

CITY OF MANHATTAN BEACH
DOWNTOWN SPECIFIC PLAN
RESPONSES TO COMMENTS ON THE INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

SCH No. 2016081065

Prepared for:

CITY OF MANHATTAN BEACH
1400 HIGHLAND AVENUE
MANHATTAN BEACH, CA 90266

Prepared by:

Michael Baker

INTERNATIONAL

3900 KILROY AIRPORT WAY, SUITE 120
LONG BEACH, CA 90806

OCTOBER 2016

PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES THAT COMMENTED ON THE PROPOSED MITIGATED NEGATIVE DECLARATION

The public review period for the Initial Study and Proposed Mitigated Negative Declaration (MND) for the City of Manhattan Beach Downtown Specific Plan and Local Coastal Program Amendments Project commenced on August 25, 2016, and ended on September 23, 2016. The table below lists the persons, organizations, and public agencies that provided comments to the City of Manhattan Beach on the Proposed MND.

COMMENTERS ON THE PROPOSED MND

Agency, Organization, and/or Person	Date of Letter
Osterhout, Gary	9/23/2016
Quilliam, Jim	9/23/2016
Victor, William	9/23/2016
California Department of Transportation (Caltrans) Watson, Dianna	9/27/2016
California Governor's Office of Planning and Research Morgan, Scott	9/28/2016

COMMENTS AND RESPONSES

The comments and recommendations received on the Proposed MND, along with the lead agency's responses to the environmental points that were raised, are presented herein. All comments on the Proposed MND were submitted in written form and are included in their entirety. Each point raised in these comment letters was assigned a number (e.g., XY-1), as noted on the comment letters included in this section. The lead agency's response to each enumerated comment is provided after the respective comment letter.

Gary Osterhout Letter

From: Gary Osterhout <garyosterhout@verizon.net>

Date: September 23, 2016 at 11:09:30 AM PDT

To: <nmadrid@citymb.info>

Subject: Downtown Specific Plan Commentary

Please accept this commentary on the Downtown Specific Plan.

GO-1

- Overall, anything approved for Downtown M.B. should be focused on residents first, then businesses. Businesses exist by grace of residents. Residents understand the benefits businesses bring and will accommodate, but there is not a co-equal right of existence.
- Investors in Downtown real estate purchased their investment knowing that the development will be controlled, and the development historically has been controlled. In fact, the Metlox development was purchased by the City to control and limit development. The residents of M.B. do not have an obligation to maximize the profit an investor can generate from their business.
- The current downtown is currently generating sufficient tax dollars. In fact, downtown in comparison to our other retail sectors is rather insignificant. Tax dollars should not be a major driver of any downtown decisions or justifications. The Dewitt Petroleum example cited in the Easy Reader is specious--that revenue should never have been mainstreamed into the General Fund due to its uniqueness and tenuous nature. That money just allowed the creation of additional non-critical employee positions that will not be eliminated along with the lost revenue stream.
- The downtown in my mind is not our "commercial center." It is our "civic center." The Metlox Plaza for instance, was billed as our "community living room." To poise downtown as our commercial center allows minimization (and demonization) of our real economic generators. By saying downtown is our "commercial center" is what allows arguments like "we need to minimize parking charges so we can compete with the mall." We then overly-subsidize the downtown both directly and indirectly. And downtown benefits by all the civic center attractions we put downtown (like Joslyn, the library, City Hall) that economically would be better elsewhere in the city.
- The current downtown configuration is currently sufficient to sustain an adequate mix of businesses. Any decline attributed to continuing status quo policies is sheer conjecture. If there is a decline that needs corrected, the city can make any changes necessary at that time. Due to the attraction of the beach any downturn would be short-lived. To change policies that attract more people without demonstrated real need is short-sighted.
- The attraction of our downtown is in our uniqueness as well as the proximity to the beach. Any change toward a more "robust, vibrant" downtown only makes it more like so many other beach towns (i.e., Huntington) that we do not want to be. Once we change away from what we have, we will never be able to change back.
- Any expansion or additional usage decisions should be first weighed against existing parking, with no projections for additional parking. Current proposals seemed designed to attract all the more people into the downtown. The same way colonizing squatters helped to expand the borders of the U.S. two centuries ago, more people downtown without parking or roads to accommodate will only create more stress for more parking and more transportation solutions. I am in favor of a better shuttle system, and elimination of the Ocean Express.
- Employers need to provide better parking or transportation for their employees beyond the issue of incursion into the residential areas. Already too many are monopolizing the free parking in the

GO-2

GO-3

GO-4

GO-5

GO-6

GO-7

GO-8

GO-9

Gary Osterhout Letter Continued

median parking area across from Shade and the streets along Ardmore. Or they should recognize this as another of the benefits provided to them by the city and that they are their own worst enemy when it comes to customer parking.

GO-9
cont.

- I am highly supportive of demand pricing for parking. Any opposition by the businesses should be recognized that they are their own worst enemy when it comes to customer parking.

GO-10

- I am in favor of allowing small pop-ups, even from chains. I do not think we need to "encourage entrepreneurs." That is not our need or mission. Nor do we as a city need to provide "a range of employment opportunities," unless that means downtown businesses will employ more of our resident high school/college kids. A farmers market does not need to be formally, separately, included in the plan.

GO-11

- I am in favor of better, permanent art. Similarly, I have heard that business areas attractive to artists create their own vibrancy.

GO-12

- I am against the concept of "large festivals that draw thousands" downtown unless kept to a very brief minimum involving historical events (i.e., 6-man; Chevron bike race).

GO-13

- I am opposed to rooftop/second floor dining. This concept is just begging to be turned into a problem in terms of party atmosphere, cramming more people into downtown, and noise. There is a reason we prohibit rooftop decks in the residential areas.

GO-14

- There should be no additional downtown residences without creation of two parking spots. No matter if rationalized otherwise that people living downtown don't need cars, I believe my solution reflects the reality.

GO-15

- There should be no additional office space off alleys if it is shown this will bring even more employees to downtown. There are better locations for such activity, and this again puts a strain on available parking.

GO-16

- All buildings, signage, landscaping, etc. must be low-profile and simple.

GO-17

- The ULI also offered a solution that if we cannot economically sustain the downtown, an alternative would be to shrink the envelope. I do not believe that is necessary, but that aspect has to be remembered.

GO-18

Thank you,
Gary Osterhout

RESPONSES TO COMMENTS

Responses

GO-1: Introductory remarks are made; no response is required.

