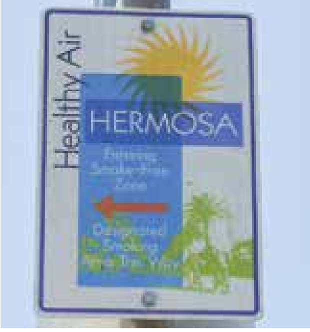

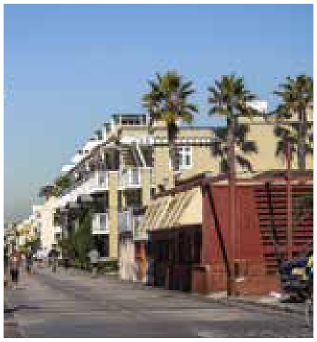

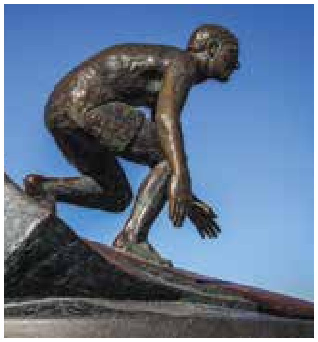

city of hermosa beach

PLAN Hermosa

Final Environmental Impact Report

Volume I: Final EIR

SCH# 2015081009 • August 2017

CITY OF HERMOSA BEACH

PLAN HERMOSA

FINAL ENVIRONMENTAL IMPACT REPORT

SCH #2015081009

Prepared for:

CITY OF HERMOSA BEACH
1315 VALLEY DRIVE
HERMOSA BEACH, CA 90254

Prepared by:

MICHAEL BAKER INTERNATIONAL
1 KAISER PLAZA, SUITE 1150
OAKLAND, CA 94612

REVISED AUGUST 2017

ABBREVIATIONS

AB	Assembly Bill
ADA	Americans with Disabilities Act
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
CHR	California Historical Resource
EIR	environmental impact report
GHG	greenhouse gas
HCM	Highway Capacity Manual
kW	kilowatt
kWh	kilowatt-hour
JWPCP	Joint Water Pollution Control Plant
LACSD	Sanitation Districts of Los Angeles County
LID	Low Impact Development
LOS	level of service
mgd	million gallons per day
MMRP	mitigation monitoring and reporting program
MW	megawatt
NAHC	Native American Heritage Commission
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
OPR	California Governor's Office of Planning and Research
PCH	Pacific Coast Highway
REC	renewable energy certificate
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
TIS	Traffic Impact Study
VMT	vehicle miles traveled

This Final Environmental Impact Report (Final EIR) was prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Section 15132). The City of Hermosa Beach (City) is the lead agency for the environmental review of the proposed PLAN Hermosa (SCH No. 2015081009), which includes the implementation of a citywide General Plan and Local Coastal Program (proposed project). The City has the principal responsibility for approving the proposed project.

1.1 BACKGROUND AND PURPOSE OF THE EIR

The following is an overview of the environmental review process for the proposed project that led to the preparation of this Final EIR.

NOTICE OF PREPARATION

A Notice of Preparation (NOP) for the Draft EIR was issued August 7, 2015. The NOP was circulated to the public, local, state, and federal agencies, and other interested parties to solicit comments. These comment letters are included in Appendix B of the Draft EIR. A scoping meeting was held on August 18, 2015. The review period for the NOP ended on September 8, 2015.

DRAFT EIR

A Notice of Availability for the Draft EIR was posted on the City's website and distributed to interested parties on October 26, 2016. The Draft EIR was released for public and agency review for a 72-day review period ending on January 5, 2017. The Planning Commission held a hearing on November 21, 2016, to receive comments on the Draft EIR. Comments received during the public review period are addressed in this Final EIR.

The Draft EIR contains a description of the project, description of the environmental setting, identification of project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives. The Draft EIR was provided to interested public agencies and the public and was made available for review at City offices and on the City's website.

FINAL EIR

The City received comment letters from public agencies and the public regarding the Draft EIR. This document responds to the comments received, as required by CEQA. As prescribed by CEQA Guidelines Sections 15088 and 15132, the lead agency (in this case, the City of Hermosa Beach) is required to evaluate comments on environmental issues received from persons who have reviewed the Draft EIR and to prepare written responses to those comments. This Final EIR contains individual responses to each comment received during the public review period for the Draft EIR. In accordance with CEQA Guidelines Section 15088(c), the written responses describe the disposition of significant environmental issues raised. The City and its consultants have provided a good faith effort to respond in detail to all significant environmental issues raised by the comments. This document also contains minor edits to the Draft EIR, which are included in Section 3.0, Revisions to the Draft EIR. This document constitutes the Final EIR.

CERTIFICATION OF THE FINAL EIR/PROJECT CONSIDERATION

This document, together with the Draft EIR (incorporated by reference in accordance with CEQA Guidelines Section 15150), will comprise the Final EIR for this project. The City will review and consider the Final EIR. If the City finds that the Final EIR is "adequate and complete," the City may certify the Final EIR. The rule of adequacy generally holds that the EIR can be certified if it: (1) shows a good faith effort at full disclosure of environmental information; and (2) provides sufficient analysis to allow decisions to be made regarding the project in contemplation of its environmental consequences.

Upon review and consideration of the Final EIR, the City may take action to adopt, revise, or reject the proposed project. A decision to approve the project would be accompanied by written findings in accordance with State CEQA Guidelines Sections 15091 and 15093. Public Resources Code Section 21081.6 also requires lead agencies to adopt a mitigation monitoring and reporting program to describe measures that have been adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.

1.2 INTENDED USES OF THE EIR

The EIR is intended to evaluate the environmental impacts of PLAN Hermosa to the greatest extent possible. This EIR, in accordance with CEQA Guidelines Section 15126, should be used as the primary environmental document to evaluate all planning and permitting actions associated with the project. Please refer to Chapter 3.0, Project Description, of the Draft EIR for a detailed discussion of PLAN Hermosa.

1.3 ORGANIZATION AND SCOPE OF THE FINAL EIR

This document is organized in the following manner:

SECTION 1.0 – INTRODUCTION

Section 1.0 provides an overview of the EIR process to date and describes the required contents of the Final EIR.

SECTION 2.0 – RESPONSES TO COMMENTS

Section 2.0 includes a list of commenters, copies of written comments (coded for reference), and the responses to those written and oral comments made on the Draft EIR.

SECTION 3.0 – REVISIONS TO THE DRAFT EIR

Section 3.0 lists the revisions made to the Draft EIR as a result of comments received and other staff-initiated changes.

SECTION 4.0 – MITIGATION MONITORING AND REPORTING PROGRAM

Section 4.0 provides a program for reporting or monitoring regarding the implementation of mitigation measures for PLAN Hermosa, if it is approved, to ensure that the adopted mitigation measures are implemented as defined in this EIR.

2.1 INTRODUCTION

This Final Environmental Impact Report (Final EIR) for PLAN Hermosa (proposed project) was prepared in accordance with CEQA (California Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (California Code Regulations Section 15000 et seq.). The City of Hermosa Beach is the lead agency for the environmental review of the proposed project and has the principal responsibility for approving the project.

REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the project's significant effects might be avoided or mitigated. This section also notes that commenters should include an explanation and evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect is not considered significant in the absence of substantial evidence supporting such a conclusion.

CEQA Guidelines Section 15088 requires that lead agencies evaluate all comments on environmental issues received on the Draft EIR and prepare a written response. The written response must address the significant environmental issue raised and must be detailed, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, there must be a good faith and reasoned analysis in the written response. However, lead agencies need only respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204).

CEQA Guidelines Section 15088 recommends that where a response to comments results in revisions to the Draft EIR, those revisions be incorporated as a revision to the Draft EIR or as a separate section of the Final EIR. Revisions to the Draft EIR are incorporated as Section 3.0 of this Final EIR.

There were numerous comments from individuals concerning PLAN Hermosa itself, with particular emphasis on carbon neutrality. Comments on PLAN Hermosa that are not germane to the analysis of environmental impacts do not require detailed responses in this Final EIR, as provided under CEQA. However, general responses are included for completeness and to inform the decision-making process. Comments that provide suggestions or questions regarding goals and policies in PLAN Hermosa are presented for consideration in a separate document and will be included in staff reports to the Planning Commission and City Council.

2.2 COMMENTER LIST

The following commenters submitted written comments on the Draft EIR. The comment period for the Draft EIR began October 27, 2016, and ended January 5, 2017. Confirmation of lead agency compliance with CEQA for public review of the Draft EIR was received from the Governor's Office of Planning and Research on October 26, 2016.

Letter Code	Commenter	Date
Agencies		
CALTRANS	California Department of Transportation (Caltrans), District 7	December 20, 2016
CSDLAC	County Sanitation Districts of Los Angeles County	January 5, 2017
NAHC	California Native American Heritage Commission	December 21, 2016
CLAFD	County of Los Angeles Fire Department	November 16, 2016
Tribes		
GBMI	Gabrieleño Band of Mission Indians	October 30, 2016
Individuals		
ADLS	Steve Adler	November 24, 2016
BARP	Peggy Barr	November 17, 2016
BERC	Claudia Berman	January 2, 2017
FORR	Robert Fortunato	November 21, 2016
GRED	David Grethen	November 21, 2016
KRUA	Arthur Krugler	December 4, 2016
MORG	G & J Moriyama	November 19, 2016
MOWB	Bette Mower	November 18, 2016
PALJ	Jens Palsberg	November 20, 2016
SARK	Ken Sarno	November 2, 2016
SCHH	Heather Schneider	December 2, 2016
TATP1	Pam Tatreau	December 5, 2016
TATP2	Pam Tatreau	December 31, 2016
TUTC	Coco Larson-Tuttle	December 12, 2016
Planning Commission Meeting		
PUBM	Transcript from Planning Commission Public Hearing on Draft EIR	November 21, 2016

2.3 COMMENTS AND RESPONSES

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments in table form at the end of this section.

Agencies

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-8391
FAX (213) 897-1337
www.dot.ca.gov

Serious Drought.
Help save water!

December 20, 2016

Mr. Ken Robertson
City of Hermosa Beach
1315 Valley Drive
Hermosa Beach, CA 90254

RE: PLAN Hermosa, General Plan & Local Coastal Program
Vic. LA-01/PM 20.60 to 21.88
SCH # 2015081009
Ref. IGR /CEQA No. 150812EA-NOP
GTS # LA-2016-00256AL-DEIR

Dear Mr. Robertson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The City is updating the City of Hermosa Beach General Plan and Local Coastal Program, locally referred to as PLAN Hermosa. The City plans to accommodate an additional 300 dwelling units and 630,400 square feet of non-residential development between 2015 and 2040.

