section 3.0.3 of the Draft EIR, the proposed project provides mixed use development in a transit priority area, and is consistent with the regional RTP goals as well as the City’s goals of encouraging mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance and supporting transit-oriented development (Redondo Beach Circulation Element, G6, G7, and G8).

As further discussed in Draft EIR Section 3.10.3:
State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. In cooperation with HCD, local governments and councils of government are charged with determining the cities or regions existing and projected housing needs as their share of the statewide housing need. The current Regional Housing Needs Allocation (RHNA) identifies housing needs in each SCAG jurisdiction and allocates a fair share of that need to every community. Redondo Beach’s RHNA for the 2013–2021 planning period has been determined by SCAG at 1,397 housing units, including 186 units for extremely low-income households, 186 units for very-low-income households, 223 units for low-income households, 238 units for moderate-income households, and 564 units for above-moderate-income households.

The comment also asserts that the City needs a commercial office complex. Please see Draft EIR Section 4, Alternative 4-1, which includes office space. While portions of the comment do not directly address an environmental issue 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 PT001-2 Doug Boswell

JASON RICKS: Is it Doug Boswell?

DOUG BOSWELL: Okay. Good morning, everybody. Can you hear me? So I'm really looking forward to an improved and more upscale mall development certainly, and I would like to see a lot more restaurants that I feel like actually eating at. And, of course, the layout of the mall looks pretty good. And let me tell you, I love mixed use development, but I don't like it if it has residential in the mix. It isn't necessary for the success of the mall for there to be residential.

What we really should see is a lot more of this last idea that I think has come up partially because of the last two presentations, to add professional office space. Professional office space, instead of residential, will bring in people from outside the area driving against the flow of traffic, so there will be less traffic. People in Redondo and the southern area of Torrance, west area of Torrance that are driving through Redondo now that weren't there will stop their commute there instead of continuing on and clogging up Inglewood, Hawthorne and Artesia on the way to the freeway.

So there will be less traffic. That's a no-brainer. The presentation the last couple of weeks said that they don't agree with that, and I think that's just excuse-making and it's wrong. I'd like to see the study that their ideas are based on that say professional office space will create so much more traffic that they will then be forced for some reason to reduce retail, which is the main purpose of the mall. Why not instead of reducing retail, reduce residential? Replace that residential complex that they're now wanting to put on Hawthorne with office space for attorneys, CPAs, architects, software developers, ad agencies, et cetera.

These people work late, they'll be eating lunch there, they'll be eating dinner there quite often, especially during on tax season for those CPAs, and they will be shopping there because that's
where the good stuff will be because that's what they're going to do with the improvement of the mall.

So if you're a resident, you're leaving in the morning to go to work. You're not eating lunch there. You're coming back in the evening, maybe late; you're tired. You're probably not going to do much shopping unless it's an emergency run. You're probably shopping on the way home maybe at Del Amo or maybe El Segundo.

So I don't get that there's this big push to say we need residential because that's what the prospective retail tenants want. What the retail tenants want are people who will buy stuff there, and if you have professional office space, not 50,000 square feet, but that entire 300-unit apartment building, then you're going to have hundreds and hundreds and hundreds of people with huge amounts of disposable income, far more than a person who can barely afford a one-bedroom apartment, shopping there, eating there, going to entertainment there, seeing movies there, participating in the economic vitality of the mall and the whole region.

As a resident of -- and a very local resident of this mall, I desperately want this mall to be successful, but it needs to be successful such that it does not reduce the quality of life of all of us around here. This Green Line that's going to come in in 10 years is going to create more traffic as people park on our streets to avoid paying for parking. And hell, that's ten years away anyway. So high residential density now to prepare for that is a non-issue.

Anyway, I've run over my time. Thank you.

**Response to Comment PT001-2**

Thank you for your comment. Please see Response to Comment PC048-1 for discussion of the residential project component and legal requirements associated with the residential Regional Housing Needs Allocation. Please see refer to Response to Comment PC0048-10, -11, -12, and -13 with regards to Alternatives considered in the Draft EIR analysis. More specifically, please see Section 4.5.5 for analysis regarding the Alternative 4-1, Reduced Density, Office Location.

Please see Section 3.13, *Transportation and Traffic*, for additional traffic analysis information including trip generation rates for residential and office space. In addition, Appendix L, the Transportation Impact Study, provides more detail for information used in the Draft EIR analysis.

**Comment PT001-3  Lara Duke**

LARA DUKE: I'm Lara Duke. After I heard details at a recent Forest City presentation, this plan is a worthwhile one except for one thing. There should be no residential element. Redondo Beach is dense enough, and the project is already a natural mixed use project with residential homes already existing in the area. There's your mixed use. It's a money-grab by the developer, and who can blame them? They want money, and it's perfect. Live-in customers for their restaurants and shops.

But the impacts would be far reaching and negative to you and me. Our City representatives must recognize and fight this plan's residential component for the sake of residents' quality of life. It is
clear that traffic impacts at major nearby intersections cannot be mitigated, and it takes a brief
drive up and down Hawthorne now to see that traffic is already bad. Do we want it to go to the
next step and be horrendous?

This isn’t even considering the issue of resources, like water and electric, where we already face
frequent shortages, especially in the summer months. So how is housing a sensible move?

The other aspects of the project appear to be good. This is a mall already, so multi-uses are
appropriate. As we all know, retail is failing at malls. So this developer knows to take a different
tact. Many restaurants are a good idea given the studies showing that people eat out often. Their
idea of giving people an experience that brings them away from their homes and personal devices
is ambitious but also a little nebulous. Small grassy swaths as communal park space seem nice.
Suggestions are yoga, live music and art displays, though I think the logistics should be finetuned and better resourced since most people go to actual parks or the beach for these activities.

I wonder with this layout, if the Green Line will be very accessible to residents there or whether
residents would even use it given the social stigma most So. Cal. people are wired with that says
mass transit equals what poor or homeless people ride. There would have to be extreme outreach
plans by Metro to convince people to use it and they would need to be really convenient. It will
take nine years before the Green Line will even break ground at this location, which is a long way
off to be touting the service. I do hope for the City’s plan will eventually be successful and their
vision will be one that draws lots of people to this exciting new South Bay destination, but I also
really hope that they truly listen to our feedback today and online so ultimately this will be a
project we can all get behind.

Response to Comment PT001-3
Thank you for your comment. The commenter is referred to Response to Comment PC008-1
through -3, which provide responses to the same issues raised in the commenter’s written
correspondence.

Comment PT001-4 Suzy Royds
SUZY ROYDS: Hi, everybody. Thanks for showing up. I want this mall to succeed, and it needs
to be a win-win for everybody. We’re working together with Forest City, and I appreciate them
being willing to work together with the community. The community and the neighborhood
integrity is an integral part of the success of this mall. And one of the issues, just one of the issues
that I want to address today to is traffic mitigation for keeping specific intersections of
Kingsdale/Artesia, Kingsdale/Grant, Kingsdale/182nd, Grant and Inglewood and also 177th
Street and Hawthorne. Specifically traffic currently is in bad shape on Kingsdale Avenue. We
have basically a narrowing between Grant and Kingsdale and Target and Kingsdale from the
other lanes. So bringing 300 residential units would actually equal proposed probably 600 cars
and probably 2400 extra car trips a day. People do not take the bus to go grocery shopping. They
do not use the Metro system to take their kids to school. We’re going to have possibly over 2,000
extra car trips a day on our streets.
The residential component really is not necessary for the integration of this community. It's actually a detriment, and it's going to bring extra car trips, which means greenhouse gas emissions, it means crime, it means a host of other issues.

I do, however, like certain proponents of the project. I do also feel that the hotel issue is good, as long as it's kept to a minimum. Office space instead of a parking structure on Kingsdale Avenue would be a better bet.

A parking structure on Kingsdale Avenue would be detrimental to this community. The existing parking structure is a detriment to this community. All night long there's racing in that parking structure, there's screaming, there's yelling --

JASON RICKS: 30 seconds left.

SUZY ROYDS: -- and it's heard all the way back to Condon Avenue. It does not just affect Kingsdale Avenue. There's great problems, I foresee, in the parking structure component to the alternative pour of this project. So going forward, I appreciate having an actual City -- actual project manager available for these meetings.

Response to Comment PT001-4

Thank you for your comment. Please see Response to Comments PC020, PC021, PC022, PC023, and PC047 which respond to many similar issues raised by the commenter and Mr. Royds. The Commenter states “The residential component really is not necessary for the integration of this community.” As discussed on Draft EIR page 3.8-16:

As noted under Government Code 65589.5(a), the legislature has concluded that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California.” The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City “facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community” (Gov. Code Section 65580(d)). More specifically, the Legislature’s stated intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal….to assure that counties and cities will prepare and implement housing elements which….will move toward attainment of the state housing goal” (Gov. Code Section 65581). Also under the Redondo Beach Housing Element, the project site represents the greatest potential for future residential development in the City, to meet the City’s Regional Housing Needs Assessment (RHNA), as well as the high regional demand for housing in the County (see also Circulation Element, Goal 8). Furthermore, as discussed in Section 3.0.3 of the Draft EIR, the proposed project provides mixed use development in a transit priority area, and is consistent with the regional RTP goals as well as the City’s goals of encouraging mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance and supporting transit-oriented development (Redondo Beach Circulation Element, G6, G7, and G8).
As further discussed in Draft EIR Section 3.10.3:

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. In cooperation with HCD, local governments and councils of government are charged with determining the cities or regions existing and projected housing needs as their share of the statewide housing need. The current Regional Housing Needs Allocation (RHNA) identifies housing needs in each SCAG jurisdiction and allocates a fair share of that need to every community. Redondo Beach’s RHNA for the 2013–2021 planning period has been determined by SCAG at 1,397 housing units, including 186 units for extremely low-income households, 186 units for very-low-income households, 223 units for low-income households, 238 units for moderate-income households, and 564 units for above-moderate-income households.

The commenter also states that “[residential development] is actually a detriment, and it’s going to bring extra car trips, which means greenhouse gas emissions…” The Draft EIR GHG analysis considers all of the project’s operational trips. As noted on Draft EIR page 3.5-12 “Project trip generation rates were obtained from the proposed project’s traffic analysis (Section 3.13, Traffic and Transportation, and Appendix L).” As shown in Draft EIR Table 3.13-7, the project’s operational trips account for all of the land uses, including residential uses.

Furthermore, as discussed in Draft EIR Section 4, the No Project Alternative (which eliminates all residential uses on the site) results in increased regional GHG emissions in comparison to the proposed project (which includes 650 residential units), because the proposed project has reduced Vehicle Miles Traveled (VMT) in comparison to the regional average. More specifically, as discussed on Draft EIR page 4-37:

Los Angeles County has built fewer housing units in comparison to existing demand, particularly in the coastal communities thereby requiring individuals to commute greater distances (State Legislative Office 2015). To that end, it is reasonable to assume that emissions associated with the 1008 residents are occurring elsewhere in the SCAG region under baseline conditions. As detailed in Section 3.5, baseline emissions assume the 2015 mobile source emission rates, and 2001 building energy efficiencies. In addition, under Alternative 1, no growth would occur at the project site, therefore all emissions associated with the 1,008 residents, commercial/retail uses would remain in the SCAG region. Alternative 1 has a net decrease in 2023 and 2035 emissions as compared to the baseline annual emissions (approximately 620 and 547 MT CO2e respectively for unmitigated scenarios). The unmitigated Alternative 1 scenarios result in less reduction from baseline than the proposed project (which results in a decrease of 10,299 (2023) and 10,313 (2035) respectively under unmitigated conditions). This is due to the amount of emissions, remaining within the SCAG region under Alternative 1 operating with greater VMT, and with older less energy efficient structures. Therefore under Alternative 1 is less efficient than the proposed project, as seen in Table 4-8. The slight decrease with respect to baseline is due to the increase in Renewable Portfolio Standards (RPS) that reduces overall energy consumption regardless of the energy efficiency of the buildings.
Inclusion of residential mixed use development in Transit Priority Areas, such as the project site, is consistent with statewide planning efforts to reduce greenhouse gases, as discussed in Draft EIR Section 3.5:

The state legislature and regional planning agencies have been tasked with different planning efforts to reduce GHG emissions. Pursuant to the provisions of Senate Bill (SB) 375 and SB 743, regional land use planning efforts have focused upon infill development, development in transit priority areas [such as the project site], and reducing per capita Vehicle Miles Traveled (VMT). As discussed in the 2016 SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), “The 2016 RTP/SCS plans for focusing new growth around transit, which is supported by the following policies: identifying regional strategic areas for infill and investment; structuring the Plan on centers development; developing “Complete Communities”; developing nodes on a corridor; planning for additional housing and jobs near transit planning for changing demand in types of housing; continuing to protect stable, existing single-family areas; ensuring adequate access to open space and preservation of habitat; and incorporating local input and feedback on future growth” (2016 SCAG RTP/SCS, pages 7 and 8).

Additionally, the underlying purpose behind the RTP/SCS is to outline “growth strategies that better integrate land use and transportation planning and help reduce the state’s greenhouse gas emissions from cars and light trucks.” (2016 SCAG RTP/SCS, page 15).

The proposed project would be a redevelopment project that would be located within walking distance to public transportation as well as existing residential uses within the city. The location of the project is in close proximity to transit, and existing residences.

The comment also alleges “traffic currently is in bad shape on Kingsdale Avenue.” As shown in Draft EIR Table 3.13-10, the Intersection of Grant and Kingsdale (Intersection 20) currently operates at LOS A during the AM and PM Peak hours with and without the proposed project. Consequently impacts of the proposed Galleria project along Kingsdale would be less than significant. While there would be a slight reduction to LOS B during the PM peak hour under cumulative conditions, impacts would still be less than significant. (See Draft EIR Table 3.13-13.) While the Galleria project’s intersection impacts along Kingsdale are less than significant, the Transit Center Relocation Project, included the following Conditions of Approval related to Kingsdale roadway improvements:

TR1. The applicant shall be required to restripe and re-establish a second west bound travel lane, on 182nd Street between Hawthorne Boulevard and Kingsdale Avenue after the bus layover zones on 182nd Street are abandoned. The plans and construction specifications for these changes shall be included in the construction document bid set.

TR2. In conjunction with the land exchange with Forest City for the South Bay Galleria Transit Terminal parcel, twenty (20) feet of land to the east of the existing westerly edge of the Transit Terminal parcel adjacent to Kingsdale Avenue shall be dedicated for street widening purposes. The street widening will allow the construction of an additional northbound, 250-feet Tong right turn only lane, curb and gutter, parkway, and sidewalk. The street widening will also require the demolition of the existing Transit Terminal bus
bays and reconstruction of the east side of Kingsdale Avenue for the length of the Transit Terminal parcel. The improvement of the street shall occur as part of the demolition of the existing transit terminal once the new Transit Center is operational. The plans and construction specifications for these changes shall be included in the construction document bid set.

The commenter also states “And one of the issues, just one of the issues that I want to address today is traffic mitigation for keeping specific intersections … Grant and Inglewood and also 177th Street and Hawthorne.” As shown in Draft EIR Tables 3.13-10 and 13 impacts were determined to be less than significant at Grant and Inglewood (Intersection #22) and at 177th Street and Hawthorne (Intersection 25).

The comment also states that the residential component “means crime.” Please see Draft EIR Section 3.11, Impact PUB-1. Please see Response to Comment PC039-12 which addresses comments related to “racing in the parking structure.” Concerning the parking structure, the commenter is referred to Response to Comment AL002-11.

**Comment PT001-5 Alex Makarzyck**

ALEX MAKARZYCK: My name is Alex Matarzyck. I just wanted to point out the area -- I mean, dealing with the 300 residences, I think, if you want to compare that to the area between -- in my little area there's about 57 residences, which is just from 183rd to the cemetery, okay? So if you go from the cemetery south to 190th, both sides of Inglewood Avenue, okay, you're going to get about 200 residences, okay? So that's -- all those residences would be packed into this area here, which -- you know, which is fine, but I think the traffic will be -- have many cars when we're talking, you know, 300 residences, 600 cars. I drive to the freeways, and I have trouble now just going to and from the freeways to go to work. And I know that it's going to be four years of construction, right? Four years of work and traffic and then after that the residents will be here.

So I like the idea, but I think the residences are just a little too much when you put it in perspective on how many residences that is and how it is versus if it's laid out on our streets. You know, that's a big area. You know, 57 houses just in my little block, and that will be, you know, compounded so much.