GO-2: The commenter provides opinions regarding the focus of planning efforts for Downtown Manhattan Beach and the importance of residents. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

GO-3: The commenter provides background information regarding real estate in Downtown Manhattan Beach. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

GO-4: The commenter provides background information and opinions regarding tax revenues. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

GO-5: The commenter provides opinions regarding the nature and intent of Downtown Manhattan Beach. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

GO-6: The commenter provides opinions regarding the economic condition of Downtown Manhattan Beach. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

GO-7: The commenter provides opinions regarding the attraction of Downtown Manhattan Beach. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

GO-8: The commenter provides recommendations regarding any expansion or additional usage decisions in Downtown Manhattan Beach. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

GO-9: The commenter provides recommendations regarding the commercial parking in Downtown Manhattan Beach. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

GO-10: The commenter provides opinions regarding demand pricing parking. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

GO-11: The commenter provides both opinions regarding the type of commercial establishments allowed in Downtown Manhattan Beach and suggestions for the land use policies in the Draft Specific Plan. This comment does not raise any environmental issues and, thus, no response is

required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

GO-12: The commenter provides opinions on art. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

GO-13: The commenter expresses opposition to the concept of "large festivals that draw thousands" to Downtown Manhattan Beach. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

GO-14: The commenter expresses opposition to rooftop/second floor dining in Downtown Manhattan Beach and expresses concerns for potentially related noise impacts. The comment will be forwarded to the City's decision makers for their consideration. Potential noise impacts, including those related to rooftop/second floor dining, is addressed in Section 12(a, c) of the Initial Study, and Mitigation Measure NOI-1 is included to reduce such potential impacts. This mitigation measure requires analysis and implementation of proper design features on a permit-by-permit basis to ensure that outdoor commercial restaurant dining complies with the exterior noise standards of the Manhattan Beach Municipal Code. With the incorporation of Mitigation Measure NOI-1, potential noise impacts related to rooftop/second floor dining are less than significant.

GO-15: The commenter provides opinions regarding parking standards for residential uses in Downtown Manhattan Beach. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

GO-16: The commenter expresses opposition for office space along alleys in Downtown Manhattan Beach. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

GO-17: The commenter provides a recommendation for building, signage, and landscape design in Downtown Manhattan Beach. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

GO-18: The commenter provides opinions regarding the economic sustainability of Downtown Manhattan Beach. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

Jim Quilliam Letter

Please incorporate these recommendations into the current downtown specific plan.

TRASH

Issue 1: Many businesses do not have adequate garbage facilities and are operating without adequate garbage facilities.

Recommended Solution: Require a thorough evaluation of any new business application that is filed for conversion to a similar business type (i.e. restaurant to restaurant). Mandate changes to insure the business will operate with adequate trash facilities/enclosures.

JQ-1

Issue 2: Overflow of recyclable trash (Cans, bottles, cardboard etc.)

Recommended Solution:

1. Make part of the municipal code and part of CUPs or create a **Master use permit** that gives the city the ability to enforce that all businesses will gather and store their recyclables on premises. Recyclable vehicles will then make pick up of the stored recyclables picking up from the businesses using the **strategically placed parking places in the commercial zones** (not adjacent or close to residents) that will be reserved for specific hours for vehicles to make their pick up from downtown businesses. **The remaining hours those parking places are not reserved for the pickup of recyclables will be available for public parking.**

JQ-2

2. Request also that the public trash cans/bins be maintained and cleaned on regular basis.
3. Develop and **enforce a garbage management plan** throughout the city

DELIVERY SUPPLY VEHICLES

Issue 1: Illegal parking of delivery vehicles, deliveries during nonoperational hours and congestion from delivery supply vehicles in the downtown area

Recommended Solution: 1. **strategically place delivery parking places in the commercial zones** (not adjacent or close to residents) that are reserved for specific hours for delivery trucks to make their deliveries to downtown businesses. The remaining hours those parking places are not reserved for commercial deliveries will be available for public parking.

JQ-3

2. Work in partnership with businesses to monitor and insure compliance with delivery vendors.
3. Service downtown with smaller trucks and do not leave truck engines running while making deliveries.

Jim Quilliam Letter Continued

SMOKING

Issue 1: Sidewalks, gutters, and alleyways are littered with cigarette butts. This not only creates a visibly trashy walkway, but also is harmful to the ocean and our environment.

Recommended Solution: 1. Implement an enforcement plan and consolidated effort among the City of Manhattan Beach police, Commercial property owners, Manhattan Beach Chamber of Commerce, Manhattan Beach Businesses and Residents for the assertive enforcement of the nonsmoking ban across the city. 2. Integrate the efforts of code enforcement and the police force for active enforcement. 3. Inform and empower the public on what they can do when encountering smoking. 4. Closing off the west end of the pier should help limit cigarette butts, given that many of them originate from the people who congregate at the end of the pier late at night. 5. Police, City personnel, business owners and residents should work to enforce existing ordinances against smoke in public.

JQ-4

Issue 2. Stem the use of illegal drugs in the city (I.e. smoking of marijuana etc.... in the city).

Recommended Solution: 1. Implement an enforcement plan and consolidated effort among the City of Manhattan Beach police, Commercial Property Owners, Manhattan Beach Chamber of Commerce, Manhattan Beach Businesses and Residents for the assertive enforcement to stem the illegal use of drugs across the city. 2. **Integrate the efforts of code enforcement and the police force for active prosecution.** 3. Inform and empower the public on what they can do when encountering illegal smoking of marijuana or illegal drug use. 4. Closing off the west end of the pier should help stem the use of illegal drugs, given that these drugs are predominating among the people who congregate at the pier late at night.

JQ-5

PARKING

Parking strategies - Parking will not be solved by just building new parking structures! First we need to understand the current comprehensive detailed make up of our parking infrastructure in Manhattan Beach = our current make-up of unique parking arrangements in place today throughout downtown and surrounding areas of MB, number of spaces, etc. situation of parking throughout the entire community of MB.

It is also to be noted that the intent of non-metered parking spaces in the residential areas adjacent to commercial or downtown businesses was for residential parking. Over the years more and more residential spaces have been converted to metered spaces and the residents have been overlooked and under-represented as a downtown constituent. These intended residential spaces co-located in primarily downtown residential areas have been manipulated

JQ-6

Jim Quilliam Letter Continued

and abused. The majority of these spaces are taken each day by the downtown business employees. This can be easily verified on any given day. **Priority should be given to residents and their ability to park in their designated intended residential areas at no additional cost. A permit parking program should be implemented for core downtown residents to have access to intended non metered parking spaces next to their residences (approximately there are approximately 130 non-metered parking spaces in downtown Manhattan Beach).** Specific safeguards should be in place so the parking cannot be manipulated or abused by any one group of constituents. Use lessons learned and best practices of other cities and being innovative in our own unique solutions to take care of the needs of our constituents.

JQ-6
cont.

VALET PARKING

We do not need any additional valet parking in the already congested areas of downtown especially if it is adjacent and causing hazards and negative impact to residential homeowners as well as increased congestion and vehicle/pedestrian hazards.