On page 4.14-32, when using Vehicle Miles Traveled (VMT) analysis, The City should refer the project's traffic consultant to OPR's website, guidelines on evaluating transportation impacts in CEQA where significant threshold is identified.

https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf

CALTRANS-1

On page 4.14-33 of the Draft Environmental Impact Report, the impact criteria for signalized intersection under Caltrans jurisdiction are shown in Table 4.14-19 (Caltrans Signalized Intersection Impact Criteria). The threshold in the Table is incorrect. Please consult with Caltrans for further assistance.

CALTRANS-2

On page 4.14-39, "…Caltrans' plan to remove a travel lane in each direction on Pacific Coast Highway, as well as a major change in roadway characteristics, east to west, from Artesia Boulevard to Gould Avenue." On the same page, "Opportunities for physical mitigations are limited by Caltrans' plan to remove a travel lane in each direction on Pacific Coast Highway and improvement plans for the intersection included in the Aviation Boulevard Master Plan, including enhanced crosswalks and repurposing of public right-of-way for parkettes, pedestrian space, or a crossing refuge." Both statements need to provide reference for Caltrans verification. Any proposed mitigation on Pacific Coast Highway (PCH) must be submitted to Caltrans for approval.

CALTRANS-3

Caltrans suggests the following new policies to the PLAN Hermosa General Plan & Local Coastal Program.

- The City will involve Caltrans in the update of the existing Transportation Impact Fee program that would include the State transportation systems and facilities. (if any)

- The City will work with Caltrans to identify cumulative impact locations on State facilities and traffic improvements to alleviate traffic congestion within the Specific Plan area.

- The City will work with neighboring Cities to address cumulative significant traffic impact on I-405 and SR-01. CALTRANS-4

- The City will work with Caltrans to evaluate access management needs and strategies to better manage traffic operations on arterial streets located within close proximity of freeway on/off-ramps in an effort to reduce traffic backups and frictions at Caltrans transportation systems.

Caltrans encourages the City to work with neighboring developing cities to resolve any cumulative significant traffic impacts on the State facilities from other cities' development.

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan. CALTRANS-5

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # LA-2016-00256AL-DEIR.

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief

cc: email to Scott Morgan, State Clearinghouse

WATER RECLAMATION
SOLID WASTE MANAGEMENT

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

January 5, 2017

Ref. Doc. No.: 3923874

Mr. Ken Robertson, Director
Community Development Department
City of Hermosa Beach
1315 Valley Drive
Hermosa Beach, CA 90254

Dear Mr. Robertson:

Response to DEIR for the PLAN Hermosa:
City of Hermosa Beach General Plan and Local Coastal Program Update

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on October 31, 2016. The City of Hermosa Beach is located within the jurisdictional boundary of the South Bay Cities Sanitation District. We offer the following comments regarding sewerage service:

1. The Districts own, operate, and maintain the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the City of Hermosa Beach (City) except to state that presently no deficiencies exist in Districts' facilities that serve the City. For information on deficiencies in the City sewerage system, please contact the City Department of Public Works and/or the Los Angeles County Department of Public Works.

2. The Districts should review individual developments within the City in order to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project. CSDLAC-1

3. The wastewater generated by the City is treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 million gallons per day (mgd) and currently processes an average flow of 254.1 mgd.

4. In order to estimate the volume of wastewater a project will generate, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link for a copy of the Districts' average wastewater generation factors.

5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is CSDLAC-2

a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate proposed projects. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.

CSDLAC-2 cont.

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

CSDLAC-3

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

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

DOC: #4003157.SBCD

STATE OF CALIFORNIA
NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Fax (916) 373-5471
Email: nahc@nahc.ca.gov
Website: http://www.nahc.ca.gov
Twitter: @CA_NAHC

December 21, 2016

Ken Robertson
City of Hermosa Beach
1315 Valley Drive
Hermosa Beach, CA 90254

sent via e-mail:
krobertson@hermosabch.org

Re: SCH#2015081009, PLAN Hermosa: City of Hermosa Beach General Plan and Local Coastal Program Update Project, City of Hermosa Beach, Los Angeles County, California

Dear Mr. Robertson:

The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report prepared for the project referenced above. The review included the Project Description and Summary of Impacts and Mitigation Measures, prepared by the City of Hermosa Beach. We have the following concerns:

- There is no Tribal Cultural Resources section or subsection in the Executive Summary as per California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf

- There are no mitigation measures specifically addressing Tribal Cultural Resources separately. Mitigation measures must take Tribal Cultural Resources into consideration as required under AB-52, **with or without consultation** occurring.

- There is no documentation of **government-to-government consultation by the lead agency** under SB-18 or AB-52 with Native American tribes traditionally and culturally affiliated to the project area as required by statute, or that mitigation measures were developed in consultation with the tribes. NAHC-1

The California Environmental Quality Act (CEQA)[1], specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.[2] If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.[3] In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52. (AB 52).[4] **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for "tribal cultural resources"[5], that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.[6] Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.[7] Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements**. Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966[8] may also apply.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

[1] Pub. Resources Code § 21000 et seq.
[2] Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)
[3] Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)
[4] Government Code 65352.3
[5] Pub. Resources Code § 21074
[6] Pub. Resources Code § 21084.2
[7] Pub. Resources Code § 21084.3 (a)
[8] 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices". NAHC-1 cont.

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

Please contact me at gayle.totton@nahc.ca.gov or call (916) 373-3710 if you have any questions.

Sincerely,

Gayle Totton, B.S., M.A., Ph.D
Associate Governmental Project Analyst

Attachment

cc: State Clearinghouse

Pertinent Statutory Information:

Under AB 52:

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.

A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.[9] and **prior to the release of a negative declaration, mitigated negative declaration or environmental impact report**. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18).[10]

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

a. Alternatives to the project.
b. Recommended mitigation measures.
c. Significant effects.[11]

1. The following topics are discretionary topics of consultation:
   a. Type of environmental review necessary.
   b. Significance of the tribal cultural resources.
   c. Significance of the project's impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency.[12]

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process **shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10.** Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.[13]

If a project may have a significant impact on a tribal cultural resource, **the lead agency's environmental document shall discuss** both of the following:

a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.[14]

Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.[15]

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 **shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program**, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.[16]

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, **the lead agency shall consider feasible mitigation** pursuant to Public Resources Code section 21084.3 (b).[17]

An environmental impact report **may not be certified**, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

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[9] Pub. Resources Code § 21080.3.1, subds. (d) and (e)
[10] Pub. Resources Code § 21080.3.1 (b)
[11] Pub. Resources Code § 21080.3.2 (a)
[12] Pub. Resources Code § 21080.3.2 (a)
[13] Pub. Resources Code § 21082.3 (c)(1)
[14] Pub. Resources Code § 21082.3 (b)
[15] Pub. Resources Code § 21080.3.2 (b)
[16] Pub. Resources Code § 21082.3 (a)
[17] Pub. Resources Code § 21082.3 (e)

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days.[18]

This process should be documented in the Tribal Cultural Resources section of your environmental document.

Under SB 18:

Government Code § 65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of "preserving or mitigating impacts to places, features, and objects described § 5097.9 and § 5091.993 of the Public Resources Code that are located within the city or county's jurisdiction. Government Code § 65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf
- Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.**[19]
- There is no Statutory Time Limit on Tribal Consultation under the law.
- Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research,[20] the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction.[21]
- Conclusion Tribal Consultation: Consultation should be concluded at the point in which:
    - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    - Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.[22]

NAHC Recommendations for Cultural Resources Assessments:

- Contact the NAHC for:
    - A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
    - A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
        - The request form can be found at http://nahc.ca.gov/resources/forms/.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    - If part or the entire APE has been previously surveyed for cultural resources.
    - If any known cultural resources have been already been recorded on or adjacent to the APE.
    - If the probability is low, moderate, or high that cultural resources are located in the APE.
    - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

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[18] Pub. Resources Code § 21082.3 (d)
[19] (Gov. Code § 65352.3 (a)(2)).
[20] pursuant to Gov. Code section 65040.2,
[21] (Gov. Code § 65352.3 (b)).
[22] (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- Avoidance and preservation of the resources in place, including, but not limited to:
  - Planning and construction to avoid the resources and protect the cultural and natural context.
  - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
  - Protecting the cultural character and integrity of the resource.
  - Protecting the traditional use of the resource.
  - Protecting the confidentiality of the resource.
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed.[23]
- Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.[24]

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.[25] In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

[23] (Civ. Code § 815.3 (c)).
[24] (Pub. Resources Code § 5097.991).
[25] per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).

COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

November 16, 2016

Ken Robertson, Director
City of Hermosa Beach
Community Development Department
1315 Valley Drive
Hermosa Beach, CA 90254

Dear Mr. Ken Robertson:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, PUBLIC REVIEW PERIOD AND PUBLIC MEETING, "PLAN HERMOSA: CITY OF HERMOSA BEACH GENERAL PLAN AND LOCAL COASTAL PROGRAM UPDATE", IT HAS INITIATED A COMPREHENSIVE PROGRAM TO UPDATE ITS GENERAL PLAN AND LOCAL COASTAL PROGRAM, IT REQUIRES EACH CITY TO ADOPT A COMPREHENSIVE, LONG TERM GENERAL PLAN FOR ITS PHYSICAL DEVELOPMENT, CITYWIDE-HERMOSA BEACH
FFER 201600178

The notice of availability of a draft environmental impact report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

The subject property is entirely within the City of Hermosa Beach, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.

