Redondo Beach Sportfishing

Carlos Fernandez <carlosfernandez911@gmail.com>

Mon 1/18/2016 8:41 PM

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

Please keep sport fishing in King Harbor. I have been fishing out of Redondo Beach Sportfishing for many many years. It brings people from all over the place to experience the beauty of our South Bay that would otherwise not come. Thanks

Carlos
310-350-0086
Sent from my iPhone
Redondo Beach Sportfishing

Craig Haratani <craigharatani@gmail.com>

Mon 1/18/2016 8:50 PM

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

Getting rid of Redondo Beach Sportfishing is getting rid of Redondo Beach history
In Support of Redondo Sportfishing

Marc R. <mramniceanu@gmail.com>

Mon 1/18/2016 9:12 PM

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

Dear Katie,

I am writing to submit a comment on the Waterfront Draft Environmental Impact Report.

I have lived in the South Bay my entire life, and I have been fishing on boats operating from Redondo Sportfishing (and hence supporting a Redondo Beach business!) since I was attending grade school. I hope to continue with this tradition, and I hope that when I have children that I will be able to take them with me on trips here.

Redondo Sportfishing is incredibly convenient for South Bay residents and has been a part of the South Bay for decades. It offers fishermen from all walks of life with equal access to the ocean around the Palos Verdes Peninsula, the greater South Bay, and Catalina Island. Redondo Sportfishing offers a unique value proposition in terms of convenience, affordability, and professionalism of the captains and crew. There are no other sportfishing landings that are an apples to apples comparison.

Hence, I highly encourage the City of Redondo Beach to allow Redondo Sportfishing to continue its business.

Additionally, I strongly oppose any actions catalyzed by the results of the Waterfront Draft Environmental Impact Report that would cause Redondo Sportfishing to permanently close, temporarily cease operations, or undergo restrictions in their ability to service South Bay fishermen.

Thank you,

Marc
Dear Katie and members of the Planning Commission, City Council, et al,

I have lived in the South Bay all of my life, first in Redondo as a small child and recently for the past twenty years. I am appalled at the concept the city seems willing to adopt for renovating the pier. This is a harbor, a beach community, a small town, and the proposed development speaks to none of that.

To top it off, we have the AES property to consider as part of the waterfront, and we need an overall municipal plan that will encompass both sites if we are to survive as a “quaint” beach community. Big is rarely better, and we’ve seen what can happen (the waterfront condos that exist where we once had a downtown) when development goes haywire.

I urge the city to rethink this renovation. I have seen Centercal’s video, and I’ve gone to their “open” planning meetings, and I think the whole thing is outrageous and not in our best interest as a community.

Sincerely,
Linda R. Neal
310-316-9931
Don’t take our fishing boats away. They are major part of the whole King Harbor experience. Without them you are basically saying, "Go and spend your time and money in San Pedro,". Redondo Beach and the Palos Verdes peninsula are world class fisheries and our local businesses deserve the support of the City of Redondo Beach.

Thank you for your time.

Sincerely,
Christopher Imbro,
Owner
Chris Imbro Plumbing
CSLB # 1001160

Sent from my Sprint Samsung Galaxy S® 6.
Fwd: Delivery Notification: Delivery has failed

Mauricio <sanges@verizon.net>

Mon 1/18/2016 9:31 PM

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

4 attachments
mime-attachment; ATT00001.htm; mime-attachment; ATT00002.htm;

Sent from my iPad

Begin forwarded message:

From: postmaster@verizon.net
Date: January 18, 2016 at 9:29:31 PM PST
To: sanges@verizon.net
Subject: Delivery Notification: Delivery has failed

This report relates to a message you sent with the following header fields:

Message-id: <38EFC6B3-DDD8-4DAE-8156-85B8CDD85F7@verizon.net>
Date: Mon, 18 Jan 2016 21:29:30 -0800
From: Mauricio <sanges@verizon.net>
To: katie.awston@redondo.org
Subject: Keep fishing in Redondo

Your message cannot be delivered to the following recipients:

Recipient address: katie.awston@redondo.org
Reason: Remote SMTP server has rejected address
Diagnostic code: smtp;550 No such user (katie.awston@redondo.org)
Remote system: dns;mx4.redondo.org (TCP|206.46.173.23|48339|208.251.67.67|25) (mx4.redondo.org) ESMTP [6a8cb7aa664394859cd05d180ac1920f]
Keep fishing in Redondo. I am actually against any changes to our marina area, keep it quiet, not congested like it has been for last many decades.

Sent from my iPad
Keep sport fishing

Carlos Medina <solrk1613@hotmail.com>
Mon 1/18/2016 9:38 PM

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

Keep the sport fishing in Redondo! Fish kept me out of trouble and gang activities! Fishing has changed my life and Redondo is the closest fishing pier around and available for every one. Sport fishing should continue to be part of Redondo for every one and every angler.

Sent via the Samsung GALAXY S®4, an AT&T 4G LTE smartphone
Hello! I am in South Redondo, 90277, and I truly hope that the Waterfront will keep a sportfishing boat landing in its plans. Thank you, John Wileman
Dear Ms. Owston,

As a 10-year city resident, I appreciate the opportunity to comment on the proposed harbor project. While the city is to be applauded for its efforts to improve this remarkable asset, the current proposed concept is seriously flawed and needs to be completely revisited.

Among my concerns:

- Malls — and make no mistake, this is a suburban mall concept — generate massive amounts of traffic and pollution that would negatively impact the quality of life in much of Redondo Beach and reduce residents' pier, harbor and beach access.
- The focus on retail — at a time when the traditional retail industry is contracting — is ill advised and puts the city at great fiscal peril. Imagine the waterfront scarred by a huge project sitting incomplete, with the city desperately trying to find funding to restart or operate it.
- As objections from thousands of residents and current pier and harbor businesses grow — and doubts surface about the developer's vague plans ability to generate funding — the likelihood that the project will be derailed for any number of reasons are very real.

More reasonable, responsible and appropriately-scaled alternatives to improving the harbor and pier do exist. Re-examining them would serve the city and its residents very well.

Sincerely,

Brad Ritter
620 The Village,
RB 90277
Hello

I just wanted to give a few words of support regarding the waterfront.

This is so important to our future. We are so lucky that Centercal wants to put so much into our city.

Please please let's just move this project along and revitalize our waterfront.

Redondo Beach needs this!!!

Sent from my iPhone
Please keep Redondo Sportfishing alive it's good for all types of people and ages. No racism or religion affected anyone can go fishing. Thank you Larry Wolf
To: Kate Ovoton

* This message was sent with low importance.
* This item will expire in 23 days. To keep the item longer, apply a different retention policy.

1 attachment

Please keep Redondo Sportfishing alive. It's good for all types of people and ages. No race or religion affected anyone can go fishing. Thank you Larry Wolf.
Dear Ms. Owlston, Mayor Aspel and City Councilmembers,

Please see the attached letter responding to the Waterfront Draft EIR.

Thank you for the opportunity to review and comment.

Adriene Biondo
January 18, 2016

Submitted by email
Katie Owston, Project Planner
Planning Division
415 Diamond Street
Redondo Beach, CA 90277
katie.owston@redondo.org

RE: Waterfront DEIR - 208-210 Fisherman's Wharf, Redondo Beach
Tony's Hats N' Things and Tony's On The Pier/Old Tony's/Top o' Tony's

Dear Ms. Owston:

Thank you for the opportunity to comment on the Draft Environmental Impact Report/Draft EIR for The Waterfront Project which directly impacts an important postwar harbor landscape as well as significant postwar landmarks, namely Tony's Hats N' Things, Old Tony's and Top o' Tony's.

Section 3.4 Cultural Resources outlines a plan that would demolish King Harbor, one of the last post-World War II harbor developments in Southern California. Planning consultants Victor Gruen Associates initially presented proposals but the final harbor master plan was designed by noted mid-century architects Arthur Froehlich (Hollywood Park, Belmont Park, Hanna-Barbera Studios) and Rex Lotery (Trousdale Estates) and approved by the U.S. Army Corps of Engineers in August 1959 with 1,300 boat slips, two breakwater sheltered marina basins, a boat lagoon, a sub-street level pedestrian walkway with shop spaces (the International Boardwalk), as well as the later addition of a warm water fed, sand-bottomed lagoon and themed Seaport Village.

This tremendous undertaking proposed removal of the Santa Fe Railroad station site and the Redondo Ballroom, built by Huntington’s Pacific Electric Land Company, among other streets and portions of Old Redondo Beach, including The Fox Theater, demolished in 1973 "to make way for a six-story hotel that was never built."
Over the years King Harbor has suffered its share of impacts, including the storms of 1988 whose 20-foot waves and 52mph winds resulted in $17 million in damage to the Horseshoe and Monstad Piers, nearly destroyed the harbor breakwater retaining wall, washed to sea the famous Blue Moon Saloon Restaurant and the fishing promenade. Then in May 1988, shorted electrical wiring under a Horseshoe Pier restaurant started a fire that destroyed 15 pier businesses and half of the remaining deck. Reconstruction of the pier using concrete pilings was completed in 1995.

Through all of this, the true survivor that has weathered all the storms is the beloved, family-owned Tony's On The Pier -- which includes Tony's Hats N' Things, Old Tony's restaurant and Top o' Tony's. It was started back in 1952 by Anthony A. Trutanich ("Tony T") who according to Old Tony's website http://oldtonys.com/about.php was a lead navigator on 25 missions during World War II, including D-Day. Tony built the single story wooden building houses Old Tony's restaurant, and in 1965 added an octagonal second story with canted window-walls which serves as a cocktail lounge and offers 360 degree views all the way to Palos Verdes. Steep gables shelter the main entrance and stairway to the lounge landing. As described in the DEIR, “These exaggeratedly steep and eccentric gables have a Polynesian ‘tiki’ aspect, with protruding shaped ridge beams and verge boards, extended eaves and rafters, and oversized random patterned shingles. The scrolled pierced-work stair railing balusters and patterned tile steps also have a tiki sensibility. These features are in marked contrast to the seaport character of the main entrance, with its heavy timber piling and chain motif and spindle balustrade frieze, and to the smoked glass story-and-a-half window wall of the restaurant foyer. The north end of the building has fishing village influences, decorated with blind multi-paned windows and iron accent lantern. The northeast wall of the first level is an aluminum framed glazed wall overlooking the harbor.”

“The octagonal upperstory displays a skirt of wood weatherboards below outwardly canted aluminum framed window walls that offer a 360 degree view of the harbor. This feature is crowned by a shake covered roof with “crow’s nest” and protruding shaped roof beams. Rising from the roof is the landmark “Tony’s” sign with three large
colored orbs. The interior of the restaurant features abundant dark toned woodwork, open ceilings with exposed framing, and period lighting fixtures including colored glass sphere net floats, fishing nets, and other features in keeping with the tiki meets sailing vessel theme.”

This is a description of buildings and signage that are so uniquely one-of-a-kind that they have come to symbolize the independent spirit of Southern California’s beach and surfing scene of the 1950s and 1960s. Old Tony’s logo of the building and sign is iconic Redondo Beach. Whether “officially designated” or not, Tony’s IS a truly important landmark that needs to be preserved, not replaced. We cannot continue losing beloved destinations like Tony’s; they are important touchstones within a community which lend character and a sense of place, and create a synergy with new buildings.

Tony’s is an historic, cultural and architectural gem that should not be demolished and rebuilt, but restored and incorporated into any new project that is built. The Grove and Farmers Market at 3rd and Fairfax in Los Angeles is an excellent example of a true “win/win” where a highly successful development incorporated historic buildings which continue to resonate with people today and tell the stories of the communities they served.

As Chair Emeritus of the Los Angeles Conservancy’s Modern Committee, I initiated the successful landmarking of the Capitol Records building in Hollywood and worked with the City of Los Angeles to create a Historic Preservation Overlay Zone for over one hundred homes built in 1963-64. I have also co-authored a number of books, Southern California Eats (which features Old Tony’s), Modern Tract Homes of Los Angeles and Southern California Out & About.

I urge you to join other progressive cities by preserving Redondo Beach’s own history and extraordinary beach city architecture. If we don’t have the foresight to preserve our historic landmarks today, there will be no landmarks for anyone to enjoy.

Respectfully submitted,

Adriene Biondo
Chair Emeritus  
Los Angeles Conservancy Modern Committee  
17125 Lisette Street  
Granada Hills, CA 91344-1438  

cc: Mayor and City Councilmembers, City of Redondo Beach
Hi Katie,

I was given your email to submit a comment on the waterfront project, not sure how this goes so just going to type out my thoughts....

When I was a pre-teen my older sister lived on the Esplanade and I would come stay with her during school breaks and summer. I never imagined that 25 years later I would move to Redondo Beach myself. While I have fond memories of the pier, I also very clearly remember that it wasn’t where everybody went to hang out even back then. Hermosa and Manhattan were where people went. I have lived in North Redondo for the last 13 years and usually when my husband and I walk or bike somewhere it’s to go to Hermosa. I’m in favor of the waterfront project because I want a place in Redondo Beach that I can further embrace my sense of community by being out in it and meeting my neighbors and welcoming anyone who wants to come support businesses in Redondo regardless of where they live. I’m so excited by what I’ve seen so far, the balance of attracting our own residents to a place the entire family can enjoy to creating an environment that everyone else wants to come and experience.

Bibi Goldstein

www.buyingtimellc.com

310-683-8258
Hi Katie,
I attended the public workshop on Saturday, January 9, 2016 to try to understand the proposed plans for the waterfront.

My name is Laura Scarbrough, I am an Authorized Representative of the Nahoa Outrigger Canoe club which occupies space on Mole B along with the Lanakila Outrigger Canoe club. I would just like to comment in reference to Chapter 4 Analysis of Alternatives, 4.4.8.3 Alternative 8 Environmental Analysis regarding the public small boat ramp. On page 4-341, all Options for Mole A are simply not viable options. The narrow 2-lane driveway leading to the where the KHYC is currently located is too narrow and cannot be widened. The traffic light at the entrance is very narrow and tight and already has to serve as an entrance to the apartment complex, the restaurant, and the yacht club.

Nahoa Outrigger Canoe club is supportive of using one of the options on Mole C for the public small boat ramp.

Thank you,
Laura C. Scarbrough
Nahoa Outrigger Canoe Club
The Waterfront Draft Environmental Impact Report - Comments

anneke blair <annekeblair55@gmail.com>

Mon 1/18/2016 3:14 PM

To: Katie Owston <Katie.Owston@redondo.org>;
Cc: annieke blair <annekeblair55@gmail.com>;

Miss Owston,

Please accept my comments below for public record.

I do not agree with the draft environmental report for this project and do not support the project at this time. For the following reasons:

The DEIR states that there are no impacts to views. The views along Harbor Drive will be significantly impacted from the bike and car lanes. More than 80% of the current view from the street will be obstructed by buildings. I don't know what can be done to mitigate the view impacts. This will significantly diminish the quality of life of those who enjoy a long leisurely bike ride.

The DEIR states there will be no impact to traffic despite an impact in traffic. This is impossible as all of the arteries that feed the area are already overstressed and a traffic nightmare. Adding an estimated 700 more trips daily will negatively impact the lives of anyone that lives or works in this area and especially commuters. The mitigation proposed in the DEIR is not enough to alleviate the already horrible congestion we face. It also does not account for traffic that could be added with the proposed.

The DEIR states that there would be no significant impact to recreation. The opening of the Seaside lagoon significantly impacts the recreation of our community and puts young children at risk. It also will impact those that use the marina to launch their stand up paddle boards and other small craft. SUP'ers will have to carry their boards through a retail, dining, and entertainment area to be able to launch. It will also open the "lagoon" up to the seals. This will mean that in order to launch you will have to make sure they have been cleared.

The DEIR calls out that competition is a risk but it did not take into full consideration all the other development projects that are happening at the same time specifically the South Bay Galleria. It also uses several other projects for a comparison but all of those projects have more of an attraction than an overpriced movie theater and the ocean. Each of the comparisons have over 30% entertainment where ours is significantly lower at just 13%.

The size of this project is way too big when you consider that it is proposed at 305,000 sq ft just 11,000 sq feet smaller than Universal Citywalk and 75,000 sq feet larger than Downtown Disney.

Thank you,

Anneke Blair
517 Ave A, Unit A
Redondo Beach, CA 90277
I taught my son to fish on Polly's Pier. We have made many memories and friendships during our hours spent on the pier. I would be heartbroken to see it disappear.

Denise Dean
Torrance, CA

Sent from my iPhone
Dear Ms. Owston,

Please add the attached comments to the Draft EIR for the Waterfront, Redondo Beach.

Thank you.

John Mann
To: Katie Owston  
From: John Mann (Owner and Resident)  
230 The Village #302  
Redondo Beach, CA 90277  
Date: January 19, 2016  

Comments on Draft EIR for the Waterfront, Redondo Beach

1. Missed Impacts Due to Narrow Definition of “Project Vicinity”

The Draft EIR defines “project vicinity” throughout the document as follows:

. . . the project vicinity (i.e., Torrance Circle/Boulevard between Catalina Avenue and the project site) . . .  
(ES 7.2.4, NOISE NOI-3 and elsewhere in the Draft EIR.)

That definition omits the residential neighborhood where many of the impacts will be most severely felt, i.e., the Seascape and Village residential units immediately east of the project site, north of Torrance Circle/Boulevard. The EIR should explicitly address the impacts on that neighborhood.

2. Impact: Ambient Noise

The Draft EIR states that the project would cause “a substantial permanent increase in ambient noise levels in the project vicinity,” and that the impact would be “significant and unavoidable.” (ES 7.2.4, NOISE NOI-3.)

This is one of the impacts that will be most severely felt in the Seascape and Village residential neighborhood. A major contributor to this impact will be the proposed new road – especially if it is used not just for access to the project but by commuters as an alternate route to Pacific Coast Highway and Catalina Avenue.

3. Mitigation: Ambient Noise – and Safety

Three mitigation measures are recommended. The first two would reduce ambient noise – and enhance safety – for the new hotel, the Seascape and Village neighborhood, and the project as a whole. The first and third would dissuade use of the new road as an alternate commuter route. They are as follows:

1. Speed-bumps, traffic lights, and/or stop signs on new road from Torrance Circle/Boulevard to turnabout where N. Pacific Ave. meets N. Harbor Dr.