The current valet parking is not being adequately enforced and addressed. Additional valet parking is not in line with taking into consideration our neighborhood and in making sound quality decisions to be good neighbors within our community. We should not be putting our community at risk for further degradation and exacerbate congestion and hazards all for the convenience of valet parking.

JQ-7

HEIGHT LIMITS

Why would we ever entertain the increase in height limits for our downtown area knowing it will degrade our overall Manhattan Beach character and put our wonderful views at risk?

Whatever height limit you have does not include the additional rooftop equipment and equipment fencing that is required by the city to surround rooftop equipment like A/C systems etc. The argument that "what is the big deal lets go to another 1-2 feet" let's go from 26 foot limit to a 28 foot limit really means that the height footprint of 28 feet really means, when all is said and done, maybe 36 ft., maybe even 38 ft. or higher, after the equipment and fencing surrounding the equipment is put in place. These 1-2 feet would continue to exacerbate our views and impact a height footprint substantially.

JQ-8

Residents and property owners living adjacent to the commercial downtown buildings views have been consistently degraded year by year and in some cases completely taken away with installment of a rooftop wall or fencing. Please maintain the current height limits and do not place the core attributes of our city in jeopardy of being lost forever.

Jim Quilliam Letter Continued

INTEGRATION OF POLICE AND CODE ENFORCEMENT FOR COMMUNICATION, UNDERSTANDING OF ISSUES AND ACTION TO ENFORCE CONDITIONAL USE PERMITS AND ENFORCE THE LAWS OF THE CITY OF MANHATTAN BEACH

Recommended Solution: Recommend a greater focus on the integration of the police force and with the city of MB code enforcement on enforcing and levying fines as required for violations of CUPs during the normal Monday through Friday 8am to 5 pm hours and also to include coverage for evening hours through bar closing times of 3AM and coverage for weekends. A greater emphasis on integrating the resources and efforts between the police department and city code enforcement will insure timely action for CUP violations.

JQ-9

COMMUNITY POLICING – ASSIGNMENT OF POLICE OFFICERS TO A SPECIFIC GEOGRAPHICAL REGION IN THE CITY OF MANHATTAN BEACH

Recommended Solutions:

1. Request that Police officers be assigned to a specific region in the community - this would build rapport with the residents and businesses knowing that the officer has been assigned and is our community point of contact for the area that we live.
2. Many positives with this approach – build rapport, consistent and helpful communication with someone we see on consistent basis, point of contact for issues and working issues collaboratively etc....

JQ-10

PROACTIVE ENFORCEMENT OF LAWS

Recommended Solutions:

1. Recommend a proactive enforcement of the laws of the city. A proactive approach to carry out citations and arrests for violations of our current laws to include enforcement of the no smoking ban, parking enforcement, noise violations, arrests for illegal drugs (marijuana) throughout the community.
2. This may include more of “walking the areas”, getting out into the community and downtown and on the Strand and the beach area to actively cite and arrest for violations and to show a presence of support for our community.

JQ-11

Jim Quilliam Letter Continued

3. This will communicate a message that our community is serious in carrying out our laws and value the great community that we have and would hopefully set a standard of respect and compliance and be a deterrent for those who are violating our laws.

JQ-11
cont.

Regards, Jim Quilliam

Responses

JQ-1: The commenter provides opinions and recommendations regarding the access and adequacy of garbage facilities for businesses. As stated on page 80 of the Initial Study, the types of improvements envisioned by the City (i.e., bicycle and pedestrian facilities, parking facilities, and public spaces) would not significantly change the volumes of solid waste. Also, as noted on p. 24 of the Initial Study, as a result of the public outreach for the proposed Specific Plan, the City will be instituting separate, but concurrent efforts, in trash and litter management in the Downtown Commercial area. The proposed Specific Plan includes policies related to improved trash and litter management in support of this work effort.

JQ-2: The commenter provides opinions and recommendations regarding the overflow of recyclable trash. As stated on page 80 of the Initial Study, the types of improvements envisioned by the City (i.e., bicycle and pedestrian facilities, parking facilities, and public spaces) would not significantly change the volumes of solid waste. Also, as noted on p. 24 of the Initial Study, as a result of the public outreach for the proposed Specific Plan, the City will be instituting separate, but concurrent efforts, in trash and litter management in the Downtown Commercial area. The proposed Specific Plan includes policies related to improved trash and litter management in support of this work effort.

JQ-3: The commenter provides opinions and recommendations regarding the illegal parking of delivery vehicles, deliveries during nonoperational hours, and congestion from delivery vehicles in the Downtown area. As stated on page 76 of the Initial Study, none of the contemplated measures in the proposed Specific Plan would redirect traffic, decrease the level of service, or degrade the performance of the roadway network. This comment does not address the adequacy of the environmental analysis and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

JQ-4: The commenter provides opinions and recommendations regarding litter, specifically cigarette butts. This comment does not raise any environmental issues or address the adequacy of the environmental analysis and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

JQ-5: The commenter provides opinions and recommendations regarding the use of illegal drugs in the city. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

JQ-6: The commenter provides opinions regarding the parking situation and the conversion of residential spaces to metered spots. As stated on pages 76–77 of the Initial Study, Circulation Plan Goal 6 supports alternatives to reduce demand for surface parking facilities. The proposed Specific Plan recommends the development of various parking strategies to manage and accommodate commercial parking demand, such as the provision of shuttle services to and from existing and potential future remote parking lots. Through the use of these strategies, overall parking demand will decrease, resulting in more available parking capacity.

JQ-7: The commenter provides opinions regarding valet parking as it relates to congestion in Downtown Manhattan Beach. As stated on page 76 of the Initial Study, none of the contemplated measures in the proposed Specific Plan would redirect traffic, decrease the level of service, or degrade the performance of the roadway network.

RESPONSES TO COMMENTS

JQ-8: The commenter provides opinions regarding the increase in height limits in Downtown Manhattan Beach. As stated on page 32 of the Initial Study, the proposed Specific Plan includes a 2-foot height limit exception (to a maximum height of 28 feet) in the Downtown Commercial designation, Area B, for mechanical equipment, solar panels, and pitched roofs, and possibly other similar features. The potential impacts of the proposed Specific Plan on views and aesthetic character, including potential impacts related to the proposed height exception, are addressed on pages 32–34 of the Initial Study. Such impacts were determined to be less than significant. As noted in the Initial Study, projects seeking the height exception would be subject to the City's design review process, which would consider the potential to block existing views from surrounding properties.