Well, thank you for time, and I hope that we can think about that. And I want to make sure that hopefully the City will protect our quality of life. And that's -- that's it.

Thank you.

**Response to Comment PT001-5**

Thank you for your comment. Please see Response to Comment PC035-1 through PC035-11 for additional responses to the commenter’s written correspondence related to housing and traffic. While construction traffic impacts were determined to be less than significant in Draft EIR
Section 3.13, the City has also proposed, as a standard condition of approval, a Construction
Traffic Management Program. (See Draft EIR page 3.13-45.)

**Comment PT001-6  Tom Lieb**

TOM LIEB: It's my writing. I'm Tom Lieb. I own the property that is south of Living Spaces
towards 182nd. We have two-and-a-half acres there. It's a machine shop. It's a warehouse. I built
that building in 1974. There was no sidewalks. There was nothing. We didn't even have mail
service. So I've been in these meetings for every development that has ever occurred, whether it's
been the Galleria, whether it's been Target, whether it's been Living Spaces and the rest of them.

The EIR is nothing more than plagiarism. It is exactly the same, the same bologna that they fed us
every time we met. The fact of the matter is that they never did a traffic study, and what
difference does it make on an intersection that's three, three-and-a-half miles away? It makes no
difference. They've completely ignored Kingsdale.

And to give a perspective, our building from 2:00 o'clock til 5:00 o'clock every day, I put 20
trucks on Kingsdale. That's my business. That's what I do. They're from UPS trucks to FedEx
trucks to semis that are up to 50 foot length, from 20 foot to 40-foot containers from the harbor.
And Kingsdale, in the last development, the City stole $80,000 from Target when they decided --
the City Council said they were going to put a traffic light on the corner of Kingsdale and 182nd
Street. They never did it. They took the money and they stuck it in a general fund.

Now we're coming in with this development, and the same thing. I've been to all these meetings.
The residents themselves have said the same. The developers -- the Galleria has not listened to
one single thing that the residents have put up.

Now, I'm not a resident of Redondo Beach so I can't vote for the councilmen, but I am a property
owner, I have a business here. I have 80-something employees.

Now, besides the trucks we put on the road, our employees leave work. So I put 80 cars on
Kingsdale. I'm one business.

Now, what about all the other businesses? The EIR never addressed the number of employees that
are on this property from 182nd to Kingsdale -- to Artesia from Kingsdale and Hawthorne
And when they drive, they come in the morning and they leave in the afternoon or they drive to
lunch. So they put their car on Kingsdale most of the time four times a day.

Now, the EIR has done nothing -- there's nothing in it that says anything about the existing
businesses, the employees, the people that come here every single day to work. On top of that,
you've got all the customers.

Does that show you the number of customers that the Galleria has? What about Panera? What
about the Bank of America? What about all the other stores? What about Target? Do you see a
Target representative here? No, because they never informed them about what was going on. I
know that for a fact because I know the executives at Target.
So the fact is that the EIR is bogus, and before you do anything -- I don't have any -- any – I don't have any points in the game as far as what's developed here. I don't care. Whatever it is, these people are professional enough to do something that's going to make them money so they can survive. Their company is in trouble. If you read the Wall Street Journal, the reaps that these people have have problems. And this is one.

And so the fact of the matter is --

JASON RICKS: Your time is up, sir.

TOM LIEB: Thank you. -- this actual project is necessary for them, but you can't do anything without developing Kingsdale. Kingsdale needs to be widened. It's time now to do that. We've got to look at the future. There's a proposed 400-residential unit on the corner of 182nd and Kingsdale that moves into our property, you've got the train station and you've got this development and you have no street. It needs to be widened, and we can do it now because the space is open. If they develop it, you can't do it.

Response to Comment PT001-6

Thank you for your comment. The commenter asserts that (1) the Draft EIR was plagiarized, (2) that no traffic study was performed, and (3) that the traffic study “completely ignored Kingsdale.” Contrary to these assertions the Draft EIR was not plagiarized, and provides impact analyses specific to the Galleria project. Furthermore, a detailed project specific traffic analysis was performed for the proposed Galleria project, and was included in Draft EIR Section 3.13, and Draft EIR Appendix L (which includes 1,377 pages of traffic analysis and supporting documentation specific to this project). This impact analysis includes four intersections located along Kingsdale Avenue at: Artesia Boulevard (Intersection 14), Grant Avenue (Intersection 20), Target Drive (Intersection 24), and 182nd Street (Intersection 27).

While the Galleria project’s intersection impacts along Kingsdale are less than significant, the Transit Center Relocation Project included the following Conditions of Approval related to Kingsdale roadway improvements:

TR1. The applicant shall be required to restripe and re-establish a second west bound travel lane, on 182nd Street between Hawthorne Boulevard and Kingsdale Avenue after the bus layover zones on 182nd Street are abandoned. The plans and construction specifications for these changes shall be included in the construction document bid set.

TR2. In conjunction with the land exchange with Forest City for the South Bay Galleria Transit Terminal parcel, twenty (20) feet of land to the east of the existing westerly edge of the Transit Terminal parcel adjacent to Kingsdale Avenue shall be dedicated for street widening purposes. The street widening will allow the construction of an additional northbound, 250-feet Tong right turn only lane, curb and gutter, parkway, and sidewalk. The street widening will also require the demolition of the existing Transit Terminal bus bays and reconstruction of the east side of Kingsdale Avenue for the length of the Transit Terminal parcel. The improvement of the street shall occur as part of the demolition of
the existing transit terminal once the new Transit Center is operational. The plans and
construction specifications for these changes shall be included in the construction
document bid set.

The commenter also alleges:

Besides the trucks we put on the road, our employees leave work. So I put 80 cars on
Kingsdale...The EIR never addressed the number of employees that are on this property
from 182nd to Kingsdale...Now, the EIR has done nothing -- there's nothing in it that says
anything about the existing businesses, the employees, the people that come here every
single day to work. On top of that, you've got all the customers... What about Target?

Contrary to these assertions, the Galleria traffic analysis accounts for all existing employees,
customers, and businesses that utilize the roadways. As stated on page 3.13-6 of the Draft EIR,
the Existing Conditions analysis was based on traffic counts collected in November 2014 at 32
study intersections and five mainline freeway segments. Traffic counts record all vehicles moving
through an intersection or across freeway lanes, and do not discriminate by trip origin or
destination, or whether a vehicle trip is made by an employee, resident, or visitor. Further, the
traffic counts include all vehicle types, which include but not limited to automobiles, delivery
trucks, buses and emergency response vehicles. The other traffic analysis scenarios presented in
the Draft EIR build upon the Existing Conditions scenario and include all planned and/or
programmed changes to transportation facilities, including changes to the roadway network; and
transit services and facilities. Therefore, the Draft EIR properly accounts for the full vehicle trip
generation potential of the proposed project and its potential impact on traffic conditions.

As shown in Draft EIR Table 3.13-7, the project’s operational trips account for all of the land
uses under existing conditions and under the proposed project. As also explained in Section
3.13.4, the trip generation rates are based upon the Institute for Transportation Engineers (ITE).
“These rates are based on empirical data at survey sites, which includes all trips entering and
exiting the site during a specified period of time.” (Emphasis added.) This includes employees,
delivery vehicles, customers, etc.

The Commenter also asserts that “Target” was never informed about the project. A Notice of
Availability of the Draft EIR (NOA) was published in the Easy Reader on July 27, 2017 and
published on the City’s website. Additionally, a mailed copy of the NOA was provided to
locations in proximity to the project site, which included a mailed copy of the NOA to Target
Corporation (DBA Sills Cummis) via 1st class mail on July 28th, 2017.

The other comments do not pertain to environmental issues associated with the proposed project
or Alternatives, therefore no further response is required. While unrelated to this project, the
commenter asserts “in the last development, the City stole $80,000 from Target when they
decided -- the City Council said they were going to put a traffic light on the corner of Kingsdale
and 182nd Street. They never did it. They took the money and they stuck it in a general fund.”

The Resolution adopting the Target project did not require payment of a fee, as asserted in the
comment. Planning Commission Resolution 9191, which approved the Target project, stated
“Kingsdale Avenue/182nd Street: Conduct a ‘before and after’ traffic signal warrant analysis within 6 months of Target store operation to determine if a traffic signal is justified at the intersection of Kingsdale Avenue/182nd Street. If a traffic signal is justified, the applicant will contribute the Target store fair share toward the cost of installation of the traffic signal.” Consistent with this condition, it was determined that the criteria for installation of a traffic signal were not met. While Target did pay money to the City pursuant to a Side-Letter Agreement dated February 2014, this was not for a traffic signal as asserted by the commenter, but instead was for “completing additional neighborhood improvements.” This funding was expended on neighborhood beautification and improvements consistent with this agreement.

Comment PT001-7 Tom Royds

TOM ROYDS: Hi everybody. So you got to make a bus terminal coming in down the street, right? And you've done an impact survey on traffic without taking into consideration a new mega bus terminal coming in down the street. Does that make any sense to anybody standing in this room, that we're not going to count all those buses that everybody knows backs up from 177th to Artesia Boulevard in the afternoon?

UNIDENTIFIED SPEAKER: Using both lanes.

TOM ROYDS: Using both lanes. I see at times in 5:00 o'clock in the afternoon six, seven buses lined up because they can't get through the light and all the stations are taken down at the bus terminal. So now all you're going to do is you're going to flip those buses around and instead of going northbound, they're going to flip around and go down the single lane trying to go northbound to the terminal.

This comes down to a really simple thing. It comes down to trust. I've been through this like Tom. I've been in my home -- I've been there for 30 years. I've been through all the development that's gone on at the City, I've been through all of these meetings. And every single time the same thing happens. They come up with an EIR that is fictitious, okay? It doesn't take into consideration the actual facts.

How can anyone do an EIR of the mall and not take Kingsdale Avenue into consideration? And when asked, "Is Kingsdale in there?" "We don't know. The right guy is not here." The right guy is not here because the right guy doesn't want to be held accountable for questions that we need answered, right? I mean, you call a meeting like this and say come down to here and everybody is going to have a conversation about this but then they don't have the right people here. They're giving you bad numbers, your health is going to be impacted, your nerves are going to be impacted, your traffic and your quality of life is going to be impacted. They're giving you bad numbers that they want to just shove down your throat. And I will prove my point to you. Does anyone see Plan 4 back there? No one sees Plan 4 back there because they aren't going to submit Plan 4 until they know what's going on.

How many people were told Plan 4 wasn't what was going in? So do you feel lied to?

UNIDENTIFIED SPEAKER: Yes.
TOM ROYDS: Do you feel deceived?

UNIDENTIFIED SPEAKER: Yes.

TOM ROYDS: So why in the world should we take the EIR into face value when the EIR is nothing but a bunch of numbers that were made up that aren't even taking into consideration probably one of the biggest traffic incidences we're going to have, which is a new bus terminal coming in down the street? I see all the time on the weekends traffic backed up so far that the emergency vehicles have to stop at Kingsdale Avenue, and the EMTs get out and run into the mall with their cases because they can't get through the traffic intersection.

I think what we need to do is we need to make sure that they have another meeting, I think that they need to bring the right people in front of us and we need to get our real questions answered. By God's witness, we need to band together as a community to protect our own health, our own welfare, our own air quality, the quality of life for our children and our grandchildren that aren't even going to be able to walk the streets any more.

Response to Comment PT001-7

Thank you for your comment. Please see Response to Comments PC020, PC021, PC022, PC023, and PC047 which respond to many similar issues raised by the commenter and Ms. Royds. Please also see Response to Comment PC039-10 regarding the Transit Center Relocation and cumulative traffic methodology. The comment also asserts “How can anyone do an EIR of the mall and not take Kingsdale Avenue into consideration?” The Draft EIR traffic impact analysis includes four intersections located along Kingsdale Avenue at: Artesia Boulevard (Intersection 14), Grant Avenue (Intersection 20), Target Drive (Intersection 24), and 182nd Street (Intersection 27). While the Galleria project’s intersection impacts along Kingsdale are less than significant, the Transit Center Relocation Project included the following Conditions of Approval related to Kingsdale roadway improvements:

TR1. The applicant shall be required to restripe and re-establish a second west bound travel lane, on 182nd Street between Hawthorne Boulevard and Kingsdale Avenue after the bus layover zones on 182nd Street are abandoned. The plans and construction specifications for these changes shall be included in the construction document bid set.

TR2. In conjunction with the land exchange with Forest City for the South Bay Galleria Transit Terminal parcel, twenty (20) feet of land to the east of the existing westerly edge of the Transit Terminal parcel adjacent to Kingsdale Avenue shall be dedicated for street widening purposes. The street widening will allow the construction of an additional northbound, 250-feet Tong right turn only lane, curb and gutter, parkway, and sidewalk. The street widening will also require the demolition of the existing Transit Terminal bus bays and reconstruction of the east side of Kingsdale Avenue for the length of the Transit Terminal parcel. The improvement of the street shall occur as part of the demolition of the existing transit terminal once the new Transit Center is operational. The plans and construction specifications for these changes shall be included in the construction document bid set.
The commenter is referred to PC047-4, regarding widening Kingsdale Avenue. Also, the commenter is referred to the Transportation Impact Study (TIS), Appendix L of the Draft EIR. The TIS was prepared in accordance with the requirements of CEQA and the City of Redondo Beach, and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. Beginning on page 3.13-29 of the Draft EIR, the significance thresholds use to determine whether the proposed project’s contribution to delay experienced at the 32 study intersections and five mainline freeway segments, are described. The Draft EIR identifies all traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible.

The commenter also asserts “It doesn't take into consideration the actual facts” and appears to be referencing the traffic analysis. As stated on page 3.13-6 of the Draft EIR, the Existing Conditions analysis was based on traffic counts collected in November 2014 at 32 study intersections and five mainline freeway segments. Traffic counts record all vehicles moving through an intersection or across freeway lanes, and do not discriminate by trip origin or destination, or whether a vehicle trip is made by an employee, resident, or visitor. Further, the traffic counts include all vehicle types, which include but not limited to automobiles, delivery trucks, buses, etc.

The commenter also asserts “your health is going to be impacted.” Air Quality impacts were determined to be less than significant, as discussed in Draft EIR Section 3.1. For discussion of weekend traffic, please see Response to Comment PC040-5. For discussion of emergency services, please see Response to Comment PC039-3.

The Commenter also states “No one sees Plan 4.” The commenter appears to be referencing Alternative 4, which is included in Draft EIR Section 4, more specifically this alternative is described in Draft EIR subsection 4.5.4 and 4.5.5 and analyzed in Sections 4.6.4 and 4.6.5. The decision to approve, disapprove, or modify the proposed project or an Alternative is not made by City Staff, but is made by the decisionmaking body after certification of the Final EIR. Consequently, such a decision could not be made while the Draft EIR was still being circulated for public review.

**Comment PT001-8 Elizabeth Espinosa**

ELIZABETH ESPINOSA: Elizabeth Espinosa, E-s-p-i-n-o-s-a. Hi everybody. I just want to say thank you so much for this. And council member, thank you for being here. You probably feel that you have thrown yourself in this ring.

But this is really important that we work together. I think everyone here wants to work together, but I have to tell you truthfully, I am a journalist and I will say most people should have stood up and said thank you so much for your time. But if you're not the person, right, as a reporter, I'm not going to go and do a story on someone who doesn't have all the answers, right? This is not a hit on you. It's just the way it goes.
Truthfully what each and every one of us has to do, because this is what we're seeing even at national level, right? Public service has to work for us, and democracy in action means we do have to show up and we have to do public comment. And so it is really important that we do what these gentlemen have talked about here. We must continue to hold them accountable.

How -- my question is, as I'm looking here -- and thank you for your presentation -- but how do you honestly as a traffic engineer and as a City official say to the community this is what is going to happen if you propose this project when truthfully Kingsdale is right there and you have accidents and there was a man who just ran -- and my newsroom had to go and do the story – that ran across the street and went into someone's house. Redondo Beach had to throw a drone to try to find the guy. He got away. We don't know what happened.

It's a safety issue. You have ambulances, people who are elderly also in the community that go and have to go down Kingsdale Avenue. How are they going to get there because there is so much traffic?

And this gentleman pointed out that he's got his 80 buses, trucks, whatever it may be. And it's true. How does the EIR not even include Kingsdale Avenue? I took some pictures of the slides to keep it -- to say maybe I'm missing something, and I went back and I'm looking. It's not there.

So I want to just go on the the record to say that I'm vehemently opposed to the residential component. I think this is an incomplete EIR.