CLAFD-1

LAND DEVELOPMENT UNIT:

This project is located entirely in the City of Hermosa Beach. Therefore the City of Hermosa Beach Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the Los Angeles County Fire Department. However this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the Los Angeles County Fire Department. CLAFD-1 cont.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department - Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this project.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. CLAFD-2

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comment regarding the project at this time. CLAFD-3

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

Kevin Johnson by mgt

KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

KTJ:ac

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AGENCIES

Comment #	Response
California Department of Transportation (Caltrans)	
CALTRANS-1	The commenter recommends that the City refer to the California Governor's Office of Planning and Research (OPR) Guidelines for vehicle miles traveled analysis in CEQA. The OPR website and guidelines regarding vehicle miles traveled (VMT) analysis in CEQA documents were reviewed in conjunction with the preparation of the project's Traffic Impact Study (TIS). The Draft EIR (pp. 4.14-19 through 4.14-20) summarizes how Senate Bill (SB) 743 will change the way in which transportation impacts may be evaluated by jurisdictions. While the VMT analysis in the EIR is consistent with draft guidelines being prepared by OPR in response to SB 743, its implementation is still evolving and has not yet been incorporated into the CEQA Guidelines. As such, the City of Hermosa Beach does not have adopted thresholds for evaluating a project's VMT. Because the recommendations for new analysis metrics and thresholds of significance are still under development by OPR, the VMT metrics presented in the City's Draft EIR are for informational purposes, as noted on page 4.14-32 in the Draft EIR, and the City has relied on adopted level of service (LOS) standards to determine potential impacts.
CALTRANS-2	This comment references Table 4.14-19 (Caltrans Signalized Intersection Impact Criteria), which is on page 4.14-34 in the Draft EIR. The table identifies three impact thresholds. The comment states that the threshold in the table is incorrect, but does not indicate which threshold is incorrect. Per Caltrans' TIS guidelines, Caltrans intersections along the Pacific Coast Highway (PCH) in the study area were analyzed using the Highway Capacity Manual (HCM) methodology. While Caltrans' TIS guidelines provide screening criteria to determine whether a TIS is needed, its guidance does not include criteria to determine whether the project's trip generation should be considered "significant" under CEQA. For purposes of the Draft EIR analysis, PLAN Hermosa would create a significant impact at a signalized intersection if it causes the intersection to degrade to LOS D, E, or F from LOS C or above. The City, as the CEQA lead agency, worked with its traffic consultant to establish the thresholds used in the Draft EIR, which are consistent with standards used in other recent environmental documents in the city, including the TIS for the E&B Oil Development Project EIR.
CALTRANS-3	The City and its project consultants selected a project evaluation scenario for the Caltrans intersections along the PCH that included lane repurposing consistent with the policies and objectives in PLAN Hermosa and that would document the potential impacts of substantial modifications to the intersections' operating capacity. Specific information for each intersection is included in Appendix G in the Draft EIR, based on the master planning documents available at the time of the analysis. The plans referred to are still under development. Caltrans has not yet completed its Project Study Report for improvements to the PCH, so no formal reference is available for that plan. However, the Request for Programming is available at: http://www.hermosabch.org/modules/showdocument.aspx?documentid=5706.

Comment #	Response
	The Aviation Boulevard Master Plan is also under development. Documentation of a public meeting for the project's early conceptualization is available at: http://hermosabeach.granicus.com/MetaViewer.php?view_id=4&clip_id=2462&meta_id=126846. As noted on page 4.14-39 in the Draft EIR, PLAN Hermosa would contribute to significant impacts at the intersections of the PCH with Artesia Boulevard and Aviation Boulevard. Opportunities for physical mitigations (by the City) are limited by alignment issues, Caltrans' plans for the PCH intersections noted in planning documents, and inconsistency with local adopted plans. For those reasons, there is no feasible mitigation available to the City to mitigate PLAN Hermosa impacts, and the City is not proposing any specific mitigation for PCH intersections at this time. However, the City will continue to work with Caltrans in the context of the PSR and future engineering studies when specific projects are advanced.
CALTRANS-4	The commenter suggests four additional policies be added to PLAN Hermosa. The suggested policies address coordination between the City and Caltrans concerning state facilities, as well as the City's transportation impact fee program. The suggested policies do not propose specific measures that, if implemented, would further reduce transportation network impacts identified in the Draft EIR. PLAN Hermosa actions include substantial implementation of Transportation Demand Management measures that are expected to reduce the expected growth in traffic compared with the 2040 without PLAN Hermosa scenario. Therefore, cumulative impacts on both local and state facilities will be reduced. It is not clear from the comment how the suggested policies would further reduce these impacts. However, the commenter's suggested changes are provided in a separate document and will be presented to the Planning Commission and City Council to consider their incorporation into PLAN Hermosa.
CALTRANS-5	PLAN Hermosa does not propose any specific projects that would directly affect state roadways or drainage systems, nor would it result in the movement of goods requiring a Caltrans transportation permit. This comment is not directed to the technical analysis or conclusions in the Draft EIR. City staff acknowledges Caltrans requirements, and the City would be responsible for ensuring private or public projects that may be developed in the city comply with applicable design standards and permitting. Additionally, the City's Low Impact Development (LID) Ordinance, green streets policy, Enhanced Watershed Management Plan, and National Pollutant Discharge Elimination System (NPDES) Permit ensure stormwater is controlled, which is explained in greater detail in Section 4.8, Hydrology and Water Quality, in the Draft EIR, beginning on page 4.8-8.
County Sanitation Districts of Los Angeles County	
CSDLAC-1	This is an informational comment about the County Sanitation Districts of Los Angeles County wastewater collection and treatment system. It is not specifically directed to the analysis in the Draft EIR, but does include information about capacity and flows. City staff reviewed the description of facilities in the Draft EIR (pp. 4.13-32 and 4.13-39) relative to the information presented in the comment

Comment #	Response
	and did not find any discrepancies, with one minor exception. The Draft EIR (p. 4.13-32) reported an average flow of 263.1 million gallons per day (mgd) to the Joint Water Pollution Control Plant (based on information provided by the district in its Notice of Preparation (NOP) comment letter [Draft EIR Appendix B]), while this comment indicates an average flow of 254.1 mgd, presumably reflecting more current information. This discrepancy does not affect the conclusion in the Draft EIR about impacts on wastewater facilities, because the capacity of the Joint Water Pollution Control Plant remains at 400 mgd, and the more current information reflects a decrease in average flow, meaning the plant is further away from reaching capacity than was previously presented. However, the Draft EIR has been revised with this information (see Chapter 3.0, Revisions to the Draft EIR). With regard to comment 4 in the letter, the flows presented in the Draft EIR (p. 4.13-39) were calculated by district staff and provided in its NOP comment letter.
CSDLAC-2	This is an informational comment about the district's sewerage fee program. It does not address the analysis in the Draft EIR.
CSDLAC-3	This comment notes that the future capacity of the Joint Water Pollution Control Plant is based on the regional growth forecast prepared and adopted by the Southern California Association of Governments (SCAG) and therefore capacity of the plant is limited to the approved growth identified by SCAG. As described in Draft EIR Section 4.12, Population, Housing, and Employment, the City of Hermosa Beach provided input to SCAG in the preparation of the Regional Growth Forecast adopted as part of the 2016–2040 Regional Transportation Plan on the population, household, and employment buildout proposed under PLAN Hermosa, and SCAG accepted that input in full, making the local and regional growth forecasts identical for growth by the year 2040. Based on the flow estimates provided by the district in its NOP comment letter, PLAN Hermosa's contribution to the wastewater system would represent less than an additional 0.1 percent contribution to flows to the system. This increase would have a negligible impact on system capacity (Draft EIR p. 4.13-39).
Native American Heritage Commission	
NAHC-1	The Draft EIR fully evaluated potential impacts on tribal cultural resources in Section 4.4, Cultural Resources. The City of Hermosa Beach has also complied with Senate Bill (SB) 18 and Assembly Bill (AB) 52 consultation requirements. The Executive Summary document provided to the NAHC by the State Clearinghouse included a CD containing the Draft EIR, which contains the specific information the commenter asserts was missing from the EIR. As stated in the Draft EIR (p. 4.4-1), information for the analysis in the Cultural Resources section of the Draft EIR was based on a technical report titled Archaeological and Paleontological Resources Assessment and Historic Resources Existing Conditions Report to support PLAN Hermosa, prepared by PCR Services Corporation and included in the Draft EIR as Appendix C-7. The assessment included an archaeological resources records search through the California Historical Resources Information System, South Central Coastal Information Center (CHRIS-SCCIC), and a Sacred Lands File search through the California Native American Heritage Commission (NAHC), among other items (Draft EIR p. 4.4-1).

Comment #	Response
	The Draft EIR (p. 4.4-5) described the requirements for SB 18 and AB 52 tribal consultation requirements and how the City has complied with those requirements. In August 2014, the City received information from the NAHC pursuant to SB 18 indicating a search of the results of a Sacred Lands File search and the names of tribal representatives. As stated on page 4.4-5, the City requested consultation with Native American tribes in compliance with SB 18 in January 2015, and again under AB 52 in August 2015. In addition to the tribal consultation process, the City has sent notifications to each of the listed tribal organizations offering opportunities to comment on the NOP and the Draft EIR. Copies of all communications with the NAHC and the tribal organizations listed by the NAHC in accordance with SB 18 and AB 52 requirements have been provided in a new **Appendix H** added to the Final EIR. The documents in Appendix H are confidential to comply with AB 52 and protect the confidential information provided by California Native American Tribes. They are included in the administrative record for the EIR and are on file with the City of Hermosa Beach. The Soboba Band of Luiseño Indians and the Gabrieleño Band of Mission Indians-Kizh Nation have requested that an experienced, trained, and certified Native American monitor be on-site during any ground-disturbing activities related to subsequent projects. It should be noted that PLAN Hermosa is a program level document that will not directly result in physical changes to the environment since there is no evidence of a substantial impact and we cannot speculate what types of projects will be proposed under the General Plan, revisions to the implementation actions are appropriate to respond to tribe's concerns. The Draft EIR (Impacts 4.1-1 and 4.1-2 on pp. 4.4-10 through 4.4-12) evaluated the potential for implementation of PLAN Hermosa to adversely affect Native American resources and human remains. As stated on page 4.4-11, no known archaeological resources (historic or prehistoric) have been recorded within the city. The Draft EIR noted that these findings, however, do not preclude the possibility of encountering undiscovered archaeological resources during construction, given the proven prehistoric and historic occupation of the region, the identification of surface and subsurface archaeological resources near the PLAN Hermosa planning area (e.g., Old Salt Lake and CA-LAN-1872), and the favorable natural conditions (e.g., Pacific Ocean) that would have attracted prehistoric and historic inhabitants to the area. The archaeological monitoring of numerous construction projects throughout the region in recent decades has demonstrated the existence of deeply buried archaeological deposits, especially in locations of rapid Holocene deposition such as alluvial fans. The Draft EIR (p. 4.4-12) also noted that the discovery of Native American human remains, including cases of multiple burials, is not uncommon in the region (e.g., Malaga Cove). The City concluded impacts would be less than significant and would not require mitigation measures because PLAN Hermosa includes a comprehensive policy-based approach for determining whether tribal resources or remains may be present in an area in which ground disturbance could occur and how potential impacts would be mitigated. For example, implementation action LAND USE-23 (Draft EIR p. 4.4-10) directs that the City require archaeological investigations for all applicable discretionary projects, in accordance with CEQA regulations, for areas not previously surveyed and/or that are determined sensitive for cultural