2. No motorcycles on new road from Torrance Circle/Boulevard to turnabout where N. Pacific Ave. meets N. Harbor Dr., from 9:00 p.m. to 9:00 a.m. every day.

3. No right turn from N. Harbor Dr. to Herondo St. from 7:00 a.m. to 9:00 a.m., Monday to Friday (similar to existing prohibition of entry to Monterey Blvd. from Herondo St. for same period).

Respectfully submitted,

John Mann
Save the Pier

Cayla Dean <cayla915@me.com>

Tue 1/19/2016 8:17 AM

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

From birthday breakfasts to family reunions to father-daughter talks over cups of coffee, Polly's has been the location of so many of my dearest memories. To see it destroyed and have a Starbucks or some chain constructed in its place would be truly heartbreaking. Like the memories they've given me, Polly's and all the pier businesses are irreplaceable. Please don't let the people of the South Bay down.

Cayla Dean
Torrance, CA
Comments on DEIR - Waterfront Project

Julian Harvey <jules.facebook@verizon.net>

Tue 1/19/2016 8:18 AM

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

Katie,

Please accept the following comments/reservations regarding the Waterfront Draft Environmental Impact Report.

Sports Fishing Pier

This should be rebuilt at its current location – not demolished/not rebuilt. It is a very worthwhile and well used feature of the current harbor.

Boat Launch

Should not be where proposed by the main project – i.e. adjacent to where Joe’s Crabshack currently is. This location provides not enough parking and also is too close to Seaside Lagoon and the Sportsfishing Pier.

It should be located to the south end of Mole D, i.e. similar to Alternative 8 – Mole D – option 2 – two lane ramp and 40 parking spaces. Redondo is a harbor and must cater for more boaters bringing their boats to Redondo by vehicle/trailer.

Apart from the above two reservations I am fully in favor of the project as proposed.

Thank you

P.S. I am the same Julian Harvey that recently got in touch with you from my redondo.org eMail address.

Julian Harvey
310 214 2904
Cell 310 435 1522
Neighborhood Watch – Dow/Johnston Triangle

“Gravitation is not responsible for people falling in love.”
Albert Einstein – To Fred Wall, 1933
Hi Katie,

I am writing to support the long-standing sport fishing operation in King Harbor. This has been a main stay of the South Bay for many decades that generations of families have enjoyed, and it is critical for thousands of people in and around the South Bay community to keep this source of recreation and local jobs.

The Waterfront Development project and the sport fishing operation can easily co-exist. The South Bay community would benefit greatly from your support for local sport fishing.

Sincerely,

Jake Porter
DEIR Comments

jmeinwich@yahoo.com

Tue 1/19/2016 8:22 AM

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

To whom it may concern,
I’m writing this in support of the wonderful community I am a part of. I moved to the South Bay area in 1987 from Chicago and after working hard was finally in a position to purchase a condo at my favorite beach/pier community. I have travelled and lived in different places but always find my way back to Redondo. I feel that the community is not the place for the type of development that is at hand. This type of development should be redirected to neighboring communities so that area can be pressured for what it is. If revitalizing is to be done, just focus on what is already there and working instead of creating something new.

Thank you,
Julie Einwich
650 The Village Dr. #303
Redondo Beach, CA 90277

Sent from my iPad
DEIR Response and Questions

Tim Charles <trc41@yahoo.com>

Tue 1/19/2016 8:33 AM

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

Please be advised here is my response and questions on the CenterCal Development DEIR. I eagerly await your response.

Traffic
I found it almost impossible (even laughable) that you state there will be no traffic impact from this new development. At a minimum, the lowest estimates would likely be north of 12,000 additional car trips per day. There is already major daily traffic along PCH and no direct freeway access so how is this remotely possible?

What are the specific proposed mitigations to handle the additional traffic?

New Road
Why a new road for thru traffic along the International Boardwalk? This will create unneeded new traffic directly under residential areas. We were lead to believe in the Center Cal input meetings that a new road would only be for a people mover (ex. Trolley). Why not?

How will this traffic be controlled? Monitored?

Noise
So, if I understand it, there is no way to mitigate noise for neighboring residents who will have to endure major construction likely for two plus years.

How do you propose that residents at The Village, Seascape I, II, III and Ocean Club handle this?

Parking
How do you expect parking be handled when you're building 523,929 sq. feet of additional development (140% more development) but only 8% more parking?

Can you explain how views will not be impacted on Harbor Drive and the Beryl intersection when you're adding a new 3 story parking structure on the north end?

Can you explain why you're not including this 3 story parking structure in the full square footage of the size/scope of the development? Why does the 523,929 sq. footage not include that structure?

Tim Charles
17 year Redondo resident
Tim Charles trc41@yahoo.com
FW: Updated DEIR Comments

Eleanor Manzano
Tue 1/19/2016 8:36 AM

To: Aaron Jones <Aaron.Jones@redondo.org>; Katie Owston <Katie.Owston@redondo.org>; Sean Scully <Sean.Scully@redondo.org>; katie.owston@redondobeach.org; Bill Brand <Bill.Brand@redondo.org>; Stephen Sammarco <Stephen.Sammarco@redondo.org>
Cc: Allen Nafissi Candace <candacekallen@gmail.com>; Todd Loewenstein <loew4567@yahoo.com>; Holmes Martin F <goholmes@mit.edu>; Nils Nehrenheim <nils.nehrenheim@gmail.com>; Cohen Melanie <dolfanmeli@yahoo.com>

Attached are comments to the Waterfront DEIR...I also received three more email from Jim which has the reference documents to his comments.

From: James Light [mailto:jim.light1@verizon.net]
Sent: Monday, January 18, 2016 10:12 PM
To: Eleanor Manzano <Eleanor.Manzano@redondo.org>; Michael Webb <Michael.Webb@redondo.org>; katie.owston@redondobeach.org; Bill Brand <Bill.Brand@redondo.org>; Stephen Sammarco <Stephen.Sammarco@redondo.org>
Cc: Allen Nafissi Candace <candacekallen@gmail.com>; Todd Loewenstein <loew4567@yahoo.com>; Holmes Martin F <goholmes@mit.edu>; Nils Nehrenheim <nils.nehrenheim@gmail.com>; Cohen Melanie <dolfanmeli@yahoo.com>
Subject: Updated DEIR Comments

Eleanor and Katie,

On behalf of BBR, ROW, SBPC and R4, I am submitting our comments to the Waterfront Draft EIR. The Attachment represents our updated comments to the Waterfront Draft EIR. Please replace the original upon receipt and verification of readability. Please acknowledge receipt and the ability to open and read the document. I have had rejections from Katies email, it appears to have a size limitation that others do not. Please ensure Katie gets a copy.

I have included the City Attorney again, because the project is not in compliance with the California Coastal Act and the Redondo Beach Local Coastal Plan. Additionally, the project description is not mature enough for the project DEIR that is intended to result in the granting of development entitlements. The DEIR is a very biased document that blatantly disregards objectivity and shows extreme bias toward the development. The lack of project specificity and the obvious bias are violations of CEQA. We wanted to give the City Attorney advanced warning of these conditions so he can evaluate for himself now, if he has not already.

Please email me at the address below or call 310-989-3332 if you have any questions, comments, or problems opening the attachment.

VR,

Jim Light
Information from ESET Endpoint Antivirus, version of virus signature database 12893 (20160119)

The message was checked by ESET Endpoint Antivirus.

http://www.eset.com

PC323

Information from ESET Endpoint Antivirus, version of virus signature database 12893 (20160119)

The message was checked by ESET Endpoint Antivirus.

http://www.eset.com
Comments to The Waterfront Draft Environmental Impact Report

18 Jan 16

Submitted by:

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

on behalf of

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

Mitigations and requirements from the Measure G EIR
Inadequate specificity of project and potential impacts
Approach to comments to DEIR
Summary of issues and concerns with the DEIR
Summary Recreational Impact Comparison
Project Alternatives
Conclusion and Summary

Project Description

Maturity of the Project Description

Cumulative Impacts

Shade Hotel
New Hermosa Beach General Plan
AES Property
Cumulative impacts conclusion

Visual and Aesthetic Resources

Visual Resources
Aesthetic Resources

Land Use Conflicts

Project Exceeds Zoning Cumulative Development Cap
Land Use and Seaside Lagoon Park
Other Land Use Conflicts
Proposed Land Swap with the California State Lands Commission

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<td><strong>APPENDIX A: CITY RESPONSE TO SEASIDE LAGOON PUBLIC RECORDS REQUEST</strong></td>
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1. Executive Summary

Bottom Line Up Front (BLUF)

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

- The DEIR shows obvious bias toward the development

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

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

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

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

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

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

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

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

The wide implications of the project alternatives (particularly the boat ramp alternatives), the demonstrated significant impacts on coastal dependent harbor uses, the upcoming lease renewal for King Harbor Marina, the impending Hermosa Beach General Plan update, and the change in AES property status combined require the City to go back to the drawing board and develop an integrated plan for the entire waterfront. The DEIR does not reflect the combined impacts of all these concurrent land use changes in the immediate vicinity of the project.
An integrated plan would allow the opportunity to define an outcome that achieves the city’s revenue goals while distributing impacts so that the coastal dependent uses are not unduly absorbing the substantial impacts of the final project(s).

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

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

1.1. Mitigations and requirements from the Measure G EIR

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

1.2. Inadequate specificity of project and potential impacts

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

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

Boat ramp location is a substantial impact on the integrated assessment of project impacts. Thus the public would have to evaluate 56 potential variations of the project
just on the formal alternatives. And when one adds in the variables introduced by the sport fishing pier and slip elimination, that produces a whopping 224 major variations of the project. Obviously, the DEIR did not adequately evaluate the impacts of all the combinations and permutations afforded by substantive variables allowed in the project description. Therefore the public is not afforded the adequate time or information to assess the impacts of the potential project outcomes.

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

1.3. Approach to comments to DEIR

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

1.4. Summary of issues and concerns with the DEIR

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

<table>
<thead>
<tr>
<th>Item</th>
<th>Issue/Concern</th>
<th>Conclusion</th>
</tr>
</thead>
</table>
| Project description | - Too many options and alternatives built into project description that could have substantive impact on the assessment of environmental impacts  
- Is not an adequate definition of the project  
- Project definition immature  
- Impacts of alternative, particularly alternative boat ramp locations is not adequately assessed. | - Public cannot reasonably respond to all combinations and permutations possible  
- DEIR should be redone with more specificity |
<table>
<thead>
<tr>
<th>Item</th>
<th>Issue/Concern</th>
<th>Conclusion</th>
</tr>
</thead>
</table>
| Visual Resources                          | - DEIR cherry picks favorable views while ignoring obvious significant view impacts.  
- DEIR contradicts findings in previous city EIR  
- The lack of detail in the DEIR, combined with conflicting images, and convenient observation points makes it impossible for the public to evaluate view impacts and compliance. | Objective and reasonable conclusion is that there are significant view impacts.  
- Reaccomplish DEIR view assessments  
- Redesign project to protect at least 50% of current views from Harbor Drive.  
- Redesign project to protect harbor views from Czuleger Park. |
| Aesthetic Resources                       | - DEIR ignores massing impact  
- Weighs development over views                                                                                                                                                                           | Massing ruins quaint feel of harbor and represents a significant impact.  
- Redesign project to reduce massing. Eliminate huge megalithic buildings.                                                                                                                                     |
<p>| Proposed California State Lands Commission land exchange | - Not in the best interest of the residents of California as it exchanges open waterfront space the city wants to develop for submerged land in Basin 3 is already protected as a navigable waterway by Federal Law | An alternative plan or land swap should be proposed that actually provides a benefit to the people of California |</p>
<table>
<thead>
<tr>
<th>Item</th>
<th>Issue/Concern</th>
<th>Conclusion</th>
</tr>
</thead>
</table>
| Vehicular Traffic           | - DEIR misrepresents increase in traffic  
- DEIR ignores cumulative impacts  
- DEIR failed to assess impact of short road segments and turning queue blockages of primary access roads  
- DEIR failed to assess weekend traffic - peak traffic for both recreational and retail/restaurant/entertainment uses  
- DEIR failed to properly evaluate impact of traffic flow for new parking structure and complex intersection of Pacific, Harbor and the exit of the project in the harbor area  
- New bike track produces significant impacts to Harbor Drive traffic capacity. Impacts are not adequately evaluated in the traffic assessment.  
- Reconnection of Harbor Drive to Torrance Blvd primarily serves through traffic, not project internal traffic flow. | - Substantial reassessment of traffic impacts required to account for critical conditions of traffic infrastructure that represent significant limitations on capacity.  
- Traffic impacts are worse than stated in the DEIR. Doubtful the stated mitigations will address all issues.  
- Weekend traffic must be assessed.  
- The reconnection of Torrance Blvd and Harbor Dr would primarily service through traffic. The impacts do not justify it. Eliminate the reconnection. |
| Bike Circulation - main bike route through project | - Proposed configuration requires bike traffic to oppose vehicle traffic flow on Torrance Blvd  
- Proposed configuration requires two hazardous traffic crossings at complicated intersections exacerbated by new unfamiliar visitors  
- Proposed configuration exacerbates loss of harbor views from Harbor Drive bike path                                                                 | - Significant impact to bicyclist safety and views  
- Project should be redesigned to eliminate dangerous double crossing of Pacific Ave and ensuring safety while riding against Torrance Blvd traffic flow  
- Project should be redesigned to protect at least 50% of current ocean and harbor views. |
| Bike Circulation - secondary route through project | - DEIR makes absurd assumption that heavy bike traffic and pedestrian traffic could commingle on same paths.  
- Currently prohibited on similar areas of pier and harbor and Hermosa’s pier area  
- Would create hazardous conditions for pedestrians and bicyclists. Children would be at particular risk.                                                                                   | - Eliminate co-use of pedestrian paths by bicyclists for safety reasons.  
- Redo DEIR assessment accordingly                                                                                                         |
<table>
<thead>
<tr>
<th>Item</th>
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</thead>
</table>
| Parking                   | - Inadequate parking for trailer boaters at boat ramp - current zoning requires 67 double length trailer parking spots for boat hoist  
- No parking requirements assessed for Seaside Lagoon visitors, paddle boarders, kayakers, pier fisherman, and passengers of whale watching and sport fishing commercial vessels.  
- Inadequate parking location for slip leasers, paddle boarders, and kayakers. Current plan represents a deterrent to recreational uses of the waterfront.                                                                 | - **Significant impact to recreational use of harbor**  
- Parking requirements are understated and inadequate for recreational uses of harbor waters.  
- Additional spaces should account for growing SUP, kayak, whale watching, sport fishing, and Seaside Lagoon usage  
- Parking should be reconfigured to support and encourage recreational uses of waterfront.  
- Since putting in boat ramp is meant to increase trailer boat use, should accommodate 30 double length trailer spots per lane and single parking spaces for guests  |
| Recreational Access - Traffic | - If properly evaluated, the traffic generated by the new development will impact access to coastal dependent recreational uses of the harbor  
- Particularly around the Portofino Way, Harbor Drive intersection                                                                                                                                                                                                                                                                                                                                                   | - **Negative impacts on coastal dependent recreation would be significant**  
- **Mitigations such as substantive increase in road capacity in the area or scaling back development should be implemented**                                                                                                                                                                                                                                 |
| Recreational Access - Parking | - Inadequate parking for trailer boaters at boat ramp  
- No parking requirements assessed for Seaside Lagoon, Paddle boarders, kayakers, whale watchers, sport fishing vessel passengers, and pier fishermen.  
- Inadequate/inconvenient parking location for slip leasers, paddle boarders, and kayakers. Current plan is a deterrent to recreational uses of the waterfront.                                                                                                                                                                                                                   | - **Negative impact on coastal dependent recreation would be significant**  
- Increase parking or decrease development  
- Reconfigure parking to support and encourage coastal dependent recreational uses of the waterfront                                                                                   |
<table>
<thead>
<tr>
<th>Item</th>
<th>Issue/Concern</th>
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</thead>
</table>
| Recreational Amenities - reconfigured Seaside Lagoon | - Seaside Lagoon loses 1/3 of its usable open parkland to a road, parking spaces and 5 new retail/restaurant lease spaces  
- Previous EIR and zoning mandated Seaside Lagoon expansion  
- Swimming pool, fountains, and slides are removed  
- According to consultant, no lifeguards are planned  
- Kids forced to swim in untreated harbor waters - the DEIR did not include any water quality testing of harbor waters at all.  
- Area of harbor water entry known collector of floating trash  
- Potential for sea lion use is understated. Mitigation plan approval by NOAA low probability as demonstrated on similar situations at other Southern California beaches  
- Harbor waters not tested for water quality as part of the DEIR  
- Swimming area of harbor is undefined. If just to end of current breakwater, swimming area will be much smaller than current lagoon. If larger, there is safety concern as turn basin as it is used by boaters to drop sail  
- Tide dramatically affects usable land portion of park  
- Tide affects usable swim area of park  
- **Significant hazards** if boat ramp is located as shown in main analysis of DEIR - new breakwater would hide SUP’ers and kayakers to trailer boaters leaving breakwater  
- Dredging of swim area has not been assessed, area shoals currently  
- **DEIR wrongly assesses open space amenities in private commercial development make up for loss of public parkland and coastal dependent recreation** | - **Impact to recreational use of Seaside Lagoon significant**  
- **Project creates hazards to coastal recreation not currently present**  

**Mitigations should include**  
- Preventing any new development from encroaching on the current park envelope  
- Expanding parkland to adjacent Joe’s Crab Shack site as stated in previous EIR  
- Retaining a pool feature  
- Retaining a water entry for kayakers and SUP’ers  
- Relocating the trailer boat ramp or breakwater to mitigate safety hazard with SUP’ers and kayakers  