JQ-9: The commenter provides opinions and recommendations regarding the integration of police and code enforcement. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

JQ-10: The commenter provides opinions and recommendations regarding community policing and assigning officers to specific regions. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

JQ-11: The commenter provides opinions and recommendations regarding proactive enforcement of the City's laws. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

William Victor Letter

Page 1 of 5

WILLIAM VICTOR 'S SUMMARY OF COMMENTS REGARDING THE
CITY OF MANHATTAN BEACH DOWNTOWN SPECIFIC PLAN

INITIAL STUDY/MITIGATED NAGTIVE DECLRATION (HEREINATER REFERED TO AS "IS")

Delivered by Hand on September 23, 2016 to

the City of Manhattan Beach Att: Marisa Lundstedt, Director of Community Development

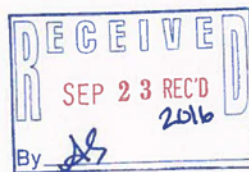
I have had a property interest in the Manhattan Beach Downtown since 1977 and since then have been a part time resident and property owner in the downtown as the downtown is defined in Figure 1 of the IS. Neither the Director nor the consultant 's representative ive in Manhattan Beach nor have they ever lived in Manhattan Beach . Despite their going through the motions of what they call "extensive public outreach, they are clearly not in touch with the reasonable expectations of the residents of Manhattan Beach including those who live and/or own property in the downtown and clearly do not make the non stakeholder residents a relevant concern in the evaluation from what I have observed her during the proposed specific plan. In fact there are many resident /taxpayers and perhaps at least one council person who believe this preparation of a specific plan was merely a "make work plan" to keep the Directors's large staff appear to be busy.

WV-1

The declaration of the IS executed by the Director at page 29 states on the basis of the IS initial evaluation that "[The Director finds] that although the proposed project could have significant effect on the environment there will not be a significant effect in this case because revisions in the project have been by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared".

WV-2

I respectfully request that this short cut not be used to avoid the necessary Environmental Impact Report (EIR) since the short cut which was timed during a Labor day long holiday when the City apparently by design knew many would not have a chance to know about this and the notice requirements of the California Coastal Act, and Local Coastal Program were not adequately complied with which has been a continuous problem with the Manhattan Beach Community Development Department as well .



Continued to Page 2

William Victor Letter Continued

WILLIAM VICTOR SUMMARY OF COMMENTS PAGE 2 of 15

The Downtown Residents Group was assured of many things during the meetings with the then Mayor Burton and correspondence from him and Council member D'Erico and Director Marisa was aware of all of these assurance since I personally discussed some of them with her and her staff myself

For example :

We were assured that the Urban Land Institute Report would not be a guideline for the Downtown Specific Plan and contrary to those assurances at page 9 the IS provides : "Based on Staff's findings and recommendations of the URBAN Land Institute .. the City Council determined it was appropriate to develop the Specific Plan"

A number of residents recalled that the ULI report at page 15 stated the following :

Overall, the economic health of the city's downtown retail is excellent. Rents are high, and vacancy is low. The tenants represent a healthy mix, with small-shop dominance.

It is simply ~~not~~ true that a great number of environmental impacts are not mitigate- Further more the outreach was a farce -For example the first workshop, I attended but we could not participate since the two representatives of the consultant spoke and would not even permit questions- what is even worse is that the information about the profile of the Downtown population was erroneous, out dated and while it was admitted by the Director when I noted this to her, it was never corrected by the City or the consultant.

The meetings of outreach was like nothing I have ever witnessed in American or anywhere in the free world-the consultant had secret meetings with persons she called "stakeholders" - I witnessed one such meeting in the City Police and Fire Building where I am informed this same Director ordered two residents to leave by the Police -In most of these unannounced meetings with "stakeholders", residents were not made to feel welcome and wherever possible residents who had diverse opinions -i

WV-3

William Victor Letter Continued

WILLIAM VICTOR'S SUMMARY OF COMMENTS PAGE 3 *15*

The remainder of this summary will have to be brief and I welcome any questions from anyone who would like to have more clarity in this summary. Unfortunately, I planned to use the library but it did not open until noon and the Joslyn Center computer was not operating as you might be able to observe from the looks of pages one and two.

We were assured :

1. that the maximum building height would not be raised. In fact I personally was informed by the Director that the maximum height is not being recommended by the City ; Obviously the owner of the property where the "maximum Height exception " is now allowed for 2 more feet for "sloped roof forms, solar panels, mechanical equipment ...the exception is intended to facilitate the development of slightly taller ground floor tenant spaces and OTHER CREATIVE ARCHITECTURAL DESIGNS THAT MIGHT NOT BE POSSIBLE WITHIN THE AREA'S 26 FOOT HEIGHT LIMIT." See page 14 the fourth bullet point.
2. Now I am quite sure that number 1 above was granted to Mr. Tony Choeke , (I apologize if I misspelled his surname) who obviously is an important stakeholder and I think when the people who have property east of his property learn about this , they will have wished to discuss this environmental impact which affects their air circulation, the vistas which are protected by the California Coastal Act and the less than fair handling of this matter. I have also learned this is only step one for Mr. Tony C, who I personally like but resent his demand for special treatment and the violation of the promise to the downtown residents. Tony is very hospitable and wines and dines whomever he wishes in the City administration, perhaps the Director, but certainly has special meetings unannounced. I have witnessed in a case involving my property where the Director decided in favor of the wealthy property owner despite a history on the property which protected neighboring property. I have a file box of evidence if anyone wishes to learn more about this. This alone is sufficient to show environmental impacts in an EIR so that the unfortunate residents who are not viewed as important stakeholders can have an even playing field and even get return calls from the Director when they leave messages in response to her usual outgoing message which has more often than not says she is in meetings. Trust is certainly a factor in the Specific Plan and some of it may be restored with an EIR rather than the short cut negative declaration route.
3. See appendix D which was another item which I recall was off the table-now called "The enhanced beach head circulation" at Manhattan Beach Blvd on the Pier where I agreed with the other downtown residents that it would cause congestion with people unloading cars and not moving-My close attention to the failure of the MB police to even properly enforce the no double parking in the Valet parking on Manhattan Avenue tells me that this also will be a problem rather than a solution and it certainly is not mitigating anything and should be part of the EIR.
4. Page 15 has proposed "Multi purpose drop off zones with "seating at locations where parking is not lost -This was , as I recall what the DRG (Downtown Residents Group had recommended against and there are at least nine proposed in Figure 5 after page 18 four of which are on Manhattan Avenue which is already cramped with enhanced pedestrian cross walks, stop signs, lights, now three valet parking kiosks at least all of which detracting from access to which beachgoers are entitled in accordance with the Coastal Act.
5. The residents have preferred and I prefer businesses that serve beach goers and residents, but the language which repeats itself throughout this Declaration discusses beachgoers which I