And Council Member, I really want you to hear that because you are our voice, and I think we come to make sure that you hold, you know, them accountable and the team and you speak for us.

How can traffic engineers who will be serving meet the city standard to keep citizens safe? And why hasn't it been discussed that Kingsdale be widened because this is -- that is the biggest -- I mean, Redondo Beach faces that way. Most people are not coming from, you know, Torrance to take Hawthorne Boulevard to get to the mall, right? So you're having residential, you're having -- you're also having office space discussion. I think that the mall has to be remodeled, sure. It's their property. It's a financial proposal that they need to, you know, fix their income, but then what you do is -- what you have in existence you fix, but you don't bring in a residential component because you haven't even widened Kingsdale Avenue yet --

JASON RICKS: 30 seconds.

ELIZABETH ESPINOSA: Great. I hear this a lot. And what I would say is that I just want to make sure that I oppose -- I want to go on the record that we oppose the residential component. I think that you fix it, you remodel it, you definitely have to do something. Whatever is proposed in this, you know, Alternative 4, Proposal 4, which isn't even up there for display, that is not going to work either.

This parking structure people are constantly racing all night. It's constant, like the traffic, the homelessness, and we will continue to speak as one voice and we should certainly keep our City
leaders accountable to our needs because this is about safety and the welfare of all residents. So even if you don't live in this district, it will affect you. Thank you.

**Response to Comment PT001-8**

Thank you for your comment. The commenter states “I'm vehemently opposed to the residential component. I think this is an incomplete EIR.” As discussed on Draft EIR page 3.8-16:

As noted under Government Code 65589.5(a), the legislature has concluded that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California.” The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City “facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community” (Gov. Code Section 65580(d)). More specifically, the Legislature’s stated intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal” (Gov. Code Section 65581). Also under the Redondo Beach Housing Element, the project site represents the greatest potential for future residential development in the City, to meet the City’s Regional Housing Needs Assessment (RHNA), as well as the high regional demand for housing in the County (see also Circulation Element, Goal 8). Furthermore, as discussed in Section 3.0.3 of the Draft EIR, the proposed project provides mixed use development in a transit priority area, and is consistent with the regional RTP goals as well as the City’s goals of encouraging mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance and supporting transit-oriented development (Redondo Beach Circulation Element, G6, G7, and G8).

As further discussed in Draft EIR Section 3.10.3:

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. In cooperation with HCD, local governments and councils of government are charged with determining the cities or regions existing and projected housing needs as their share of the statewide housing need. The current Regional Housing Needs Allocation (RHNA) identifies housing needs in each SCAG jurisdiction and allocates a fair share of that need to every community. Redondo Beach’s RHNA for the 2013–2021 planning period has been determined by SCAG at 1,397 housing units, including 186 units for extremely low-income households, 186 units for very-low-income households, 223 units for low-income households, 238 units for moderate-income households, and 564 units for above-moderate-income households.

The commenter also asserts the EIR does not address Kingsdale Avenue. The Draft EIR’s traffic impact analysis includes four intersections located along Kingsdale Avenue at: Artesia Boulevard (Intersection 14), Grant Avenue (Intersection 20), Target Drive (Intersection 24), and 182nd Street (Intersection 27). (See Draft EIR Section 3.13.) Impacts at all of the Kingsdale
Intersections were determined to be less than significant without mitigation, with all of these intersections operating at an acceptable levels of service (i.e. LOS A, B, or C); with most Kingsdale intersections operating at LOS A or B. (See Draft EIR Tables 3.13-10 and 3.13-13.) While the South Bay Galleria project’s intersection impacts along Kingsdale Avenue were determined to be less than significant, the Transit Center Relocation Project included the following Conditions of Approval related to Kingsdale Avenue roadway improvements:

TR1. The applicant shall be required to restripe and re-establish a second west bound travel lane, on 182nd Street between Hawthorne Boulevard and Kingsdale Avenue after the bus layover zones on 182nd Street are abandoned. The plans and construction specifications for these changes shall be included in the construction document bid set.

TR2. In conjunction with the land exchange with Forest City for the South Bay Galleria Transit Terminal parcel, twenty (20) feet of land to the east of the existing westerly edge of the Transit Terminal parcel adjacent to Kingsdale Avenue shall be dedicated for street widening purposes. The street widening will allow the construction of an additional northbound, 250-feet Tong right turn only lane, curb and gutter, parkway, and sidewalk. The street widening will also require the demolition of the existing Transit Terminal bus bays and reconstruction of the east side of Kingsdale Avenue for the length of the Transit Terminal parcel. The improvement of the street shall occur as part of the demolition of the existing transit terminal once the new Transit Center is operational. The plans and construction specifications for these changes shall be included in the construction document bid set.

The commenter also appears to be referencing comments from Tom Lieb [i.e. “this gentleman pointed out that he's got his 80 buses, trucks, whatever it may be.”]. Please see Response to Comment Response to Comment PT001-6 which addresses those issues.

Please see refer to Response to Comment PC0048-10 with regards to Alternatives considered in the Draft EIR analysis. More specifically, please see Section 4.5.5 for analysis regarding the Alternative 4-1, Reduced Density, Office Location. For discussion of emergency services, please see Response to Comment PC039-3. Please see Response to Comment PC039-12 which addresses comments related to alleged racing in the parking structure. Please see Response PC040-5 for discussion of accidents and safety.

**Comment PT001-9  Colleen Otash**

COLLEEN OTASH: My name is Colleen Otash. I've lived in this area for over 30 years in my home. I am less than a half a mile away. So I'm familiar with all the problems with Kingsdale, and I'm very concerned with everyone that's mentioned it. Thank you.

The buses currently are -- the bus station off of Galleria, it was discussed at Christian Horvath's last meeting that that be eliminated, the City eliminate the access to that Galleria stop and have it off of 182nd street or Torrance or Hawthorne so that we can eliminate that traffic from the bus because if you're behind a bus or two, there's no way that you can get a car on these streets. So Kingsdale, as this project goes forward, needs to be widened.
I don't agree with the parking structure on Kingsdale and No. 4 is not up there for us to review and talk about, and that should also be there because that moves the apartments and the hotel on Hawthorne, which would be a better plan if people agree to it.

The apartments currently do not have two parking spots per each unit. They're only allocating 1.5, and that's currently in the DEIR. So that's impossible because people will be driving around my street looking for a place to park for their two or three or four parking spots needed because it's going to be a single, a one-bedroom and two-bedroom units will be proposed. So they need at least two parking places per unit. So that has to be modified.

The project manager should be here so that we could discuss these questions with him next time. And that's about it for now. Thank you.

**Response to Comment PT001-9**

Thank you for your comment. Please see Response to Comments PC009-1 through 4 which address written correspondence from Colleen Otash. The Commenter asks the “City [to] eliminate the access to that Galleria stop and have it off of 182nd street or Torrance or Hawthorne so that we can eliminate that traffic from the bus.” As noted in Draft EIR Section 2.4.2, the existing Transit Center was approved for relocation back in 2010 to the parcel below the existing Target Store (just north of 182nd along the west-side of Kingsdale Ave). The Draft EIR further explained that the transit center relocation was scheduled to take place within 18 months of release of the Galleria Draft EIR. Construction bids for the Transit Center Relocation are proposed to be considered by City Council in February 2018, or shortly thereafter.

The commenter also discusses traffic from existing buses along Kingsdale. As stated on page 3.13-6 of the Draft EIR, Existing Traffic Conditions was based on traffic counts collected in November 2014 at 32 study intersections. Traffic counts record all vehicles moving through an intersection and include trips by employees, residents, visitors, buses, etc. Impacts at all of the Kingsdale Intersections were determined to be less than significant without mitigation, with all of these intersections operation an acceptable levels of service (i.e. LOS A, B, or C); with most Kingsdale intersections operating at LOS A or B. (See Draft EIR Tables 3.13-10 and 3.13-13.) While the Galleria project’s intersection impacts along Kingsdale were determined to be less than significant, the Transit Center Relocation Project included the following Conditions of Approval related to Kingsdale roadway improvements:

TR1. The applicant shall be required to restripe and re-establish a second west bound travel lane, on 182nd Street between Hawthorne Boulevard and Kingsdale Avenue after the bus layover zones on 182nd Street are abandoned. The plans and construction specifications for these changes shall be included in the construction document bid set.

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The street widening will also require the demolition of the existing Transit Terminal bus bays and reconstruction of the east side of Kingsdale Avenue for the length of the Transit Terminal parcel. The improvement of the street shall occur as part of the demolition of the existing transit terminal once the new Transit Center is operational. The plans and construction specifications for these changes shall be included in the construction document bid set.

The commenter states they do not agree with the parking structure on Kingsdale. This parking structure in the northwest corner of the project site along Kingsdale is an existing facility (see Draft EIR Figure 2-3). The commenter also states No. 4 is up there (which appears to be a reference to Alternative 4). Alternative 4 is included in Draft EIR Section 4. A detailed description of this alternative is provided in subsection 4.5.4 and 4.5.5 and analyzed in Sections 4.6.4 and 4.6.5. Please see Response to Comment PC027-2 for discussion of parking.

Comment PT001-10  Carol Aguas

CAROL AGUAS: Hi. I'm Carol Aguas, and we have a home on Firmona Avenue that will be greatly affected by the development of this area. I notice that the impact to the few residential owners on Firmona Avenue and Condon Avenue, they're not at all included in the EIR, and it's just the next street from Kingsdale.

The impacts -- I mean, the problem right now on those two streets are really, really unimaginable when this place is going to be constructed; the noise, the pollution, the traffic and the crime that will be associated with all this development. Right now people in this existing -- at this existing level, people who don't live in that area and live in apartments somewhere, they go and search for parking on Firmona and Condon, and so the homeowners are -- actually just cannot park even in front of their own homes because park there and they leave their vehicles for the rest of the weekend. And so you, as a homeowner, will go somewhere else and leave your car for the rest of the weekend and walk to your house. That's not good.

In this area, parking is at the premium, and right now, the area is dense enough. The residential aspect of the plan is going to add congestion and other problems, and the sections are not now congestion friendly. It's a deathtrap. So reducing the scale of the project is better for the area, and please, make it people friendly, pedestrian friendly. Consider the quality of life for homeowners around this area. Thank you.

Response to Comment PT001-10

Please also see Response to Comment PC011-1 which addresses similar issues raised in separate correspondence by the commenter.

The commenter is referred to Response to Comment PC009-4 and PC027-2, above concerning parking for the project. Your comment with respect to pedestrian safety on Condon Avenue and Firmona Avenue is noted; please see Response to Comment PC011-1 and PC040-5. Further, as discussed on page 3.13-10 of the Draft EIR, the latest records available from the California Highway Patrol Statewide Integrated Traffic Records System were reviewed to identify collisions in which a vehicle struck a bicyclist or a pedestrian in the study area over a 5-year period from...
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2008 to 2012. These data were used as a screening process to determine if there are any locations adjacent to the project site that have a greater frequency of multi-modal conflicts compared with other areas in Redondo Beach. Collisions in the study area were found to follow a similar frequency distribution compared to the City as a whole.

A supplemental evaluation of line-of-sight at the two major project site access points along Kingsdale Avenue (Grant Avenue and 177th Street) was conducted. Following guidance provided in *A policy on Geometric Designs of Highways and Streets, 6th Edition* (American Association of State Highway and Transportation Officials [AASHTO], 2011), at signalized intersections the first vehicle stopped on an approach should be visible to first vehicle stopped on the other approaches and left-turning vehicles should have sufficient distance to select gaps in traffic to complete turns. Otherwise, generally no other approach or departure sight triangles are needed for signalized intersections. A right-turn sight triangle was prepared per AASHTO standards for westbound vehicles exiting the project driveways as right-turns on red are permitted. The diagrams provided below indicate that the sight distance meets the safety standards for right-turning vehicles.
The Transportation Impact Study (TIS), Appendix L of the Draft EIR, was prepared in accordance with the requirements of the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. In consultation with City of Redondo Beach staff, the transportation study area was selected to include intersections likely to be affected by traffic generated by the proposed project, specifically major intersections located within roughly a one-mile radius of the project site. As described in Draft EIR Section 31.13, Traffic and Transportation, 3.13.4, Impacts and Mitigation Measures, the residential component of the proposed project was included in the trip generation, trip distribution, and trip assignment process; as such, residential trips made to and from the project site were adequately accounted for in the traffic analysis. Therefore, the Draft EIR adequately addressed the impact of the residential component of the proposed project on traffic conditions near the project site.

The commenter states “The residential aspect of the plan is going to add congestion and other problems, and the sections are not now congestion friendly. It's a deathtrap.” Please refer to Draft EIR Chapter 4.0, Alternatives Analysis, for a discussion of alternatives to the proposed project that would develop fewer residential units. The trip generation associated with the residential project components is included in the proposed project/alternative traffic analysis scenarios. (See Draft EIR Section 3.13-4, Table 3.13-7, which includes “Residential.”) As discussed in Draft EIR Section 3.13, four of the study intersections are located along Kingsdale Avenue at: Artesia Boulevard (Intersection 14), Grant Avenue (Intersection 20), Target Drive (Intersection 24)177th Street, and 182nd Street (Intersection 27). Impacts at all of these intersections were determined to be less than significant, with all intersections operating at LOS C or better. (See Draft EIR Table 3.13-10, and 3.13-13.) Please also see Response to Comment PC011-1 for discussion of the geographic scope of the traffic analysis.

The commenter also asserts there will be crime. The Draft EIR discussed police protection and crime prevention in Draft EIR Section 3.11, Public Services, and determined that impacts are less than significant. Existing crime rates were analyzed through crime classification and incident numbers in the South Bay Galleria area and surrounding streets (Table 3.11-1 and Table 3.11-2), including Condon Avenue and Firmona Avenue. The analysis provided in the Draft EIR states that the anticipated activity level at the site may deter some crime, as greater numbers of people can typically deter criminal activity. Additionally, the proposed project incorporates strategies for Crime Prevention Through Environmental Design (CPTED) aimed at deterring criminal behavior by designing the physical environment in ways that reduce identifiable crime risks. While impacts in Section 3.11 were determined to be less than significant, the project is proposing Condition of Approval PS-1, which incorporates a Fire, Life-Safety and Security Plan. Please see Draft EIR Section 3.9 for discussion of Noise, and Section 3.1 for discussion of Air Quality.

**Comment PT001-11 Hailey Ogle**

HAILEY OGLE: Hello. My name is Hailey Ogle. I live on Condon Avenue, and I've been there for my whole life.

I have two things I want to note. First is that during the first meeting that Forest City held about this in the fall of '16, we asked him who would be -- we asked the representative who would be
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February 2018

2-345

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SCH# 2015101009

doing the EIR. He said currently no one had been chosen, he did not know and that would be up to the City. When the EIR came out, it said they'd been doing studies since 2015. I want to know how that happened because we hadn't seen any and we had been told it hadn't been happening. Secondly, there were no EIRs, no impact studies being done on Kingsdale during any holiday that would be majorly impactful. We still watched because we were very concerned about this. Nothing has been done.

Secondly, the EIR states that in elementary schools alone, there will be an addition of 39 students. That is a full other classroom of students. The only school that they're allowed to, Washington, currently has trailers and has had them since the '90s. It is absurd that our City states that we have a housing crisis when they are refusing to deal with the problems that we currently have as a city. We do not need to add more residents without fixing the things that are already affecting our residents. Thank you.

Response to Comment PT001-11

Thank you for your comment. Please also see Response to Comment PC040-1 through PC040-5 which address similar issues raised in separate correspondence by the commenter.

It is unclear from which meeting the commenter is referencing. A meeting was held on October 10, 2015, that was a scoping meeting held by the City and their consultants who assisted in the preparation of the Draft EIR. The Notice associated with the October 2015, was also for the Notice of Preparation/Initial Study. The Notice of Preparation/Initial Study/Scoping Meeting Notice was published in the Easy Reader on July 27, 2017 and published on the City’s website. Additionally, a mailed copy of the NOA was provided to locations in proximity to the project site. The footer of the Initial Study expressly listed “ESA” as the environmental consultant. (See Draft EIR Appendix A1.) Selection of the Draft EIR consultant was also agendized at the City Council’s December 16, 2014 meeting (Item H.21 listing “Environmental Science Associates (ESA) for the South Bay Galleria Project…”).