**If the only swimming feature is to use harbor waters**  
- Perform water quality testing so public understands the impact  
- Evaluate impact of shoaling and frequency dredging would be required  
- Require lifeguards  
- Define swimming area and controls so that public can assess impact  
- Perform tidal assessment to assess area changes in both swimming area and land area  
- Assess number of daily users the reconfiguration could reasonably accommodate, ensure it meets or exceeds current capacity  
- If beach entry retained, plan pre-approved by NOAA and state authorities to drive sea lions off the beach, so the public can evaluate the impact
<table>
<thead>
<tr>
<th>Item</th>
<th>Issue/Concern</th>
<th>Conclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hand launch boat ramp</td>
<td>- Insufficient parking to support current and growing number of SUP’ers and Kayakers&lt;br&gt;- Lack of access to safely offload equipment within reasonable distance to water entry/exit point&lt;br&gt;- Distances to parking create theft opportunities for expensive equipment - deters users&lt;br&gt;- Distances to parking and requirement to move equipment to and from parking structure and cross active road and active shopping and restaurant areas increases risk of injuries and damage to equipment&lt;br&gt;- If sea lions haul out, could lose ability to launch or return&lt;br&gt;- Sea lion haul out creates safety concerns and could prevent use of entry/exit point&lt;br&gt;- Proximity to trailer boat ramp presents a hazard to SUP’ers and kayakers. New breakwater creates blind spot for trailer boaters.</td>
<td><em>Project represents a significant impact to a popular and growing use of the harbor</em>&lt;br&gt;&lt;br&gt;<em>Mitigations should include:</em>&lt;br&gt;- Adequate reserved parking in close proximity to launch point without crossing active roads and shopping dining areas&lt;br&gt;- If beach entry retained, plan pre-approved by NOAA and state authorities to drive sea lions off the beach, so the public can evaluate the impact&lt;br&gt;- Locate trailer boat ramp to another part of the harbor or reconfigure breakwater to eliminate blind spots and dangers of mixing motor vessel traffic with human powered vessel traffic&lt;br&gt;- Alternatives that collocate hand launch with trailer boat launch should be prohibited.</td>
</tr>
<tr>
<td>Trailer Boat launch - primary location</td>
<td>- Inadequate parking for trailer boaters at boat ramp - current zoning requires 67 double length trailer parking spots for boat hoist&lt;br&gt;- Hazardous configuration and proximity to proposed hand launch boat beach access creates conflicts and blind spots&lt;br&gt;- Traffic uses will be concentrated on Portofino Way and Harbor Drive in this vicinity, creates access deterrent to trailer boaters&lt;br&gt;- Tight configuration of boat ramp area creates hazards that would substantially increase risk of damage to boats, trailers, vehicles and boat ramp infrastructure</td>
<td><em>Project represents a significant impact to boating by creating hazards that do not exist today and by artificially limiting the capacity of the boat ramp</em>&lt;br&gt;&lt;br&gt;<em>Mitigations should include:</em>&lt;br&gt;- Providing adequate number of parking spaces, minimum of 30 pull through double trailer spaces per ramp and adequate single spaces for guests&lt;br&gt;- Adequate maneuvering space to reduce risk of damage&lt;br&gt;- Reconfiguration or movement of boat ramp to eliminate blind spots and other hazards related to SUP/Kayak launch area&lt;br&gt;- Redo traffic analysis and assess mitigations to ensure traffic is not a deterrent to use of boat ramp</td>
</tr>
<tr>
<td>Item</td>
<td>Issue/Concern</td>
<td>Conclusion</td>
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<tr>
<td>------</td>
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</tr>
<tr>
<td><strong>Trailer Boat Ramp - alternate locations</strong></td>
<td>- Letter to King Harbor Yacht Club members demonstrates domino effect of alternate locations is not adequately addressed in DEIR. For example, movement of KHYC building to Mole B to accommodate boat ramp on Mole A would impact parking and or Moonstone Park and Lanikila Outrigger Canoe uses of Mole B. These impacts are not assessed in the DEIR and affect areas beyond to stated scope of the project area defined and evaluated in the DEIR.</td>
<td>- <strong>Insufficient data in the DEIR for the public to fully understand and evaluate impacts of alternate locations of boat ramp</strong>  - Select final location and configuration of boat ramp and redo DEIR to access specific and comprehensive impacts</td>
</tr>
<tr>
<td><strong>Basin 3, Redondo Beach Marina slips</strong></td>
<td>- Potential halving of slip space reduces coastal dependent recreation and commercial use of harbor and navigable waters  - Limited hours of operation of proposed drawbridge substantially impact both recreational and commercial uses of Basin 3 also increases risk of life of property and life in emergency  - Parking configuration substantial deterrent to commercial and recreational uses of slips. Crossing active roads and negotiating parking structures while transporting boating gear introduces hazards and deterrents.  - Inadequate number of parking spaces could prevent access to boats and slips.</td>
<td>- <strong>Significant impact to coastal dependent recreational and commercial use of Basin 3 slips. Project should be redesigned to eliminate impacts to use of Basin 3</strong>  - Require full replacement of current slips  - Provide 24 hour operation of drawbridge with rapid response  - Protect / prioritize parking and convenient access to Basin 3 slips.</td>
</tr>
<tr>
<td>Item</td>
<td>Issue/Concern</td>
<td>Conclusion</td>
</tr>
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<td>----------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Cumulative impacts</td>
<td>- Cumulative impacts not adequately assessed for known projects in work</td>
<td>- Comprehensive, integrated plan and EIR should be developed for entire waterfront not just sq. with current project. DEIR inadequately addresses significant cumulative impacts of known projects</td>
</tr>
<tr>
<td></td>
<td>Known projects include:</td>
<td>As a minimum the DEIR should be reaccomplished to address realistic cumulative impacts:</td>
</tr>
<tr>
<td></td>
<td>- Reuse of AES power plant site or building of new AES power plant</td>
<td>- DEIR should use Measure B zoning of AES site to evaluate impacts from that site</td>
</tr>
<tr>
<td></td>
<td>- Completion of Shade Hotel - increased traffic and unique impact of valet parking from Shade Hotel to parking lot off Portofino Way</td>
<td>- DEIR should assess some bounding level of reuse of the SCE right of way that would become available for development once power generation ceases on AES site</td>
</tr>
<tr>
<td></td>
<td>- New tenants filling in Green Street development that has been largely vacant during traffic counts for project</td>
<td></td>
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<td></td>
<td>- New Sketchers Headquarters project in Hermosa Beach on PCH</td>
<td></td>
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<tr>
<td></td>
<td>- New General Plan for Hermosa Beach that substantially increases commercial uses (over 600,000 sq ft) near project area</td>
<td></td>
</tr>
<tr>
<td>Land use violations</td>
<td>- Total development exceeds development cap set by zoning and LCP.</td>
<td>- Project should be redefined to eliminate violations of zoning, LCP and Coastal Act.</td>
</tr>
<tr>
<td></td>
<td>- View protections required by zoning are ignored. Violates zoning, LCP and Coastal Act</td>
<td>- A DEIR should be reaccomplished on a compliant project.</td>
</tr>
<tr>
<td></td>
<td>- Expansion of Seaside Lagoon required by HOC EIR ignored</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Paving over public park for new private commercial development road violates zoning, LCP and Coastal Act</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Substantial impacts to coastal recreational and commercial use of the harbor violates zoning, LCP and Coastal Act</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Project violates city parking requirements and artificially constrains access to coastal resources violating zoning, LCP and Coastal Act.</td>
<td></td>
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<tr>
<td></td>
<td>- Project clearly prioritizes private commercial development at the expense of coastal dependent commercial and recreational uses.</td>
<td></td>
</tr>
</tbody>
</table>
1.5. Summary Recreational Impact Comparison

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

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

<table>
<thead>
<tr>
<th>Recreational Element</th>
<th>Current</th>
<th>Proposed Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Visual</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Views from Harbor Dr</td>
<td>+++</td>
<td>---</td>
</tr>
<tr>
<td>Views from the Promenade</td>
<td>-</td>
<td>+</td>
</tr>
<tr>
<td>Views from Czuleger Park</td>
<td>+++</td>
<td>---</td>
</tr>
<tr>
<td>Aesthetics</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Massing</td>
<td>+++</td>
<td>---</td>
</tr>
<tr>
<td>Aesthetics</td>
<td>--</td>
<td>++</td>
</tr>
<tr>
<td>Walking</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Harbor Perimeter</td>
<td>+</td>
<td>++</td>
</tr>
<tr>
<td>Bridge</td>
<td>---</td>
<td>+++</td>
</tr>
<tr>
<td>Harbor Drive</td>
<td>++</td>
<td>---</td>
</tr>
<tr>
<td>Bicycling</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Biking Torrance Blvd</td>
<td>++</td>
<td>---</td>
</tr>
<tr>
<td>Recreational Element</td>
<td>Current</td>
<td>Proposed Project</td>
</tr>
<tr>
<td>----------------------</td>
<td>---------</td>
<td>-----------------</td>
</tr>
<tr>
<td>Biking International Bdwk</td>
<td>+++</td>
<td>--</td>
</tr>
<tr>
<td>Biking through pier area</td>
<td>-</td>
<td>--</td>
</tr>
<tr>
<td><strong>Seaside Lagoon Park</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Capacity of Seaside Lagoon Pool</td>
<td>+++</td>
<td>---</td>
</tr>
<tr>
<td>Kids water play features</td>
<td>+++</td>
<td>---</td>
</tr>
<tr>
<td>Swim water quality</td>
<td>+++</td>
<td>untested but will be worse--</td>
</tr>
<tr>
<td>Kids’ swim safety</td>
<td>+++</td>
<td>---</td>
</tr>
<tr>
<td>Usable park land area</td>
<td>+++</td>
<td>-- varies with tide</td>
</tr>
<tr>
<td>Lagoon parking accessibility and availability</td>
<td>+++</td>
<td>--- parking space requirement not included</td>
</tr>
<tr>
<td>Sea Lion Impact on Lagoon use</td>
<td>+++</td>
<td>---</td>
</tr>
<tr>
<td>Lagoon Year Round Use</td>
<td>--</td>
<td>+</td>
</tr>
<tr>
<td><strong>Hand launch boat dock</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hand launch availability</td>
<td>+++</td>
<td>+</td>
</tr>
<tr>
<td>Hand launch drop off</td>
<td>+++</td>
<td>---</td>
</tr>
<tr>
<td>Hand launch parking</td>
<td>+++</td>
<td>--- parking space requirement not included</td>
</tr>
<tr>
<td>Sea lion impact on launch or return</td>
<td>-</td>
<td>---</td>
</tr>
<tr>
<td><strong>Boating</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Recreation boater - slip number</td>
<td>+</td>
<td>If halved --- If not +</td>
</tr>
<tr>
<td>Recreational Element</td>
<td>Current</td>
<td>Proposed Project</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>---------</td>
<td>----------------------------------------</td>
</tr>
<tr>
<td>Recreation boater - slip use 24 x7</td>
<td>+++</td>
<td>-- drawbridge limited operation</td>
</tr>
<tr>
<td>Commercial boater slop use 24x7</td>
<td>+++</td>
<td>--- drawbridge limited operation will drive out commercial boats</td>
</tr>
<tr>
<td>Boaters - slip access</td>
<td>+</td>
<td>--- through shopping and restaurants</td>
</tr>
<tr>
<td>Boaters - slip parking</td>
<td>++</td>
<td>---</td>
</tr>
<tr>
<td>Trailer boaters usability</td>
<td>--</td>
<td>+++</td>
</tr>
<tr>
<td>Trailer boaters capacity/parking</td>
<td>+++</td>
<td>---</td>
</tr>
<tr>
<td>Trailer boaters hazardous conflict with paddlers</td>
<td>+++</td>
<td>--- based on primary location</td>
</tr>
<tr>
<td>Boat Ramp Mole A alternative</td>
<td>+++</td>
<td>---</td>
</tr>
<tr>
<td>Sport fishing pier</td>
<td>++</td>
<td>--- (no replacement) or +++ (rebuild)</td>
</tr>
<tr>
<td>Access to parking</td>
<td>+++</td>
<td>---</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>61 + 13 -</strong></td>
<td><strong>14 to 18 + 54 to 60 -</strong></td>
</tr>
</tbody>
</table>

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

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

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

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

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

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

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

1.2. Conclusion and Summary

The project violates Redondo Beach zoning, previous EIR requirements, the Local Coastal Plan (LCP) and Coastal Act. The project description is too vague for the public to reasonably evaluate its impact. The project is not ready for public assessment until it is compliant with local and state requirements and adequately described for reasonable evaluation. The current DEIR should be withdrawn from public review and comment and reaccomplished.
But more disturbing, while the DEIR is intimidating in its volume and is advertised to be the most thorough accomplished by the city, it misses or avoids key and obvious assessments and evaluation. This leads one to believe the DEIR is crafted to intentionally, artificially reduce impacts and deceive the public and other agencies that must assess this project. The fact that city staff approved this for public release implies a complicity in this act.
2. Project Description

2.1. Project background

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

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

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

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

2.2. Maturity of the Project Description

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

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

- The plan view (Figure 8) and elevation view (Figure 6) of the Market Hall. The plan view portrays a relatively small second floor, while the elevation shows a much wider second floor. Configuration of second floor development is critical to the assessment of view impacts from Czuleger Park. The ambiguity prevents this assessment.
• The number of parking spaces for the boat ramp varies between 20 and 40 spaces.

• Every elevation and plan view is caveated that it is conceptual only.

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

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

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

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

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

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

The project is not adequately defined for a specific project impact analysis. And the DEIR does not and cannot reasonably reflect the impacts the public can expect. The DEIR should be withdrawn and reaccomplished after more final project details are definitized.
December 11, 2015

Dear Members,

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

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

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

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

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

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

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

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

Sincerely,

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

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

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

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

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

3.1. **Shade Hotel**

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

3.2. **New Hermosa Beach General Plan**

Hermosa Beach is in the process of updating its General Plan. Their DEIR is currently in work and scheduled for release in February 2016. The City has broadly released its plan in the Scoping Document for the DEIR and other documents. Figure 2. shows the non-residential use summary from this scoping document.
Figure 2: Hermosa General Plan Update includes substantial increase in commercial development in close proximity to Redondo’s waterfront

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

3.3. AES Property

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

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

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

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

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

3.4. Other projects

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

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

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

3.5. Cumulative impacts conclusion

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

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

4. Visual and Aesthetic Resources

4.1. Visual Resources

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

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

![Figure 3: Typical view of harbor breakwater, ocean, cliffs of Palos Verdes, and a faint Catalina Island from Harbor Drive.](image)

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

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

Based on the project plan view included in the DEIR, the proposed development would conservatively block 80% of the current views from Harbor Drive as shown in Figure 4.
FIGURE 4: Sight Analysis of CenterCal project shows 80% of views blocked from Harbor Drive. Sight analysis does not evaluate impact of landscaping and other visual impediments.

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

Interestingly enough, the only key observation points chosen for the DEIR were chosen to coincide with the center of the only two view slivers through the development. Had the DEIR fairly and reasonably evaluated the view impacts, the view assessments would show an even more dramatic impact. Because the proposed development along
Figure 5: Current and future view looking south toward edge of new parking structure. Note the image in the DEIR is taken from a higher vantage point to hide the overbearing height of the new structure.
Drive is built right up against Harbor Drive, including a huge, unbroken, three story parking structure and a two story movie theater; the pedestrians and bicyclists lose much of the view of the sky and would have to look very high to even see the sky. Shadows from these megalithic buildings will cloak most of the sidewalk and bike path by 2 PM.

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

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

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

While the DEIR does not evaluate this significant urbanization of harbor views significant, the HOC EIR does - demonstrating the pro-project bias built into this DEIR.
Figure 5b: 3D engineering block model of proposed parking structure and movie theater demonstrates overwhelming massiveness and shadow a bike rider would experience riding south on the bike path around 3PM. The DEIR somehow concludes this is not a significant view or aesthetic impact.

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

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

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

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

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

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

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1 Redondo Beach Local Coastal Program 10-5.814 b. 1.
The next image shows that the City has named this path a “Redondo City Walk”. As such substantive view impacts would be significant.
And here is an image from the bottom of the park, overlooking the harbor.

![Image from the bottom of the park, overlooking the harbor.]

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

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

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

![Image of the harbor](image)

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

Figure 8 shows the dramatic increase in development on this part of the harbor represented by the megalithic Market Hall as depicted in the DEIR. The scale of the market hall becomes obvious from a plan view:
Figure 8: The proposed Market Hall fills the entire southern tip of the harbor and will dominate most views from Czuleger Park. (from The Waterfront DEIR)

While the Waterfront DEIR did not do the view impact assessment justice, the Measure G Final EIR (HOC EIR) for the zoning change for this area gives us a much better idea of what a two story market hall in this part of the harbor would do to views from Czuleger Park. Figure 9 is from this earlier EIR and shows the before and after effect.
for a two story market hall. It seems the DEIR observation points were purposefully chosen to mask the substantive view impacts showing again its bias toward the development.

Figure 9: Previous city Final EIR shows the real impact of two story development in south end of the harbor on views from Czuleger Park. This view shows much more ocean and harbor view impact than the convenient view chosen for the Waterfront DEIR. Lower in the park, the impact would be worse.
A more objective and balanced assessment of the views from Czuleger park would have included more observation points from more utilized areas at various elevations. And as shown by the previous EIR, views from these observations points would be substantively affected by the huge, two story market hall on the southern tip of the harbor. The vagueness of the DEIR combined with its very selective observation points, makes it almost impossible for residents to evaluate compliance with height limitations and view impacts in the southern part of the harbor.

4.1.3. Views from the Bike Path through the Parking Structure

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

![Figure 10: View from the bike path through the parking structure.](image)

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

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

4.1.4. Views from within the development

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

The aesthetics of the interior pedestrian harbor/ocean views would improve somewhat with the project. Today the splash wall impedes views for children, the promenade in many areas is just asphalt, and the pier’s handrails need replacement. Most of the
issues can be improved without the massive overdevelopment and its impacts on existing coastal dependent recreational uses of the waterfront.

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

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

4.1.5. View impact assessment inconsistent with previous city findings

When the city passed the current zoning that would allow the development proposed in this DEIR, it utilized a Final EIR for a zoning called Heart of the City. The Heart of the City (HOC) zoning would have allowed less development than currently proposed in the southern area in this DEIR. Yet the HOC Final EIR (HOC EIR) concluded the view
impacts from Harbor Drive and Czuleger Park would have been Significant and Unavoidable as shown in Figure 13. In fact, when Measure G zoning was brought to the Coastal Commission for approval, the Commission strengthened the protection of views from Czuleger Park. Despite this requirement from the Coastal Commission, the DEIR avoids reasonable and objective assessment of the view impacts from Czuleger Park by choosing a convenient northern observation point in the park that can barely see the harbor. Now, add the lack of objective assessment of the real view impacts from Harbor Drive and it brings the DEIR assessment even more in question. The loss of 80% of the harbor and ocean views from Harbor Drive combined with the view impacts of the market hall from Czuleger Park should objectively and reasonably be evaluated a significant impact.