WV-4

WV-5

WV-6

WV-7

WV-8

William Victor Letter Continued

Page 4 of 5

- applaud but emphasizes visitors and omits residents all too often. Sort of Dial one for Visitors, dial 2 for beachgoers and if there is a third it might be the residents mentioned like an afterthought. WV-8
cont.
- 6. At page 10 , the Director provides fo guidelines to address “architectural design, circulations, parking and “infrastructure in the plan area” does not enumerate any of the implementation there and this shortcut to eliminate an EIR eliminates discussion placed before the public in greater detail for those most affected by the environmental impacts of all the construction, dust, traffic, trucks all day , even during the summer on the downtown narrow streets, excavations, in the narrow streets , sidewalks many if not all for the extra “architectural designs “ some for the possible turrets in the 28 foot or higher buildings now negotiated by the nice likeable but less than thoughtful Tony C. It is known by many that Tony C as the owner of the Inad beneath the Shellback has a desire to tear it down, and replace it with a multi story building and a roof garden to be as high if not higher than the Strand Restaurant which also has some special stakeholder rights for balconies over the sidewalks of MBB. Incidentally, I have been informed the Strand is now seeking awnings over the seating area on the balconies which many residents find an environmental impact and which should be part of the EIR as well. WV-9
- 7. The core principle at page 11 to” provide goods and services primarily to beachgoers”-I do believe we must rovide access to the beach to beachgoers but I do not think we have an obligation to provide goods and services PRIMARILY to beachgoers and I think this need to be clarified and discussed in an EIR where beachgoers (and residents as well) have an opportunity to review the EIR and participate with comments,etc. WV-10
- 8. The reference to new streetscapes the City already knows how the construction of a streetscape will have serious environmental impacts and these less than necessary impacts should be mitigated and that is difficult to do in the narrow close to residential property streets and should be part of an EIR dealing with the means to mitigate same which was not easy the last time around WV-11
- 9. The urbanization influenced by the ULI has not been set aside as promised by Council member D’Erico and then Mayor Burton, and the trust element with the Council and City could be restored with an EIR which gives a better chance for the residents and other involved entities and individuals participate in a resolution and clarification without Michael Baker International involved hopefully. WV-12
- 10. See page 14, third bullet point, another assurance to the DRG was broken and emphasizes in this point “other creative architectural designs that might not be possible within the areas 26 foot height limit” such as I assume the turrets that Mr. Choke is anxious for and the downtown residents very much oppose and certainly has the result of cutting vistas and views , air circulation and the dust and impact of creating these monstrosities need to receive the complete input for all Including residents, the Coastal Commission, the beach goers for the obstruction of access during these construction events; WV-13
- 11. The parking elements such as taking spaces for electric cars has already caused environmental impacts for persons seeking parking in the City Hall parking area and placement of these should be discussed and reviewed by public on an open period of time provided by EIR process without a labor day holiday interference and reduction of review times to review and respond. WV-14
- 12. Incidentally , the notice for this initial study is flawed and not compliant with the MB LCP. WV-15
- 13. The set of changes in the small defined area is an example of a change developed in seret with a special stakeholder named Tony Choeke for his properties creating environmental impact for persons who probably will not know about it until their vistas are cut by his turrets or whatever in the 28 feet when they have relied upon the 26 foot limit to enjoy their vistas-The manner in which this is is very un-American and it does not pass the smell test as far as an absence of the WV-16

William Victor Letter Continued

Page 5 of 5

- appearance of corruption since Mr. Choke is popular for entertaining and dining city personnel, etc although I personally like him, I think he is not thoughtful about the people east of his property ; this is a prime example for the need for an EIR for many reasons and the problem is not shown as being mitigated from what is provided in the initial study; | WV-16 cont.
14. Page 26 is false since not all of the parcels in the Specific plan area are developed. | WV-17
 15. Page 27-The notice of plan to initiate amendments to the LCP appears to require notice that is required by the LCP and the Coastal Act and should be brought to the attention of the Coastal Commission and would be more properly accomplished by the EIR process and the notice is more likely to be determined deficient if an EIR is not determined necessary by the Director of Community Development or directed by the City Council; | WV-18
 16. Page 32 last paragraph really gives the 28 foot height a boost by now here adding the words "and possible other similar features " as an excuse for adding to the existing maximum 26 feet that everyone else has; this is a real stretch! | WV-19
 17. Pages 33 and 34 deals with another way to destroy vistas by changing the "tree canopy". This alone should be a basis for using the EIR instead if this is a fair shortcut; | WV-20
 18. Page 36 , 2c should reflect "potentially significant impact" | WV-21
 19. Page 59 I have learned that Residents in the downtown and others are concerned about LU 3.2 and some may likely be considering challenging this for cut off of vistas | WV-22
 20. Page 60 is unclear since it does not describe the "design guidelines " which is really sloppy and there is some residential concern about the lack of consistency and contradictions ; | WV-23
 21. Pages 60, 65, need clarification which the EIR would be helpful; | WV-24
 22. Page 66, the use of stacked parking and other parking solutions need an EIR in view of the fact that the City cannot even enforce the no double parking violations with valet parking for the last few years including now; | WV-25
 23. Page 68-the 28 foot amendment for height affects vistas which is protected by the Coastal Act and should be incorporated in an EIR process now; | WV-26
 24. Page 70, 12a and 12 d should be changed to potential significant impacts and are difficult to impossible to enforce or mitigate for example this forcing the City to change its page 29 determination executed by the Director | WV-27
 25. Page 71 have proven to not be enforceable or possible to mitigate and require EIR- all paragraphs on that page | WV-28
 26. Page 73 -13(a) and (b) should be noted as Potential significant Impact and are also reasons for EIR | WV-29
 27. Pages 74 through 77 cry for an EIR | WV-30
- If anyone has a question or needs clarification, I can be reached at 516-670-2590.

The short cut will be the long route and less than fair to those who are affected by the above.
William Victor

Responses

WV-1: The commenter provides opinions regarding the subject Specific Plan work program and staff. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

WV-2: The commenter requests that an Environmental Impact Report (EIR) be prepared for the proposed project and suggests that certain noticing requirements have not been met. Section 15070 of the State CEQA Guidelines explains that a public agency shall prepare a negative declaration or mitigated negative declaration when there is no substantial evidence that the project (or in the case of a mitigated negative declaration, the revised project) may have a significant effect on the environment. The Initial Study prepared for the proposed Specific Plan analyzed all of the potential environmental impacts of the proposed project and determined that, after mitigation, the project would not have a significant effect on the environment. The commenter does not provide any evidence to the contrary. In regard to the public review period, the City of Manhattan Beach published and distributed a Notice of Intent to Adopt a Mitigated Negative Declaration on August 25, 2016, which initiated a 30-day public review period. The noticing and duration of the public review period met or exceeded CEQA's public review requirements. Finally, as stated on page 27 of the Initial Study, the California Coastal Commission will need to review and certify the project proposal.