Please see Response to Comment PC040-4 for discussion of schools and payment of statutory fees. Please see Response to Comment PC040-5 for discussion of holiday traffic conditions. Furthermore, Firmona Ave, Condon Ave., and Kingsdale Ave are subject to a preferential parking program during the holidays (11/15 – 12/31), which only allows permanent residents to part with a valid permit. The commenter also states “It is absurd that our City states that we have a housing crisis when they are refusing to deal with the problems that we currently have as a City. We do not need to add more residents without fixing the things that are already affecting our residents.” As discussed on Draft EIR page 3.8-16:

As noted under Government Code 65589.5(a), the legislature has concluded that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California.” The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City

“facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community” (Gov. Code Section 65580(d)). More specifically, the Legislature’s stated intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal” (Gov. Code Section 65581). Also under the Redondo Beach Housing Element, the project site represents the greatest potential for future residential development in the City, to meet the City’s Regional Housing Needs Assessment (RHNA), as well as the high regional demand for housing in the County (see also Circulation Element, Goal 8). Furthermore, as discussed in Section 3.0.3 of the Draft EIR, the proposed project provides mixed use development in a transit priority area, and is consistent with the regional RTP goals as well as the City’s goals of encouraging mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance and supporting transit-oriented development (Redondo Beach Circulation Element, G6, G7, and G8).

As further discussed in Draft EIR Section 3.10.3:

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. In cooperation with HCD, local governments and councils of government are charged with determining the cities or regions existing and projected housing needs as their share of the statewide housing need. The current Regional Housing Needs Allocation (RHNA) identifies housing needs in each SCAG jurisdiction and allocates a fair share of that need to every community. Redondo Beach’s RHNA for the 2013–2021 planning period has been determined by SCAG at 1,397 housing units, including 186 units for extremely low-income households, 186 units for very-low-income households, 223 units for low-income households, 238 units for moderate-income households, and 564 units for above-moderate-income households.

Comment PT001-12  Sheila Lamb

SHEILA LAMB: Hi good morning. This is Sheila Lamb, District 4 resident.

So I have a couple of points here. The Draft EIR is too complex for residents to make important comments on, and there's been no opportunity for us to just ask questions for clarification, right? It's not been offered to us, no outreach to us to help us understand this Draft EIR.

And second to that point is that in our attempts to have clarity, we were not offered the correct project manager so that -- so that we could even approach the topic of questions and have the answers for us by someone who is knowledgeable.

Second, I do want to say that we do -- all of us here in District 4 and throughout the district, throughout the City want this to be a successful mall, and we believe that it does have valuable assets to it. I personally like its -- its pedestrian and mobility options. So we're all going to benefit by a successful mall.
However, the unmitigated traffic impacts are really a problem. Those unmitigated impacts are
counter to the efforts that the City and the State have put forth to reduce congesting, to reduce
commute travel time for our residents and improve the relationship between housing and
employment. These are direct issues from the State that they're trying to help us at the local level
to -- again, to -- to reduce.

I'm getting lost here. But so -- so having more housing here would not help improve the
relationship between housing and employment. What that means is making -- reducing the
commute out time so that we can -- by having businesses here in the mall in this area, instead of
residents – so that the residents in our community who commute outside –

JASON RICKS: 30 seconds.

SHEILA LAMB: -- outside the City can actually become employed here locally.

I also want to comment on Kingsdale. The Draft EIR needs to include the bus terminal in the
evaluation, and -- and Kingsdale needs to be either widened or there needs to be a frontal road put
there and -- and that's it.

Response to Comment PT001-12

Thank you for your comment. Similar comments were raised in other written correspondence
from the commenter; please see Response to Comments PC024-1, PC034-1, and PC046-1
through 4. While the majority of the comment does not directly address an environmental issue,
your comment is acknowledged and will be included in the Final EIR presented for review and
consideration by the City’s decision-making body.

The comment states “there's been no opportunity for us to just ask questions for clarification.”
The purpose of the Draft EIR comment period is to receive comments on environmental issues
from members of the public, feedback is then provided through preparation of response to
comments during the Final EIR process. (CEQA Guidelines Sections 15088, 15132.)
Furthermore, the Draft EIR, Chapter ES, Executive Summary, provides a summary of each impact
and mitigation for the proposed project. The Draft EIR is a summary of the technical analysis that
was prepared for the project and is provided in the individual resource sections of the Draft EIR
and the associated Appendices. As discussed in the “Notice of Public Workshop for the South
Bay Galleria Improvement Project Draft EIR,” the purpose of the workshop on August 26, 2017,
was to provide “a presentation regarding the Draft Environmental Impact Report and its findings.
Any and all interested members of the public are encouraged to attend and may submit comments
either verbally or in writing at the meeting.” The Public workshop was not intended to provide
immediate response to comments regarding the findings of the Draft EIR. As discussed above,
this process occurs during the Final EIR preparation.

The commenter also states “Those unmitigated impacts are counter to the efforts that the City and
the State have put forth to reduce congesting, to reduce commute travel time for our residents and
improve the relationship between housing and employment.” This issue was addressed in
Response to Comment PC046-3. For discussion of Housing and its relationship to commutes,
please see Response to Comment PT001-1. As partly discussed in that response, “Los Angeles County has built fewer housing units in comparison to existing demand, particularly in the coastal communities thereby requiring individuals to commute greater distances (State Legislative Office 2015).” For discussion of employment, please see Draft EIR Section 3.10.

The commenter also states that the “The Draft EIR needs to include the bus terminal in the evaluation.” As stated on page 3.13-6 of the Draft EIR, the Existing Conditions traffic analysis was based on traffic counts collected in November 2014 at 32 study intersections and five mainline freeway segments. Traffic counts record all vehicles moving through an intersection or across freeway lanes, and do not discriminate by trip origin or destination, or whether a vehicle trip is made by an employee, resident, or visitor. Further, the traffic counts include all vehicle types, which include but not limited to automobiles, delivery trucks, and buses. For discussion of the proposed relocation of the Transit Center, please see Response to Comment PC039-10. While the Galleria project’s intersection impacts along Kingsdale Avenue are less than significant, the Transit Center Relocation Project, included the following Conditions of Approval related to Kingsdale roadway improvements:

TR1. The applicant shall be required to restripe and re-establish a second west bound travel lane, on 182nd Street between Hawthorne Boulevard and Kingsdale Avenue after the bus layover zones on 182nd Street are abandoned. The plans and construction specifications for these changes shall be included in the construction document bid set.

TR2. In conjunction with the land exchange with Forest City for the South Bay Galleria Transit Terminal parcel, twenty (20) feet of land to the east of the existing westerly edge of the Transit Terminal parcel adjacent to Kingsdale Avenue shall be dedicated for street widening purposes. The street widening will allow the construction of an additional northbound, 250-feet Tong right turn only lane, curb and gutter, parkway, and sidewalk. The street widening will also require the demolition of the existing Transit Terminal bus bays and reconstruction of the east side of Kingsdale Avenue for the length of the Transit Terminal parcel. The improvement of the street shall occur as part of the demolition of the existing transit terminal once the new Transit Center is operational. The plans and construction specifications for these changes shall be included in the construction document bid set.

Thanks you for your comments, the comment is acknowledged and will be forwarded to the appropriate decision-making body.

Comment PT001-13 Tiffany Maloch

JASON RICKS: Tiffany. Tiffany Maloch.

TIFFANY MALOCH: My Tiffany Maloch. I own a home over on Condon. I think its crazy that no one aside from the people in this group are talking about Kingsdale. Just yesterday I got bullied off of my line by a bus. Buses take up two lanes. It's impossible to drive with them. I think they're responsible for a lot of the traffic. I think it sucks that the City thinks we need to take up the slack for rental housing with this location here. I think we all pay a lot of money to live here,
and if we wanted to live in an overcrowded place, we would have chosen Santa Monica. It's a
great example of nobody can leave. You know, it's really horrible. I don't travel there for that very
reason. And it's upsetting -- it's not your fault; you just work for the company -- that they sent you
instead of the guy we need to talk to, guy or girl, whoever that may be. That makes me feel like
we're irrelevant, and you're going to do what you want anyway. I want to feel important. I want to
feel like the that you guys really do want to work with us, and by them sending you, makes me
feel like it doesn't matter.

So hopefully that's not the case, and hopefully our voices can be heard. That's it.

Response to Comment PT001-13

Thank you for your comment. The comment states in part “Just yesterday I got bullied off of my
line by a bus. Buses take up two lanes. It's impossible to drive with them. I think they're
responsible for a lot of the traffic.” As stated on page 3.13-6 of the Draft EIR, the Existing
Conditions traffic analysis was based on traffic counts collected in November 2014 at 32 study
intersections and five mainline freeway segments. Traffic counts record all vehicles moving
through an intersection or across freeway lanes, and do not discriminate by trip origin or
destination, or whether a vehicle trip is made by an employee, resident, or visitor. Further, the
traffic counts include all vehicle types, which include but not limited to automobiles, delivery
trucks, and buses. While the Galleria project’s intersection impacts along Kingsdale are less than
significant, the Transit Center Relocation Project, included the following Conditions of Approval
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travel lane, on 182nd Street between Hawthorne Boulevard and Kingsdale Avenue after
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Transit Terminal parcel, twenty (20) feet of land to the east of the existing westerly edge
of the Transit Terminal parcel adjacent to Kingsdale Avenue shall be dedicated for street
widening purposes. The street widening will allow the construction of an additional
northbound, 250-feet long right turn only lane, curb and gutter, parkway, and sidewalk.
The street widening will also require the demolition of the existing Transit Terminal bus
bays and reconstruction of the east side of Kingsdale Avenue for the length of the Transit
Terminal parcel. The improvement of the street shall occur as part of the demolition of
the existing transit terminal once the new Transit Center is operational. The plans and
construction specifications for these changes shall be included in the construction
document bid set.

The commenters also states “I think it sucks that the City thinks we need to take up the slack for
rental housing with this location here.” As discussed on Draft EIR page 3.8-16:

As noted under Government Code 65589.5(a), the legislature has concluded that “the lack
of housing, including emergency shelters, is a critical problem that threatens the
economic, environmental, and social quality of life in California.” The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City “facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community” (Gov. Code Section 65580(d)). More specifically, the Legislature’s stated intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal” (Gov. Code Section 65581). Also under the Redondo Beach Housing Element, the project site represents the greatest potential for future residential development in the City, to meet the City’s Regional Housing Needs Assessment (RHNA), as well as the high regional demand for housing in the County (see also Circulation Element, Goal 8). Furthermore, as discussed in Section 3.0.3 of the Draft EIR, the proposed project provides mixed use development in a transit priority area, and is consistent with the regional RTP goals as well as the City’s goals of encouraging mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance and supporting transit-oriented development (Redondo Beach Circulation Element, G6, G7, and G8).

As further discussed in Draft EIR Section 3.10.3:

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. In cooperation with HCD, local governments and councils of government are charged with determining the cities or regions existing and projected housing needs as their share of the statewide housing need. The current Regional Housing Needs Allocation (RHNA) identifies housing needs in each SCAG jurisdiction and allocates a fair share of that need to every community. Redondo Beach’s RHNA for the 2013–2021 planning period has been determined by SCAG at 1,397 housing units, including 186 units for extremely low-income households, 186 units for very-low-income households, 223 units for low-income households, 238 units for moderate-income households, and 564 units for above-moderate-income households.

Please also see Response to Comment PT001-12 for discussion of the purpose of the Public Workshop.

**Comment PT001-14 Suzy Royds**

ELIZABETH ESPINOSA: There's a lot to say.

SUZY ROYDS: Traffic. It always comes back to traffic, schools. But here, let's include the intersection once again of 182nd and Kingsdale. Yes, we were robbed of that traffic signal, and the City did pocket 80 grand and that was -- Tom brought it up for me. That was another instance that I was going to review. However, in addition to that traffic signal, there needs to be crosswalks at 182nd and Kingsdale. There needs to be full four crosswalks at Inglewood and 182nd Street. If anyone lives on Condon, Firmona, Kingsdale, you're aware of the horrific auto accidents that occur probably no less than five times a year at the intersection of Grant and Kingsdale Avenue.
UNIDENTIFIED SPEAKER: There's a car mirror sitting in our bushes right now.

SUZY ROYDS: Oh. The reason is -- the reason is -- and it's not just Kingsdale Avenue. It's a bigger picture. It's cross-through traffic. Cross-through traffic is occurring all throughout the City. It occurs in the tall and skinny area off of Artesia, those Golden Triangle homes, but on Kingsdale Avenue, it's been occurring for quite a while to avoid the Hawthorne and Artesia intersections. And what happens is at Kingsdale and Grant, a car is trying to make a left-hand turn, and they don't realize that that car coming is a through-way and they're doing 40 to 50 miles an hour.

So we've had head-on collisions, we've had cars broadsided, we've had kids crying on the curb with their mom after their car ended up on the sidewalk. And these are horrific auto accidents, and that intersection in and of itself is a problem.

So I fail to see that the EIR is not flawed. It is flawed. It's very flawed because currently what exists is a problem, and traffic in this whole area -- can you imagine adding 300 residents to that component, 600 cars more and how that traffic is going to impact the residents trying to leave their cul de sac streets on Firmona, Condon onto Grant? It's -- it's a bad issue and we -- we really need the City's help, we need their involvement, and we need community involvement as well. We need our residents to unite, and we need to bring these issues to fruition. I want to mall to be outstanding. I lived here when JFK spoke here. In 1960, I heard that speech. So this is my home. And I want to thrive here. I have no intentions of leaving.

Response to Comment PT001-14

Thank you for your comment. Similar comments were raised in other written and oral correspondence from the commenter and Mr. Royds; please see Response to Comments PC020, PC021, and PC047, PT001-4, and PT001-7. Please see Response to Comment PC040-5 for discussion of safety and sight lines. Please see Response to Comment PT001-6 for discussion of potential signalization associated with the 2004 Target project.

The comment also states “It's a bigger picture. It's cross-through traffic. Cross-through traffic is occurring all throughout the City.” As described in Draft EIR Section 3.13.4, the trip distribution considered roadway congestion that might cause vehicles to seek alternative travel routes. As discussed under Vehicle Trip Distribution in Draft EIR Section 3.13.4 “[t]he SCAG model assignment accounts for congested travel time on roadways and iteratively assigns trips until equilibrium is reached.” The commenter also states “traffic is going to impact the residents trying to leave.” As described in Draft EIR Section 3.13, Transportation and Traffic, specifically, 3.13.4, Impacts and Mitigation Measures, the residential component of the proposed project was included in the trip generation, trip distribution, and trip assignment process; as such, residential trips made to and from the project site were adequately accounted for in the traffic analysis.
The commenter also refers to Firmona, Condon, and Grant as “cul de sac streets.” Cul-de-sac is defined as “a street or passage closed at one end.” None of these streets meet the definition of a cul-de-sac.

Comment PT001-15  

Tom Royds  

TOM ROYDS: Tom Royds. This is about community, okay? This is all about us as a community and bringing it home. And I sat over there a few minutes ago and had a tear in my eye because how many of us have seen those flowers on the corner and those candles? How many of us have seen that on Inglewood Avenue and 182nd? How many of us have seen that on Kingsdale Avenue, right? That's the way that it is now.

As a community, these are our children, our grandchildren and our family members that are going to be impacted by this. And you put that much traffic and you put that much congestion on the streets and you take the community not into consideration, you're saying they don't matter. You're saying their lives don't matter because we've actually seen people that have had – died on these street corners and on these thoroughfares. And now you're -- it's going to be somebody's child trying to cross Kingsdale Avenue with all of this increased traffic that they say is an A intersection, right? It's going to be somebody's child or grandchild or somebody's family member is going to get nailed at 182nd Street and killed because we don't matter as a community. All that matters is that we want to put in these units.

How many people have bought on Amazon in the last year? Okay? So what you have going on is they need to bring in the residential component so that they can attract retail because Amazon is killing retail. I get it. We want them to be successful. But when they don't bring down the guy who can answer our questions, we don't matter, okay? What they don't bother to post and tell us, "Just trust us, Plan 4 is what we're going with, we just can't put it up here," they insult us and they tell us we don't matter as a community. When they endanger our lives by putting traffic on streets that is going to result in deaths, they're saying we don't matter as a community. The only person and only people that can get back at this is us if we stand up as a community, we gather our forces and we go head on at this because we do matter. This is our community. This isn't just numbers. This is our people, our family's lives, our safety and we matter.

And I'm going to encourage everybody. Love John, email John, and also email Bill Brand because they need to know that we were not satisfied that they didn't bring somebody down here, they didn't answer our questions and we think that this matter meeting was more of a hoax than it was about our lives matter.