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

4.2. Aesthetic Resources

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

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

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

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

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

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

*Figure 14B: Four megalithic structure dominate site north to south (estimated from DEIR Figure 2-8)*
Building dimensions estimated from the DEIR project plan view reveal that four megalithic buildings dominate the site from north to south. Figure 14B shows the estimated dimensions of these massive structures. Figure 14C shows DEIR depictions of the three largest. These buildings do not overlap north to south, so their additive length is approximately 2,270 ft. The whole project site north to south from Portofino Way to the north side of the Torrance Circle is about 1,280 ft. That means the development represented by these four megaliths takes up 85% of the project length north to south. The only real views through this wall of development are the fairway leading into Basin 3, the two driveways into the harbor area, and the 70ft diagonal AES right of way. The project creates a massive wall of development between the residents and the harbor.

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

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

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

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

5. Land Use Conflicts

5.1. Project Exceeds Zoning Cumulative Development Cap

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

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

This cap is repeated for each Commercial Recreation District sub area in Redondo’s harbor zoning.
According to the DEIR project description, the total project would increase total development to over 417,000 square feet as shown in Figure 15.

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

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

5.1.1. Parking structure zoning cap discussion

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

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

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

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

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

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

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

Furthermore, the actual language on the ballot states:

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

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

The City may claim the ballot supplement pamphlet included the current total square footage of current development and that voters should have been able to derive from this total square footage that parking structures were excluded, but this is a spurious argument. The city did not break down their calculation so that the voters could have
seen that parking structures were not included in this total. Even if they did, the public can easily contend this city calculation was simply in error based on the text and definitions in the Measure G text.

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

![Table of Measure G benefits](image)

Mike Guia - Mayor of Redondo Beach

“Measure G protects out Harbor from over development yet allows for revitalization without raising taxes. It ensures the future economic vitality of our Harbor and supports the recommendations of the California Coastal Commission.”
Figure 16: Campaign literature heavily touts development cap and limitations on overall development, but never states new parking structures would be excluded from that cap. The message communicated by proponents of Measure G and elected officials was that Measure G included a firm cap on all building development. There is never any mention or caveat that it would allow an unlimited amount of parking structure development on top of that cap.

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

5.2. Land Use and Seaside Lagoon Park

5.2.1. Heart of the City EIR and Seaside Lagoon

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

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

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

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

- Expansion of the Seaside Lagoon

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

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

3 HOC Final EIR, page III-168
plan spelled out increasing visibility through the development by creating green open space from Harbor Drive through to the Seaside Lagoon Park.

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

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

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

“5. Mitigation Measures

The following measures are required to address impacts on recreational resources:

REC-1 The City shall explore opportunities for development of active public and commercial recreational facilities within the Project area in addition to the expansion of Seaside Lagoon. ...”

4 HOC Final EIR, page III-170
5 HOC Final EIR, page III-172b
As later sections of this document will show, the proposed project represents significant adverse impacts to coastal dependent recreational uses of the harbor. The zoning EIR recognized this and required expansion of Seaside Lagoon. The proposed project and DEIR ignore this HOC EIR mitigation requirement by shrinking Seaside Lagoon Park rather than expanding it. Thus the project does not comply with mandatory requirements of the HOC EIR.

5.2.2. Redondo Land Use Ordinances and Seaside Lagoon

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

When the standard was established in 2004 the City was at a ratio of 2.35 acres of parkland per 1000 residents. Based on 2014 estimates of city population and reducing the Knob Hill parkland, that ratio has dropped to 2.27 acres per 1000 residents. According to a study funded by the California State Coastal Conservancy, Redondo Beach had a lower parkland ratio than any other beach city in our vicinity as shown in Figure 18.
Legislation passed in 2008 enacted the Statewide Park Program (Public Resources Code §5642) that defined underserved communities as having a ratio of less than three acres of parkland per 1000 residents. By this definition, Redondo Beach is “underserved”. Paving over what little usable parkland Redondo has exacerbates this situation.

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

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

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

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

“**Objective:** It shall be the objective of the City of Redondo Beach to:

8.2a **Maintain and enhance existing recreation resources, maximize recreation opportunities, improve accessibility to the coastline, provide view corridors to the beach and marina from the surrounding area, and restore a sense of place in the Coastal Zone.**

**Policies** It shall be the policy of the City of Redondo Beach to:

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

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

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

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

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7 General Plan, Parks and Recreation Element page 3-167
8 General Plan, Parks and Recreation Element, page 3-176
more detail, it won’t be covered in more detail here, other than to summarize that shrinking Seaside Lagoon violates this zoning requirement.

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

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

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

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

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

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

The images that follow show how the campaign material promised the preservation of the Seaside Lagoon and protection from private development.
Yes For Protecting Seaside Lagoon From Potential Development

Measure G Validates Seaside Lagoon Park Zoning

Fact: Yes on G locks in place Public Park Zoning for 3 ½ acres of prime oceanfront land that can never be up-zoned for private development without another vote of the people
But perhaps most telling the ballot argument by Councilmen Aspel, Kilroy, Aust, and Mayor Gin published in ballot materials,

“They KNOW that the Seaside Lagoon cannot be converted to any other use without a public vote.”

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

5.2.4. Coastal Act and Seaside Lagoon

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

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9 “Rebuttal to the Argument Against Measure G” published in election ballot booklet
As a unique, salt water, sand bottom recreational beach/pool feature drawing its water from the ocean/harbor itself and recycling it back into the harbor, the Seaside Lagoon is a coastal dependent recreational use as defined by the Coastal Act:

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

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

**Section 30116 Sensitive coastal resource areas**

“Sensitive coastal resource areas” means those identifiable and geographically bounded land and water areas within the coastal zone of vital interest and sensitivity. “Sensitive coastal resource areas” include the following: ...

(b) Areas possessing significant recreational value....”

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

**Section 30001.5 Legislative findings and declarations; goals**

“The Legislature further finds and declares that the basic goals of the state for the coastal zone are to:

(c) Maximize public access to and along the coast and **maximize public recreational opportunities in the coastal zone** consistent with sound resources conservation principles and constitutionally protected rights of private property owners.

(d) **Assure priority for coastal-dependent and coastal-related development over other development on the coast. ...**”

\(^{10}\) City of Redondo Beach statistics provided in response to a California Records Act Request, Appendix A
The Coastal Act specifically protects public coastal-dependent recreational uses:

“Section 30220 Protection of certain water-oriented activities

Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.”

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

“Section 30221 Oceanfront land; protection for recreational use and development

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

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

“Section 30252 Maintenance and enhancement of public access

The location and amount of new development should maintain and enhance public access to the coast by ...

(4) providing adequate parking facilities....”

Today, Seaside Lagoon and the hand launch boat ramp utilize 3 acres of surface level parking shared with the Redondo Beach Marina and its lessees. Parking is in close proximity to the Seaside Lagoon and boat launch and both have convenient drop off access directly adjacent to the use. The project defined in the DEIR is over 200 parking spaces short of Redondo parking standards - yet writes this deficit off as no significant
impact. Later sections of this report will show that the parking assessment in the DEIR does not include any allocation for Seaside Lagoon users, users of the hand launch boat ramp, fishermen using the sport fishing pier, or those embarking from the sport fishing pier for whale watching or sport fishing. So the REAL deficit is much greater than that assessed in the DEIR. Furthermore, the vast majority of that parking would be in a four level parking structure across the new private road and through multiple commercial lease spaces.

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

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

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

5.2.5. Seaside Lagoon Land Use Compliance Summary

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

11 Coastal Commission Staff Report on Application 5-97-379, 29 Jan 1998, pages 8 and 9
Parks and Recreation Element. The project should be redesigned to preserve and enhance this unique coastal recreational feature.

5.3. Other Land Use Conflicts

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

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

Redondo zoning ordinance:

“10-5.800 Specific purposes, CC coastal commercial zones.

In addition to the general purposes listed in Section 10-5.102, the specific purposes of the CC coastal commercial zone regulations are to:

(a) Provide for the continued evolution and use of the City’s coastal-related commercial-recreational facilities and resources for the residents of Redondo Beach and surrounding communities, while ensuring that uses and development are compatible with adjacent residential neighborhoods and commercial areas;

(b) Provide for the development of coastal-dependent land uses and uses designed to enhance public opportunities for
coastal recreation, including commercial retail and service facilities supporting recreational boating and fishing, and to encourage uses which:

(1) Are primarily oriented toward meeting the service and recreational needs of coastal visitors, boat users, and coastal residents seeking recreation,

(2) Are active and pedestrian-oriented while meeting the need for safe and efficient automobile access and parking,

(3) Have a balanced diversity of uses providing for both public and commercial recreational facilities,

(4) Provide regional-serving recreational facilities for all income groups by including general commercial and recreational use categories,

(5) Provide public access to nearby coastal areas, and

(6) Protect coastal resources;

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

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

“Objective: It shall be the objective of the City of Redondo Beach to:

8.2a Maintain and enhance existing recreation resources, maximize recreation opportunities, improve accessibility to the coastline, provide view corridors to the beach and marina from the surrounding area, and restore a sense of place in the Coastal Zone.

Policies It shall be the policy of the City of Redondo Beach to: ...

8.2a.2 Increase recreational boating opportunities for visitors and residents.
8.2a.3 Evaluate potential improvements to and facilities for Moonstone Park using input from the boating community, Commissioners, and Harbor Department Staff.

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

“8.2b.5 Minimize parking conflicts at parks. …”

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

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

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

Expand land area of Seaside Lagoon.”

The project ignores the policies required by the HOC EIR:

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

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

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

D. “Land Use Policies

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

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

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

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

   c) *Be consistent and harmonious with the scale of existing development,...”*

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

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15 HOC Final EIR, page III-168

16 Redondo Land Use Plan, page 6
This document has previously cited the stated priorities of the Coastal Act, so they are not repeated here. But there are other sections of the Coastal Act that are violated in the project described by the DEIR.

“ARTICLE 3 RECREATION
Section 30220 Protection of certain water-oriented activities

Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.”

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

“Section 30221 Oceanfront land; protection for recreational use and development

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

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

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

The project eliminates 67 pull-through trailer parking places and only includes 20 at the new boat ramp per the parking evaluation in the DEIR. The Coastal Commission
required a boat ramp to encourage more trailer boating than the boat hoists do. Shrinking the trailer parking to less than the state guidelines for two lanes would artificially constrain the use of the boat ramp. This violates CEQA priorities and requirements by reducing capacity from what exists today.

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

**Section 30222 Private lands; priority of development purposes**

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

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

**Section 30223 Upland areas**

Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.
Section 30224 Recreational boating use; encouragement; facilities

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

Section 30234 Commercial fishing and recreational boating facilities

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

Section 30234.5 Economic, commercial, and recreational importance of fishing

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

The impact to commercial fishing and whale watching boats is not evaluated in the DEIR. Commercial fishing includes true commercial fishing vessels as well as boats that charge to take recreational fishermen out to fish. The limited and poor configuration of the parking, the limited and awkward access to slips, and the limited hours and low height of the pedestrian bridge could be devastating to commercial fishing and whale watching. This could be mitigated by moving the commercial fishing out of Basin 3 and providing space in other marinas, but this is not cited as a mandatory mitigation in the DEIR. Also, the basin is not the preferred location of most recreational boaters due to lack of openness of this marina already. This condition is exacerbated by the dramatic increase in development and the new road, the awkward access, the limited and inconvenient parking, and the limited hours of bridge operation. Overall the impact to commercial fishing is not consistent with the cited sections of the Coastal Act.
Figure 19: Commercial fishing boat returns to Basin 3 late in the evening. Limited pedestrian drawbridge hours would preclude commercial fishing from this basin.

Figure 20: Commercial fishing vessels dominate Basin 3 giving it a unique charm. The pedestrian drawbridge and halving of slips would drive these users out of the basin.
Section 30251 Scenic and visual qualities

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

Section 30252 Maintenance and enhancement of public access

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

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

Section 30255 Priority of coastal-dependent developments

Coastal-dependent developments shall have priority over other developments on or near the shoreline. Except as provided elsewhere in this division, coastal-dependent developments shall not be sited in a wetland. When appropriate, coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support.
The project described in the DEIR is not compliant with the Coastal Act and the City’s Local Coastal Program, Land Use Plan and Implementing ordinances. The priorities are backwards. Per the Coastal Act the harbor area should prioritize commercial and recreational boating, stand up paddling, kayaking, fishing, and use of the unique coastal amenity, the Seaside Lagoon. Instead the project prioritizes the non-coastal dependent uses at the expense of existing coastal dependent uses.

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

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

5.4. Proposed Land Swap with the California State Lands Commission

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

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

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

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

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

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

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

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

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

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

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

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

(1) To improve navigation or waterways.
(2) To aid in reclamation or flood control.

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

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

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

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

(7) To resolve boundary or title disputes.

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

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

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

• The exchange does not improve navigation or waterways. In fact the proposed project has negative impacts on navigation of the waterways by limiting access with a drawbridge that operates limited hours.

• The exchange does not aid in reclamation of flood control.

• The exchange does not enhance the physical configuration of the shoreline or trust land ownership.

• The exchange does not enhance public access to or along the water. The area already provides access along and to the water. In fact the density and intensity of development will impede access to and along the water.

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

• The exchange does not resolve boundary disputes.

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

6. Recreational Use Impacts

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

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

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

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

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

17 General Plan, Parks and Recreation Element, pages 3-161, 162
locations for new parkland and/or recreation facilities, including the AES power plant site, City yards, the former Camacho’s restaurant, the octagonal building near the harbor, and vacant occupancies on the pier.”

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

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

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

6.1. Thresholds of Significance

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

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

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

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18 General Plan, Parks and Recreation Element, page 3-163
19 General Plan, Parks and Recreation Element page 3-167
These impacts of the proposed project violate state and local land use regulations as described in the land use section of this document, and they should result in an assessment of significant impact with proposed mandatory mitigations.

6.2. Recreational use of Seaside Lagoon

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

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

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

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

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

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

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

20 Heart of the City Final EIR, page III-156
“... Because of its popularity, participants would like to see the Lagoon enlarged, longer operating hours, more off-season events, a better snack facility, and a larger and more secure storage facility.....”

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

6.2.1.1. Swim feature water quality

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

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

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

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21 General Plan, Parks and Recreation Element, pages 3-161,162
miles from the proposed Seaside Lagoon harbor entry (see Figure 21). One can hardly draw any real conclusions from these water tests, except that the waters in the harbor are most likely worse on any occasion due to the harbor’s limited water exchange, boating impacts, the large resident sea lion population, and bird droppings washing off the break walls.

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

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

1) expand existing bird exclusion structure into the tidal zone and across the beach face;

2) design and implement an improved water circulation system; and

3) commence an in-depth source identification study to potentially identify and mitigate sources of bacteria.

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

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

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

22 Heal the Bay, 2011-2012 Beach Report Card
poor water quality is exacerbated by poor water circulation. Three of the top Beach Bummers are located with enclosed waterbodies." 

"Inner Cabrillo Beach in San Pedro is the prime example of poor water quality caused by the poor circulation of an enclosed waterbody. In contrast, outer Cabrillo Beach (ocean side, 400 feet away) received A/A+ grades throughout the year." 

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

Figure 22: Heal the Bay Beach Report Card shows the repeated poor quality of beaches in enclosed waters

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

We also have specific conditions that are unique to our site. One is the proximity to the Sea Lion barge. Sea Lion defecation in the vicinity of the protected lagoon entry is likely

23 Heal the Bay 2014-2015 Beach Report Card
24 Heal the Bay 2014-2015 Beach Report Card
to impact water quality substantially. Likewise prevailing winds blow garbage in the protected area and break water tends to trap the garbage as evidenced in Figures 23 and 24. Should the new trailer boat ramp be upwind of this site, the oil, gas, trash and other pollutants associated with the boats and boaters would be blown straight into the Seaside Lagoon entry to the harbor and trapped there by the break water further exacerbating this situation.

Figure 23: Watermelon rind and kelp trapped in rocks at location where Seaside Lagoon would be open to harbor.

Figure 24: Floating water bottles, trash and kelp blown into proposed Seaside Lagoon entry by prevailing winds and trapped by break wall.
Lacking specific test data over long periods of time, it is reasonable to conclude that the water quality at the proposed Seaside Lagoon entry to the harbor is likely to regularly exceed safe standards. Certainly, the project should not be approved without proactively proving the water quality in the harbor would be consistently safe for swimmers. Finding out after-the-fact, that the water quality precludes most swimming, would be too late.

6.2.1.2. Impacts on use of reconfigured Seaside Lagoon for swimming
Currently, Seaside Lagoon is attractive to parents for the following attributes:

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

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

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

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

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

![Image](image1.png)

**Figure 26:** Note how small the area bounded by the breakwater on the left is. Also this shot at low tide shows the dramatic affect tide will have on depth and size of the water area.

![Image](image2.png)

**Figure 27:** The impact of tide is very apparent in this image. At mid tide, the water is up to the inner break wall with no sand bottom showing (see Figure 24)
Estimates based on the DEIR plan views and the known dimensions of the current configuration show the swim area going from about 400’ x 140’ in today’s configuration to about 140’ x 150’ at mid-tide in the proposed configuration. This represents a dramatic loss in swim area. An unknown variable ignored by the DEIR is how much this area will shoal over time (as evidenced in Figure 27) and how much redredging would be required to maintain usable depths at low tides. Also it is likely sand on the beach would have to be replenished as it is pulled into the harbor by tides, waves, and rain runoff. The DEIR is silent on all of these very real concerns related to the long term usability and maintainability of the proposed configuration.

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

6.2.1.3. Impact of combining water recreational uses

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

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

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

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

25 “Stand-up paddlers in Redondo Harbor get boaters, harbor patrol support”, Easy Reader, Oct 17, 2012
By any objective measure both sports are popular activities in King Harbor. The DEIR study on current boat traffic did not have any actual counts of use of the current hand launch boat dock. It estimates 50 launches per day on peak weekends. In our experience, this count seems low. Ownership is growing as the sport grows and the hand launch is the only publicly available, legal, launch point in the calm harbor waters. The DEIR estimates at least 200 SUP rentals on peak weekends.