WV-3: The commenter provide opinions regarding the project's public outreach program. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

WV-4: The commenter states that he was assured the maximum building height would not be raised. This comment does not address the adequacy of the environmental analysis and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration. As stated on page 32 of the Initial Study, as recommended by the Planning Commission, the proposed Specific Plan includes a 2-foot height limit exception (to a maximum height of 28 feet) in the Downtown Commercial, Area B, designation for mechanical equipment, solar panels, and pitched roofs, and possibly other similar features. The potential impacts of the proposed Specific Plan on views and aesthetic character, including potential impacts related to the proposed height exception, are addressed on pages 32–34 of the Initial Study. Such impacts were determined to be less than significant. As noted in the Initial Study, projects seeking the height exception would be subject to the City's design review process, which would consider the potential to block existing views from surrounding properties.

WV-5: The commenter provides background information and opinions regarding the reasons for the proposed 2-foot height limit exception. The commenter also asserts potential impacts on air circulation and vistas. The potential impacts of the proposed Specific Plan on air quality are addressed on pages 37–40 of the Initial Study and were found to be less than significant after the incorporation of Mitigation Measure AQ-1, which would minimize air pollutant emissions during construction. The potential impacts of the proposed Specific Plan on views and aesthetic character, including potential impacts related to the proposed height exception, are addressed on pages 32–34 of the Initial Study. Such impacts were determined to be less than significant. As noted in the Initial Study, projects seeking the height exception would be subject to the City's design review process, which would consider the potential to block existing views from surrounding

properties. See also response to comment WV-2 regarding the lack of need to prepare an EIR for the project.

WV-6: The commenter provides opinions and observations regarding traffic circulation, parking, and police enforcement of parking law, including (1) the opinion that the conceptual beach head circulation plan would cause congestion due to people unloading cars while potentially occupying travel lanes; and (2) the observation that double parking is an existing issue that is not properly enforced. The project's potential impacts on transportation and traffic were analyzed on pages 76–79 of the Initial Study and were found to be less than significant with the incorporation of mitigation to ensure no net loss of parking from public realm improvements (Mitigation Measure TR-1). This analysis includes an evaluation of the conceptual Beach Head improvements noted by the commenter. As noted in this analysis, the turnaround included in the conceptual Beach Head improvements would eliminate vehicle queuing in the westbound direction and remove a "dead end" that currently requires drivers to back up or turn across pedestrian paths or drive through parking lots in order to exit the area. The conceptual design would also establish safe pedestrian sidewalk connections and crossings that are separated from the vehicular traffic flow, helping to reduce the potential for vehicle-pedestrian collisions.

WV-7: The commenter states that the proposed multi-purpose drop-off zones were not recommended by the Downtown Resident Group. The multi-purpose drop-off zones are conceptual circulation improvements envisioned in the proposed Specific Plan as identified through the public process. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

WV-8: The commenter provides the opinion that the proposed Specific Plan emphasizes visitors over residents. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

WV-9: The commenter provides the opinion that Specific Plan guidelines will not be implemented and suggests that an EIR would provide further detail regarding implementation. For clarification, an EIR would not provide any further detail or assurances regarding implementation of the Specific Plan guidelines. To the contrary, the Initial Study, Mitigated Negative Declaration, and Mitigation Monitoring and Reporting Program provide the same level of detail and enforcement as an EIR with regard to mitigation measures to reduce potentially significant environmental impacts.

WV-10: The commenter provides the opinion that the Specific Plan need not provide goods and services primarily to beachgoers. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

WV-11: The commenter states that the construction of a streetscape will have serious environmental impacts due to narrow streets and close proximity to residential property, yet provides no evidence to support this assertion. The potential environmental impacts of the streetscape improvements envisioned in the proposed Specific Plan are evaluated on pages 37-41 (Air Quality); pages 70-73 (Noise); and pages 76-80 (Transportation/Traffic) in the project's Initial Study.

WV-12: The commenter provides opinions regarding the process undertaken for the proposed Specific Plan. This comment does not raise any environmental issues and, thus, no response is

RESPONSES TO COMMENTS

required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

WV-13: See response to comment WV-4. The commenter expresses opposition to the proposed height limit exception, which is duly noted and will be forwarded to the City's decision makers for their consideration.

WV-14: The commenter suggests that more consideration be afforded to the provision of parking spaces dedicated to electric cars. The comment is not related to the proposed Specific Plan but is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

WV-15: The commenter claims that the Notice of the Initial Study is flawed and is not compliant with the Local Coastal Program (LCP), though provides no evidence to substantiate this assertion. The notice indicates that Local Coastal Program Amendments are proposed and it provides a description of those proposed Amendments in compliance with all local and state Coastal regulations. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

WV-16: The commenter expresses opinions regarding the process the City undertook to develop the proposed Specific Plan and concerns for view impacts related to the 2-foot height exception included in the proposed Specific Plan. The commenter's opinions and concerns are duly noted and will be forwarded to the City's decision makers for their consideration. The potential impacts of the proposed Specific Plan on views and aesthetic character, including potential impacts related to the proposed height exception, are addressed on pages 32–34 of the Initial Study. Such impacts were determined to be less than significant. As noted in the Initial Study, projects seeking the height exception would be subject to the City's design review process, which would consider the potential to block existing views from surrounding properties.

WV-17: The commenter states that page 26 of the Initial Study is false because not all parcels in the Specific Plan area are developed, though provides no specifics as to what particular issue on page 26 is false. Furthermore, the commenter provides no indication of the false or incorrect analysis in the language on page 26 of the Initial Study.

WV-18: The commenter states that the proposed project should be brought to the attention of the California Coastal Commission and claims that notice was insufficient. As described on page 27 of the Initial Study, in order to implement the proposed project, the City of Manhattan Beach will need to amend the LCP and Implementation Program, including but not limited to the Land Use Plan Policy Map, Coastal Zone Zoning Map, policies, and text to reflect any corresponding changes in development standards, guidelines, policies, and the other proposed zoning and land use revisions, and the California Coastal Commission will need to review and certify the amendment. Per Section A.96.250 of the City of Manhattan Beach Local Coastal Program, LCP Amendments, the City Council may amend all or part of the LCP, but the amendment will not take effect until it has been certified by the Commission. The certification process includes the following steps:

- Initiation of Amendments to the LCP by the Planning Commission or initiated by the City Council directing the Planning Commission to initiate the amendments.
- Planning Commission action on the amendments, in the form of a written recommendation to the City Council, whether to approve, approve in modified form, or

disapprove, following a duly noticed public hearing, in accordance with the Coastal Act and the California Code of Regulations.

- City Council action on the amendments, whether to approve, approve with modifications, or disapprove the amendments following a duly noticed public hearing, in accordance with the Coastal Act and the California Code of Regulations.
- Coastal Commission certification of the amendments in accordance with Sections 30512 and 30513 of the Public Resources Code, Section 13551 of the California Code of Regulations, and Chapter 6, Article 2 of California Coastal Act.