Response to Comment PT001-15  

Thank you for your comment. Similar comments were raised in other written correspondence from the commenter and Ms. Royds; please see Response to Comments PC022, PC023, PC047, PT001-4, PT001-7, PT001-14. Furthermore, as discussed under Draft EIR Impacts TRA-3 and TRA-5 in Section 3.13 the proposed project would not result in significant safety impacts or

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87 https://www.merriam-webster.com/dictionary/cul-de-sac  
88 https://www.google.com/maps/place/South+Bay+Galleria/@33.8709973,-118.3590928,18.33z/data=!4m5!3m4!1s0x0:0xe4e4b4b9a5ecd026f8m2!3d33.8712777!4d-118.3550423
significant impacts to pedestrian or bicycle facilities. As also discussed in Response to Comment PT001-10 and PC040-5, the roadway along Kingsdale has adequate sight lines to ensure drivers exiting the driveways have adequate views of oncoming vehicles, bicycles, and pedestrians.

As noted on page 3.13-52 through 3.13-54 of the Draft EIR, access to the project site will continue to be provided on all four sides of the site. Many of the existing access points to/from the project site would remain the same. While the project would add vehicle volumes to the existing roadway network, it does not propose modifications to the roadway network off site. All new or reconstructed access points would be designed to applicable standards and best practices to minimize any potential conflicts or safety hazards for vehicles, pedestrians, and bicyclists.

The comment also asserts “they need to know that we were not satisfied that they didn't bring somebody down here, they didn't answer our questions.” As discussed in greater detail in Response PT001-12, the purpose of the project meetings was to solicit community input, which would be responded to as part of the Final EIR process.

**Comment PT001-16 Carol Aguas**

CAROL AGUAS: I have the question. Has the City of Redondo already accepted all of your part, EIR?

JASON RICKS: No. This is the Draft EIR. So the next step after September 11th, we will prepare the final EIR, which will include everybody's comments, everybody's responses -- or the City's responses to the comments and any revisions to the EIR that we make.

CAROL AGUAS: Okay. So we have a chance that all these comments that we have made are going to be hopefully in your report and incorporated?

JASON RICKS: Yes. And responded to. There will be detailed responses to your comments --

CAROL AGUAS: The next question is is the City of Redondo going to listen to the homeowners around the area?

JASON RICKS: That's a question for the City. So there are more speakers that would like to speak.

**Response to Comment PT001-16**

Thank you for your comment. 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 PT001-17 Andre Pegus**

ANDRE PEGUS: Hey, neighbors. My name is Andre Pegus. I've been a resident here for, I don't know, longer than I can remember, 16 -- 20 years. I don't know. So here's what I wanted to say to my neighbors, okay? Look around at what's happening, okay? El Segundo is -- has this resurgence of activity, office space, retail, everything else, okay? Manhattan Beach has been redeveloped quite some years, and they continue. I was driving down PCH the other day in
Hermosa, and – you know, right near the Chipotle. You know, six new office buildings, "boom," "boom," "boom," "boom," with new offices, new retail, all right? Torrance, oh my God? This mall right now, there's nobody in it. No one. Take a look when you leave, okay?

We can wait for development for forever, or we can compete. You know, it's not going to wait for you. If this sits here many more years with nothing happening, it's a disaster for the City. It really is. It really is. We have on Artesia Boulevard a grocery store that you've got no one that wants to reinvest in it because the building and the parking lot are so old, okay? That's the truth. That's the problem.

CAROL AGUAS: We're not the against development.

ANDRE PEGUS: You know, so I'm not saying that -- first of all, it's not they. "They," "they," "they", they." "I need, pitchforks." "Let's get angry."

SUZY ROYDS: It's Charlottesville.

ANDRE PEGUS: Come on, guys? You know, it's not us versus them. We have to figure out a way of moving forward to keep us relevant, to keep us competitive and to keep our property values growing. You know, so that's where I come from, you know. And I'm not Mr. Pro Development or nor do I have some friend that's giving me cash. That's not what's happening here. I'd like to see my property values raise --

HAILEY OGLE: What street do you live, sir?

ANDRE PEGUS: Hum?

HAILEY OGLE: What street do you live on?

ANDRE PEGUS: Ruhland

HAILEY OGLE: Hum.

ANDRE PEGUS: Hum? What's so insightful about me living on Ruhland?

HAILEY OGLE: You won't be impacted the way that we are. We don't want residential.

ANDRE PEGUS: Excuse me. First of all, I'm not here to argue with you, okay, anyone else? I'm giving my opinion. And because you have your opinion, that's great. I have mine, too. I live here, as you do, all right?

TOM ROYDS: No. You live here, but not as we do.

ANDRE PEGUS: Again, you can play us versus them forever. It's old. That's the problem with our country right now. We're about to kill each other, okay? So the point I'm making is, you know, while we consider these things, there is a clock that's ticking. This is aging, there's nobody in the mall, you know. And we -- we can face a real problem. If we don't solve this issue, then we
don't solve the grocery issue on Artesia, there's a real problem there, okay? And that's how I feel. I mean, you really need to look around and see what's happening with your neighbors. Personally, mixed development I think makes a lot of sense, okay? Having residences that are mixed --

UNIDENTIFIED SPEAKER: Your time is up. Your time is up.

ANDRE PEGUS: Okay. I'll be done. I'll be done.

CAROL AGUAS: Your time is up.

ANDRE PEGUS: Just give me one more minute. Having residents that re mixed with retail makes sense because retail is dying in and of itself. That's a fact.

CAROL AGUAS: We haven't heard anyone against development.

JASON RICKS: Are there any other public comment speaker cards?

CAROL AGUAS: The impact and all the --

ANDRE PEGUS: And I agree with that.

JASON RICKS: Excuse me.

Response to Comment PT001-17

Thank you for your comment. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. The City acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The types of jobs available at the project site is not considered an environmental issue under CEQA, therefore no further response is required. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Please see Response to Comment PT001-1 for discussion of Housing.

Comment PT001-18  Doug Boswell

DOUG BOSWELL: My name is Doug Boswell, Part 2. Thanks for your comments. But I think we need to focus on a couple of things. One is I don't think anybody is against the development or slowing down the development. We want it to go forward, we want it to go forward as soon as possible. We just don't want it to wreck the community, and the residential component is definitely going to lower the quality of life of everybody in this region all the way to Ruhland and beyond because it is not just about the traffic, it's related to the residential component. The mall itself is going to be bigger, it's going to be better, yes. He said it's empty now. Guess what happens when it's not empty? Traffic. The mall development itself is going to create a huge amount of additional traffic that we don't have right now.

When I first moved here, this mall was thriving. You couldn't find a place to park, especially in the holiday season. Then you'd drive down to Del Amo and find same thing. People liked to come
here because this is where the stuff was that they wanted to buy. And that can happen again. But that's a lot of traffic. You put on top of that 300 to 650 residential units, and it's just going to be a mess.

Now, what's going to happen on weekends? These people are home in their residences on the weekend. What are they going to do? They're going to go hang out at the mall. They can just clog up the mall, the shops. Are they going to buy stuff, or are they just looking for stuff and they go back to their apartment, you know, a minute or two minutes away and order it on Amazon. I bet that's what they do, especially since they say they're trying to attract millennials. Hell, they won't even go back to their apartment. They'll order it right there on their cell phone in the store. Talk about blatant.

So the restaurants are really what's going to make this successful. The residential is what's going to make it not successful. Imagine, you drove here fighting through traffic, you parked and then couldn't get out. Would you come here again? Probably not, or you'd think twice about it. If you have professional office space in that location on Hawthorne it's going to be the least amount of traffic issues with that location, and they're not here on the weekends. When most of us are coming in to do our actual shopping and looking at the mall retail-wise, they're not going to be in the way; plus traveling against traffic, they're not going to be adding to the morning rush hour. And since it's professional office space, they're probably not even leaving at 5:00 o'clock during the rush hour that we're all dealing with at the end of the day. So just remember, put it in context. It's not just the residential traffic. It's the mall traffic too. Please don't add the residential aspect to make the whole thing that much worse. We want -- we desperately want this mall to be successful, and it can be. It just has to be thought out correctly, and you have to pull away from the greed that is residential construction, which is the most profitable kind of construction there is. Thank you.

TOM ROYDS: It's $11 million a year in additional capital to the mall --

DOUG BOSWELL: And nothing for the City.

TOM ROYDS: And nothing for the City.

Response to Comment PT001-18

Thank you for your comment. Similar comments were raised in other written correspondence from the commenter; please see Response to Comments PC012 and PC048. The commenter states that “the residential component is definitely going to lower the quality of life;” please see Response to Comment PC048-1 for discussion of the residential component of the project. The impacts of the totality of the project, including the residential component, were analyzed in Draft EIR Sections 3.1 through 3.14. Draft EIR Section 3.13 analyzed the impacts of the proposed project associated with traffic, which included consideration of the project’s residential component. (See Draft EIR Table 3.13-7.) While the proposed project would result in three significant and unavoidable Level of Service Intersection impacts, the project would provide regional transportation benefits. As discussed on Draft EIR pages 3.13-45 and the project would have reduced Vehicle Miles Traveled (VMT) in comparison to the regional average.
The commenter also suggests professional office space off of Hawthorne. Please see refer to Response to Comment PC048-10 with regards to Alternatives considered in the Draft EIR analysis, which included Alternative 4-1 which includes office space.

Comment PT001-19   Carol Skinner

CAROL SKINNER: Hello everyone. My name is Carol Skinner, and I live in the El Nido area. For sure, this galleria area is a very difficult location to come up with a good answer. I really do believe that. You have all spoken so well. You were all so informed, so I'm not going to go back over those things.

One thing I would like to concentrate on is my concern about these parking structures. As we all know, the Galleria and the small businesses along Hawthorne Boulevard is the highest crime rate in all of Redondo Beach. It is. I know that as a fact, and I think we all know that. And these parking structures, as you have stated, gangbanger activity has gone on with them for years. People don't like -- they're afraid of these parking structures.

So my concern is is that the people don't want to use the parking structure, what they're going to do, they're going to go over to the strip mall where we have the wonderful Sprouts and those stores. They're going to use up all the parking spaces. It's just going to happen. And I just don't like that idea at all. So thank you.

Response to Comment PT001-19

Thank you for your comment. The commenter is referred to the Draft EIR 3.11, Public Services Section 3.11.4, Impacts and Mitigation, of the Draft EIR for information on public safety. The analysis provided in the Draft EIR states that the anticipated activity level at the site may deter some crime, as greater numbers of people can typically deter criminal activity. Additionally, the proposed project incorporates strategies for Crime Prevention Through Environmental Design (CPTED) aimed at deterring criminal behavior by designing the physical environment in ways that reduce identifiable crime risks, and thus, a proportional increase in the number of incidences is not anticipated. The proposed project would include the installation of the Code Blue security and emergency communication system, that would provide emergency signaling, mass notification systems, and help points (e.g., emergency blue light phones and call boxes) which offer a level of security without the cost and expense of patrolling officers (CodeBlue.com 2016). Further, the proposed project would introduce residential units on the project site, which would require increased security on site. The project would increase security staff in proportion to the amount of new residential and commercial square footage.

The proposed project would include new and updated security lighting on site, at vehicle entrances, pedestrian walkways, courtyards, driveways, and parking facilities, pursuant to the requirements of RBMC Section 10-5.1706(c)(10). Primary outdoor lighting would consist of mounted, downward shielded luminaries, and ground level accent lighting would also be installed to increase visibility, safety and wayfinding. Residents would access the parking garage via key fob, and would be separate from the commercial parking levels. Moreover, security cameras
would be installed at all the new buildings to supplement the existing security system on-site. While impacts in Section 3.11 were determined to be less than significant, the project is proposing Condition of Approval PS-1, which is a Fire, Life-Safety and Security Plan. For discussion of parking, please see Response to Comment PC027-2.

**Comment PT001-20 Carol Skinner**

CAROL SKINNER: Just a question. Do you write the DEIR, or does the City write the DEIR?

AARON JONES: The Draft EIR is the City's document. It is prepared largely by ESA, who has expert consultants in the fields of science, air quality, traffic and so forth. For this EIR, you'll see that the traffic consultant was Fehr & Peers. Fehr & Peers is -- has done many of the City's traffic studies, including the studies that went with our circulation element of the general plan in 2010. They have a traffic model that is more accurate than any calculation which could be performed by looking up or doing traffic counts. Their traffic model is validated and extremely accurate with respect to the traffic numbers you've seen. It's been validated by over 100 cities and 100 studies. So we are using a very predictive traffic analysis method. We'll respond to the questions on traffic as a master response to the EIR. So all of your questions about did we study Kingsdale? Yes, we did. Those will all be answered. What improvements are going to be made on Kingsdale? That will be a response. So I encourage all of you that haven't spent too long with the EIR to go dig back into Chapter 3. Kingsdale has two intersections, 27 and 28. It shows your delay, it shows your traffic volumes and shows the conditions of the roadway. Those are the kinds of responses we'll give back to the questions that were raised today, so -- I'm not really taking questions right now. I'm just kind of summing it up.

**Response to Comment PT001-20**

Thank you for your comment. While the comment does not directly address an environmental issue your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

However, the commenter is referred to Draft EIR Section 3.13 and the Transportation Impact Study (TIS), Appendix L of the Draft EIR. Draft EIR Section 31.3 and the TIS were prepared in accordance with the requirements CEQA and the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. Beginning on page 3.13-29 of the Draft EIR, the significance thresholds use to determine whether the proposed project’s contribution to delay experienced at the 32 study intersections and five mainline freeway segments, are described. The Draft EIR identifies all traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible.

The project will not result in a significant impact at any of the study intersections along Kingsdale Avenue; therefore, no improvements or mitigation measures are proposed as part of the project. While the Galleria project’s intersection impacts along Kingsdale Avenue are less than significant, the Transit Center Relocation Project, included the following Conditions of Approval related to Kingsdale Avenue roadway improvements:
TR1. The applicant shall be required to restripe and re-establish a second west bound travel lane, on 182nd Street between Hawthorne Boulevard and Kingsdale Avenue after the bus layover zones on 182nd Street are abandoned. The plans and construction specifications for these changes shall be included in the construction document bid set.

TR2. In conjunction with the land exchange with Forest City for the South Bay Galleria Transit Terminal parcel, twenty (20) feet of land to the east of the existing westerly edge of the Transit Terminal parcel adjacent to Kingsdale Avenue shall be dedicated for street widening purposes. The street widening will allow the construction of an additional northbound, 250-feet Tong right turn only lane, curb and gutter, parkway, and sidewalk. The street widening will also require the demolition of the existing Transit Terminal bus bays and reconstruction of the east side of Kingsdale Avenue for the length of the Transit Terminal parcel. The improvement of the street shall occur as part of the demolition of the existing transit terminal once the new Transit Center is operational. The plans and construction specifications for these changes shall be included in the construction document bid set.

Comment PT001-21 Carol Aguas

CAROL AGUAS: -- your study, it seems to me, only states Kingsdale, not on Grant Avenue, the immediate streets on Firmona, and these are just a few yards away from Kingsdale which is really hugely impacted.

AARON JONES: Okay. So in order to kind of get the best response from us in the Environmental Impact Report, the question would be what intersections were studied, and the answer is 30 intersections in the community were studied. And what were the results with respect to Grant Avenue and other intersections? And those answers are in the environmental document. And so we're going to respond back and say yes, we did, and here's what the results were. And then you'll know that we listened to you.

Response to Comment PT001-21

Similar comments were raised in other written correspondence from the commenter; please see Response to Comments PC011, PC027, PC028, PC030, PC031. Please see Response to Comment PC011-1 for discussion regarding the selection of intersections and trip distribution.

The commenter also states that “…Kingsdale which is really hugely impacted.” The commenter is referred to Draft EIR Section 3.13 and the Transportation Impact Study (TIS), Appendix L of the Draft EIR. Draft EIR Section 3.13 and the TIS was prepared in accordance with CEQA and the requirements of the City of Redondo Beach and utilized the latest, state-of-the-practice guidance with respect to methodologies used to assess potential impacts to transportation facilities. The commenter is referred to the Draft EIR, Section 3.13, Traffic and Transportation, beginning on page 3.13-29, the significance thresholds use to determine whether the proposed project’s contribution to delay experienced at the 32 study intersections and five mainline freeway segments, are described. The Draft EIR identifies all traffic impacts resulting from the proposed project, and physical intersection mitigation measures were developed to address these impacts, where feasible.
Four of the study intersections are located along Kingsdale Avenue at: Artesia Boulevard (Intersection 14), Grant Avenue (Intersection 20), Target Drive (Intersection 24), and 182nd Street (Intersection 27). No impacts were identified at the four study intersections located on Kingsdale Avenue. While the Galleria project’s intersection impacts along Kingsdale are less than significant, the Transit Center Relocation Project, included the following Conditions of Approval related to Kingsdale roadway improvements:

TR1. The applicant shall be required to restripe and re-establish a second west bound travel lane, on 182nd Street between Hawthorne Boulevard and Kingsdale Avenue after the bus layover zones on 182nd Street are abandoned. The plans and construction specifications for these changes shall be included in the construction document bid set.