Comment #	Response
	resources. As part of the implementation action, the City will require the preservation of discovered archaeologically significant resources (as determined based on city, state, and federal standards by a qualified professional) in place if feasible or provide mitigation (avoidance, excavation, documentation, curation, data recovery, or other appropriate measures) prior to further disturbance. The Draft EIR (pp. 4.4-11 through 4.4-12) explained how this process would work: an initial archaeological study (Phase I Assessment), at a minimum, would consist of the following tasks to identify known archaeological resources in a given project site: a cultural resources records search through the South Central Coastal Information Center of the California Historical Resources Information System, a pedestrian survey of the project site, a review of the land use history, and coordination with knowledgeable organizations or individuals (e.g., Hermosa Beach Historical Society, Native American tribes). If warranted, additional analyses such as archaeological test excavations and/or remote sensing methods would be implemented to identify resources. To more explicitly address tribal requests for a Native American monitor to be present during ground-disturbing activities, the City proposes amending implementation action LAND USE-21 as follows (new text underlined): LAND USE -21. All discretionary projects that include ground disturbance or excavation activities on previously undisturbed land shall be required to conduct archaeological investigations in accordance with CEQA regulations to determine if the project is sensitive for cultural resources. Additionally, as the Lead Agency for future discretionary projects, the City is required under AB 52 to notify tribal organizations of proposed projects and offer to consult with those tribal organizations that indicate interest. Following any tribal consultation or archaeological investigation, the City shall weigh and consider available evidence to determine whether there is a potential risk for disturbing or damaging any cultural or tribal resources and whether any precautionary measures can be required to reduce or eliminate that risk. Those precautions may include requiring construction workers to complete training on archaeological and tribal resources before any ground disturbance activity and/or requiring a qualified archaeologist or tribal representative to monitor some or all of the ground disturbance activities. The City shall require the preservation of discovered archaeologically significant resources (as determined based on city, state, and federal standards by a qualified professional) in place if feasible or provide mitigation (avoidance, excavation, documentation, curation, data recovery, or other appropriate measures) prior to further disturbance.
County of Los Angeles Fire Department	
CLAFD-1	The commenter states PLAN Hermosa does not appear to have any impact on the emergency responsibilities of the County of Los Angeles Fire Department. The comment does not affect the conclusions in the Draft EIR concerning fire protection impacts (Impact 4.13.2-1 [pp. 4.13-7 through 4.13-8] in Section 4.13, Public Services, Community Facilities, and Utilities).

AGENCIES

Comment #	Response
CLAFD-2	This commenter states the statutory responsibilities of the County of Los Angeles Fire Department Forestry Division. The comment does not address the technical analysis or conclusions in the Draft EIR.
CLAFD-3	The commenter states that the Health Hazardous Materials Division of the County of Los Angeles Fire Department has no comments at this time.

Tribes

Subject: Plan Hermosa: City of Hermosa Beach Beach General Plan and Local Coastal Program Update

Gabrieleno Band of Mission Indians [redacted]

Sun 10/30/2016 1:59 PM

To: Leeanne Singleton <generalplan@hermosabch.org>;

Cc: Matt Teutimez.Kizh Gabrieleno [redacted]; Christina Swindall [redacted]; Henrypedregon [redacted]; Gary Stickel [redacted];

2 attachments (737 KB)

IMG_4746.jpg; Subject- Plan Hermosa- City of Hermosa Beach Beach General Plan and Local Coastal Program Update .docx;

please see atatchment

Sincerely,

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

On October 30, 2016 the Gabrieleno Band of Mission Indians-Kizh Nation submitted a letter on the City of Hermosa Beach General Plan and Local Coastal Program Update regarding their ancestral and traditional territories that overlap with the City of Hermosa Beach Boundaries and requested that a tribal monitor is present during any ground disturbance activities associated with the project. The letter provided by the tribe may be found in Appendix H, which is on record with the City of Hermosa Beach, but kept confidential to comply with AB 52 and protect the confidential information provided by California Native American Tribes.

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TRIBES

Gabrieleño Band of Mission Indians–Kizh Nation	
Comment #	**Response**
GBMI-1	The commenter summarizes information about the ancestral and traditional territories of the Kizh villages such as Engnovangan, and has included an excerpt from a 1978 publication about the Gabrieleño. The Draft EIR (p. 4.4-2) notes the significance of this village in Hermosa Beach. The Draft EIR (Impacts 4.1-1 and 4.1-2 on pp. 4.4-10 through 4.4-12) evaluated the potential for implementation of PLAN Hermosa to adversely affect Native American resources and human remains. As stated on page 4.4-11, no known archaeological resources (historic or prehistoric) have been recorded within the city. The Draft EIR noted that these findings, however, do not preclude the possibility of encountering undiscovered archaeological resources during construction, given the proven prehistoric and historic occupation of the region, the identification of surface and subsurface archaeological resources near the PLAN Hermosa planning area (e.g., Old Salt Lake and CA-LAN-1872), and the favorable natural conditions (e.g., Pacific Ocean) that would have attracted prehistoric and historic inhabitants to the area. In addition to the specific examples cited by the commenter for a project in Los Angeles and Hawaiian Gardens, the archaeological monitoring of numerous construction projects throughout the region in recent decades has demonstrated the existence of deeply buried archaeological deposits, especially in locations of rapid Holocene deposition such as alluvial fans. The Draft EIR (p. 4.4-12) also noted that the discovery of Native American human remains, including cases of multiple burials, is not uncommon in the region (e.g., Malaga Cove). As noted in response NAHC-1, the City is proposing to amend implementation action LAND USE-21 to more explicitly detail the tribal consultation process and include direction as to when a Native American monitor would be required to be present on-site during ground disturbance activities. This implementation action, as amended, would ensure the consultation requirements of AB 52 are followed by the City as the lead agency and that requirements are clear related to the presence of Native American monitors during ground-disturbing activities in which a tribe or archaeological investigation indicate the potential for tribal resources to be found.
GBMI-2	As described on page 4.4-5 in Section 4.4, Cultural Resources, in the Draft EIR, the City requested consultation with Native American tribes in compliance with SB 18 in January 2015 and again under AB 52 in August 2015. The City notified all of the relevant tribal organizations identified by the Native American Heritage Commission for the City of Hermosa Beach. In a letter dated May 19, 2014, the NAHC provided a list of the tribes that claim traditional or cultural affiliation with the area surrounding Hermosa Beach, including the Gabrieleño/Tongva San Gabriel Band of Mission Indians, Gabrieliño-Tongva Tribe, Gabrieliño Band of Mission Indians, and Gabrieliño/Tongva Nation. All of the groups identified by the NAHC will continue to be notified of projects in Hermosa Beach and offered an opportunity to consult with the City in accordance with AB 52.

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INDIVIDUALS

Carbon Neutral

steve adler [redacted]

Thu 11/24/2016 12:17 PM

To: Leeanne Singleton <generalplan@hermosabch.org>;

Dear Council-members
Upon reviewing the general plan towards the goal of becoming "carbon neutral" I am pleased that you have taken a thoughtful approach to this endeavor. However, after my review I find this far beyond the scope of your elected positions to ratify any part of this proposal without asking the community for permission. Additionally, I would like to know what benefit the City of Hermosa would have for being the "1st" to be carbon neutral?

1. Do we receive tax benefits for implementing this plan?
2. Do the savings offset the expense of implementing this plan? If so, how many years will it take?
3. If there are no financial benefits to going carbon neutral why purchase carbon offsets?
4. If we have the money for carbon offsets wouldn't that money be more beneficial to the environment if we promoted worthy environmental causes? For example: we could promote the need that we as consumers actually consume less. Clearly it is better for the environment over all to use a gasoline powered car until it no longer can be used... rather than turning the car in and purchasing an electric car. If you wish I can provide many studies that speak to over consumption with regards to autos, computers, phones etc.

ADLS -1

As stated before, I applaud all of you for undertaking this lofty goal, however, I believe many of your suggestions should be open to a vote and not dictated by our City Council.

Thank you

--
Steve Adler
[redacted]

comments on carbon neutrality

Peggy Barr [redacted]

Thu 11/17/2016 3:44 PM

To: Leeanne Singleton <generalplan@hermosabch.org>; Marie Rice <marierice@gmail.com>; Mike Flaherty <mikeflaherty2010@gmail.com>; Peter Hoffman <phoffman@lmu.edu>; Rob Saemann <rsgc1@aol.com>; David Pedersen <dpedersen@hermosabch.org>; Councilmember Carolyn Petty <cpetty@hermosabch.org>; Councilmember Jeff Duclos <jduclos@hermosabch.org>; Mayor Hany Fangary <hfangary@hermosabch.org>; Mayor Pro Tem Justin Massey <jmassey@hermosabch.org>; Councilmember Stacey Armato <sarmato@hermosabch.org>; City Clerk <cityclerk@hermosabch.org>; John Jalili <jjalili@hermosabch.org>;

11/17/2016
RE: Carbon Neutrality/EIR

Enough is Enough!

There have been 4 “studies” on the feasibility of Hermosa Beach becoming Carbon Neutral. And in October the council approved yet another $7500 for an additional study…when all of the 4 previous ones came to a similar conclusion: *The only way to be Carbon Neutral is to either purchase carbon offset credits or produce renewable energy in order to offset emissions.*

Neither of these options is a sound management or fiscal decision.

BARP -1

First of all, purchasing carbon offset credits (RECs) is NOT being carbon neutral {EIR 4.6-15}: Just by merely purchasing RECs you can’t create CLEANER energy or CLEANER air. RECs do nothing to actually lower greenhouse gases (GHG) but merely shift money from the city to the pockets of the brokers representing Carbon Neutrality or CCAs, who are usually the consultants pushing this agenda on cities. RECs are merely deals on paper that cost Hermosa Beach taxpayers more money.

Secondly, producing renewable energy on our own (thru a CCA) is not sound judgement. There is no guarantee that the energy we will generate/receive will be any more renewable or CLEANER than what we already receive from SCE. SCE is currently regulated by the state and federal governments to have CLEANER/RENEWABLE energy. The most recent statistics I was able to find for SCE were from 2014 and it is required to increase yearly-in 2014 we received 27% CLEAN energy and 24% RENEWABLE. [source: 2014 Power Content Label - Southern California Edison]

BARP -2

The actual break down looked like this:
27% is CLEAN
33% is moderately CLEAN

40% is unspecified*****
And 24% of this power is RENEWABLE

BARP -2 cont.

***** My understanding of the definition of unspecified, includes things they can't really measure, like the input onto the grid of the CLEAN solar power that our household and many others generate.