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

One alternative would be to allow both uses to mingle. This would be hazardous to kids swimming and playing near beginning paddle boarders or kayak fishermen. Beginner paddle boarders fall without being able to control where their board is going, where their paddle goes and where they themselves fall. Playing children could easily be struck by the paddle, the paddle or the board. Likewise, with kayak fishermen, small kids could grab equipment on the kayak and injure themselves or damage the equipment. So this approach introduces real hazards that don’t occur today.

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

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

6.2.1.4. Beach reconfiguration impacts
The proposed reconfiguration of Seaside Lagoon shrinks the usable portion of the park by 1/3rd. That area is then subject to tides. The DEIR clearly shows the dramatic loss of beach area at high tide, but even at low tide the usable area is smaller than today. The fence is gone, so the comfort of having kids confined to a controlled area is gone as well. There is an active roadway crossing the park in extremely close proximity to the park beach and there is exposure to strangers. It is questionable whether day camps could operate in this smaller and less controlled environment. The loss of usable beach and the loss of the controlled area combined with the close proximity of the road, and strangers impact the appeal of the park for families with young children. Add kayakers and SUP’ers traversing the area with their equipment and gear and the problem is only exacerbated. **In response to a California Public Records Act Request, the City responded that they had no estimate of the loss of usable parkland land area based on the proposed project. The DEIR does not provide any evaluation of the impact of the loss of usable beach area either.**
6.2.1.5. Parking configuration impacts

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

Figure 28: SUP’ers lined up to offload their SUP’s at the hand launch boat ramp. Users must turn around to exit as their is no exit in the direction the vehicles are pointing. Stealing a dropped off board or kayak would be difficult due to this configuration.

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

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

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

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

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

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

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

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

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

“We have a problem,” said Leslie Page, the property manager of Redondo Beach Marina. “I’ve had five of them wandering around the parking lot. I had one knock on the front door of the marina office next to R10 Social House (restaurant).”

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

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

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

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

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

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

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26 “Sea Lion Population in King Harbor is ‘out of control’”; Daily Breeze, Carly Dryden; April 24, 2015
Figure 29: Pedestrians enjoying waterside path behind Seaside Lagoon on a cool winter day

The configuration described in the DEIR routes the pedestrian path in amongst shopping and restaurant lease spaces with a road and parking very nearby and sand between the path and the waterfront. It then routes straight out to Portofino Way as depicted in the DEIR without returning to waterfront. Yet elsewhere, the DEIR evaluates that the current lack of the pedestrian path at the Joe’s Crabshack site as a negative. The DEIR seems to ignore this with the primary project assessment and shows its pro-development bias.

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

6.2.1.9. Impact of opening Seaside Lagoon year round

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

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

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

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

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

6.2.1.10. Open space in development replaces Seaside Lagoon loss

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

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

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

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

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

6.3.1. DEIR Primary Assessment

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

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

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

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

Having to negotiate most of the way down the narrow Portofino Way, and then turning into the space constricted ramp parking lot only to find there are no parking spaces would be a very frustrating situation and generate needless traffic of a vehicle/trailer combination on very constricted roadways in the harbor area. This increases congestion, increases potential of accidents and increases the likelihood that frustrated boaters would be artificially deterred from using the ramp in the future. The situation is exacerbated by the location of the new parking structure further consolidating traffic congestion on these key and very constrained intersection.

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27 California Boating Facility Needs Assessment Volume V, October 15, 2002
Add the proximity hazards represented by the paddlers launching from Seaside Lagoon and it only builds the case that this is a bad location for a new boat ramp.

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

6.3.2. DEIR Alternatives Assessment

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

The DEIR exacerbates the confusing formatting by making broad and vague statements such as siting the boat ramp on Mole D would increase development on the northern section of the harbor, but then contradicts itself on how much development this would actually mean - it increases density but cuts back on development... how much in each case? Would deletion of the road allow recovery of Seaside Lagoon space? The public cannot know because the DEIR does not describe it. The alternative shows no lay down of the proposed alternative. The public cannot possibly assess the impacts based on this vague description. Moles A and B are not even included in the Project Scope. This DEIR is all over the map.

The assessments are not well supported. Some bias seems to have crept into a very shallow analysis. All but the primary alternative assess no breakwater, yet surge in the harbor, especially at Moles C and D is substantial and it would seem use of the ramps without new breakwaters would be unsafe. Also it would seem any floating docks would suffer battering that would require substantial maintenance. The assessments on other impacts like views for Mole D options are impossible to evaluate because no plan views of the resulting development are included. The hazards of the Mole D double ramp seem exaggerated. The ramp is far enough from the Basin 3 fairway to reduce risk. And professional boat skippers could easily use the far side of the sport fishing pier without posing any danger to paddlers using the hand launch boat ramp area. Also there is the question of whether the Mole D double ramp option could be moved somewhat more south to improve the space from the sport fishing pier. Another glaring missing assessment is that of the ability to maneuver vehicles with trailers in the recommended reconfiguration. Lack of maneuvering room increases traffic congestion on project roadways and creates property and personnel safety hazards in the ramp parking areas.

In the DEIR, Mole A comes out as a winner, but the assessment does not account for impacts of moving the yacht club to Mole B. It does not seem feasible to operate the yacht club and the boat ramp, especially the two lane boat ramp from the same site.
Additionally, the yacht club removes its floating docks every winter to prevent storm damage, it does not seem there was any assessment of this in the Mole A alternatives.

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

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

### 6.4. Recreational use of Basin 3 slips

Recreational use of Basin 3 slips is significantly impacted by this development. Unless the surface parking spots in the back of the Market Hall are reserved for boaters, the boaters are forced to trek through shopping and restaurants, across active streets, and through parking structures to get their gear and guests back and forth to their boats. The canyon created by the walling off of International Boardwalk and the development on the west side of the basin will echo the new traffic noise from the new Pacific Avenue into this echo chamber. And the limited hours of the pedestrian bridge will impact the desirability of these slips and impact safety. Boaters cannot always determine when they must return - weather, sickness, injury, shoreside emergencies, and mechanical failures can require a return anytime.  The limited hours of the drawbridge affect any boater with a boat over 10 feet high at any point. Overall, the project makes these slips very undesirable to recreational or commercial users of the Basin.

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

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

### 6.5. Bike path usage

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

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

This route does preclude walking your bike through the pier entry, but it adds the double hazard of having to cross the new Pacific Ave twice once on the south side of the project and once on the north side where it joins with the busy and confusing intersection of Pacific and Pacific and Harbor Drive and the new road in the harbor shopping area.

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

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

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

DEIR Appendix L-1, Transportation Impact Study, page 20 actually points out current shared pedestrian/bicyclist spaces where bicyclists must dismount for pedestrian safety. It is odd that the same DEIR ignores this safety precaution when assessing the secondary bike routes through the new project. This is yet another obvious indication of the bias that has manifested in this DEIR.
Overall, the project negatively impacts bicycling with new driveway crossings, increased traffic crossing the bike track, and the odd routing to the far side of the new Pacific Avenue. At the very least, the new bike path through the hotel area should be routed to the west side of the new Pacific Ave. Any statements about the bicyclists sharing the same path as pedestrians should be removed. It is unsafe, unrealistic and deceptive.

6.6. Recreational impacts of the sport fishing pier removal

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

The close proximity of the pier parking lot makes this a favorite fishing spot for those who have mobility challenges. It is a favorite for families with small children just learning to fish.

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

Obviously, removal of the sport fishing pier is a negative impact on this recreational and open space asset on the harbor side of the development. Loss of the proximity of surface level parking will negatively impact this attraction as well.
The assessment of the condition of the pier seems to be overly negative and suspect. The Monstad Pier portion of the Horseshoe Pier and the Balboa pier are both wooden piers that have survived since the early 1900’s. The sport fishing pier is decades younger and protected from heavy storm action. Maintenance and refurbishment are not even discussed, which also makes this assessment suspect. There is no independent professional assessment of the condition of the pier. It seems a convenient excuse to eliminate the cost of maintaining this well loved asset and used recreational asset.

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

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

7. Traffic, access, parking and circulation impacts

7.1. Parking

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

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

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

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

7.1.1. Parking need assessment

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

The plan includes zero parking assessment for paddlers who own their own equipment and launch out of the Seaside Lagoon area. And it does not account for the current level of use of the Seaside Lagoon. As mentioned earlier, the Seaside Lagoon attracts an average of 753 visitors per day. Even a conservative four visitors per car estimate yields a need for 188 additional parking spaces on an average
day, peak weeks that would jump to 304 parking spaces. Though the DEIR has no
counts for paddlers using the hand launch dock, it estimates 50. At most paddlers would
come 2 to a vehicle, so that is an additional 25 parking spaces required.

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

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

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

*Figure 33: The beach just south of the pier is one of the most populated beaches on
summer weekends and holidays. Due to insufficient parking, many use the pier parking.*

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

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

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

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

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

7.1.2. Parking configuration

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

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

While the harbor area does have about 100 surface level parking spots, the need of recreational boaters who lease a slip, of the users of the Seaside Lagoon, of fishermen using the sport fishing pier and the sport fishing boats, and paddlers launching from the Seaside Lagoon area would demand more than this number of surface level parking spots on their own. The plan does NOT reserve these spots for these users anyway.
Thus these recreational users would be forced to fight for parking in parking structures and must traverse through the parking structures themselves with all their equipment, gear, kids, etc - in most cases they will not be able to fit their gear and equipment into the parking structure elevators. Then once they trek through the active traffic in the parking structure they must negotiate through shopping and restaurant areas, cross the active new street cutting through the harbor, across more shopping and restaurants to finally reach their intended recreation. There is very good reason marinas and harbors have ample, nearby surface level parking. While parking structures are fine for shopping centers (although data supports that most shoppers dislike parking structures) it is a major deterrent for those who would have to lug kayaks, SUP’s, fishing gear, boating supplies and their family through the parking structure and development.

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

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

### 7.1.3. Private parking impacts

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

### 7.2. Traffic assessment

#### 7.2.1. Blatant flaws in the approach and analysis

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

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

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

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

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

### 7.2.2. Harbor Drive Configuration

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

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

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

**Zero right turn queue storage for driveway entrances** - There are currently seven driveways on the west side of Harbor Drive in the project area. Figure 34 shows a typical driveway entrance. None of these driveways have any southbound, right turn lane. A single car turning into these driveways blocks traffic. The two way traffic on the

bike path combined with pedestrian traffic create this situation regularly particularly at rush hour and on weekends. The busy entrances to Cheesecake Factory and the parking lot entrance near Capt. Kidd’s suffer from this condition frequently. **The traffic analysis does not account for these conditions that impede the traffic capacity of the through lanes.**

![Image of traffic conditions](image)

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

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

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

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

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

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

### 7.2.3. Short Road Segment Impacts

Key ingress and egress roads from this development suffer from critically short road segments. During heavy demand, these segments fill to capacity and prevent more vehicles from entering the segment during their green light. This often results in residual vehicles stuck blocking through lanes until the downstream signal changes to let the short segment clear. These short segments occur on Beryl between Catalina and Harbor Drive, Torrance Blvd between Catalina and Broadway and between Broadway and PCH, and on northbound PCH between Catalina and 190th/Herondo. Figure 35 shows an example of a short road section that limits intersection capacity. *While these overflowing intersection conditions are the definition of gridlock, the traffic analysis does not account for these conditions in either the upstream or downstream intersections impacted. This leads to an artificially inflated LOS grade for an intersection.*
Figure 35: Example of short road segment at PCH and Herondo/190th. Note segment storage overflow into intersection of Catalina and PCH. These conditions are not reflected in the traffic analysis.

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

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

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<thead>
<tr>
<th>Driving along</th>
<th>Entering</th>
<th>Direction</th>
<th>Turn Movement</th>
<th>Queue Storage</th>
<th>Limitations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harbor Drive</td>
<td>Yacht Club Way</td>
<td>South</td>
<td>Right Hand Turn Lane</td>
<td>2 - 3 cars</td>
<td>Extremely Narrow Lane, Frequent turn lane overflows blocking through traffic, LeK turns from northbound lane oKen block southbound lane waitMg for bike/ped traffic</td>
</tr>
<tr>
<td></td>
<td>Tarsans/Boatyard Drive Way</td>
<td>South</td>
<td>Right Turn Main Lane</td>
<td>0 cars</td>
<td>Extremely Narrow Lane, any right turns block through traffic waitMg for bikes/peds, LeK turns from northbound lane oKen block southbound lane waitMg for bike/ped traffic</td>
</tr>
<tr>
<td>Harbor Drive</td>
<td>Marina Way</td>
<td>South</td>
<td>Right Hand Turn Lane</td>
<td>2-3 cars</td>
<td>Extremely Narrow Lane, Frequent turn lane overflows blocking through traffic, LeK turns from northbound lane oKen block southbound lane waitMg for bike/ped traffic</td>
</tr>
<tr>
<td>Harbor Drive</td>
<td>Port Royal Marina Parking</td>
<td>South Bound</td>
<td>Right Turn Main Lane</td>
<td>0 cars</td>
<td>Extremely Narrow Lane, any right turns block through traffic waiting for bikes/peds, LeK turns from northbound lane oKen block southbound lane waiting for bike/ped traffic</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Harbor Drive</td>
<td>Shade Hotel Entrance</td>
<td>South Bound</td>
<td>Right Turn Main Lane</td>
<td>0 cars</td>
<td>Extremely Narrow Lane, any right turns block through traffic waiting for bikes/peds, LeK turns from northbound lane oKen block southbound lane waiting for bike/ped traffic</td>
</tr>
<tr>
<td>Harbor Drive</td>
<td>Cheesecake Factory Entrance</td>
<td>South Bound</td>
<td>Right Turn Main Lane</td>
<td>0 cars</td>
<td>Extremely Narrow Lane, any right turns block through traffic waiting for bikes/peds, LeK turns from northbound lane oKen block southbound lane waiting for bike/ped traffic</td>
</tr>
<tr>
<td>Harbor Drive</td>
<td>Port Royal Marina Parking</td>
<td>South Bound</td>
<td>Right Turn Main Lane</td>
<td>0 cars</td>
<td>Extremely Narrow Lane, any right turns block through traffic waiting for bikes/peds, LeK turns from northbound lane oKen block southbound lane waiting for bike/ped traffic</td>
</tr>
<tr>
<td>Harbor Drive</td>
<td>Portofino Way</td>
<td>South Bound</td>
<td>Right Hand Turn Lane</td>
<td>2-3 cars, 1 car/trailer</td>
<td>Extremely Narrow Lane, wide turn needed for vehicles with trailers. Frequent turn lane overflows blocking through traffic</td>
</tr>
<tr>
<td>Harbor Drive</td>
<td>New Parking Structure Entrance/Exit</td>
<td>South Bound</td>
<td>Not Available</td>
<td>Not Available</td>
<td>If not signalized, similar limits to other non-signalized intersections</td>
</tr>
<tr>
<td>Harbor Drive</td>
<td>Southern Parking Entrance</td>
<td>South Bound</td>
<td>Right Turn Main Lane</td>
<td>0</td>
<td>Significant blockages due to left turns from northbound lane. Pacific often block southbound lane waiting for bike/ped traffic, any right turns block through traffic waiting for bikes/peds</td>
</tr>
<tr>
<td>Harbor Drive</td>
<td>Port Royal Marina Parking</td>
<td>North Bound</td>
<td>LeK Hand Turn Lane</td>
<td>Variable</td>
<td>On heavy days, frequent conflict for lane with South bound traffic trying to run onto Beryl, dangerous negotiation southbound vehicle and bikes and peds from both directions, frequent stops across south bound lane</td>
</tr>
<tr>
<td>Location</td>
<td>Location</td>
<td>Direction</td>
<td>Hand Turn Lane</td>
<td>Variable</td>
<td>Notes</td>
</tr>
<tr>
<td>---------------------------</td>
<td>--------------------------------</td>
<td>-----------</td>
<td>----------------</td>
<td>----------</td>
<td>----------------------------------------------------------------------</td>
</tr>
<tr>
<td>Harbor Drive</td>
<td>Cheesecake Factory Entrance</td>
<td>Northbound</td>
<td>LeK Hand Turn Lane</td>
<td>Variable</td>
<td>Dangerous merging of southbound vehicle and bikes and peds from both directions, frequent stops across southbound lane</td>
</tr>
<tr>
<td>Harbor Drive</td>
<td>Shade Hotel Entrance</td>
<td>Northbound</td>
<td>LeK Hand Turn Lane</td>
<td>Variable</td>
<td>Dangerous merging of southbound vehicle and bikes and peds from both directions, frequent stops across southbound lane</td>
</tr>
<tr>
<td>Harbor Drive</td>
<td>Port Royal Marina Parking</td>
<td>Northbound</td>
<td>LeK Hand Turn Lane</td>
<td>Variable</td>
<td>Dangerous merging of southbound vehicle and bikes and peds from both directions, frequent stops across southbound lane</td>
</tr>
<tr>
<td>Harbor Drive</td>
<td>Tarsans/Boatyard Drive Way</td>
<td>Northbound</td>
<td>LeK Hand Turn Lane</td>
<td>Variable</td>
<td>Dangerous merging of southbound vehicle and bikes and peds from both directions, frequent stops across southbound lane</td>
</tr>
<tr>
<td>Harbor Drive</td>
<td>Beryl St</td>
<td>Southbound</td>
<td>LeK Hand Turn Lane</td>
<td>Variable</td>
<td>On heavy days, frequent conflict for lane with South bound traffic trying to run onto Beryl</td>
</tr>
</tbody>
</table>
| Beryl Drive               | Catalina                       | East Bound| Segment         | 18 cars through, 2-3 vehicles leK and right onto Catalina, conflicts for center lane turns into hotel and Salv on Army | Heavy conflict with center turn lane for Redondo Hotel and Salv on Army, Total segment length less than 400 feet, Can only hold 18 cars in through lane (less with trailers), 2 to 3 cars in either turn lane. EnMe segment fills on busy days.
<table>
<thead>
<tr>
<th>Location</th>
<th>Direction</th>
<th>Type</th>
<th>Segment</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beryl Drive</td>
<td>West</td>
<td>Through 18 cars</td>
<td>18 through, 18 vehicles right onto Harbor, conflicts for center lane turns left onto Harbor,</td>
<td>Heavy conflict with center turn lane for Redondo Hotel and Salvage on Army, <strong>Total segment length less than 400 feet,</strong> Can only hold 18 cars in through lane (less with trailers) and right turn lane, 2 to 3 cars in left turn lane. EnM segment fills on busy days. Frequently blocks all access to Salvage on Army and Redondo Hotel from eastbound turns</td>
</tr>
<tr>
<td>Catalina</td>
<td>North</td>
<td>Hand Turn Lane</td>
<td>3-4 cars, 2 vehicles with trailers</td>
<td><strong>Extremely dangerous turn across two lanes of Catalina South Bound,</strong> short distance to intersection adds risk</td>
</tr>
<tr>
<td>Pacific</td>
<td>East</td>
<td>Right Turn Only</td>
<td>NA</td>
<td><strong>Extremely dangerous stop unsignalized intersection,</strong> short distance and poor sight makes turn risky, frequent illegal left turn lanes by tourists who did not know it was right turn only</td>
</tr>
<tr>
<td>Torrance Blvd</td>
<td>East</td>
<td>Segment</td>
<td>2-3 cars left and right turn</td>
<td><strong>TOTAL SEGMENT ONLY 300 FEET ONLY</strong> - only 13 through cars per lane x 2 lanes. Frequently fills both lanes on heavy days. Turns from Broadway east onto Torrance from both sides block platoon movement. Will not likely resolve with signal light</td>
</tr>
<tr>
<td>Torrance Blvd</td>
<td>East</td>
<td>Segment</td>
<td>5 cars left turn</td>
<td><strong>TOTAL SEGMENT ONLY 300 FEET ONLY</strong> - only 13 through cars per lane x 2 lanes. Frequently fills both lanes on heavy days. Turns from Broadway east onto Torrance from both sides block platoon movement. Will not likely resolve with signal light. Vehicles desiring to go north on PCH often get blocked out from left turn lane due to through queue blocking EnM turn lane - causes full signal cycle delay. Left turn lane can overflow onto through lane blocking through traffic.</td>
</tr>
</tbody>
</table>
7.2.5. No weekend analysis