TR2. In conjunction with the land exchange with Forest City for the South Bay Galleria Transit Terminal parcel, twenty (20) feet of land to the east of the existing westerly edge of the Transit Terminal parcel adjacent to Kingsdale Avenue shall be dedicated for street widening purposes. The street widening will allow the construction of an additional northbound, 250-feet Tong right turn only lane, curb and gutter, parkway, and sidewalk. The street widening will also require the demolition of the existing Transit Terminal bus bays and reconstruction of the east side of Kingsdale Avenue for the length of the Transit Terminal parcel. The improvement of the street shall occur as part of the demolition of the existing transit terminal once the new Transit Center is operational. The plans and construction specifications for these changes shall be included in the construction document bid set.

Comment PT001-22         Tom Royds

TOM ROYDS: So just as a point of clarification, do you work for the City of Redondo Beach?

AARON JONES: Yes, for the last 30 years, sir.

TOM ROYDS: Okay. So you are the liaison between the development -- because you keep saying "we."

AARON JONES: We the City.

TOM ROYDS: We, the City.

AARON JONES: This Environmental Impact Report is 100 percent property and ownership of the City of Redondo Beach, is prepared by our consultant, but the City is producing this document.

TOM ROYDS: Who pays for that?

AARON JONES: The developer has to pay for it through a reimbursement agreement, and the selection of the consultant is solely the City's responsibility.
2. Response to Comments

Response to Comment PT001-22
Thank you for your comment. 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 PT001-23 Unidentified Speaker
UNIDENTIFIED SPEAKER: I have a question on Kingsdale. I noticed in the EIR that they had stipulated that it's two lanes northbound and two lanes southbound, okay? So the City should know that it's one lane southbound and two lanes northbound. To me, that changes all the numbers.

TOM ROYDS: And doesn't that void all your numbers?

Response to Comment PT001-23
Please refer to Response to Comment PC047-1 regarding the number of lanes along Kingsdale Avenue. 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 PT001-24 Tom Royds
TOM ROYDS: Tom Royds. For the record, your EIR states at this time Kingsdale Avenue is two lanes both northbound and southbound. That is not true. One lane is one lane heading southbound. The other lane is two lanes heading northbound.

This being the case, based off of your numbers, does this not void your numbers? Was that clear number enough?

Response to Comment PT001-24
Please refer to Response to Comment PC047-1 regarding the number of lanes along Kingsdale Avenue. 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 PT001-25 Hailey Ogle
HAILEY OGLE: I'd just like to say that we live here. We've been going through this process before for a year, as I said earlier. We watched. There were no little tapes out monitoring traffic flow during any major holiday. Whether you say there was or not, we live here, we drive over them, we noticed there were not. So I'd love to know what holidays you think you studied

AARON JONES: Okay. So the question is is were peak holiday trips studied, and how were they studied? And that will be responded to.

HAILEY OGLE: I'd like specific holidays, not peak holidays.

Response to Comment PT001-25
Similar comments were raised in other written correspondence from the commenter; please see Response to Comments PC017 and PC040. As stated on page 3.13-6 of the Draft EIR, traffic
counts were collected in November 2014 at 32 study intersections and five mainline freeway segments. Supplemental weekday holiday PM peak hour turning movement counts were conducted using cameras to record intersections, however the recordings were then counted by hand. More specifically, at eight of the 32 study intersections around the project site on December 17, 2015. Please see Response to Comment PC040-5 for more detailed information on this issue.

As stated in the Transportation Impact Study (TIS), Appendix L of the Draft EIR, weekday holiday PM peak hour turning movement counts were conducted at eight study intersections around the project site in December 2015. As noted in Section 3.13, Transportation and Traffic, on page 3.13-6 of the Draft EIR, the City defines significant traffic impacts based on changes in weekday AM and PM peak hour conditions, consistent with the 2010 Los Angeles County Congestion Management Program. Please see Response to Comment PC027-2 for discussion of parking.

Comment PT001-26 Tom Royds

TOM ROYDS: I have one more question before you end. So based off of this room, based off the communication you've heard today, based off the fact that we're not satisfied that our questions aren't be answered and that we didn't have somebody here who could address the EIR, will you call another meeting before the 11th when final comments are due?

Response to Comment PT001-26

Thank you for your comment. While the comment does not directly address an environmental issue your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Additional public hearings will be held before the Planning Commission to consider certification of the Final EIR, and potential action on permits for the proposed project or alternatives, as well as potential modifications thereto.

Comment PT001-27 Carol Aguas

CAROL AGUAS: Why is there a short timeframe from the draft EIR to the final in September?

AARON JONES: It's required by law --

JASON RICKS: Look, the final EIR is not going to be done in September. That's when the public comment period for the draft closes.

CAROL AGUAS: I see.

Response to Comment PT001-27

Thank you for your comment. While the comment does not directly address an environmental issue, 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 PT002: September 5th, 2017 Public Meeting

On September 5, 2017, a public hearing was held to consider the adoption of a potential moratorium in the CR Zone (which includes the Galleria project site). However, many members
of the public utilized this public hearing as an opportunity to comment upon the Galleria project and the Draft EIR. Consequently, responses to these oral comments have also been prepared and are provided below.

Comment PT002-1 Matt Kappadakunnel

MATT KAPPADAKUNNEL: District 2. Mayor Brand and City Councilmembers. I am supportive of a moratorium on development in the CR zoning district. The emphasis in this area has been geared toward residential units as well as augmenting retail with some mention of commercial and corporate development, however, this has been a lot more muted in my opinion. Redondo Beach has not had a housing shortage or housing issue in my opinion, does not have a retail issue in my opinion. Redondo Beach has a job shortage, particularly with respect to professional employment. I look to the example of Playa Vista and their ability to invite corporations such as Google, Tom’s, Belk and Deonest Company, Yahoo is now owned by Verizon as commercial operators. I believe it is quite admirable. I also look to our neighbors in Manhattan Beach and El Segundo and how they’ve been able to along Rosecrans have many professionals take up posts right there and I can think of ten firms right there on Rosecrans I can potentially work for, whereas I can’t think of one firm in Redondo Beach that falls under my professional discipline. When I think about our neighbors in El Segundo and Manhattan Beach, they have also opened their doors to these co-working enterprises. El Segundo in particular has Biz House which has a variety of not just tech, but a variety of different professionals operating under one roof. They are also building out cross campus on Rosecrans, and Manhattan Beach has We Work which is actually a global brand that recently received a $4.4 billion investment from a Japanese telecom firm South Bay signifying a valuation of over $20 billion, and future development in Redondo would actually be beneficial to invite a company like We Work to potentially take up space in the Galleria and make it easily replace an existing anchor tenant and retail space. Not only that, but it would bring a group of young professionals who will be spending their dollars in Redondo during their lunch breaks, during before and after work. It would also be able to potentially, they would have the financial wherewithal to purchase existing homes or townhomes within Redondo Beach as well as contribute to the overall City. So it would be a positive protectory forward on the beach. We Work is actually pretty creative in their tenancy, in Santa Monica, for instance, they actually have two locations within walking distance of downtown Santa Monica signifying how full their capacity is, and I believe they could, in Redondo Beach, they could potentially be, let’s just say in the Galleria as well as the second area, whether it be North Redondo or South Redondo. Again, having a co-working enterprise in our City attracts a young professional and diverse demographic. But I would also say that it’s actually beneficial for, there are several professionals within Redondo Beach that work from home. I believe there are four out of five of our Councilmembers, if I’m not mistaken, who work from home and so a co-working environment. Okay. Alright, that’s it.

Response to Comment PT002-1

The commenters also states “Redondo Beach has not had a housing shortage or housing issue in my opinion, …” As discussed on Draft EIR page 3.8-16:

As noted under Government Code 65589.5(a), the legislature has concluded that “the lack of housing, including emergency shelters, is a critical problem that threatens the
economic, environmental, and social quality of life in California.” The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City “facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community” (Gov. Code Section 65580(d)). More specifically, the Legislature’s stated intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal” (Gov. Code Section 65581). Also under the Redondo Beach Housing Element, the project site represents the greatest potential for future residential development in the City, to meet the City’s Regional Housing Needs Assessment (RHNA), as well as the high regional demand for housing in the County (see also Circulation Element, Goal 8). Furthermore, as discussed in Section 3.0.3 of the Draft EIR, the proposed project provides mixed use development in a transit priority area, and is consistent with the regional RTP goals as well as the City’s goals of encouraging mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance and supporting transit-oriented development (Redondo Beach Circulation Element, G6, G7, and G8).

As further discussed in Draft EIR Section 3.10.3:

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. In cooperation with HCD, local governments and councils of government are charged with determining the cities or regions existing and projected housing needs as their share of the statewide housing need. The current Regional Housing Needs Allocation (RHNA) identifies housing needs in each SCAG jurisdiction and allocates a fair share of that need to every community. Redondo Beach’s RHNA for the 2013–2021 planning period has been determined by SCAG at 1,397 housing units, including 186 units for extremely low-income households, 186 units for very-low-income households, 223 units for low-income households, 238 units for moderate-income households, and 564 units for above-moderate-income households.

The City acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The types of jobs available at the project site is not considered an environmental issue under CEQA, therefore no further response is required. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Please also see Draft EIR, Section 4, Alternative 4-1, which includes office space as one of the proposed uses.

**Comment PT002-2  Tom Lieb**

TOM LIEB: I’m Tom Lieb. I’m not a resident of Redondo Beach but I’ve been a property owner here for just short of 50 years. I own the property we’ve all talked about this afternoon or this evening on 1400 Kingsdale. I own all the property that is adjacent the opposite east side of Kingsdale. I’m the one that developed Kingsdale on the south side and I’ve gone through all of the development that the Galleria, the Target Store, and everything that’s happened there. I paid
2. Response to Comments

for the sewer, the water line, the power lines, the street lights, the sidewalk. I paid for the fire hydrants at that end of the street. The California Environmental Quality Act was put in place specifically for developments like this to protect the property and the ownership of the little guy to the big guy. The Environmental Impact report that has been submitted not only does not have facts in it, it has no support whatsoever, it totally ignores traffic, pollution and safety. It has no facts. It has no baseline. It has no validity except that they deny that there is going to be an impact. Now on the traffic side of it, they are proposing a 650-resident series of structures and if you have both single family or single bedroom and dual bedrooms, that means that there’s going to be probably somewhere in the neighborhood of about 1582 people. If you take those people and you figure that they are going to drive to work and you only take 600 of them, 650 of them, that means that you put on Kingsdale Avenue, that you put on Artesia Boulevard, that you put on Hawthorne Boulevard, that you put on 182nd Street, just with those people alone, you put 650 cars on that street because they are proposing the parking structure to be on Kingsdale, they are going to come out of that parking structure. There’s 650 cars that are going to go on that street between 7 o’clock and 9 o’clock in the morning. There’s going to be another 650 cars that are going to go on Kingsdale between 4:30 and 6 o’clock. Now in the process, they also have a 150-room hotel. If you have a 150-room hotel, your occupancy rate is 60 some percent, 70 percent, you have 100 cars there. They come and they go. So for every car, there’s two cars on the road, because they come and then they go. Now all of the information is readily available. The Community Development person, you know, he told us that they had a report and it was magnificent and all the rest of it, but there is no baseline. How many employees are in that area? Now the area is Artesia on the north, 182nd on the south, it’s Hawthorne Boulevard on the east, and it’s the Kingsdale corridor on the west that you have to take into consideration up to the railroad tracks. You have businesses…..

MOTION by Councilmember Loewenstein, seconded by Councilmember Gran, to extend Mr. Lieb’s time by 1 minute. Motion carried unanimously.

MR. LIEB Continues - The basics is that Kingsdale Avenue, the safety of the people, there was an incident on Friday where the traffic was so jammed, that the fire trucks coming down from the fire station ended up at the intersection of Grant and Kingsdale had to turn around. They went up, they went north on Kingsdale, they went east on Artesia, they went south on Hawthorne Boulevard, they went west on 182nd and then finally arrived at the fire. The people have been aware of all of this and the Environmental Impact Report did not put any ______. They said there is no effect whatsoever by this development. That’s absolutely false, in fact it gets borderline of being flat and out fraud. Thank you. I appreciate your time.

Response to Comment PT002-2

Similar comments were raised in other written correspondence from the commenter; please see Response to Comments PT001-6. The commenter states that the Draft EIR “totally ignores traffic, pollution and safety.” Contrary to these assertions, traffic and safety were discussed in Draft EIR Section 3.13, air pollution was discussed in Section 3.1, hazardous materials were discussed in Draft EIR 3.6, water quality was discussed in Draft EIR Section 3.7, and geology and seismicity were discussed in Section 3.4. The commenter also states that the Draft EIR has no facts and no baseline. Contrary to these assertions, the Draft EIR is supported by substantial
evidence as outlined in each section of the Draft EIR, including a list of reference materials at the end of each section. Furthermore, each resource section of the Draft EIR has a subsection titled “Environmental Setting” which constitutes the baseline for the analyses. As discussed on Draft EIR page 3-1:

**Environmental Setting:** Describes the existing physical conditions (also referred to as the “baseline”) with regard to the environmental resource area reviewed within and in the vicinity of the project site. Each environmental topic provides a description of the baseline physical conditions by which the City, as Lead Agency, determines whether an impact is significant (additional details regarding baseline may also be provided in the individual impact assessments).

The commenter also states that the Draft EIR concludes that there would be no impacts. Contrary to these assertions the Draft EIR concluded there would be three significant and unavoidable intersection impacts. (Draft EIR Section 3.13). Several other impacts were also determined to be significant without mitigation. (See Draft EIR, Executive Summary, Section ES.7.2.)

The commenter also opines on the number of residential units and the population projections for the project site. Please see Response to Comment PC033-5 for discussion of this issue, which explains the basis for the City’s 1,008 population projection for the project site. “A public agency can make reasonable assumptions based on substantial evidence about future conditions without guaranteeing that those assumptions will remain true.” (Pub. Res. Code Section 21080 (e); City of Del Mar v. City of San Diego (1982) 133 Cal.App.3d 401, 412, 183 Cal.Rptr. 898.) The City notes the commenter’s point of disagreement over this population estimate, however the basis for the commenter’s projection has not been provided, therefore no further response is possible.

The commenter also discusses trip generation and trip distribution associated with the residential and hotel components of the project. The traffic analysis considered trip generation and distribution associated with all of the project components including the residential and hotel uses of the project. (See Draft EIR Section 3.13.4, and Draft EIR Table 3.13-7.)

The commenter further states “there is no baseline. How many employees are in that area? Now the area is Artesia on the north, 182nd on the south, it’s Hawthorne Boulevard on the east, and it’s the Kingsdale corridor on the west that you have to take into consideration up to the railroad tracks. You have businesses….” This issue is addressed in Response to Comment PT001-6. The commenter is referred to Response PC040-5 concerning accidents in the proposed project vicinity. Please see Response to Comment PC039-3 for discussion of emergency service vehicles.

**Comment PT002-3 Bob Pinzler**

BOB PINZLER: There is no exigent public health, safety and welfare, and you need all three, issue that requires the need for the zoning change. The present occupant has a plan that has been presented. Therefore, the underlying zoning is theirs and for those of you, and I was one of those people who was angry at the City Council for doing something that put this City into jeopardy
regarding the Waterfront Project by voting early just before the Measure C election. It would be problematic for you to put the City into the kind of jeopardy that could come legally from going through this process. There is a long-sided study about the impact of residential on city revenues and many people say that residential does not help, in fact it’s negative. It’s not exactly the case. The study speaks about cities that are expanding, that are adding infrastructure, that are going beyond their city limits, not about built-out cities. So under this situation, I believe you should leave the situation to the General Plan Advisory Committee, let them go through this process, let them deal with it, not put the City into some kind of potential legal jeopardy by doing something that could enable a litigant to come after the City. Thank you.