So far I have only been addressing the Hermosa Beach City as its own entity. But if the EIR is passed to include "community wide carbon neutrality" {EIR 6.0-9, 6.0-10} Hermosa Beach residents and taxpayers are due to see huge increases in costs with instituting :
- the establishment of greenhouse gas impact fees {EIR 4.6-16} which will drive up the cost of development-ultimately passed on to us as consumers.
-the requirement to install renewable energy projects on homes and businesses, mandating retrofits to existing buildings to improve energy efficiency {EIR 4.6-13} -costing the homeowners money and again ultimately the business passing the cost onto consumers.
-the elimination of the use of natural gas within the city
-new modified parking standards to disincentive gasoline powered cars, making it more onerous and/or expensive to park – ultimately driving down our tax base from businesses.

BARP -3

We cannot have these provisions hard coded as part of our General Plan, providing the foundation for future policies. If we do we are just setting ourselves up for misery, bankruptcy, a decrease in our quality of life and worst of all an infringement on personal property rights.

I reiterate…Enough is Enough!

Please consider your decision thoroughly; it affects everyone for generations to come!

Peggy Barr

PLAN Hermosa DEIR Comments

Claudia Berman [redacted]

Mon 1/2/2017 3:41 PM

To: Leeanne Singleton <generalplan@hermosabch.org>;

Here are a few comments for the PLAN Hermosa DIER related to the Carbon Neutrality topic:

- Are the assumptions made on today's technology or do you factor in technological changes that may occur over the next 20+ years? It's my understanding that they are based on today's technology. Therefore, please specify that clearly upfront.
- I found the comparisons between the PLAN and State requirements confusing. It would be good to have some type of table so that people can compare the PLAN options to State requirements. I did a quick table of an example. The EIR should have something like this and have a clearer statement of how we line up to the State requirements. It took me many hours to realize that PLAN Hermosa end date of 2040 is in line with California's current requirements.

BERC-1

	Carbon Reduction % 2005 Level			
	2020	2030	2040	2050
California	-15	-49		-80
Hermosa Sustainabity Project 2011	-15			
PLAN Hermosa Carbon Neutrality PLAN end date 2040			-66	
PLAN Hermosa Carbon Neutrality Goal 2 @ 2030		-66		
PLAN Hermosa Project Alternative 2020	-66			

Thank you,
Claudia Berman
[redacted]

Plan Hermosa Meeting tonight and Palo Alto to get $1 million

Robert Fortunato [redacted]

Mon 11/21/2016 12:32 PM

To: Leeanne Singleton <generalplan@hermosabch.org>; Peter Hoffman <phoffman@hermosabch.org>; Michael Flaherty <MFlaherty@hermosabch.org>; Rob Saemann <rsaemann@hermosabch.org>; Marie Rice <mrice@hermosabch.org>; David Pedersen <dpedersen@hermosabch.org>;

Cc: City Council <citycouncil@hermosabch.org>; Elaine Doerfling <edoerfling@hermosabch.org>;

City Clerk - Would you please forward this email to the Planning commission and I ask that this email be included as a supplemental

Dear Honorable Planning Commissioners and Staff,

Thank you for all the good work you are doing on Plan Hermosa. I know you are aware of the importance of this plan in setting the course for the city in the coming decades. While reviewing Plan Hermosa you will inevitably get questions as to why we are pursuing a carbon neutrality goal.

If health of our residents, sustainability of our environment and disaster preparedness are not compelling enough reasons, than the economics should be. Plan Hermosa was partially funded by $410K from the Strategic Growth Council because we are pursuing the goal of Carbon Neutrality.

Many other initiative have been and will be funded because we differentiate ourselves from competing cities by aspiring to this Carbon Neutral goal. A recent example is the UCLA-MBA study where a group of local residents who are working toward their MBA heard about our Carbon neutral goal and are doing a business plan for our city that is conservatively valued at $160,000 for $7,500. FORR -1

By keeping this ambitious goal at the forefront of our consciousness, we can help the city be more efficient in its operations and better for our residents - while getting funding to help our local economy. As you can see in the email below, Palo Alto, who has a similar Carbon Neutral goal, just recently got $1 million to study how to reduce traffic.

Please support an aggressive Carbon Neutral 2030 goal for our city and let me know let me know if you have any question or concerns.

Respectfully,

Robert Fortunato

---------- Forwarded message ----------
From: **City of Palo Alto** <cityofpaloalto@service.govdelivery.com>
Date: Thu, Nov 17, 2016 at 4:39 PM
Subject: Climate Action: Taking Our Next Big Step -- 80 x 30!
To: [redacted]

November 2016

Climate Action: Taking our Next Big Step

Palo Alto: Designing Our Path to 2030

Palo Alto has long been ahead of the pack in sustainability, adopting one of the first municipal climate action plans in the U.S. in 2007, delivering carbon neutral electricity, and partnering with our community to develop a vision for an innovative, carbon neutral city of the future. Poised to take the next step as a climate and sustainability leader - with one of the boldest municipal climate goals in the country...[Read More...]

BRT

Regional Consortium Wins $1 Million Federal Grant for Technology-based Commute Alternatives

One of the Sustainability and Climate Action Plan's (S/CAP) key focus areas is to rethink mobility. Road transportation represents about 61% of Palo Alto's carbon footprint. Last month, the City of Palo Alto, as part of a regional consortium of stakeholders, won a $1 million federal grant for a demonstration project to reduce single-occupant vehicle driving from 75 percent to 50 percent in the Bay area. [Read More]

Palo Alto and Sustainability News of interest

- Governor Brown signs major climate bill, requiring the state to reduce emissions to 40 percent below 1990 levels by 2030
- City of Palo Alto received the 2016 California Energy Efficiency Industry Council Energy Champion Award, in recognition for adopting a new Zero Net Energy (ZNE) Ready "Reach Code", which goes into effect January 1, 2017
- The second phase of the Cool Block pilot program is about to get underway and additional neighborhood blocks are invited to participate
- Palo Alto and leading U.S. cities partner on guidelines for smart cities to ensure the responsible and equitable deployment of smart city technologies
- City of Palo Alto Utilities ranks in the national top 10 for most solar watts per customer

Council Adopts 80 x 30 Goal and Framework for Climate Action Plan

The City Council adopted the general framework of the Sustainability and Climate Action Plan (S/CAP) at its meeting on Monday, April 18, which identifies a Greenhouse Gas Emissions reduction goal of 80 percent by 2030. [Read More]

Get Involved. S/CAP at the next City Council Meeting on November 28th.

On Monday, November 28th, the City Council will meet to review the Sustainability and Climate Action Plan (S/CAP) and decide upon formal adoption of the plan. The agenda for the meeting will be posted here. As always, you're invited and welcome to share your perspectives (just be sure to fill out a comment card).

Share Your Priorities for 2017 with Palo Alto City Council

What are the priorities you would like to see the Palo Alto City Council adopt in 2017? You are invited to share your thoughts on Open City Hall. [Read more]

- Considering Solar? Sign up now to take advantage of Palo Alto's Current Net Metering program.

For more timely sustainability news and updates...

...follow Chief Sustainability Officer Gil Friend on Twitter @PaloAltoCSO

--

Robert Fortunato [redacted]
President [redacted] www.ForStrategy.com

Our commitment to leadership, innovation and sustainability is reflected in our Green Idea House

"Don't be put off by people who know what is not possible. Do what needs to be done,

and check to see if it was impossible only after you are done" - Paul Hawken

HB Planning Commission - PLAN EIR - 11/21/2016 - D. Grethen

(Comments in ***bold italics***. Introductory/background info in plain text)

Figure 4.6-3 is a useful way to depict state-driven carbon reduction goals and measures as related to local neutrality goals, as well as potential offsets.

But the following accompanying description of may need to be even more precisely explained to be more clear to describe how the numbers add up.

Per report: "As depicted in Figure 4.6-3 (Emissions Reductions Needed to Meet State and Local Targets), the impact of state legislation on local emissions in 2040 would leave a remaining gap of 48,800 $MTCO_2e$ to be reduced by local policy to achieve state goals and a remaining gap of 95,420 $MTCO_2e$ to achieve a carbon neutral goal by 2040 as proposed in the draft of PLAN Hermosa."

More significantly, the following questions associated with Figure 4.6-3 should be addressed:

- Why does state legislation need to be augmented by local policy to meet state goals?
- Why is state legislation insufficient to meet state goals?
- Is there something specific about Hermosa Beach that results in state legislation not being sufficient for Hermosa Beach to not meet state goals?

GRED1-1

These insights might help the city better understand its challenges, regulatory role, and degree of local initiative necessary to achieve carbon reduction goals.

Figure 4.6-3 and its accompanying discussion also indicate the following conclusions, which could imply large environmental impacts:

- The city will already be significantly challenged to meet state goals through local measures beyond what will be driven by state legislation (this is indicated by the size of the blue shaded region of the figure compared to the size of the pink shaded region)
- The city will be greatly additionally challenged in order to achieve full carbon neutrality beyond what it must do to meet the state goals, with neutrality approximately doubling the size of the total challenge (this is apparent since the size of the green shaded region is roughly the size of the blue shaded region)

The subsection underlined as "Renewable Energy Generation" on Page 4.6-21 highlights how renewable energy may be generated for local use in the following ways, some local and some remote:

GRED1-2

- Installations on homes and businesses (local)
- Carbon neutral municipal facilities (local)
- Locations appropriate for additional renewable energy technologies and to

"allow by right" (local)
- Community choice aggregation (CCA - remote)

The decision to use remotely- versus locally-generated renewable energy to achieve carbon reductions will be a large determinant of impacts to the local environment, residents, and businesses.

Rough order of magnitude estimates for potential land use impacts should be provided for scenarios where municipal (and entire community) carbon reduction/neutrality goals are met by use of local solar energy to fully supply the total kW-hr energy needs every day, plus any additional renewable energy generation needed in lieu of purchasing carbon offsets (e.g. Alternative 2).

The estimates should specify the following for both the municipality and entire community:

- Total land/mounting area to achieve municipal (and community) carbon neutrality with all electricity generated locally for solar.
- Total available rooftop mounting area on municipal (and community residential/business) buildings
- Amount of additional land/mounting area that would be needed to be provided in municipal (and community) open spaces

GRED1-2 cont.

This would provide an initial feasibility assessment for local solar and help determine whether most of the city's renewable energy is likely to be locally generated, or whether we would heavily rely on remotely located sources (e.g. via CCA). This could also provide further insight about potential local impacts such as glare and ability to preserve local city character.

Additionally, it should also be identified what specific locations in the city might be "appropriate for additional renewable energy technologies" and where they might be "allowed by right" as stated on Page 4.6-21.

The availability of locations would determine feasibility or whether land use modification impacts occur. The city is already well developed and rather dense.

Fuel consumption Table 4.13-7 includes electric vehicle electricity use in kW-hr, as well as assumed fuel efficiencies.