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

![Figure 36: Significant road segments, intersections, and driveway impediments ignored for in the DEIR traffic assessment. DEIR assessment artificially optimistic.](image)

<table>
<thead>
<tr>
<th>ITE Land Use</th>
<th>Land Use Description</th>
<th>Size</th>
<th>Units</th>
<th>TOTAL WEEKDAY (DEIR)</th>
<th>TOTAL SATURDAY*</th>
<th>WEEKDAY PEAK (DEIR)</th>
<th>SATURDAY PEAK*</th>
</tr>
</thead>
<tbody>
<tr>
<td>820</td>
<td>Retail</td>
<td>97</td>
<td>KSF</td>
<td>6,658</td>
<td>9,064</td>
<td>587</td>
<td>857</td>
</tr>
<tr>
<td>444</td>
<td>Theater</td>
<td>700</td>
<td>seats</td>
<td>1,260</td>
<td>1,568</td>
<td>49</td>
<td>322</td>
</tr>
<tr>
<td>931</td>
<td>Quality Restaurant</td>
<td>128</td>
<td>KSF</td>
<td>11,514</td>
<td>12,032</td>
<td>959</td>
<td>1,385</td>
</tr>
<tr>
<td>932</td>
<td>Hi Turn Restaurant</td>
<td>45</td>
<td>KSF</td>
<td>5,722</td>
<td>7,127</td>
<td>443</td>
<td>633</td>
</tr>
<tr>
<td>310</td>
<td>Hotel</td>
<td>130</td>
<td>rooms</td>
<td>1,062</td>
<td>1,365</td>
<td>78</td>
<td>113</td>
</tr>
<tr>
<td>710</td>
<td>Office</td>
<td>60</td>
<td>KSF</td>
<td>662</td>
<td>148</td>
<td>89</td>
<td>26</td>
</tr>
<tr>
<td><strong>TOTAL:</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>26,878</strong></td>
<td><strong>31,303</strong></td>
<td><strong>2,205</strong></td>
<td><strong>3,336</strong></td>
</tr>
<tr>
<td>Percentage increase from weekday DEIR analysis:</td>
<td></td>
<td></td>
<td></td>
<td><strong>16%</strong></td>
<td></td>
<td></td>
<td><strong>51%</strong></td>
</tr>
</tbody>
</table>

*All values derived from ITE Trip Generation Tables, 9th Edition

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

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

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

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

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

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

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

7.2.7. Traffic Impact Study Comments

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

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

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

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

7.2.7.4. The trip length assessment does not make sense. It assesses that the trip lengths will be relatively short. The City says it the current development underperforms because it is not getting enough patronage, and their stated intent is to attract customers from nearby cities. It cites employment statistics from a relatively short radius as the justification for short trips. If this number of local employees are available today, the harbor should be more successful without the dramatic increase in development proposed by the project. For the development to be successful at this scale, it will have to draw customers from a much wider draw area and this would result in increased trip lengths.
7.2.7.5. Analyzing the impact of the reconnection of Pacific Ave on intersection utilization, it appears that the heaviest use of the new street would be to service through traffic from the north side of the project. According to Figure 2 in the Traffic study, 100% of Harbor Drive Southbound traffic that currently turns east on Beryl diverts to going straight through to the south.

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

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

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

7.2.7.7. Trip Generation

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

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

The proper way to make this assessment is to bound the current project area key intersections. Use current traffic counts for the current traffic. The future traffic generation should be calculated for all the uses that will reside in that same area after project completion. That results in a realistic assessment of traffic impact.
The current methodology understates traffic growth and that then is perpetuated and magnified in the intersection capacity utilization and LOS analyses resulting in under predicted traffic impacts.

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

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

DEIR Figure 4 shows the new traffic generated by the project allocated to this intersection. There is a significant amount of traffic going down Portofino Way from southbound Harbor Drive and westbound Beryl. Yet despite 6x the growth in harbor development, the new parking structure and the new boat ramp, not a single new vehicle trip turns into Portofino Way from northbound Harbor Drive. From this assessment, reconnecting Harbor Drive to Torrance Blvd appears to have little utility from a project. Likewise, only 66 additional vehicle proceed straight through the intersection toward the pier. This does not seem to justify the great expense and unavoidable impacts of the new Pacific Ave reconnection.

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

This conclusion is further substantiated by comparing the westward traffic counts of Beryl at Harbor. Although the Harbor area has 6x the growth, the total west flow for all movements only goes up by 4 vehicles. Examining the turn movements shows a dramatic drop in the northbound turns from Beryl. And this drop is offset by a dramatic rise in through traffic from south to north through the intersection. At the same time the turn traffic into Portofino way represent no gain from current turn traffic, just 11 vehicle. Again, analysis shows that the new connection primarily serves through traffic.

The reconnection of Harbor to Torrance has just made the harbor a new arterial south. This negatively impacts recreational uses of the harbor by impact access.
Again, the minor benefit (66 cars) to the project does not justify the dramatic increase in harbor area traffic and the significant and unavoidable noise impacts to Basin 3, Hotel guests and the boaters in Basin 3.

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

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

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

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

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

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

Figure 38: Circulation Element traffic analysis shows much greater impacts

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

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

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

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

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

**The reconnection may actually impede response time.** The new Pacific Avenue does not appear to have any shoulder. And it has no center turn lane. It is often bounded by development and walls on both sides. With heavy through traffic in both sides.

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30 Measure G Supplemental Ballot Information, City of Redondo Beach; November 2, 2010
directions and a stop sign and a bike path crossing at each end, emergency response trying to use this route could easily be stuck while the traffic clears. There is no way to use a center turn lane to split the traffic, a shoulder for drivers to pull over, and no way to turn around or exit the narrow roadway once you are in it.

8. Biological Impacts

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

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

Tree trimming troubles

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

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

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

Elizabeth Courtenay
Manhattan Beach

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

9. DEIR Alternatives Assessment

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

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

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

Waterfront revitalization and increased revenue streams for the city can be accomplished without overdeveloping this relatively small area of the Redondo waterfront. Infrastructure maintenance and refurbishment funding tools and mechanisms have not been fully explored and vetted. Combining smaller changes over a broader area can accomplish the same objectives without the negative impacts and risk on our harbor and its coastal dependent uses.

10. Summary, Recommendations, and Conclusions

10.1. Summary
The analysis of the DEIR reveals the following:

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

10.2. Recommended Alternatives
This project is broken. The city and developer are trying to pack too much development into too small a site. When the impacts are reasonably evaluated, it becomes obvious.
With the AES site available for redevelopment and the lease renewal for King Harbor Marina nearing, an integrated plan for the entire waterfront should be developed including the entire harbor and pier area, the AES property, the power line right of way, and properties bordering AES and the right of way (the dirt farm, bank, mini storage, etc.)

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

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

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

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

- The project definition is not mature enough for a Project Level DEIR
- The DEIR shows obvious bias toward the development
- The DEIR analysis is significantly flawed and much of it needs to be reaccomplished with better project maturity and definition
- The proposed project violates the Coastal Act and Redondo General Plan and Local Coastal Program
- The project represents significant impacts to existing coastal dependent recreational and commercial uses of the harbor
- The project represents megalithic development on the waterfront. The harbor takes an unfair brunt of the development as the development is increased by 1000%
- The reconnection of Torrance Blvd and Harbor Drive primarily serves through traffic while causing unavoidable and significant noise impacts to existing residential development, hotel guests and boaters in Basin 3.
- The proposed land swap with the State Lands Commission is not in the best interest of the People of California
- The project and the alternatives prioritize commercial development at the expense of existing coastal dependent recreational and commercial uses of the harbor

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

This would allow the opportunity to define an outcome that achieves the city’s revenue goals while distributing impacts so that the coastal dependent uses are not unduly absorbing the substantial impacts of the final project(s).
APPENDIX A: CITY RESPONSE TO SEASIDE LAGOON PUBLIC RECORDS REQUEST
Public Records Request – Case # 24631
1) Seaside Lagoon visitors broken out by day for the 2015 season.
Response: The City maintains weekly totals for Seaside Lagoon attendance. Attendance for summer 2015 is attached.

2) Does the number provided in the response below include special events, private events, and kid’s camps?
Response: Attendance figures for Breakwater Camp at Seaside Lagoon or special and private events are not included in the attendance figure #1. The attendance for 2015 Camp is attached. Attendance figures are not recorded for special or private events at Seaside Lagoon.

3) Please provide a list of the special events, public and private, and kid’s camps held at the Seaside Lagoon for the 2015 season. Please provide the specific number for each event and if that is not available, an estimate. Also state whether the numbers provided in this answer are included in the total provided in the response below.
Response: Attached is the report on 2015 special and private events at Seaside Lagoon. Attendance figures are not recorded or estimated.
### Seaside Lagoon
**Weekly Attendance Report**
*Summer 2015*

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## Registration Summary Report

**Printed: 17 Dec 2015, 04:01 PM**  
**User: ccss**

Activity: Breakwater Day Camp  
Registrations, and Withdrawals, and Transfer In, and Transfer Out, and Cancellations

Session: 2015 Spring Registration Session  
Courses Suppressed: Yes

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### Facility Usage Report

**Booking Types:** Rentals|QuickRez|Courses|Maint|Admin|Holiday

**Include Subfacilities:** Yes

**Date from:** Thursday, January 01, 2015
**Date to:** Thursday, December 31, 2015

**Facility:** Luau Shelter
**Facility Option:** Facility

**Complex:** Seaside Lagoon
**Rental Status:** Closed/Firm/Tentative

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APPENDIX B: DEIR Water Quality Responses from City of Redondo Beach
December 14th 2015

SENT VIA EMAIL: jim.light1@verizon.net

Dear Mr. Light:

Further to your request of December 10th, 2015, please be advised of the following:

Request #1: Are the results you sent me the ones referred to in the DEIR? If not please send those results including location and dates.

Response: Per our Engineering Department, the results we sent are the water quality samples referred to in the DEIR.

We find this fulfills your request. Please contact our office at (310) 318-0656 with any further questions.

Thank you,

Khatirah Nazif
December 10th 2015

SENT VIA EMAIL: jim.light1@verizon.net

Dear Mr. Light:

Further to your request of November 30th, 2015, please be advised of the following:

Request #1: I request harbor water quality data for the past three years. I am asking for any data about sampling in the harbor including dates and locations of the samples.

Response: Per our Engineering Department, please see attached water quality monitoring data for site SMB 6-2 with sampling result unit and the sampling location map.

We find this fulfills your request. Please contact our office at (310) 318-0656 with any further questions.

Thank you,

Khatirah Nazif
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Appendix C: City Public Records Act Response to Harbor Village Traffic Analysis

Lupe Cazares
To: James Light  Cc: Khatra Nazif, Eleanor Manzano
RE: Redondo Beach - Customer Service Center case number 24636

Mr. Light,

Please see below the response from the Community Development Department:

Traffic consulting services were initiated for the AES Harbor Village project but not completed as this project failed. No preliminary draft traffic information was retained by the City for this project.

Thank you,

Lupe Cazares

From: Jim Light [mailto:jim.light1@verizon.net]
Sent: Wednesday, December 23, 2015 9:39 AM
To: Lupe Cazares <Lupe.Cazares@redondo.org>
Cc: Khatra Nazif <Khatra.Nazif@redondo.org>; Eleanor Manzano <Eleanor.Manzano@redondo.org>
Subject: Re: Redondo Beach - Customer Service Center case number 24636

Thank you for the response. The contract with CDM Smith was modified to require the generation of the requested data. If the contract was subsequently modified to delete this requirement, I request the documentation of this contract change.

Jim Light
Appendix D: City Public Records Act Response regarding Seaside Lagoon Park

December 22, 2015

SENT VIA EMAIL: jim.light1@verizon.net

Dear Mr. Light:

Further to your request of December 15, 2015, please be advised of the following:

Request #1: “Per the California Public Records Act, I request the following follow up information to the response below:”

1. 1) Seaside Lagoon visitors broken out by day for the 2015 season.

2. 2) Does the number provided in the response below include special events, private events, and kid's camps?

3. 3) Please provide a list of the special events, public and private, and kid's camps held at the Seaside Lagoon for the 2015 season. Please provide the specific number for each event and if that is not available, an estimate. Also state whether the numbers provided in this answer are
included in the total provided in the response below.

4. 4) Please provide the acreage of the Seaside Lagoon in the Waterfront Project DEIR that is free from any new development. Please provide that number at high Måle, medium Måle and low Måle.

Response: Per our Community Services Department, Responses to items 1, 2, & 3 are attached in a single .pdf file.

For item 4: We anticipate more Måle is needed. Accordingly, pursuant to Government Code Section 6253(c), the City of Redondo Beach is requesting an additional fourteen (14) days.

Please contact our office at (310) 318-0656 with any further questions.
Thank you,
Lupe Cazares
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# Seaside Lagoon
## Weekly Attendance Report
### Summer 2015

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### Registration Summary Report

**Activity:** Breakwater Day Camp  
**Registrations, and Withdrawals, and Transfer In, and Transfer Out, and Cancellations**  
**Session:** 2015 Spring Registration Session  
**Courses Suppressed:** Yes  
**User:** ccass

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<th># W/D</th>
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### Facility Usage Report

**Printed:** 22 Dec 2015, 10:19 AM  
**User:** coseas

**Booking Types:** Rentals/QuickRez/Courses/Maint/Admin/Holidays  
**Include Subfacilities:** Yes  
**Date from:** Thursday, January 01, 2015  
**Date to:** Thursday, December 31, 2015  
**Complex:** Seaside Lagoon  
**Rental Status:** Closed/Firm/Tentative

#### Complex: Seaside Lagoon

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| Report Totals: | 473:29 | $59,685.35 | $2,796.73 | $62,482.08 |
January 7, 2016

SENT VIA EMAIL: jim.light1@verizon.net

Dear Mr. Light:

Further to your request of December 15, 2015, please be advised of the following:

Request #1: “Per the California Public Records Act, I request the following follow up information to the response below:”

1. 1) Seaside Lagoon visitors broken out by day for the 2015 season.

2. 2) Does the number provided in the response below include special events, private events, and kid's camps?

3. 3) Please provide a list of the special events, public and private, and kid's camps held at the Seaside Lagoon for the 2015 season. Please provide the specific number for each event and if that is not available, an estimate. Also state whether the numbers provided in this answer are included in the total provided in the response below.

4. 4) Please provide the acreage of the Seaside Lagoon in the Waterfront Project DEIR that is free from any new development.
Please provide that number at high Mde, medium Mde and low Mde.

Response 1-3: Per our Community Services Department, Responses to items 1, 2, & 3 were sent to you on December 22, 2015.

Response 4: Per our Community Development Department, Some preliminary-draft investigations concerning acreages for the Seaside Lagoon were considered but not ultimately completed nor retained. The City does not have records of the requested information. It is anticipated that subsequent specific development plans would include acreage details of the Seaside Lagoon.

We find this fulfills your request. Please contact our office at (310) 318-0656 with any further questions.

Thank you, Lupe Cazares
Appendix E: Referenced Documents Provided Separately

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

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

1. It seems very likely that building heights of 44-66 feet will block our view of the ocean.
2. Having Pacific go through will undoubtedly increase long-term traffic (and thus noise) on that street. Our condo directly faces Pacific.
3. I was not convinced by the discussion that opening the Seaside Lagoon won't result in more pollution.
4. As to a matter apparently not in the report, but mentioned by numerous speakers, it seems to me to be ill-conceived in economic terms. The fifth biggest shopping center in America is about 2 miles away. What major tenants will want to locate in this project and not in Del Amo and if already in Del Amo will want another outlet in this project? Which shopper will come here instead of there?

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

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

Sincerely,

Alan Hammer
Hi Katie,

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

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

Sincerely,
Matt Marble
Hello Katie Owston,

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

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

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

--

Charlie Trujillo
Development Associate
Peninsula Friends of the Library

Office: 310.377-9584 x250
Direct: 310.921.7503
Email: atrujillo@pvldfriends.org
Website: www.pvldfriends.org

701 Silver Spur Road
Rolling Hills Estates, CA 90274

Mailing Address
P. O. Box 2361
Palos Verdes Peninsula, CA 90274
Hi Katie,

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

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

We do not need a mall in paradise. Right?

Best from the big Redondo Beach Pier,

Luis Vasquez-Ajmac
Save the Pier

Wayne Toddun <wayne@2talk.com>

Tue 1/19/2016 10:18 AM

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

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

Thanks, Wayne.