WV-19: The commenter expresses concern about the proposed 2-foot height limit exception (to a maximum height of 28 feet) in the Downtown Commercial designation, Area B, for mechanical equipment, solar panels, and pitched roofs, and possibly other similar features. The comment is duly noted and will be forwarded to the City's decision makers for their consideration. See also response to comments WV-4 and WV-5 regarding the height limit exception.

WV-20: The commenter states that the project proposal to change the tree canopy instigates the need to prepare an EIR. Pages 33 and 34 of the Initial Study states that the project could include changes to the tree canopy, which has the potential to partially obstruct views. However, future street tree replacements and installations would be undertaken in compliance with the City's street tree planting guide (Municipal Code Section 7.32.090) and would be similar in species and scale to the existing street tree canopy. In certain limited instances, it is possible that the landscaping and tree canopy improvements undertaken to implement the proposed Specific Plan could partially obstruct intermittent views from vehicular streets and walkstreets that act as "view corridors." Any new street trees and landscaping would be designed to be in harmony with the street lighting and would act to soften the urban context of the built environment, as well as serving to frame existing views of the Manhattan Beach Pier, the beach areas, and the Pacific Ocean. In addition, any proposed street tree would be required to conform to the City's Municipal Code Chapter 7.32 – Tree, Shrub and Plant Regulations. Specifically, Section 7.32.080 requires that any new street tree comply with the Street Tree Master Plan, as approved by the Public Works Director. At full implementation of the public realm improvements envisioned in the proposed Specific Plan, the primary public views of the ocean, beach areas, and geographic features, including the Palos Verdes Peninsula from the Beach Head area near the pier, would remain largely unobstructed. Furthermore, future improvements would be subject to applicable City regulations and requirements and to the proposed design guidelines that are intended, in part, to preserve the visual character of the plan area. Such improvements would also be subject to project-level CEQA documentation.

WV-21: The commenter expresses the opinion that impacts to agricultural resources should be determined to be potentially significant, though provides no evidence to substantiate this assertion. Page 36 (Agriculture and Forestry Resources) of the Initial Study analyzes potential impacts, and there are no forestlands, timberlands, or timberland zoned Timberland Production within the project area, therefore, there are no impacts. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

WV-22: The commenter states that residents in the Downtown are concerned about General Plan Land Use Policy LU-3.2, though provides no details about such concerns. The comment is duly noted and will be forwarded to the City's decision makers for their consideration.

RESPONSES TO COMMENTS

WV-23: The commenter states that the Specific Plan design guidelines are not described on page 60 of the Initial Study. The Specific Plan design guidelines are described in Chapter 6 of the Specific Plan.

WV-24: The commenter states that pages 60 and 65 of the Initial Study need clarification. Page 60 of the Initial Study contains a thorough discussion of consistency between the proposed project and the City General Plan. Page 65 of the Initial Study contains a thorough discussion of consistency between the proposed project and the Local Coastal Program.

WV-25: The commenter states that the City is not enforcing the current prohibition on double parking associated with valet parking and therefore the use of stacked parking or other parking solutions should be analyzed in an EIR. Stacked parking for vehicle storage in off-street parking lots does not raise any environmental issues germane to CEQA as it will be attendants or valet monitoring and there will be no use of or impact to the public right-of-way. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

WV-26: The commenter states that the proposal to include a 2-foot height limit exception (to a maximum height of 28 feet) in the Downtown Commercial designation, Area B, for mechanical equipment, solar panels, and pitched roofs, and possibly other similar features, requires the preparation of an EIR. Page 67 of the Initial Study describes the project's consistency with LCP Policy II.A.2, which requires the preservation of the predominant existing commercial building scale of one and two stories, by limiting any future development to a 2-story maximum, with a 30-foot height limitation. The proposed Specific Plan is consistent with this policy. The Specific Plan maintains the current 26-foot height limit for the majority of the commercial area of the Specific Plan, with exceptions in Area B for a 2-foot increase to 28 feet to allow for mechanical equipment, solar panels, pitched roofs and similar features which would still be under the 30-foot height limitation within the policy. Area A of the commercial area allows a 30-foot height limit and no revisions are proposed. The code already provides height exceptions for vent pipes, antennas (up to 10 feet) and chimneys (up to 5 feet) and this proposal is consistent with these current exceptions. See also response to comment WV-5.

WV-27: The commenter suggests that Mitigation Measure NOI-1 is unenforceable and therefore the noise-related impacts it seeks to mitigate should be considered potentially significant. Mitigation Measure NOI-1 requires that prior to the issuance of a use permit or building permit for any second-floor outdoor commercial restaurant dining that includes service of alcohol and hours of operation during the late night hours, an acoustical study shall be prepared to the satisfaction of the Community Development Director. The study shall quantify the anticipated noise levels generated by the use and demonstrate compliance with the "Exterior noise standards" identified in Section 5.48.160 of the Manhattan Beach Municipal Code. Design and construction techniques may be utilized to reduce and/or shield noise sources to achieve compliance with the standards, such as sound-rated plexiglass parapets, noise curtains, and other noise-reducing materials, and/or operational conditions may be imposed to reduce any potential impacts. As stated on page 71 of the Initial Study, Mitigation Measure NOI-1 shall be implemented during use permit or building permit review process and shall be enforced by the City of Manhattan Beach Community Development Department. It is unclear why the commenter considers Mitigation Measure NOI-1 difficult or impossible to enforce.

WV-28: The commenter states that Mitigation Measure NOI-1 is unenforceable. The commenter is referred to Response WV-27.

WV-29: The commenter expresses the opinion that impacts related to population and housing should be determined to be potentially significant, though provides no evidence to substantiate

this assertion. Page 73 (Population and Housing) of the Initial Study describes that the proposed Specific Plan does not include any site-specific designs or proposals, or grant any entitlements for development. Future improvements implementing the proposed Specific Plan would not include the development of any new housing or employment centers that would directly increase the population or indirectly induce population growth. Future improvements implementing the Specific Plan would primarily consist of redevelopment of existing buildings as well as pedestrian and bicycle improvements. The exact locations of these improvements have not yet been determined, but they would not be anticipated to require the removal of any housing in the plan area. Furthermore, future projects would be subject to further CEQA review of project-specific impacts. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

WV-30: The commenter expresses the opinion that impacts related to public services, recreation, and transportation/traffic should be determined to be potentially significant and an EIR should be prepared, though provides no evidence to substantiate this assertion. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

Caltrans Letter

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
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SFP 27 2016

STATE CLEARINGHOUSE

September 27, 2016

Nhung Madrid
City of Manhattan Beach
1400 Highland Avenue
Manhattan Beach, Ca 90266

RE: City of Manhattan Beach
Downtown Specific Plan & Local Coastal
Program Amendments
SCH # 2016081065
GTS# 07-LA-2016-00123
Vic. LA-105/P.M. 21.3

Dear Nhung Madrid:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed mitigated negative declaration of City of Manhattan Beach Downtown Specific Plan and Local Coastal Program Amendments. The proposed Specific Plan Project is situated in the central western portion of the city adjacent to the Pier and within the city's Coastal Zone. The Specific Plan area encompasses approximately 40 blocks, 51.62 acres, bounded by 15th street to the north, Ardmore Avenue to the east, 8th, 9th, and 10th streets to the south and The Strand to the west. The proposed Local Coastal Program (LCP) Amendments include the city's Coastal Zone.