The basis for the electric vehicle use estimate should be supported clarified including the following:

GRED1-3

- Which corresponding level of carbon reduction this usage supports (full neutrality vs. 66% of 2005 levels
- Fraction and amount of increase in the fraction of citywide vehicles that are

electric (extent of gasoline vehicle replacement assumed or needed)
- Anything else that might better relate this table to the GHG Section 4.6 of EIR

These estimates would help to better understand the amount of supporting infrastructure needed (e.g. charging stations and parking area) and potential resident impacts (e.g. home electricity and vehicle replacement)

The basis for the 77 mpg fuel efficiency estimate should be described and supported.

The accuracy of fuel efficiency forecasts directly affects carbon emissions predictions. Fuel efficiency could also determine the extent of conversion to electric vehicles driven based on how it motivates vehicle owners.

GRED1-3 cont.

GHG mitigation measures MM4.6-1a, b, and c call an active/adaptive management approach for tracking progress towards state carbon reductions goals, potentially including regulatory corrective measures.

Mitigation measures potentially resulting in regulation to meet state-driven carbon reduction goals may be appropriate if necessary to assure legal compliance, but would not be appropriate to meet local voluntary goals for complete carbon neutrality. The proposed mitigations listed above seem to be consistent with state goals and measures (legislation and orders).

GRED1-4

Section 6.0.5 entitled "Environmentally Superior Alternative" identifies the Character Retention alternative as environmentally superior to the other alternatives presented, including 2030 Carbon Neutrality.

Among the alternatives presented, I would not object to Character Retention Alternative 3. I do not support the 2030 Carbon Neutrality Alternative 2.

GRED1-5

Alternative 2 in Section 6 is defined by two simultaneous changes to the baseline (acceleration to 2030 and no carbon offset purchases) whose respective impacts are not at all readily distinguishable in the report. The lack of distinction also hinders public discourse in this area.

The report needs to better distinguish between the impacts of acceleration to 2030, versus the effects of not allowing carbon offset purchases, perhaps by adding a column to an existing table, or with a new table.

GRED1-6

Table 6.0-4 compares carbon reductions for the 2040 versus 2030 (with offsets) scenarios. The most glaring difference between the scenarios is seen by

comparing the 'Community Solar' and 'Purchase Offsets' line items in the table.

The main difference in HOW the carbon goals are met between the two scenarios is that the offsets in 2040 are roughly exchanged for a large increase in local energy generation. This is a large impact to land use, with other impacts such as glare and aesthetics also identified in the report.
Note: This also relates to other comments provided about land and solar area.

GRED1-6 cont.

Section 6 includes impacts for each environmental area including Land Use Planning on Page 6.0-22.

Why is there no discussion under Land Use Planning for Alternative 2 given that elsewhere in the report it is shown that the amount of local energy generation needed would increase by a factor of about 5x? Please include in Land Use section or elsewhere in the report if more appropriate.

Additionally, Page 6-35 states as follows (underline added here):

"Alternative 2 could pose greater impacts to aesthetics and biological resources due to increased use of renewable energy systems such as solar, wind, or ocean-based renewable energy sources, and greater impacts to cultural resources due to greater alteration or demolition of designated or potentially eligible historic resources to construct high energy performance buildings. While the impacts to aesthetics, biological resources, and cultural resources may be greater than with PLAN Hermosa, <u>it is unknown whether they would rise to the level of being considered a significant impact, because the specific design and location of additional renewable energy projects cannot be determined at this time</u>"

GRED1-7

The above underlined excerpt seems to limit the depth of certain impact assessments in a way that is not very satisfying. That is why the solar scenario calculations are requested per other comments provided here. I can see how ocean wave/tidal technology may not yet be so well understood, but solar is.

Section 6 includes Alternative 2 for 2030 Carbon Neutrality, which means the community has 14 years, not 24 years to reach neutrality after 2016.

The <u>rate</u> of carbon reductions, based on the amount of reduction and reduced length of time to achieve, would be additionally challenging and likely especially impacting since the amount of time to meet goals is reduced by a factor of about 1.7x. Given the amount of reduction to achieve carbon neutrality is about 2x what is needed by city initiatives beyond state goals and measures (Fig. 4.6-3), this means carbon reduction must occur at a <u>rate</u> of nearly 4x what might normally be needed based on state measures.

GRED1-8

Alternative 2 in Sec 6 identifies impacts including the following effects on residences.

- Replacement of gas heating systems, water heaters, and stoves
- Expense and delays to retrofit their homes for energy purposes prior to sale (unless onus for upgrades could be placed on homebuyer after sale)
- Home electrical system impacts for electric vehicle charging.

GRED1-9

If homeowners lose discretion in the way they manage their property, this could have adverse environmental impacts. For example, if replacements or changes to home appliances, utility infrastructure, or building conversions are mandated to occur before these resources have exhausted their naturally useful lifetimes, there would be environmental impacts associated with the prematurely generated wastes.

PLAN EIR - Additional Grethen Comments

HB PLAN EIR Comments (Transportation/General) - Dec 2016 - D. Grethen
(Comments/Recommendations in ***bold italics***. Introductory/background info in plain text)

Transportation:

Tabulated data along with Figs 4.14-8 and -9 indicate worsening traffic levels or service (LOS) for 2040 including PCH, Artesia, Aviation, Prospect, and Manhattan Avenue. Accompanying discussion indicates reasons why the impacts are expected to be significant and unavoidable, emphasizing limitations of potential mitigation measures. But it was not clearly certain just what is the root cause of the LOS degradation impacts. Is it mostly driven by the identified planned elimination of a lane of traffic in each direction of PCH in Hermosa Beach? Or is it more driven by other factors, such as increased regional traffic through Hermosa Beach, (e.g. more Redondo residents using Prospect)?
Please provide an enhanced analytical explanation of reasons for degraded LOS in Hermosa Beach, especially for those roadways where LOS is as low as D or E (or even C), including on Prospect.

GRED 2-1

General:

As a general EIR comment, it would be good if more explanations could be provided about what are the driving causes for environmental differences due to the PLAN (or between now and 2040). The comment above about LOS is a specific example that spurred this general comment.
Throughout the EIR, as a goal and to the extent practical, please attempt include more insight about reasons for results, not just stating the results and showing the supporting data. Such insights and identification of root causes might be useful to guide additional future analyses and efforts to seek mitigation. If this info is in certain appendices, perhaps add references to those.

Comments; EIR / City Planning Commission

Art Krugler [redacted]

Sun 12/4/2016 8:28 PM

To: Leeanne Singleton <generalplan@hermosabch.org>;

From; Arthur H Krugler, Professional Chemical and Mechanical Engineer.
Forty years of experience in power generation and fuels; 26 years in process plant engineering.

Attendee and speaker @ Nov. 21 hearing - invited by Tracy Hopkins.
Provided copies of my booklet; POLAR BEARS IN THE HOT SEAT; CO2 and Global Warming

You commission members impressed me with your attention to the EIR and the speakers;
And also your understanding of the magnitude of the EIR proposals. KRUA -1

My comments as an observer:
1 The elephant in the room is the State Mandate on Carbon Neutrality; the Clean Power Plan.
This could force major and expensive changes on the city and residents.
I do not see enough information of how self-generation of power could save so much money.
"A pessimist is someone who has financed an optimist".

Ozone and Methane rules are also significant.

2 My handout, "POLAR BEARS IN THE HOT SEAT; . . " is a condensation of years of study.
Yes, NOAA data shows a sudden warming of the small North Pole area which started in 1980. see pages 1 and 20.
I am neither denier, nor acceptor, nor challenger of modelers but a careful analyzer of data.

3 Ice core data shows our planet had started the cool down portion of the 110,000 year cycle (see pages 1 and 19) some 10,000 years ago.
Magma activity, (volcanoes and undersea vents) has caused a 35 year long 10 degree rise at the North Pole temperature, **which is very likely ending.** KRUA -2
Earthquake activity near the North Pole, responding to Magma movement, increased in 1970 and has abruptly stopped.
The North Pole ice could return very quickly.
4 CO2 levels will continue to rise along with the increased use of natural gas fuel but temperatures will cool.
5 I expect to see many news reports this year and next like those in the LA Times today, Sunday Dec 4;
Page A-20 "Aloha, Old Man Winter; Hawaii peaks get 2 feet of snow" - 'last year had none'
Page B-5; "Water year is off to a good start"; Northern Sierra Nevada sees wettest fall since 1984', 200% above average.

Expect snow storms and floods in Central and Eastern US. Cold arctic air meets warm humid Caribbean air with predictable results.
An 'ice age' requires heavy snowfall for many years to create the thick ice layer.
However, LA Times front page news continues; Page A-19 - Opinion;
"OUR REPUBLIC OF CLIMATE"; 'California is a role model leading the nation - and even the world'.
Actually, we need to develop and install a new generation of nuclear plants to provide the power for desalination and heating in this cold world, as well as the ever increasing energy uses. Energy efficiency and alternate sources where economical are excellent also.
Leaving fossil fuel in the ground will also leave the asphalt we need to replace roads and roofs.

Arthur H Krugler
[redacted]

Should any of you commissioners be interested in further discussion, I am available 24/7.

Further bio information is available @ [redacted]

Untitled

G & J Moriyama [redacted]

Sat 11/19/2016 1:46 AM

To: Leeanne Singleton <generalplan@hermosabch.org>;

This carbon neutrality business is a bunch of bologna.

MORG-1

City owned building Prospect and 6th St.

[redacted]

Fri 11/18/2016 1:52 PM

To: Leeanne Singleton <generalplan@hermosabch.org>;

I have read the PLAN Hermosa draft and the General Plan and see references to maintenance and upgrades to City facilities, parks, etc. The structures in the City yard are referenced and I agree, they are in dire need of renovation. There is a building being used for storage next to Ft. Lots of Fun at 6th and Prospect. It has been allowed to deteriorate and is now an eyesore and a blight in our neighborhood. It is not in an industrial area - it is in a residential neighborhood with children, homes, dogs, parks, etc. and as such, is a HIGHLY VISIBLE structure. I do not see this building referenced in any of the documents under review. I invite you to do a driveby, take a look and tell me if you agree or disagree that this structure (peeling, cracked stucco, mold and mildew growing up the sides) should be a HIGH PRIORITY item. I guarantee you that no one in City government would want this structure in its condition in their neighborhood. MOWB -1

I am asking that language be included in the planning documents that specifically references this building just as Clark Stadium, 8th Street, Plaza, fire station, library and other sites are referenced.

Since this building has some historical significance (it was originally a school), perhaps it could be painted with one of the lovely murals I see in the downtown area, showing children playing and arriving for school as they would have back in 1925 when it was constructed.