--
Wayne Toddun
2talk LLC
121 W Torrance Blvd. | Suite 201
Redondo Beach, CA 90277
Email: wayne@2talk.com
Direct: 310-634-1777
Mobile: 310-406-5498
Waterfront DEIR

Jessica Travis <jmtravis87@gmail.com>

Tue 1/19/2016 10:28 AM

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

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

Jessica Travis
2706 Ruhland Ave #1
Redondo Beach, CA 90278
Draft EIR submission

Melanie Cohen <dolfanmeli@yahoo.com>

Tue 1/19/2016 10:32 AM

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

1 attachment
DEIR letter SBPC for RB Pier Jan 2016.docx;

Please acknowledge this submission. Thank you

Melanie Cohen
Comments:

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

*per Federal and Trust for Public Land recommendations

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

1) Land Use/Planning: The plan does not give any information on what would be considered publicly delineated space for physical activities such as walking, running, gathering, sitting, biking. Will pedestrians and bikers alike to able to access the harbor and adjacent pier areas without restraint? Will there be any accommodation for a public gathering space or park as requested by Redondo Beach residents in the 2005 advisory vote? Will this development adhere to State Lands Commissions rules? How will the California Environmental Quality Act be impacted?
2) **Air Quality**: Based upon the size of the development for the project, up to 12,550 car trips per day could occur. How will this exceed Coastal (CEQA), State, and Federal Air Quality regulations for carbon and ozone emissions? How will this impact residents and visitors alike—especially the very young and old—who are adversely impacted by these gasses? The environmental issues of **Greenhouse Gas Emissions**, **Transportation/Traffic** and **Noise** will also be adversely impacted per this process.

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

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

5) **Aesthetics**: **Views from project would be blocked** from several significant areas: Czelugar Park— from Catalina Avenue West to the current top floor of the Parking structure (See Figures 1-3A)

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

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

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

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

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


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

Respectfully submitted:

Melanie L Cohen- President – South Bay Parkland Conservancy
Comments on Draft EIR

ben sloan <benfsloan@yahoo.com>

Tue 1/19/2016 10:49 AM

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

Ben Sloan
514 N. Helberta Ave., Redondo Beach, 90277

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

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

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

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

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

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

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

7. Greenhouse Gases GHG-1 and GHG-2. Again, a simple "not significant" to the answer of a highly technical question. It seems to me the proposal is to add restaurants, hotels, theaters and shops. Each and every one of these will need to consume natural gas for cooking and heating. There is no accounting for how much additional CO and Co2 will be admitted. This is highly unprofessional to simply state that its not significant. Maybe they will all be using electricity or renewable recourses. We don’t know because this Draft EIR simply passes it off as not a problem.
8. There are numerous references to the existing square footage of development from MeasureG and an entire Appendix which shows and lists each building and shed. However, there is a proposal to add a large amount of additional square footage but not one list or scaled drawing that shows what building is where or how tall it will be. How are we supposed to really evaluate all of this if there are no details?
Redondo Waterfront

tom@rivierawm.com

Tue 1/19/2016 10:50 AM

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

I support the proposed Redondo Waterfront project.

Here’s my observations as a long-time resident.

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

I would consider the following:

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

Thankyou.....

- Thomas A Gray

Thomas A. Gray, MBA
Financial Advisor
Riviera Wealth Management
322 Vista Del Mar
Redondo Beach, CA 90277
310-375-1300 x 15
310-375-1391 Fax
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This email may be an advertisement or solicitation for products and services.
Sierra Club Comments on the Waterfront Draft Environmental Impact Report

E Cicoria <cicoriae@aol.com>

Tue 1/19/2016 10:54 AM

To: Katie Owston <Katie.Owston@redondo.org>
Cc: alsattler@igc.org <alsattler@igc.org>

1 attachment
SierraClubCommentsWaterfrontDEIR.pdf;

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

Eva Cicoria
Conservation Chair
Palos Verdes-South Bay Regional Group
Sierra Club
January 19, 2016

Ms. Katie Owston, Project Planner
Planning Division
415 Diamond St.
Redondo Beach, CA 90277
katie.owston@redondo.org

Re: The Waterfront Draft Environmental Impact Report (DEIR)

Dear Ms. Owston,

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

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

Project Description

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

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

Aesthetic and Visual Resources

“An EIR is an informational document which will inform public agency decision makers and the public generally of the significant environmental effect of a project.” CEQA Guidelines, § 15121(a). The purpose of informing public agency decision makers and the public is not served if a DEIR or EIR analysis reflects bias or seeks to put conditions in the most favorable light to the exclusion of other information.
The DEIR analysis of aesthetic and visual resources is patently developer-biased in the choice of views used to analyze potential view impacts and in the apparent preference for buildings over open vistas along the coastline. Views of the water from all public places in Redondo Beach must be evaluated in the DEIR. These include, but are not limited to, views from Diamond, Beryl, Herondo/Anita, and Catalina streets, and Veterans Park, none of which were considered.

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

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

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

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

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

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

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

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

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

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

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

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

Czuleger Park

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

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

Recreation Resources

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

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

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

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

Seaside Lagoon

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

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

Bicycle Paths and Bikeways

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

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

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

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

**Open Space**

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

**Traffic and Transportation**

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

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

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

**Land Use and Planning**

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

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

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

**California State Lands Commission**

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

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

Summary

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

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

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

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

Sincerely,

Eva Cicoria
Conservation Chair
Palos Verdes-South Bay Group
Sierra Club

Al Sattler
Chair
Palos Verdes-South Bay Group
Sierra Club
January 14, 2016

Via electronic mail

Katie Owston
Project Planner
Community Development Department
415 Diamond Street
Redondo Beach, CA 90277

Re: The Waterfront Redevelopment Project Draft Environmental Impact Report

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

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

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

If you have any questions or concerns please feel free to call me at (213) 481-8530 Ext. 350 or email me at aweyman@unitehere11.org.

Sincerely,

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

Thank You

Walt Meadows
Fw: Response to the Waterfront DEIR

Delia Vechi <pelu1917@yahoo.com>

Tue 1/19/2016 11:30 AM

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

2 attachments

DEIR my COMM FINAL to city 011916.docx; DEIR my COMM FINAL to city 011916.pdf;

Dear Katie:
Please, I would appreciate that acknowledge me that you have received my concerns about the Waterfront DEIR.
Thank you again,
Delia A. Vechi

On Tuesday, January 19, 2016 11:19 AM, Delia Vechi <pelu1917@yahoo.com> wrote:

January 19, 2016

Katie Owston, Project Planner
Planning Division
Redondo Beach, CA

Dear Ms. Owston:

Please attached you find my concerns regarding some of the issues discussed in the Waterfront DEIR.

Thank you for your attention to this matter.
Sincerely,

Delia A. Vechi
District 2

PS: Attached is also a PDF version

Cc: A. Jones
January 19, 2016

Delia A. Vechi – District 2

MY FINDINGS * QUESTIONS TO THE WATERFRONT DEIR

ES.8  PUBLIC COMMENTS

ES.1  Issued Raised

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

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

TRAFFIC AND TRANSPORTATION

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

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

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

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

AES - Proposed project

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

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

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

HYDROLOGY AND WATER QUALITY

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

The DEIR conclusion is that the “impact determination is significant”. The aggravation is that after the entire list of the Mitigation Measures, the impact still is “significant and unavoidable-operation (tsunami)”. I have been an eye witness of many natural disasters that have not been mentioned in the DEIR which have taken place in our Waterfront. I can mention few examples of those calamities concentrating only in the following: liquefaction, high tides, storm surges and flood:

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

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

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

2014 * Storm destroyed Redondo Boardwalk.

JANUARY 2016 * El Nino struck again with heavy waves and some damages occurred.
Why are these documented natural phenomena not mentioned in the DEIR when they are a matter of Public Record in recent times, especially when the damages from them are known?

Those are the consequence of the climate change.

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

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

Send the proposed project back to the drawing board.

Delia A. Vechi – District 2
Draft Environmental Impact Report Response

Laura Zahn <myhomecastle@yahoo.com>

Tue 1/19/2016 11:39 AM

TO: Katie Owston <Katie.Owston@redondo.org>

CC: Laura Zahn <myhomecastle@yahoo.com>

1 attachment

PRC 6307.docx

TO: Katie Owston, Project Planner, City of Redondo Beach

FROM: Laura D. Zahn (born and raised in Redondo Beach at 2308 Grant Avenue) now at 2315 Huntington Lane, Redondo Beach, 90278 myhomecastle@yahoo.com

Please find attached a response to the DEIR report
LAND EXCHANGE OR LAND LOST?

California Public Resources Code – PRC Section 6307

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

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

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

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

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

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

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

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

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

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

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

AS STATED IN (4) THE TIDELANDS ARE ANYTHING BUT USELESS. IN FACT THEY PROVIDE EXACTELY WHAT THE PURPOSE OF THE PUBLIC TRUST WAS CREATED FOR TO; KEEP THESE LANDS TO BE FOREVER HELD BY SAID CITY, AND BY ITS SUCCESSORS, IN TRUST FOR THE USES AND PURPOSES, AND UPON THE EXPRESS CONDITIONS...SOLELY FOR THE ESTABLISHMENT, IMPROVEMENT AND CONDUCT OF A HAROR...PROTECTION OF LANDS...CONSTRUCTION OF WHARVES, DOCKS, PIERS, SLIPS...NECESSARY FOR THE PROMOTION OR ACCOMODATION OF COMMERCE AND NAVIGATION.

AS IT IS NOW, THE LAND SHALL ALWAYS REMAIN A PUBLIC HARBOR FOR ALL PURPOSES OF COMMERCE AND NAVIGATION. TO GO ON... IN THE MANAGEMENT, CONDUCT OR OPERATION OF SAID HARBOR, OR ANY OF THE UTILITIES, STRUCTURES OR APPLIANCES MENTIONED IN (A), NO DISCRIMINATION IN RATES, TOLLS, OR CHARGES, OR IN FACILITIES, FOR ANY USE OR SERVICE IN CONNECTION THEREWITH SHALL EVER BE MADE, AUTHORISED OR PERMITTED BY SAID CITY OR BY ITS SUCCESSORS. THE ABSOLUTE RIGHT TO FISH IN THE WATERS OF SAID HARBOR, WITH THE RIGHT OF CONVENIENT ACCESS TO SAID WATERS OVER SAID LANDS FOR SAID PURPOSE, IS HEREBY RESERVED TO THE PEOPLE OF THE STATE OF CALIFORNIA.

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

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

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

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

IF THIS EXCHANGE GOES THROUGH, THE STATE WILL NOW HAVE CONTROL OVER BASIN 3 BECAUSE IT WILL NOW BE PUBLIC TRUST LANDS. WHO IS TO SAY THAT LATER ON DOWN THE ROAD SOME OTHER DEVELOPER FROM SOME OTHER LOCATION IN THE STATE OF CALIFORNIA DOES NOT WANT TO “EXCHANGE” BASIN 3 FOR SOME OTHER LAND ELSEWHERE IN THE STATE. THIS WOULD THEN ALLOW THAT NEW DEVELOPER TO MAKE ANY CHANGES THEY SO CHOOSE TO BASIN 3.
(c) An exchange made by the commission pursuant to subdivision (a) shall be for one or more of the following purposes, as determined by the commission:

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

(1) To improve navigation or waterways.

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

(2) To aid in reclamation or flood control.

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

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

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

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

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

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

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

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

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

LAURA D. ZAHN BORN AND RAISED IN REDONDO BEACH  myhomecastle@yahoo.com
2315 Huntington Lane Redondo Beach, CA 90278
Dear Ms. Owston:

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

NO
3-story 1.43 acre parking structure
reduction/relocation of Seaside Lagoon
Boutique Hotel
Vehicle Through-Way
Pedestrian Draw-Bridge
Loss of Boat Slips
Loss of Boat Trailer Parking
Movie Theater
2-Football Field Sized "Open-Air Markets"
City Funding to remove existing parking structure
R.B. City Motto: More to Sea Not More to Shop

YES
live with more open space along our waterfront
reduce carbon footprint of concrete, cars, congestion
keep our existing boat slips and boat trailer parking
keep more small, independent stores and shops in tow
keep the saltwater lagoon affordable for everyone to enjoy
offer space for more festivals/fairs/food trucks
>
Traffic congestion
>
-- The proposed building of hotel(s), cinema, boutiques, and new restaurants will aggravate an already-existing traffic congestion. A traffic study which would show the traffic patterns for the last ten years would at least provide an overview of the actual increase of traffic due to property development in the area and its most adjacent proximities. Re-connection to Pacific Avenue will do very little to mitigate the negative impact of traffic

https://mail.redondo.org/owa/#/viewmodel=ReadMessageItem&ItemID=AAMkADB1YWUxNjliLWExYzltNDFlNi1hMTQxLTVIM2RkOTi5Yzg4NQBgAAAAA...
congestion.

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

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

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

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

> Sincerely,

> MYRNA MENDOZA
> 26151/2 Carnegie Lane
> Redondo Beach, CA 90278
> kerani510@yahoo.com

}<re:fw: draft of e-mail: waterfront (eir) - katie owston>
Hello,

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

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

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

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

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

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

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

Thank You,

Kaye Gagnon

717 Opal Street, Redondo Beach, CA 90277

Note: resent with proper subject line content
Comments in regard to EIR

Barbara Best <bbwyre@sbcglobal.net>  
Tue 1/19/2016 12:25 PM

To: Katie Owston <Katie.Owston@redondo.org>;  
Cc: Barbara Best <bbwyre@sbcglobal.net>; John Lubratich <johnml52@gmail.com>;

Dear Ms. Owston:

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

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

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

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

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

Sincerely,

Barbara Best and John Lubratich  
150 The Village  
Unit 2  
Redondo Beach, CA. 90277  
(408) 398-2625

Sent from my iPad
Dear Ms. Owston and City Councilmember,

Attached are my comments regarding the Waterfront DEIR.

Thank you,
John Eng
January 19, 2016

Submitted by email
Katie Owston, Project Planner
Planning Division
415 Diamond Street
Redondo Beach, CA 90277
katie.owston@redondo.org

Dear Ms. Owston:

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

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

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

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

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

Thank you,
John Eng
Author, Photographer - *Southern California Eats*
17125 Lisette St
Granada Hills, CA 91344

cc: Christian Horvath, City Councilmembers, City of Redondo Beach
Hello,

I am writing to request that sport fishing is retained as part of the new waterfront development in Redondo Beach. I grew up fishing on sport boats operating out of Redondo Beach, and the fishing operation in Redondo has been a large part of the community for generations. Access to the ocean and its resources is an integral part of life in southern California and Redondo Beach has historically been critical in providing this access for many people in the South Bay. Please keep sport fishing in Redondo Beach!

Best regards,

Jonathan Marquit
Hello Katie,

My Name is Moses Ramler, I am the President of Lanakila Outrigger Canoe Club Located on Mole B near the Harbor Patrol.

I am a Redondo Beach Resident
2102 Speyer Lane
Redondo Beach, CA 90278

Here are our comments of the Draft EIR

Lanakila Outrigger Canoe Club is located on Mole B, which is not mentioned when discussing leaseholders of Mole B. Since we are located on Mole B and launch directly in the main channel we have concerns about the alternative location of a boat ramp being placed on Mole A.

We support the proposed project listed under 4.3 of the Chapter 4 in the DEIR which places a boat ramp in the south turning basin on Mole C near Seaside Lagoon. We object to the alternative plan and all options of placing the boat ramp on Mole A. The DEIR seems to exclude certain factors when considering safety and waterside traffic measures for the Mole A alternative.

As documented on 4-17 - BIO 3 - the need to mitigate surge and swell impact at Mole C would require an additional wall for mitigation of swell and surge during 20 or 100 year events, however there is no mention of additional mitigation measures for the Mole A location. As recently as 1-7-16 documented by video and distributed via youtube El Nino waves near King Harbor Yacht Club. As you can see in the video below swell and water surge can present a dangerous safety issue if proper mitigation is not accounted for.

https://www.youtube.com/watch?v=1yYbA080dC8

There is a need for additional mitigation analysis to be consistent with measurements for both Mole A and Mole C. However because no mitigation is included in Mole A the BIO - 3 measurement is skewed and adversely affects the original plan of placing a boat ramp on Mole C. Reflected by page 4-340 - Mole C figures represent mitigation where Mole A all options reflect no mitigation. This needs to be addressed and corrected to be fair to both locations.

As documented on 4-18 Impact TRA - 3 - it show Mole A has the least amount of traffic with a L score and the original proposal for Mole C has a M score. This may be somewhat true for landside traffic but is absolutely incorrect for waterside traffic. Mole A and Mole B have the highest amount of waterside traffic in the entire harbor. There are two glaring issues, there is not much relevant data to support water traffic numbers in the area of Mole A and Mole B and there is not account for the landside traffic access to Mole A which is narrow.

The water traffic is much more significant in this area of the harbor and has dangerous potential with increased congestion of a boat ramp. During the summer months at peak levels of waterside traffic the location of a boat ramp is much better suited in the south turning basin near Mole C versus Mole A. This is an additional safety issue which is not addressed.

Section 4.4.8.1 on Page 4.295 "Landside constraints include providing adequate vehicle access and parking, including vessel loading and off-loading and trailer turnaround. Water side constraints include adequate space for the ramp and vessel maneuvering
navigational safety, and wave and surge exposure.*

Mole C is the best location to meet these needs. Alternative site options for Mole A do not give adequate landside access which is not mentioned in the report and have significant wave and surge exposure for Waterside traffic. Access to Mole A is narrow and expansion of the roadway would be costly and difficult. This would increase the BIO-3 measurements if expansion was considered.

Maneuvering and navigation is also congested with youth sailing, KHYC, all boating traffic between Mole A and B as well as SUP craft from Tarzan launch and outrigger traffic off of Mole B. The main Channel is now also congested with mooring which narrow the main channel. The alternative location for Mole A has seemed to exclude these traffic and safety concerns.

As listed on table 4-84 page 4-429 under traffic Impact TRA-3 Mole A all options show best results at -3 score and Mole C measures at -1 score. Exclusion of waterside data in the northern area of the harbor as well as exclusion of access to Mole A skew the scoring. This data should be assessed and corrected as the South turning basin has much lower water traffic and is located out of the main channel. Mole C by the DEIR quoted language from section 4.4.8.1 would be the best and safest option for landside and waterside traffic.

Although Lanakila Supports aspects of the original project design, specifically the location of the Boat ramp at Mole C, it opposes the alternative boat ramp location of Mole A for all options. This is due to oversight of safety, waterside and landside traffic issues which present themselves at this location.