Response to Comment PT002-3

Thank you for your comment. While the comment does not directly address an environmental issue 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 PT002-4 Bob Pinzler

MAYOR BRAND: so you’re in favor of this moratorium or not? I couldn’t tell what you were saying.

BOB PINZLER: I am not in favor of the moratorium. I think you’re doing the wrong thing.

Response to Comment PT002-4

Thank you for your comment. While the comment does not directly address an environmental issue 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 PT002-5 Tom Lieb

MAYOR BRAND: Actually I didn’t hear from Mr. Lieb whether he’s for or against the moratorium.

TOM LIEB: I’m for the moratorium.

Response to Comment PT002-5

Thank you for your comment. While the comment does not directly address an environmental issue 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 PT002-6 Tom Royds

TOM ROYDS: District 4. So I actually hold in my hand right now the numbers that they gave on their report and it’s astounding. This is actually the report. This is the DEIR right here. And it says that they are anticipating 44,000 car trips a day. That’s a lot of car trips. That’s a lot of traffic that they’re going to be getting. They haven’t taken into consideration the people that work there when we looked at the draft EIR. They didn’t take into consideration the people that work there, the trucks, the semi’s, the service workers. This is just talking about the traffic that’s going to be
created by the 650 units. Okay. So when you talk about the validity of the report, and we’re all in agreement that something is going to happen with the Galleria. Nobody is going to be the ostrich with their head in the sand. Something is going to happen. But we’ve got one shot of getting this right. One shot. Because if we get it wrong, we’re going to have to live with it. You’re not factoring in, nobody is factoring in this new mega bus terminal. That’s not factored into any of these numbers. All the people that that’s going to bring and all the traffic that that’s going to bring. So we have to make sure that that infrastructure gets addressed so that it can handle what we’re going to drop there. Because if it doesn’t, you’re going to have a mess on your hands. And I watch it every day. I watch the emergency vehicles not being able to get down the street. At holiday time, I watch them have to slam their brakes at Kingsdale and Grant and just run across the street and run up into the mall with their little, you know, emergency vehicle cases. We’ve got one chance to get it right and when you have a draft EIR that says Kingsdale Avenue is four lanes in both directions. Kingsdale Avenue is not four lanes in both directions. Kingsdale Avenue is three lanes. Kingsdale Avenue is four lanes for about a 100-yard strip that goes by the bus terminal. That’s where they did their study. Those are the numbers that they’re using. That’s not accurate data. That’s false. That’s borderline fraudulent. The other thing is that you have nine intersections that they quote, in the EIR they quote nine separate intersections and two off ramps/on ramps to the freeway that are negatively impacted without the possibility of mitigation. They do not address Kingsdale Avenue. Not only do they not address it, but they don’t even call Kingsdale Avenue a street. They call it a collector. In the report, Kingsdale is referred to as a collector. Later on in the report, they go onto say Kingsdale Avenue will be an A street. How can you have nine intersections that go up to a mile and a half away from it that are going to be negatively impacted but the street that is at ground zero isn’t going to be impacted. The EIR is false. They didn’t include a lot of data that they should have included. The numbers that they did use when they decided to go from the standards that they have which is called, level of service has always been the standard for them to go ahead and to calculate car movement and traffic patterns in these types of studies. They didn’t do that. They went to what’s called the NXD service calculation which by the way the people that did the actual study, they came up with that calculation on their own. So what we’re saying is, you guys, we’re not saying it doesn’t going to happen, we’re just saying we have one chance to get it right. Let’s make sure we get it right. Let’s make sure we don’t drop and just give these guys everything they want. Let’s get the street situation situated.

Response to Comment PT002-6

Similar comments were raised in other written correspondence from the commenter; please see Response to Comments PC022, PC023, PC047, PT001-7, PT001-15, PT001-22, PT001-24, PT001-26, and PT002-6.

The commenter first states the Draft EIR is “anticipating 44,000 car trips a day.” The commenter incorrectly discusses the trip generation for the proposed project. As shown in Draft EIR Table 3.13-7, the total trip generation (including existing baseline trips) for the project site is 32,615 daily trips. However, when existing trips are removed, the proposed project would only result in an increase of 8,020 daily trips. The value the commenter appears to be referencing included both existing and proposed uses under the stand alone ITE trip generation rates, and did not take into account the MXD+ calibration; which accounts for site specific factors and the specific mix of
land uses. Please see Response to Comment PC002-1 for additional details on the MXD+
calibration.

The commenter also states “They haven’t taken into consideration the people that work there
when we looked at the draft EIR. They didn’t take into consideration the people that work there,
the trucks, the semi’s, the service workers. This is just talking about the traffic that’s going to be
created by the 650 units.” Please see Response to Comment PT001-6, which explains that
existing workers, employees, and trucks were all taken into consideration in the traffic analysis.

The commenter further states “nobody is factoring in this new mega bus terminal. That’s not
factored into any of these numbers…So we have to make sure that that infrastructure gets
addressed so that it can handle what we’re going to drop there.” Please see Response to Comment
PC039-10 which addresses this issue. As also discussed in Draft EIR page 2-9, the Transit Center
Relocation was approved by the City in 2010, and was subject to a Mitigated Negative
Declaration which addressed the impacts associated with that project. Please also see Response to
Comment PC039-3 for discussion of emergency service vehicles.

The commenter also states “you have a draft EIR that says Kingsdale Avenue is four lanes in both
directions. Kingsdale Avenue is not four lanes in both directions. Kingsdale Avenue is three
lanes. Kingsdale Avenue is four lanes for about a 100-yard strip that goes by the bus terminal.
That’s where they did their study. Those are the numbers that they’re using. That’s not accurate
data. That’s false. That’s borderline fraudulent.” Please see Response to Comment PC047-1
which explains that the Draft EIR used the correct intersection lane configurations, and that the
text referenced by the commenter did not affect the substantive analysis, but was nevertheless
clarified in the Final EIR Errata chapter.

The commenter further states “The other thing is that you have nine intersections that they quote,
in the EIR they quote nine separate intersections and two off ramps/on ramps to the freeway that
are negatively impacted without the possibility of mitigation. They do not address Kingsdale
Avenue.” The commenter incorrectly summarizes the Draft EIR significance conclusions and the
intersections analyzed in the transportation analysis. As discussed in Draft EIR Section 3.13, the
transportation analysis considered 32 intersections, four of which were located along Kingsdale
Ave. More specifically, the analysis included Kingsdale intersections at: Artesia Boulevard
(Intersection 14), Grant Avenue (Intersection 20), Target Drive (Intersection 24), and 182nd
Street (Intersection 27). (See Draft EIR Figure 3.13-1 and Table 3.13-10.) Draft EIR Section 3.13
disclosed that the proposed project would result in six significant intersection impacts before
implementation of mitigation which included significant impacts at Intersection 13 (Inglewood
Ave/Artesia), Intersection 15 (Redondo Beach Blvd/Artesia), Intersection 16 (Hawthorne
Blvd/Artesia), Intersection 17 (Prairie Ave/Artesia Blvd), Intersection 18 (I-405 Southbound
Ramps/Artesia Blvd), Intersection 19 (I-405 Northbound Ramps/Artesia Blvd). Three of these
impacts would be reduced to less than significant with mitigation, and three intersections would
remain significant and unavoidable after implementation of mitigation.

The commenter also states “How can you have nine intersections that go up to a mile and a half
away from it that are going to be negatively impacted but the street that is at ground zero isn’t
going to be impacted. The EIR is false.” As noted in the previous paragraph, there would not be nine significantly impacted intersections. The commenter is also referred to Draft EIR Section 3.13.4, which includes discussion of methodology, such as trip distribution and significance thresholds. As discussed in these subsections, not all intersections receive the same number of trips generated by the proposed project. Furthermore, the significance criteria are based upon the underlying Level of Service, which become more restrictive as the baseline LOS degrades. As shown in Draft EIR Table 3.13-10, the baseline LOS values along Kingsdale range from LOS A to LOS C.

The commenter also states “level of service has always been the standard for them to go ahead and to calculate car movement and traffic patterns in these types of studies. They didn’t do that. They went to what’s called the NXD service calculation which by the way the people that did the actual study, they came up with that calculation on their own.” The commenter incorrectly equates two different components of the traffic analysis. The Traffic Analysis in Draft EIR Section 3.13, expressly utilized Level of Service (“LOS”) as shown in Draft EIR Tables 3.13-10 and 3.13-13. The MXD+ model is discussed on Draft EIR page 3.13-22 and was utilized to calibrate the trip generation for the proposed project. The trip generation was then distributed to various intersections as discussed in Section 3.13.4, and was then used to measure the Volume/Capacity (V/C) ratio, also known as the Intersection Capacity Utilization (ICU). These values equates to specific LOS values shown in Draft EIR Table 3.13-2.

The commenter states “They went to what’s called the NXD service calculation which by the way the people that did the actual study, they came up with that calculation on their own.” This assertion is incorrect. As discussed in Draft EIR Appendix L (“Appendix A – MXD Model Documentation”), the MXD+ model is based upon two earlier trip generation studies including (1) the National Cooperative Highway Research program (NCHRP) Report 684, and (2) the US EPA sponsored Report “Traffic Generated by Mixed-Use Developments – A Six-Region Study Using Consistent Built Environmental Measures” which in turn was based upon a study of 239 Mixed Use Developments and verified through 27 mixed use sites across the U.S. (Appendix L, Appendix A, p. 10-11.) The MXD+ model combines the datasets and factors from both of these models. (Draft EIR Appendix L, Appendix A, pp. 12-16.)

Comment PT002-7 Suzy Royds

SUZY ROYDS: Good evening Mayor Brand and Councilmembers and staff. My name is Suzie Royds. I’m in District 4. I am definitely for the moratorium at least until we’ve had the chance to really study not only this draft EIR but also community input and also Forest City, what are they really planning on doing? We still don’t have it secured down. Is it alternative 4, is it alternative 4.1, is it a parking structure on Kingsdale, could it be an office building? It’s kind of still up in the air. But I want to read to you a description from the LA County on regional commercial zone. Chapter 17-7-12. The purpose. The purpose of the regional commercial zone is to (a) allow for a wide range of commercial and retail trades, uses as well as offices, business and personal services that contribute to the positive character of the city, buffer adjacent residential neighborhoods and maintain pedestrian access with links to neighborhoods and other commercial developments, (b) Allow for new commercial development that is compatible with and contributes to the character of the city of the community through use of appropriate building, architectural, color, lighting and
landscaping criteria to soften the visual impact of commercial building sites and parking areas. To encourage commercial development that incorporates design elements related to public outdoor space including pedestrian, circulation and trails, transit facilities, plaza, pocket parks and public art. That sounds very reasonable and very good, however, what’s been proposed by Forest City basically is like Godzilla stamping on New York City. Yes, it can be done and it can be done right, but simply by what we’ve heard about and the truth is about the EIR report, the impact to the traffic, the safety, the noise, the pollution, there aren’t mitigations for it. Even one of our own City Planning staff has told a reporter that Kingsdale Avenue is not able to be mitigated. I would really be horrified to find that that’s the actual opinion but we have many opinions about how it can be mitigated and also about what kind of development would better suit the community. And I really hope that this Council votes for a brief moratorium so that we can really do some communicating with Forest City about what their actual plan is.

**Response to Comment PT002-7**

The commenter states “Forest City, what are they really planning on doing? We still don’t have it secured down. Is it alternative 4, is it alternative 4.1, is it a parking structure on Kingsdale, could it be an office building? It’s kind of still up in the air.” The decision to approve, disapprove, or modify the proposed project or an Alternative is not made by City Staff, but is made by the decisionmaking body after certification of the Final EIR. Consequently, such a decision could not be made while the Draft EIR was still being circulated for public review. Nevertheless, the City notes that applications have been submitted requesting approval of Alternative 4/4-1.

The commenter also refers to the “LA County on regional commercial zone” citing Chapter 17-7-12. The LA County Code does not appear to have such a subsection, nevertheless, it would not be applicable to the City of Redondo Beach. The project site is located within the City of Redondo Beach, and is therefore subject to the Redondo Beach Municipal Code. As discussed in Section 3.8, *Land Use*. The project site is designated as regional commercial (CR) zone within the Redondo Beach General Plan and Zoning Ordinance. The General Plan describes the CR zone and land use designation as designed to establish regional-serving commercial and ancillary uses, including department stores, promotional/discount retail, eating and drinking establishments, entertainment, movie theaters, financial institutions, and professional offices. The CR designation also encourages the possibility of residential units which would be integrated with commercial land. As discussed in Table 3.8-2, the proposed project is consistent with the General Plan as a whole. In addition, the commenter expresses general concern regarding traffic, safety, noise, and pollution. The comment does not raise any specific issue related to the adequacy of the analysis as provided in the EIR. However, the comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, the commenter is referred to the Draft EIR, Section 3.13, *Transportation and Traffic*, which discuss proposed project impacts on Kingsdale Avenue; Section 3.11, *Public Services*, which discusses police protection; Section 3.9, *Noise*, which discusses noise impacts; and Section 3.1, *Air Quality*, which discusses the proposed project’s emissions.
Comment PT002-8  Sheila Lamb

SHEILA LAMB: Good evening. Sheila Lamb, District 4. I am in support of a moratorium for this development for this reason. The development reports to be in alignment with SCAG and the State of California’s goals for reduction in VMT and GHG and I would say that that’s contrary to what the reality is. The State of California’s goal of reducing the number and length of vehicle trips will not be addressed by this mixed use at the Galleria. Even under proposal 4-1, the least dense proposal, the Galleria development would increase traffic, and this is their data, by 6,000 car trips per day, thus increasing VMT and GHG emissions which are counter to SCAG and the RTPSCS goals. What the Galleria development won’t do is significantly reduce the distance between where the people are and where the jobs are which is what we really need in Redondo Beach because 90% of Redondo residents travel outside the City for employment. In addition, the Greenline extension that the EIR reports to be in alignment with our goals will have only a very minor impact on any, on reducing any of the VMT for Redondo Beach residents because the majority of residents travel north, not south. The promise of mixed use and transportation infrastructure improvements are an empty promise. We’re currently in a new General Plan process to update the Redondo Beach Land Use Element. This process will provide an opportunity for the public to comment on mixed use and its appropriateness as part of the community’s broader vision for the future. Once the Land Use Element is updated and the public has had a chance to comment on mixed use and its relevance for today’s context, the moratorium could be lifted. So for these reasons, I respectfully request the City Council place a moratorium temporarily on mixed use development in the Galleria development plan. Thank you so much.

Response to Comment PT002-8

Similar comments were raised in other written correspondence from the commenter; please see Response to Comments PC024, PC034, PC046, PT001-12.

The commenter states “The development reports to be in alignment with SCAG and the State of California’s goals for reduction in VMT and GHG and I would say that that’s contrary to what the reality is. The State of California’s goal of reducing the number and length of vehicle trips will not be addressed by this mixed use at the Galleria.” Please see Response to Comment PC046-3 which addresses this issue and explains that the site currently meets the statutory definition of a Transit Priority Area (TPA), regardless of a potential green-line extension. 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. Please also see Response to Comments A1002-19 and 19 for discussion of the potential Green Line Extension.

Comment PT002-9  Bruce Szeles

BRUCE SZELES: Good evening Mayor and Council. Bruce Szeles, City of Torrance. I’m in favor of the moratorium. I was a 20-year resident of the 2400 Block of Vanderbilt Lane, not too far from where Councilmember Gran lives. The, we’re talking about one, albeit large, but we’re talking about one property asking for a moratorium as opposed to this Council approving a mixed use moratorium which covers many, many, many different properties. But this one is a big one in North Redondo. Why is it a big one in North Redondo? Because District 4 has already seen historic infill construction in that tiny district, so it is already doing its part, it’s already doing its
share to create new housing for this City. What Forest City has the opportunity to do is to build something that’s more commercially aligned so that we can reverse the flow of traffic from going out of the City to go to work, back into the City to go to work. This is one large area, but only one, and it happens to cover a big part of District 4 and I ask that you consider this one piece of property, ______ and look for a way to make this work for both the residents and Forest City. As a 20-year shopper at the Galleria Mall, I’m not exactly sure I’m going to be so inclined to part with my money while having to fight traffic to get in and out of there. Quite frankly, I’ve been for 30 years taking the Inglewood off ramp off the 405 Freeway to either go to the west side or to Burbank. I don’t know if I’m going to take that with all this extra traffic. I really don’t. So I ask you please put the moratorium in place. Thank you.