Based on the information received, Caltrans has the following comments:

1. The nearest State facility to the proposed project is the I-105 freeway. Caltrans does not expect project approval to result in a direct adverse impact to the State facility.
2. On page 16 of the Specific Plan, it is stated there is a desire to have four bike parking spaces per side of the street per block. Because sidewalk space can sometimes be limited or certain businesses may attract more customers arriving by bicycle than others, the City might wish to explore the installation of on-street bicycle parking or "bicycle corrals." Typically, a bicycle corral is placed on the street in place of an existing car parking space. Bicycle corrals can be an effective piece of infrastructure if placed in an area that meets any of the following conditions: high demand for bicycle parking; sidewalk space is limited; or there is nearby on-site car parking. Although the City has a no net-loss policy with parking in the area, it may be worthwhile to consider.
3. To enhance bicycling conditions and overall traffic safety, some consideration should be given to implementing a conventional or "classic" road diet on the block of 15th Street between Highland Avenue and Valley Drive. Currently the street is 54' wide with two lanes westbound and a single lane eastbound. However, outside of this block the street is a single lane in each direction.

Caltrans-1

Caltrans-2

Caltrans-3

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability."*

Caltrans Letter Continued

Nhung Madrid
 City of Manhattan Beach
 September 27, 2016
 Page 2 of 2

4. Implementing a conventional road diet will make the block more consistent with the rest of the street and create space for a dedicated center left turn lane and Class II bike lanes. Altogether, these elements can make the street more predictable, enhance the comfort and safety of bicycling, and improve driveway access. The Federal Highway Administration (FHWA) recognizes the conventional road diet as a proven safety countermeasure.

Caltrans-4

5. Additionally, one of the primary goals of the Specific Plan is to promote alternate modes of travel in order to reduce traffic congestion and parking demand. As such, there may be an opportunity to install "Lead Pedestrian Intervals" or LPis, as well as pedestrian scramble crossings within the Specific Plan area. Where there are signalized intersections, LPis can provide walking a green light between 2 to 6 seconds before the light turns green for vehicle traffic in the same direction. This measure, by giving pedestrians a head start on crossing the street, makes pedestrians more visible by the time a light turns green for drivers and reduces potential conflict. Pedestrian scramble crossings, on the other hand, are typically installed in areas with high pedestrian volumes and eliminate vehicle-pedestrian conflicts altogether by separating the two modes having completely separate signal phases. Pedestrian scrambles can be popular in situations where there is a strong desire to cross in all directions.

Caltrans-5

6. Where appropriate, multi-modal safety measures that promote active transportation should be considered. Standard crosswalks, such as those present at the intersection of 15th Street and Manhattan Avenue, the Specific Plan could look to upgrade to high-visibility continental crosswalks. Continental crosswalks provide greater visibility than standard crosswalks and can improve yielding compliance from drivers. Traffic calming measures such as roundabouts, pedestrian refuge islands, raised crosswalks or raised intersections might also be considered.

Caltrans-6

Please note that any work performed within State right of way will require an encroachment permit from Caltrans. In addition, please be reminded that transportation of heavy construction equipment materials, or other special equipment, which require the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute hours.

Caltrans-7

If you have any questions please feel free to contact Melanie Bradford, the project coordinator at (213) 897-9446 and refer to GTS# 07-LA-2016-00123.

Sincerely,



DIANNA WATSON
 LD-IGR Branch Chief

cc: Scott Morgan, State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Responses

Caltrans-1: The commenter states that the nearest state facility to the project is Interstate 105 and that Caltrans does not expect the project to result in a direct impact to Interstate 105. The comment is duly noted and will be forwarded to the City's decision makers for their consideration.

Caltrans-2: The commenter recommends that the City consider the use of bicycle corrals to accommodate on-street bicycle parking. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

Caltrans-3: The commenter recommends that the City consider implementing a conventional or classic road diet on the block of 15th Street between Highland Avenue and Valley Drive. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

Caltrans-4: The commenter notes that the implementation of a conventional road diet at the block of 15th Street between Highland Avenue and Valley Drive will make this block more consistent with the rest of the street and create space for a dedicated center left-turn lane and Class II bike lane. The commenter further states that a conventional road diet is a proven safety measure. A road diet is not proposed as part of the Specific Plan, however, the comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

Caltrans-5: The commenter recommends that the City consider implementing "Lead Pedestrian Intervals" and pedestrian scramble crossings in the Specific Plan area, noting these strategies can reduce potential vehicle-pedestrian conflicts. Leading Pedestrian Intervals have already been implemented at the intersections of Manhattan Beach Boulevard at Highland Avenue and Manhattan Beach Boulevard at Manhattan Avenue. A possible scramble crossing is included in the Specific plan as a possible pedestrian enhancement. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

Caltrans-6: The commenter recommends that the City consider implementing multimodal safety measures such as high-visibility continental crosswalks as well as traffic-calming measures such as roundabouts, pedestrian refuge islands, and raised crosswalks. This comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The comment is, nonetheless, duly noted and will be forwarded to the City's decision makers for their consideration.

Caltrans-7: The commenter notes that work performed within the state right-of-way will require an encroachment permit from Caltrans. The commenter also notes that certain heavy construction equipment requires a Caltrans transportation permit if traveling on state highways. No work is anticipated within the State right-of-way, therefore, this comment does not raise any environmental issues and, thus, no response is required pursuant to CEQA. The City acknowledges the comment and will obtain the requisite permits.

Office of Planning and Research Letter



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

September 28, 2016

Nhung Madrid
City of Manhattan Beach
1400 Highland Avenue
Manhattan Beach, CA 90266-4795

Subject: City of Manhattan Beach Downtown Specific Plan and Local Coastal Program Amendments
SCH#: 2016081065

Dear Nhung Madrid:

The enclosed comment (s) on your Negative Declaration was (were) received by the State Clearinghouse after the end of the state review period, which closed on September 23, 2016. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

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

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2016081065) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

OPR-1

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Responses

OPR-1: The letter confirms compliance with State Clearinghouse requirements and forwards one comment letter from a state agency, Caltrans, received by OPR. The comment letter from Caltrans is addressed previously herein.