If there is another channel I should use to bring this to the attention of those who could bring about this request, please give me that information and I will pursue the issue further.

Bette Mower

From: Jens Palsberg [redacted]
Date: November 20, 2016 at 4:41:54 PM PST
To: Peter Hoffman <phoffman@hermosabch.org>, Michael Flaherty <mflaherty@hermosabch.org>, Rob Saemann <rsaemann@hermosabch.org>, Marie Rice <mrice@hermosabch.org>, David Pedersen <dpedersen@hermosabch.org>
Subject: a carbon neutral community

Dear Members of the Hermosa Beach Planning Commission,
Peter Hoffman, Michael Flaherty, Rob Saemann, Marie Rice, and David Pedersen,

Thank you for all you do for Hermosa Beach.

I like PLAN Hermosa, which spells out worthwhile opportunities and has a forward-looking approach. I am particularly excited about the vision of a carbon neutral community. This vision attracted me and my UCLA Executive MBA team to do our final project on aspects of the vision, as detailed in the attached plan. The Hermosa Beach City Council voted in favor of the project on September 28, 2016. The project will run from January to June 2017.

PALJ-1

I believe that PLAN Hermosa's vision of a carbon neutral community will continue to garner interest and excitement in the future.

Sincerely,

Jens Palsberg
Professor, UCLA Computer Science Department
[redacted]

General Plan Air Quality Section

Ken Sarno [redacted]

Wed 11/2/2016 3:06 PM

To: Leeanne Singleton <generalplan@hermosabch.org>;

The refineries surrounding us should not be omitted from the air quality section of the plan. The particulates and gasses emitted during surprise flares and other unanticipated refinery events in Torrance and El Segundo definitely lower the air quality in surrounding cities. To what extent and for how long our city's air quality is affected would vary depending on the nature and duration of the event. The problem is, we never know what the effects are because the refineries certainly won't tell us and we don't measure or analyze the air ourselves.

In addition, low-probability but very deadly refinery emergencies related to the use of acid catalysts could require a rapid response by the city to minimize injury and loss of life. While this could be classified more as an emergency-preparedness issue than a matter of air quality, it underscores the need to continuously monitor our own air for sudden changes, using city-controlled and calibrated equipment. It also reinforces the dual threats posed by regional refineries. SARK -1

The general plan should affirmatively recognize these threats (as should the planning of all nearby cities) and not just rest on regional trends and averages. Therefore the plan should incorporate:

-- City-owned and observed air monitoring equipment
-- Enhanced city relationship with AQMD and other regulatory agencies
-- Involvement by the city in efforts to mitigate or remove refinery risks by both community groups and other neighbor city governments. SARK -2

Ken Sarno

[redacted]

Sent from AOL Mobile Mail

Carbon neutrality

Heather Schneider [redacted]

Fri 12/2/2016 3:01 PM

To: Leeanne Singleton <generalplan@hermosabch.org>;

It is very very rare that I send comments to the city council, but I feel so strongly that I had to send this email. While we all need to do our part for the environment, I am strongly **against** Hemosa's proposed plan for Carbon Neutrality. I am against Hermosa buying carbon offsets. I am against the elimination of the use of natural gas. What is the proposed alternative? I am against establishing a CCA. Putting requirements on new building is one thing, but to mandate retrofits to existing buildings is not ok. We have all lived in Hermosa for many many years and now you want to change the rules. All of these things will increase costs to home owners, prohibitively for many. How about going with a more positive approach of passing on savings and benefits to people who voluntarily make the proposed changes to their home, not penalizing others who don't. SCHH-1

Sincerely,
Heather Schneider
Hermosa resident

NO 100% Carbon Neutrality

Pam T [redacted]

Mon 12/5/2016 8:25 AM

This is my letter to the Beach Reporter:

Unless the HB Council can be convinced otherwise, it is about to adopt PLAN HERMOSA's general plan which includes making Hermosa Beach 100% Carbon Neutral. I feel the City Council is over stepping its authority and infringing on my Constitutional and Property Rights. While "Going Green" should be encouraged, it should not be mandatory. A big step to that plan is changing to Community Choice Aggregation for our energy source. It is an expensive undertaking and not without risks. The PLAN would mandate expensive retrofits on new construction, rebuilds and selling a home. It even effects what kind of car you drive. If compliance is not met, one must pay a penalty (yet to be determined) in the form of credits to offset emissions. Residents have no vote in the matter. I feel that it is irresponsible of the Council to agree on such an extreme PLAN which will likely have negative impact on our property values. Kudos to HB Planning Commissioner Rob Saemann, for his common sense presentation at the last Council Meeting. Here is the link: https://www.youtube.com/watch?v=O5Jr_eiKQUY&t=26s .

TATP 1-1

PLAN HERMOSA seems determined on being "the first" to be Carbon Neutral. Our 1.4 sq. miles won't be a speck in the Global Carbon Footprint. Unless, you are competing in the Olympics or sports event, I don't see the need to be "first". You can learn a lot by others mistakes. It is time for PLAN HERMOSA to re-evaluate its PLAN. I LOVE Hermosa Beach, but dislike the radical direction it is headed. As the old saying goes, "If it isn't broken, don't fix it".

Pam Tatreau

Hermosa Beach

Carbon Neutrality

Pam T [redacted]

Sat 12/31/2016 9:01 AM

PLAN HERMOSA is a group of individuals faced with determining and planning the future of H.B. I applaud their efforts to improve the health and environment of our city. However, I do **NOT** feel the "Carbon Neutrality" should be a part of that plan. Mandating expensive retrofits to new construction, rebuilds and selling a home is too extreme. "Carbon Neutrality" is better suited to a **newly** planned community where homes are built with solar panels and electrical appliances. People moving into that community are aware that there may be restrictions placed on the vehicles they drive. A BIG step in the "Carbon Neutrality Plan" is changing to Community Choice Aggregation (CCA) for our energy source. It is an expensive undertaking and not without risks. Even our City Planners raised some valid concerns. "Carbon Neutrality" is too extreme for our little beach community and should be revised or deleted from **the Plan**. I feel that "Carbon Neutrality" is the goal of a few people and NOT the goal of the residents. Changes of this magnitude should NOT be decided by a few people. Why must residents try to convince the City Council not to support these changes? Many residents are still unaware of these changes which are about to affect their daily lives. If you really wanted to know how residents felt, you would not be afraid to put the measures on a ballot for a vote. I am beginning to lose faith in our community. I thought that I still lived in a democracy or is my beloved Hermosa Beach turning into a dictatorship? Thank you for your time.

TATP
2-2

Pam Tatreau

Hermosa Beach

Feedback on PLAN Hermosa

Coco Tuttle [redacted]

Mon 12/12/2016 5:32 PM

To: Leeanne Singleton <generalplan@hermosabch.org>;

Hello. My name is Coco Larson-Tuttle and my husband is Bruce Tuttle. We live at 1139 7th Place, Hermosa Beach. My husband is handicapped (visually impaired and in a wheelchair). I wanted to be sure that handicapped access is addressed in the general plan. Currently there are limited access streets that are safe for wheel chair travel and only a few streets (PCH) that have audible alarms for crossing at lights. I would implore the city to consider handicapped people when decisions regarding the general plan are being made. TUTC -1

Thank you,
Coco Larson-Tuttle

Sent from my iPad

INDIVIDUALS

Comment #	Response
Steve Adler	
ADLS-1	The commenter expresses an opinion about the City's carbon neutral goal. It is not directed to the adequacy of the technical analysis or conclusions in the Draft EIR. The specific questions raised by the commenter do not require further consideration for purposes of the EIR's evaluation of greenhouse gas (GHG) emissions impacts but are addressed in a separate document that will be presented to the Planning Commission and City Council to consider incorporating into PLAN Hermosa.
Peggy Barr	
BARP-1	This comment addresses PLAN Hermosa Sustainability + Conservation Element Policy 1.4 (carbon offsets as needed), which appears on page 4.6-15 in the Draft EIR. The commenter suggests "purchasing carbon offset credits (RECs) is not carbon neutral." It should be noted that "RECs" are not the same as carbon offsets; an REC is a renewable energy certificate. Neither PLAN Hermosa nor the Draft EIR refer to RECs. Section 4.6, Greenhouse Gas Emissions, evaluates the ability of PLAN Hermosa to reduce community GHG emissions to meet statewide GHG reduction goals, equivalent to 66 percent below 2005 levels by 2040, the threshold of significance used in the analysis. While this section of the Draft EIR identifies carbon offsets as a strategy to meet a local carbon neutral goal by 2040, carbon offsets are not necessary, nor are they included in the analysis showing how the City will meet the long-term state goals.
BARP-2	In addition to general policy comments on carbon neutrality, the commenter expresses an opinion about the production of renewable energy or participation in a Community Choice Aggregation (CCA), stating there is no guarantee that the energy the City will generate or receive will be any more renewable or cleaner than what is already received from Southern California Edison (SCE). The commenter also provides a summary of SCE's power content mix in 2014, stating that 27 percent is clean, 33 percent is moderately clean, 40 percent is unspecified, and 24 percent of the power is renewable. The Draft EIR's GHG emissions analysis considered the emissions generated by SCE's current electricity mix, the effect of state legislation such as the Renewables Portfolio Standard (requiring 50 percent renewables by 2030), and the potential GHG reductions that would be achieved through implementation of a future CCA program, increased local renewable energy generation, and improved energy efficiency. Because the exact effect of each strategy on reducing GHG emissions cannot be determined until specific details of each program and policy are determined by the City Council and programs are implemented, the Draft EIR recommends three GHG-related mitigation measures: re-inventory community GHG emissions and evaluate implementation progress every five years at a minimum