Response to Comment PT002-9

The commenter expresses general concern regarding traffic. The comment does not raise any specific issue related to the adequacy of the analysis as provided in the EIR. However, the comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, the commenter is referred to the Draft EIR, Section 3.13, Transportation and Traffic, which discuss proposed project impacts on Interstate 405 northbound and southbound ramps. The commenter is also referred to Response to Comment PC001-1, above.

Comment PT002-10  Rose Espinosa

ROSE ESPINOSA: Hello, hello. Thank you so much Mayor Brand and City Council ______ for listening to us. Thank you for your time and attention. I wanted to say______ Enterprise owner, Tom, pointed out the numbers. Great job. And also the fact that you heard from the residents on interesting and incredible points on different aspects about the redevelopment project. But I want to respectfully submit the following opposition to the draft EIR. I hope you can follow because I’m going to go fast. I want to get all this in. The opposition is based on the following very basic facts. You have all the fancy codes and ordinances at your disposal and you have a whole team here. The draft EIR presented to you is incomplete. Number one. Number two. Given that the draft EIR is incomplete, to submit this as an official document will be considered fraudulent. Number three. It is irresponsible and illegal for city government officials to use taxpayer dollars to pay for an incomplete city document the city knowingly has full knowledge of but there is lacking data. Number four. City government cannot ignore basic facts about the project and cannot even make a recommendation on the project when the data is not available. Number five. When referring to data, I’m referring to an existing baseline, future numbers. The draft EIR as you see it does not outline existing number of people who travel to the Galleria by bus, car, train. It does not indicate the number of cars that travel to the mall by employees, residents, retail, restaurant, daily truck deliveries, it does not show how many people travel by car and foot to the surrounding retail space and the Target store on a daily basis. Correct? Okay. Nor does it indicate how many cars and buses travel on all streets surrounding the Galleria. The most glaring and blatant oversite is the fact that the draft EIR shows absolutely no data on Kingsdale Avenue. Allow me to repeat that because you need to hear that. Number six. The most glaring and blatant oversite is the fact that the draft EIR shows absolutely no data on Kingsdale Avenue. Number seven. As a resident, I can tell you it is a fact that this project in its current proposed
phase, if in fact number four is the proposed phase we’re going to go with, right, which still is unclear, will be a public safety hazard to residents and visitors given that Kingsdale is not wide enough to handle the present traffic flow, much less with the added traffic flow. Kingsdale is not a four-lane street. Absolutely correct Tom Royds. Come over. Schools aren’t even being discussed in this. The impact of the housing component will have on already overcrowded classrooms. Now personally both as a journalist and as a resident, I’ve watched ambulances stuck fire trucks on Kingsdale where there has been a homicide report at the Galleria. It’s an issue. There is so much traffic there. And this is just now. Think about the holidays, etc. Truthfully, and the former mayor, let me just respond to. The only real jeopardy here you’re talking about, you know, being open to litigation. I’ve seen this in many stories in the past. The only real jeopardy here is that you are opening yourself up. You’re being vulnerable as a city if the General Planning Committee greenlights a project without data and someone gets hurt. Consequently, I request that the City Council not accept this draft EIR, realize that there are numerous significant adverse impacts to the Phase 4, again if that’s the one, draft of the South Bay Galleria Redevelopment Project that will negative impact air quality and equally important, the public safety and welfare of Redondo Beach residents. Let’s not forget what the mission statement is, right, for the City. And of course it will also impact visitors to the area. Now again, people are open to a responsible sensible redevelopment of the project, but that’s all we have here. So we urge you to do the research. Yes to the moratorium and all developments in the City. Remember, taxpayers deserve responsible governance, so that is respectively submitted, residents and people of District 4.

Response to Comment PT002-10

Similar comments were raised in other correspondence from the commenter; please see Response to Comments PT001-8. Please also see Response to Comment Response to Comment PT001-6 which explains that the EIR baseline conditions accounted for employees, residents, retail, restaurant, daily truck deliveries. While the commenter alleges that “the draft EIR shows absolutely no data on Kingsdale Avenue,” as discussed in Response to Comment PT001-8, this is incorrect, and four intersections along Kingsdale were analyzed and determined to be less than significant. The commenter also states that Kingsdale is not a four way street; please see Response to Comment PC047-1 which explains that the Draft EIR used the correct intersection lane configurations, and that the text impliedly referenced by the commenter did not affect the substantive analysis, but was nevertheless clarified in the Final EIR Errata chapter.

The commenter also states “Schools aren’t even being discussed in this. The impact of the housing component will have on already overcrowded classrooms.” School capacities were in fact analyzed in Draft EIR Section 3.11, Public Services. This analysis made reasonable assumptions about Student Generation factors based upon RBUSD’s 2016 Enrollment Impact Analysis. This included Elementary School Student Generation factors of 0.1284 Elementary School students per unit, 0.0489 Middle School students per unit, and 0.051 High School students per unit. As further discussed in Section 3.11.4, Impact PUB-3, pursuant to state law “the project would pay statutory fees which are ‘…deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.’” (Gov. Code Section 65995(h) and 65996; see also Stand Up for Fremont v. City of Fremont (2017 Alameda County Superior Court Case No RG17844308) [“Finally, we respect to Petitioner’s
claim that the project may risk overcrowding the schools, the Court finds that by law this cannot be asserted as a substantial impact on the environment under CEQA because that claim is barred by Government Code section 65996.”] For discussion of emergency services, please see Response to Comment PC039-3. For discussion of holidays, please see Response to Comments PC027-2. For discussion of trip generation and vehicular safety, please see Response to Comment PC040-5.

The commenter also expresses general concern regarding air quality impacts and public safety. The comment does not raise any specific issue related to the adequacy of the analysis as provided in the EIR. However, the comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body. Nevertheless, the commenter is referred to the Draft EIR, Section 3.11, Public Services, which discusses impacts associated with safety, police, and fire protection; and Section 3.1, Air Quality, which discusses the proposed project’s emissions, which were determined to be less than significant.

Comment PT002-11 Arlene Pinzler

ARLENE PINZLER: Arlene Pinzler, District 4. If someone didn’t get to see the agenda for this evening and just heard the comments on this item, they might think this was about the EIR for the Galleria and I think the problem here is that, I’m not in favor of the moratorium. I think the City can be, I agree with those who have said that the City Council needs to be doing a lot more to get, grab control of the CEQA process and to make sure that this project does not move forward with all kinds of problems, failure to mitigate. So many problems with the EIR. This is where, that’s where the real work of getting, coming up with a project at the, on the Galleria property that meets the needs of the City and the desires of the residents. That’s really where the work needs to be done. I just think this moratorium is not the right way to go for so many reasons. There are so many ways in which the City opens itself up to lawsuits. We have enough lawsuits. I think probably all of you could possibly, I hope you might agree, and there is a process available and a lot more could be done with it. So, I hope that’s what you’ll be doing. Thank you.

Response to Comment PT002-11

Thank you for your comment. While the comment does not directly address an environmental issue, 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 PT002-12 Delia Vechi

DELIA VECHI: Delia Vechi, District 2, I be very briefly. I don’t need to read any _______ to realize the impact of this proposed project. Unfortunately, when the time right was, when was discussed, the mixed use moratorium and _______, that’s the mistake unfortunately, that’s the City authorities. CR was removed from the mixed use. Now, we are in this situation. Everything has been avoid if at that time had been removed. I’m against the 300 units adding more that we already have plenty of units in the City. The traffic in that area is outrageous and I don’t like to explain what already very well explained has been for another people. They only like to say that the moratorium I hope don’t open the door for litigation. But I support the moratorium. The only I really would like that the people that have removed CR previously, because I follow the City very
well, repent and be the consequence of __________ because now it’s a critical moment to take a
decision. That’s what I say. Thank you so much.

**Response to Comment PT002-12**

The commenter expresses concern related to the residential component of the proposed project
and additional traffic. The comment does not raise any specific issue related to the adequacy of
the analysis as provided in the EIR. However, the comment is acknowledged and will be included
in the Final EIR presented for review and consideration by the City’s decision-making body.
Nevertheless, the commenter is referred to the Draft EIR, Section 3.10, *Population and Housing,*
and Section 3.13, *Transportation and Traffic.*

**Comment PT002-13  Joshua Gottheim**

JOSHUA GOTTHEIM: Thank you, I’m Joshua Gottheim, attorney for Forest City and the
Galleria and we have our letter, I have ten copies to distribute just with our legal objections. I
won’t bore you with the legalisms but just wanted to say that from our perspective, this project
has been moving forward in an orderly fashion the way it’s supposed to with dialogue with the
community, feedback the applicant is considering now, hearing the comments, looking forward to
the public comments that will come in on the EIR, and we hope to take those comments to heart
and present a project that has been, has listened to the community and made appropriate changes,
and we think this will be a terrific project. There is no sudden urgency that has come up that
should derail a three-year process that involves several hundred pages of studies, every issue
that’s been raised tonight is raised in the EIR and the public will have the opportunity through
public comments to submit additional comments that will be responded to by the City. It is only
after that process that you will know what the major significant impacts may be and that will be
for you to decide. So we hope to have the opportunity to present a project. The urgency for the
community in our view is the urgency of Nordstrom’s departing and having a center that needs to
be, that urgently needs to be revitalized to be an asset for the community. So we would like to
have the process go forward and we oppose the moratorium. Thank you.

**Response to Comment PT002-13**

While the comment does not directly address an environmental issue, 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 PT002-14 Motion by Councilmember Horvath**

MOTION by Councilmember Horvath, seconded by Councilmember Gran, to receive and file
documents presented by Mr. Gottheim. Motion carried unanimously.

**Response to Comment PT002-14**

While the comment does not directly address an environmental issue 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 PT002-15 Don Szerlip

DON SZERLIP: Good evening Mayor, City Council. Don Szerlip, District 4. I can’t agree more strongly with those who have come before you telling you and stating that there is no viable urgency for you upon which to make a ruling that there should be this temporary halt to any processes that are moving forward. We are not this evening evaluating the EIR. The process towards getting to a final potential improvement on this is a long way away, and there is nothing impending that will dramatically affect the public safety or the other findings that you must make as a board in order to justify. In fact, this direction appears to continue the City’s recent program of denying property owners their rights and resulting in major litigation, and I would hate to see us opening the door for more of that. We are already under plenty of it. Thank you.

Response to Comment PT002-15

While the comment does not directly address an environmental issue, 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 PT002-16 Jim Light

JIM LIGHT: Jim Light, District 1. Forest City’s marketing firm has already showed doesn’t really care what residents want. They are calling landscaped setbacks linear parks as I had said previously. They show bike paths crossing their main driveway which is a public hazard, and they also in the press were recently quoted that there will be a residential component despite the public opposition to that. So they’ve already shown that they don’t really care what the public thinks. We’ve already been through several public processes where the public has been ignored. So once again, we are in this position because previous administrations and staff have ignored repeated and widely voiced concerns of the residents about over densification of our City. And those who ignore history are doomed to repeat it. The time is right for a moratorium. The GPAC is considering General Plan revisions right now. In fact, our next meeting is the first one where we’re actually going to give some real input into potential future land uses. So we haven’t even gotten a chance to opine on that, but we’re about to get into it. One of the first briefings we got showed that we have a huge work force job disparity. More than 90% of Redondo workers commute out of Redondo every day to work, and that accounts into other communities where they spend their money. That equates to over 30,000 residents, nearly half of Redondo commute outside our town every day and spend their money outside our City. And then to add insult to injury, over 23,000 retail, restaurant and hotel workers commute into Redondo because they can’t afford to live here because of the price. So we have 30,000, nearly half the town leaving, and then we’ve got 23,000 people coming in to job center underperforming because everybody’s left the town. And what the study also showed is only 2500 residents commute to work and stay inside Redondo each day. We have only two potential sites that make a dent in this job disparity. The Galleria and the AES/Catalina area. High end jobs in Redondo would bring weekday year round revenues into the community, into our business districts and corridors that are underperforming. A recent reference book on modern city planning recommended by the American Planner’s Association states very clearly that only and under very unique circumstances does high density and high cost, does residential make money. And those are very high density with high cost residential units. I think Downtown New York City. So it’s very limited circumstances where
cities really make revenue on housing. The time is right. I’d ask you to approve the moratorium, let the GPAC do its job, and consider an integrated and comprehensive zoning for the City. Thank you very much.

Response to Comment PT002-16

The City acknowledges the comment and notes that most of the comments are related to economic, social, or political issues that do not appear to relate to any physical effect on the environment. The commenter also voices general opposition to the residential component of the project. The commenter’s opinion is noted. As discussed on Draft EIR page 3.8-16:

As noted under Government Code 65589.5(a), the legislature has concluded that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California.” The Redondo Beach Housing Element contains state mandated policies and analysis to ensure that the City “facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community” (Gov. Code Section 65580(d)). More specifically, the Legislature’s stated intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal” (Gov. Code Section 65581). Also under the Redondo Beach Housing Element, the project site represents the greatest potential for future residential development in the City, to meet the City’s Regional Housing Needs Assessment (RHNA), as well as the high regional demand for housing in the County (see also Circulation Element, Goal 8). Furthermore, as discussed in Section 3.0.3 of the Draft EIR, the proposed project provides mixed use development in a transit priority area, and is consistent with the regional RTP goals as well as the City’s goals of encouraging mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance and supporting transit-oriented development (Redondo Beach Circulation Element, G6, G7, and G8).

As further discussed in Draft EIR Section 3.10.3:

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. In cooperation with HCD, local governments and councils of government are charged with determining the cities or regions existing and projected housing needs as their share of the statewide housing need. The current Regional Housing Needs Allocation (RHNA) identifies housing needs in each SCAG jurisdiction and allocates a fair share of that need to every community. Redondo Beach’s RHNA for the 2013–2021 planning period has been determined by SCAG at 1,397 housing units, including 186 units for extremely low-income households, 186 units for very-low-income households, 223 units for low-income households, 238 units for moderate-income households, and 564 units for above-moderate-income households.
The commenter also claims “We’ve already been through several public processes where the public has been ignored.” The commenter appears to be referencing the Waterfront project. Despite this assertion from the commenter, numerous revisions were made the Waterfront project in direct response to Mr. Light and similar comments. For example, (1) one of the new proposed roadway was moved further east away from Seaside Lagoon, (2) the number and density of new building in Seaside Lagoon was reduced, (3) a new view corridor was added along Harbor Drive, (4) as well as several revisions to the boat launch facilities, including an increase in trailer parking, an increase in boat launch maneuvering and queuing space, and moving the stand-up paddle board launch location.

The commenter also states “They show bike paths crossing their main driveway which is a public hazard.” The purpose of CEQA is to analyze physical impacts to the existing environment at the time of the NOP (CEQA Guidelines Section 15125(a)), not to hypothetical future conditions. The bike paths shown in Draft EIR Figure 3.13-2 along Kingsdale and Artesia have not been constructed. Furthermore, the proposed project is not adding any additional driveways along Kingsdale or Artesia Blvd. As shown in Draft EIR Figure 2-7, the proposed project would utilize the existing driveways at (1) the intersection of Kingsdale and Grant Ave. and (2) Kingsdale and 177th St. As also shown in Draft EIR Figure 2-7, the proposed project site would utilize the same two driveways along Artesia Boulevard.

Furthermore, as discussed under Draft EIR Impacts TRA-3 and TRA-5 in Section 3.13 the proposed project would not result in significant safety impacts or significant impacts to pedestrian or bicycle facilities. As also discussed in Response to Comment PC040-5, the roadway along Kingsdale has adequate sight lines to ensure drivers existing the driveways have adequate views of oncoming vehicles, bicycles, and pedestrians. The fact that a bike path may cross a driveway does not result in a de facto significant roadway safety impact, as implied in the comment. As shown in Draft EIR Figure 3.13-2, there are numerous existing bike paths within the City of Redondo Beach and the neighboring jurisdictions. Every single one of these paths traverses numerous driveways and roadways. For example, the existing bike path along Grant Avenue shown in Figure 3.13-2 starts at: (1) Kingsdale Avenue, and traverses (2) Firmona Avenue in two locations, (3) Condon Avenue, (4) Inglewood Avenue, (5) Perkins Lane, (6) Felton Lane, (7) Phelan Lane, (8) Mackay Lane, (9) Slauson Lane, (10) Rindge Lane. This bike path also crosses approximately 100 driveways which are mostly multi-family residential developments along this route. Finally, future bicycle facilities will be designed to applicable standards and best practices.
and include traffic control signage and markings, consistent with current CA MUTCD and industry standards. For discussion of “linear parks” please see Response to Comment OR007-2.