Best regards,
Moses Ramler
President - Lanakila Outrigger Canoe Club
310-489-1830
Proposed Redondo Beach Waterfront Development

Gigi Frampton <gframpton@foss.com>

Tue 1/19/2016 1:35 PM

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

Katie,

Good afternoon:

Here is my comments and concerns for the proposed development for the Redondo Beach Waterfront project.

Will there still be a hoist and forklift for commercial operations that are currently operating in Basin 3? These are essential to our operation as we support the Tankers and Chevron operations at the El Segundo Marine Terminal.

Will there be any type of storage for businesses?

Bridge – We are a 24/7 operation that must be able to fulfill our support role to Chevron and the El Segundo Marine Terminal. We cannot be hindered by a mechanical bridge that at some point will fail. Is there a backup plan for when it fails? Power outage?

Proposed slips – In front of South Bay Sailing. Not the best place to put slips due to the surge and the amount of assorted vessel traffic in the harbor.

Sport fishing Pier – This is vital to the sport fishing operation and to the history of Redondo Beach. People have been coming to Redondo to go fishing and enjoy the “destination” for approximately 100 years.

While I have been in the marine industry since the 60’s the current state of the Redondo Beach pier, International Boardwalk is depressing. I do remember Santa Monica pier, POP and Redondo were a place to go fishing, surfing, take in some rides and enjoy family life, etc..

Would like to see the overall footprint be smaller than is currently proposed. While I realize there will be shopping, dining and some activities of various types, would like to see a good mix of maritime and family activities.

Regards,

Gigi Frampton / Port Captain PAL/ El Segundo

https://mail.redondo.org/owa/#viewmodel=ReadMessageItem&ItemID=AAMkADBiYWUxNjliLWExYzMtNDFhNi1hMTQxLTVM2RkOTI5YzQ4NQBGAAAAA…
gframpton@foss.com
Foss Maritime Company
161 N. Harbor Drive, Redondo Beach, CA 90277
Cell 562-666-5196
www.foss.com
Hi Katie,
Attached are my comments. Can you please let me know that you received this and have no issues with the attached file.
Thanks!
Julie

Julie Coll
Founder/Executive Director

Waterfront Education - WEgoH2O
"Programs that Enthuse and Inspire"
waterfronteducation.org
WEgoH2O.org
cell 818 268 4740
Comments from Julie Coll, founder and Executive Director of King Harbor Boating Foundation dba Waterfront Education. In response to the recent DEIR for the CenterCal project and King Harbor I have the following thoughts and concerns.

**Mole A.** I am a sailboat owner and avid racer. My boat is in dry storage and goes in and out of the water 2-3 times a week on Mole A from April through September. In the other months it averages about once a week. I am very familiar with the tides, surges, storm issues and water traffic patterns in this area. Placing a boat ramp on this mole is a bad idea for many reasons.

1. **Safety.** We get many storms that generate huge waves that crash over the break wall. Even medium storms generate life threatening situations with people climbing on the break wall. As the ocean gets warmer the water is expanding and raising the levels. Huge waves over the break wall will increase with rising ocean levels and greater tides. USC has a Citizen Science Initiative studying this very topic. More information can be found at the following: http://dornsife.usc.edu/uscsceagrant/urban-tides-initiative/

2. **Water side traffic.** In the DEIR it states “Location of a launch ramp on Mole A is considered to not have significant impact on existing harbor traffic since the site is located near the end of the main navigation channel where traffic volume in lowest”. This is actually a false statement written by individuals unfamiliar with our local water traffic. The north part of the channel is actually the busiest part of the harbor. It is also narrow with a blind corner out of basin 1 into the main channel. The King Harbor Youth Foundation and the Sea Scouts run programs in this part of the channel. In addition, King Harbor Yacht Club and Redondo Beach Yacht Club have boaters that race on Tuesday and Thursday nights and most week-ends that utilize the north part of the channel from early spring until late fall. Also Tarsan paddle boarders enter the main channel in this north area. This does not even take into account the many visiting yachts that are guests to the harbor and stay on the docks located in this area.

3. **Land side traffic.** I am in the harbor almost every day. I enter from 190th/Herondo. There are frequent back-ups to PCH since the road way was reduced from two lanes down to the current one with parking. The left turn on to Harbor Drive is better. The turn from Harbor drive to Yacht club way is a night mare. It is the only traffic light along Harbor Drive where the bikers and the cars are both green at the same time. In addition cars are not allowed to turn right on red. The back-ups are terrible and frequent. The bikes tend to ignore the signals anyway. This is a tight difficult turn for cars let alone a truck and a trailer. There are several tight turns as you navigate through to Mole A including the “S” turn. The is barely room for two cars along the road and at times after a big storm there is only room for one with the sand that covers the road. I don’t see how it is possible to widen the road in this area to accommodate a queuing lane for a boat ramp. You have marina slips on one side and the break wall on the other.
The Sport Fishing Pier needs to be a part of the redevelopment plan. Our most popular class, Fishing and Gross Morphology, takes place several times a week on this pier. We throw birthday parties here as well. For the kids, fishing is often their first interaction with the ocean. The rocks provide food for the fish unlike the larger pier. In addition, with our harbor being a shallow one, there is a need for a dock to bring in the larger vessels such as whale watching boats and tall ships. The last time our organization brought in a tall ship over 700 people attended from as far away as Westlake Village, Santa Clarita and San Bernardino. These larger vessels are the way that non-swimmers interact with the ocean. Having a dock that can accommodate a variety of large visiting vessels is an important way to draw interest to the waterfront on an ongoing basis. A new Sport Fishing Pier could be a clean, safe and integral part of the overall project.

The DEIR sections that talk about soft vs. hard harbor bottoms are in general true but not in our harbor. Our Marine Exploration class takes place out on the water several times a week and studies the many creatures and plant life in our harbor. We have some small invertebrates like sea urchins and sea slugs. Very occasionally we will see a sea star or octopus. We don’t have eelgrass in our harbor, we have kelp.

In conclusion, I am in support of the CenterCal project in general provided that public access to the ocean is not reduced and is incorporated. The south turning basin is a great location for a boat ramp with its quick access to the ocean. It is very wide in this area. In Marina del Rey where there is a super long channel out to the ocean I have seen many unsafe boating practices as various water craft attempt to share the water. The sooner we can get visiting boaters out to the ocean the safer it will be.

We have an opportunity for an “education destination” and to create a unique experience for visitors similar to other locations such as Dana Point. I think it is critical that those that experience the ocean from land and those that experience it on the water come together as one community. Past projects where boaters have not been integral in the planning process have resulted in poor results and wasted tax dollars...for example the mooring balls which sit unused and not maintained.

I think it is critical to include public storage and access for stand up paddle boards, kayaks and small sailing and boating craft. We need dock space for this beyond a mother’s beach. These vessels are a key gate way for initial ocean access and creating a harbor habit. The price point for these types of vessels is lower and usually leads to purchasing of larger boats. Healthy marinas with active boaters are good for the city’s economy since a portion of all monies collected for these services go to the city.

I am not opposed to a mother’s beach if it is designed so that the sea lions cannot access it. The sea lion problem in our harbor is not going away. Although some people consider these animals cute, they are wild, territorial and can be very aggressive. The damage they cause to docks and boats can be seen throughout the harbor.

As a resident of Redono Beach I am excited to see the city and CenterCal create a revitalized waterfront for us all to enjoy. I can be reached at julie.coll@waterfronteducation.org or cell (818) 268-4740.

Respectfully submitted by Julie Coll
Good Afternoon Katie,

I wanted to take a moment to strongly voice my support for the proposed redevelopment of our waterfront. The current state of our harbor area is shameful and dangerous, nothing short of a major redevelopment will fix that. It's time to move forward as a city and CenterCal's vision is better than any alternative I've heard of. As a life long South Bay resident, I look forward to Redondo Beach taking the next step to develop as Manhattan and Hermosa Beaches already have. I look forward to a pier and boardwalk that residents will use, instead of the outdated and dilapidated structure we have now.

I would be interested in an alternative boat ramp location, though as the primary site next to Seaside Lagoon would create significant safety hazards and increase pollution at an already heavily used beach. I also have concerns about the significant traffic issues as Portofino Way is only one lane in each direction, the backup for water crafts waiting to launch would cripple at area. I believe powered watercraft should be kept as far away as possible from unpowered recreational water users.

Thank you,
Rebecca Elder
2614 Robinson Street
Redondo Beach, CA 90278
The unique South Bay quality of life is threatened by overdevelopment, much of it in Redondo. The Centercal Waterfront Project is especially wrong for our area. This will mean the total destruction, forever, of a large portion of our beautiful water front. Structures will block 80% of views along southern Harbor Drive, some up to 45' tall. Already the Shade Hotel has blocked out the sailboat masts that I loved to gaze at as we ride along the bike path. There are predicted to be 12,550 additional car trips per day. This is obscene. Those of us who live in these communities don’t want more and more shoppers and tourists pouring in. We LIVE here. Parking has always been better in RB than in MHB, but now we will have 140% more development, with only 8% more parking. There will be less access for boaters, kayakers, swimmers, SUP’ers.

My children played and had parties had Seaside Lagoon. Now a Seaside Lagoon 1/3 the current size and open to the dirty harbor water is threatening to create even more health hazards.

Give up this primitive American boosterism. It’s not the early 20th century anymore. We know that development doesn’t automatically make for a better world.

Sincerely,
Sally Hayati
Redondo Beach
Polly's on the Pier

CallieOB@aol.com

Tue 1/19/2016 1:53 PM

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

Dear Redondo Beach People,

For years I have been going to Polly's on the Pier, to eat, watch people fish, to enjoy just sitting in the sunshine, and in general, just to hang out at a place that rarely exists anymore. On a monthly basis I would go there with my group of lady friends. We would have breakfast or lunch and sit and talk and talk and talk...and nobody would care if we took our sweet time. At Christmas we would go there and exchange gifts...and we always took some little presents for our dear waitress, Cindy. Terry Turk would often come by and say hello to us 'Lung Ladies' as we would call ourselves. We would have our support group meetings there and it was such a special place to help ourselves feel well. Our little group has kind of disbanded but the memories of all the times we went there are still with us.

I loved to take my grandson, Griffinn, to the pier to 'catch seagulls'. He will never forget fishing on the pier. Every one would be so helpful. We could rent a fishing rod and get some bait...and just enjoy the feeling that you will never forget. The pier and Polly's on the Pier go together like a PB&J.

I'm writing to express my hope that Polly's on the Pier will always have a place on the pier...and I certainly hope that there will always be a Pier.

Thank you for listening.

Marcia Pine
760 360-4888
Good afternoon Ms. Owston,

Please see attached comments from Maryann Guthrie regarding the Waterfront Revitalization Project.

Thank you,
Menchie Ramirez
King Harbor Marina
310.376.6926 x121
Tue-Fri (8am-2pm)
January 12, 2016

Katie Owston, Project Planner
katie.owston@redondo.org
Planning Division
415 Diamond Street
Redondo Beach, CA 90277

Dear Ms. Owston:

Marina Cove Ltd. (MCL), as the Master Lessee, has owned and operated the King Harbor Marina leasehold located within the City of Redondo Beach for the past 45 plus years. Our leasehold consists of approximately 36 acres; twelve (12) acres of land and twenty-four (24) acres of water. It has come to our attention that a portion of our leasehold identified as “Mole A” is being considered as an alternative site for a Small Craft Boat Launch Ramp Facility as part of “The Waterfront Draft Environmental Impact Report” (WDEIR) process.

MCL concurs with the WDEIR determination based on its ranking system that the Mole A Options are the most environmentally superior alternatives for a Small Craft Boat Launch Ramp. The Mole A location studied has been and will continue to be subject to significant ocean swell action topping over the breakwater. It occurs mostly during the winter storm season, causing public safety issues and private property damage which includes the existing yacht club and parking facilities. During these heavy surf events, access to Mole A is usually closed off, even to yacht club members. This includes the launching of boats, especially while small craft warnings have been issued so a ramp at this location would also be closed.

Additionally, we believe the Mole A site and access roadway would provide adequate queuing space for vehicles with trailers waiting to be launched so as not to block the public streets providing access to other facilities. However, if the yacht club remains on Mole A the roadway would need to be modified to allow for continual access to its facilities.

Since Mole A was selected as one of the alternative sites for a Small Craft Boat Launch Ramp, we have worked diligently with a marine engineering firm, the King Harbor Yacht Club (KHYC) and the City of Redondo Beach to consider the feasibility of such a facility along with various complimentary amenities on our leasehold. A conceptual plan representing this effort has been shared with both the City and the KHYC for their consideration.

KHYC is an existing sublessee of MCL which currently occupies the majority of Mole A and operates various programs promoting boating for its members and the public. We have been informed by KHYC that after serious consideration it has determined that a Small Craft Boat Launch Ramp on Mole A would be incompatible with its ongoing operations. Consequently, we studied and concluded that the KHYC facilities (excluding its dry boat storage) could be relocated to Mole B in the event the City of Redondo Beach and California Coastal Commission ultimately determine that the most suitable and beneficial long term solution for locating a new Small Craft Boat Launch Ramp in King Harbor is on Mole A. In this regard, we have formally proposed relocating KHYC to Mole B in order to better accommodate the placement of a Small Craft Boat Launch Ramp on Mole A.

At the present time, MCL is in discussions with the City of Redondo Beach and KHYC to accomplish this transaction.

Sincerely,

Maryann Guthrie
President
MCL Marina Corporation
General Partner, Marina Cove Ltd.

King Harbor Marina
apartments ■ offices ■ boat slips

208 Yacht Club Way . Redondo Beach, CA 90277  www.kingharbor.com  Voice 310.376.6926 . Fax 310.376.9927
EIR Comments

rbwaterfront@aol.com

Tue 1/19/2016 1:59 PM

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

From: JoAnn Turk  
Business and Property Owner in Redondo Beach  
Polly's on the Pier  
216 - 32nd Street, Manhattan Beach, Ca. 90266  
310-545-6204 and 310-863-2976  
Rbwatrerfront@aol.com

Thank you and the City of Redondo Beach for conducting these studies and opening them to the public for comment and discussion. I have worked and volunteered and been involved in the Harbor for 40 years and improvements such as these that are being discussed by the City and CenterCal and Harbor and Pier businesses and the public have been a long time coming and are much needed. I have seen many potential developers come and go in Redondo Beach, but I have never seen a developer of this quality, means and experience get this far. Part of the credit goes to the good officials and management at the City who now have the will to plow forward because they know it's time to do something and they know the infrastructure needs help.

I realize that there are still many moving parts to figuring out this whole puzzle, which I trust will be figured out by some very smart people, so I will limit my comments in this memo to the ones that seem the most important to the waterfront in my eyes.

First of all, I think it is very important that the beloved family-oriented, legacy businesses be saved. The ones I think of off the top of my head are Captain Kidd's and Quality Seafood, Redondo Sport Fishing, Voyager Whalewatching and Boat Rides, Ruby's and Polly's. And the Looking Glass bottom boat and pedal boats. Kayaks and bike rentals.

It is also very important for the future of the harbor that you fix or replace the sportfishing pier. This is a historical icon, an environmentally important piece of the harbor, and represents much needed open space, and it is the soul of the waterfront for many people. It is not enough that the fishing and boating and Polly's get relocated to other areas of the new development. They need to be on that pier.

To remove the sportfishing pier would have a huge negative impact on the environment of Redondo Beach. It is the home to many birds, kids learning to fish, deepsea sportfishing, diners, whalewatchers, bird watchers, and people of all ages seeking a connection with nature. The reason Polly's has been so popular is because it blends into the background and let's nature be the entertainment. There are some pet pelicans that hang out there, a couple of Great Blue Herons, some night herons, seagulls, and many Garibaldi, the state fish, under the pier. There is currently
a program one of our local volunteers is conducting that teaches kids about the environment and to fish. The Cetacean Society in conjunction with Voyager Whalewatching wants to conduct occasional Saturday morning classes on marine mammals and particularly the whale migrations for kids to learn about the ocean and its inhabitants.

The little pier represents access to the water for such a diverse audience. In comparison, for example, the boat ramp that is required to be built by the California Coastal Commission (for several million dollars) will serve around 40 customers/boaters a day. If two or more go out boating, it might be 100 a day.

The sportfishing pier currently serves around 800 to 1000 people a day, on the warm weather days, between the sportfishing, whalewatch, Polly's on the Pier, kids fishing, strollers, and sightseers. It is a favorite for not only the locals who come down on a regular basis, some of them two or three times a week, for 30 or 40 years, but also is a favorite of visitors. They say there is no other place like it in California. I have served on the Visitors Bureau for 20 years, and the current trend is for visitors looking for an "experience." Our visitors say there is no better experience than coming to the sportfishing pier and eating in the outdoors at Polly's. I am meeting a travel writer from Florida Thursday morning for breakfast on the "little" pier. The visitors to Redondo Beach represent a good chunk of money to Redondo Beach through the TOT taxes funded by the hotels. There has to be some "there" there to make this an interesting place for their guests want to come and come back another time.

It would be crazy to remove the sportfishing pier because it represents waterfront square footage. The cost of replacing it is minimal in comparison to the 7,000 square feet located right OVER the water. Buyers currently are paying $15,000,000 for a Strand lot in Manhattan and Hermosa Beach. That is to give pleasure to one family! Compare that to the hundreds of people who enjoy the sportfishing pier!

Simply moving the businesses that exist on the little pier to the waterfront development does not replace the square footage. I have never heard of any municipality or individual REMOVING waterfront square footage. In Dubai, Holland, San Blas Islands, the South China Seas, and many other countries, they are adding soil and making islands to increase square footage. Let's not lose the 7,000 square feet we now have. It is an irreplaceable treasure.

If the sportfishing pier were removed (and it would cost a good sum to remove it too), it will never be rebuilt because of the myriad laws and regulations and the red tape that would be required to build something new.

The pier is also a safety backup for boats coming back to Basin 3 and other parts of the harbor. If some docks were wiped out due to a storm or the new bridge malfunctioned, passengers could be unloaded at the sportfishing pier.

So the key words are Nature -- Waterfront Square Footage -- Access to the water -- Bird and Wildlife habitat -- Families -- Outdoor dining -- Visitors and happy locals. Please save the sportfishing pier!

Respectfully,

JoAnn Turk

on the water!