	(mitigation measure MM 4.6-1b) and revise PLAN Hermosa and/or the City's Climate Action Plan should the City determine that Hermosa Beach is not on track to achieve the applicable state GHG reduction goals.
BARP-3	The commenter expresses an opinion about the effects that a carbon neutrality goal will have on residents and taxpayers with regard to specific policies contained in PLAN Hermosa. The comment is not directed to the adequacy of the technical analysis or conclusions in the Draft EIR. The specific comments do not require further consideration for purposes of the EIR's evaluation of GHG emissions impacts, but are provided for consideration by the City Council and Planning Commission in their review and adoption of PLAN Hermosa.
Claudia Berman	
BERC-1	The commenter suggested more detailed information regarding the technology assumptions used in the GHG emissions analysis should be provided to enhance the utility/readability of the Draft EIR, along with a table that compares PLAN Hermosa to the various GHG reduction goals set by local plans and state legislation. The Draft EIR has been revised to incorporate this information into Section 4.6, Greenhouse Gas Emissions (see Chapter 3.0, Revisions to the Draft EIR).
Robert Fortunato	
FORR-1	The commenter expresses an opinion about the City's carbon neutral goal. The comment is not directed to the adequacy of the technical analysis or conclusions in the Draft EIR. An attachment to the comment letter outlined the City of Palo Alto's Sustainability and Climate Action Plan efforts, which are informational but are not relevant to PLAN Hermosa or the adequacy of the analysis and conclusions in the Draft EIR. No further response is required, but the information will be provided to the Planning Commission and City Council for consideration.
David Grethen	
GRED1-1	The commenter notes the usefulness of Figure 4.6-3 (Emissions Reductions Needed to Meet State and Local Targets) on page 4.6-20 in Section 4.6, Greenhouse Gas Emissions, in the Draft EIR, but suggests that the following questions should be addressed associated with the emissions reduction data presented in the figure: why does state legislation need to be augmented by local policy to meet state goals; why is state legislation insufficient to meet state goals; and Is there something specific about Hermosa Beach that results in state legislation not being sufficient to meet state goals? The commenter's questions are not directed to the adequacy of the technical analysis or conclusions in the Draft EIR. However, the questions are relevant to the policy and decision-making process for local GHG reduction goals. These issues are addressed in a separate document and will be presented to the Planning Commission and City Council to consider their incorporation into PLAN Hermosa.
GRED1-2	The commenter suggests that the decision to use remotely generated versus locally generated renewable energy to achieve carbon reductions will be a large determinant of impacts, and suggests that rough order-of-magnitude estimates to supply the total kilowatt-hours (kWh) of energy needed, and any

additional renewable energy generation needed to avoid purchasing offsets, should be provided to support the impact analysis.

Draft EIR Section 4.13, Public Services, Community Facilities, and Utilities, identifies the current and projected electricity use in Hermosa Beach, under a business-as-usual scenario and with implementation of PLAN Hermosa policies. The table below illustrates the rough order of magnitude of renewable energy needed to offset electricity use (including electric vehicle charging).

Electricity Use Only	2040	
	Business-as-Usual Scenario	**With Implementation of PLAN Hermosa Policies**
Residential (kWh)	54,696,400	33,363,500
Nonresidential (kWh)	55,142,800	40,102,000
Electric vehicle (kWh)	—	9,959,700
Total electricity use (kWh)	109,839,200	83,425,200
Average kWh generated annually per kW of solar	1,488	1,488
kW solar needed	73,817	56,065
MW solar needed	73.82	56.07

kWh – kilowatt-hour; kW – kilowatt; MW – megawatt

-- The business-as-usual scenario does not anticipate energy use by electric vehicles to be tracked separately or represent a significant portion of the electricity consumption.

As indicated by the data, to offset all Hermosa Beach electricity use in 2040, with the implementation of other PLAN Hermosa policies to reduce electricity use (e.g., building codes and energy conservation programs), approximately 56 megawatts (MW) of solar electricity would need to be installed.

The feasibility of solar energy to provide more than 50 MW of electricity can be roughly estimated using Google's Project Sunroof, an interactive web-based tool that estimates the technical solar potential of all buildings in a region or community. For Los Angeles County, as a whole, a rooftop is considered viable if it receives 75 percent or more of the maximum annual sun. In Hermosa Beach, approximately 77 percent of rooftops in the city are considered viable (Project Sunroof data explorer (October 2016) [https://www.google.com/get/sunroof/data-explorer/). It should be noted that the Project Sunroof data only consider rooftops and do not consider parking lots or the potential use of roadways for solar energy generation. Additionally, Project Solar focuses only on solar and does not consider the potential of wind, tidal, or wave energy technologies to meet local electricity demand.

If the City were to offset all emissions sources through the generation of renewable energy, it would take the equivalent of 390 million kWh annually or approximately 262 MW of solar capacity. Given the limited land area in

	Hermosa Beach, there is a higher likelihood that some of the energy would have to be generated outside of the city's boundaries to achieve this scenario. This analysis does not change the conclusions of the Draft EIR related to the feasibility of achieving GHG emissions reductions through implementation of PLAN Hermosa policies because the capacity to generate energy locally was already considered in the analysis presented in the Draft EIR. Additionally, this analysis does not change the conclusions of the potential effects of Alternative 2 (2030 Carbon Neutral Alternative), included in Draft EIR Section 6.0, Alternatives to the Proposed Project, to achieve carbon neutrality by 2030, which indicates there could be potentially greater impacts associated with aesthetics, biological resources, and cultural resources due to increased renewable energy generation (locally or elsewhere).
GRED1-3	The commenter suggests that additional context or information should be provided associated with Table 4.13-7 (Fuel Consumption Associated with the Future Development Potential Under PLAN Hermosa), which is on page 4.13-62 in Section 4.13, Public Services, Community Facilities, and Utilities, in the Draft EIR, specifically which corresponding level of carbon reduction this usage supports (full neutrality versus 66 percent of 2005 levels); fraction and amount of increase in the fraction of citywide vehicles that are electric; and anything else that might better relate this table to Section 4.6, Greenhouse Gas Emissions, in the Draft EIR. Table 4.13-7 was developed using the same assumptions used for the GHG emissions analysis in Section 4.6 in the Draft EIR, which shows that PLAN Hermosa will reduce emissions locally by at least 66 percent by 2040 and that achievement of carbon neutrality may occur through the purchase of offsets. By 2040 it is estimated that in Hermosa Beach approximately 75 percent of new vehicles will be electric or carbon-free vehicles, compared to approximately 5 percent in 2015. This information, along with all other assumptions associated with the calculation of energy or fuel use and GHG reductions, is also detailed in Appendix E-1 in the Draft EIR. As indicated in Table 4.13-7, the average fleet fuel efficiency is projected to be 55 miles per gallon by 2040; the projection is based on state and federal fuel efficiency standards. The reduction of transportation fuel consumed (77 percent) is a result of greater fuel efficiency from conventionally fueled vehicles, a reduction in overall vehicle miles traveled through land use changes, and a greater shift to electric vehicles. This information has been added to Section 4.13, Public Services, Community Facilities, and Utilities (see Chapter 3.0, Revisions to the Draft EIR).
GRED1-4	As noted in the commenter's letter, mitigation measures MM 4.6-1a, 1b, and 1c are intended to ensure consistency with the state's GHG reduction goals, which are based on the scientific consensus of the emissions reductions needed to limit global warming to two degrees Celsius. As articulated on page 4.6-17 in the Draft EIR, the City of Hermosa Beach has identified that the impact of PLAN Hermosa would be significant if it would generate GHG emissions that exceed long-term state targets, roughly equivalent to emissions that are 66 percent below 2005 levels by 2040. The mitigation measures are focused on ensuring compliance with long-term GHG reduction goals that exceed state goals. If the City sets GHG reduction goals that exceed state goals, the City could establish additional monitoring mechanisms separate from the EIR. The comment does

	not change the analysis or conclusions of the EIR; therefore, no additional response is required.
GRED1-5	This comment references Subsection 6.0.5, Environmentally Superior Alternative, of the Draft EIR, which identifies Alternative 3 (Character Retention Alternative) as the environmentally superior alternative. The commenter's preference for Alternative 3 is noted. The comment does not address the adequacy of the technical analysis or conclusions in the Draft EIR. No additional response is required.
GRED1-6	The commenter suggests that a better distinction between the impacts of accelerating a carbon neutral goal to 2030 versus the effect of not allowing carbon offset purchases should be made in Alternative 2 (2030 Carbon Neutral Alternative). The commenter also suggests that an increase in local renewable energy generation would have impacts on land use that should be discussed in the environmental analysis of Alternative 2. Table 6.0-4 (Comparison of Emissions Reduction Scenarios 2030 vs. 2040), referenced by the commenter, illustrates the major changes in annual carbon reduction between the two scenarios presented under the Community Solar, Land Use and Transportation Alternatives, Additional Transportation Strategies, and Purchase Offsets categories. While it would be up to the City's decision-makers to determine exactly what policy direction should be explored in alternative scenarios, a scenario which accelerates carbon neutrality to 2030, but still includes the use of carbon offsets, would appear to be similar to the 2040 scenario already presented. A 2040 scenario that forgoes the use of carbon offsets would appear similar to the 2030 scenario, perhaps with slightly smaller reductions needed from the community solar strategy due to greater reductions from energy efficiency strategies. A rough order-of-magnitude analysis was presented in Response GRED1-2 to demonstrate the amount of renewable energy generation needed to meet various GHG reduction scenarios. The 2030 scenario presented as Alternative 2 in the Draft EIR assumes that 134 MW of solar, or other renewable energy production (wind, tidal, wave) equivalent to 200 million kWh annually, would be needed to achieve the resulting emissions reductions presented in Table 6.0-4. A large portion of this renewable energy has the potential to be generated locally, although the analysis indicates that some of this energy may be developed elsewhere, which may have potentially greater impacts on aesthetics, biological resources, and cultural resources, as noted in Responses GRED1-2 and GRED1-7.
GRED1-7	This comment references the Land Use and Planning analysis for Alternative 2, which is on page 6.0-22 in the Draft EIR. The commenter notes that there is no discussion related to additional area needed for renewable energy generation and suggests that the analysis should be able to determine the potential impact of solar on certain resource areas, such as aesthetics, biological resources, and cultural resources. For the purposes of the EIR analysis, and in accordance with CEQA Guidelines Appendix G, the evaluation of land use impacts is limited to whether or not the action would physically divide an established community, or whether it would conflict with an applicable plan, policy, or regulation. Because renewable energy resources such as solar and wind can already be accommodated on

	rooftops or parking lots, or can serve as shade structures as an accessory to the primary use of a property (described in Section 17.46.220 of the Hermosa Beach Municipal Code), there is limited potential for the development of these generally small-scale resources to prevent the primary function or use of a property that would alter established land use patterns. With regard to potential impacts from larger-scale solar development on aesthetics, biological resources, and cultural resources, these impacts are difficult to determine without having specific details on location (local or elsewhere), size (utility scale or distributed), or technology (ground- or roof-mounted, static or sun-tracking). In general, renewable energy projects vary in their impacts and mitigations with respect to biological resources and aesthetics. Some of the impacts identified in large renewable energy projects in the state have included loss of sensitive habitat, alteration of migration and wildlife movement, aesthetic impacts along scenic highways, and creation of new sources of light and glare. A detailed impact analysis for these topics for Alternative 2 would be speculative and is not required under CEQA (CEQA Guidelines Section 15145), and this level of detail is also not required for the alternatives analysis (CEQA Guidelines Section 15126.6). The Draft EIR (p. 6.0-35) does, however, conservatively conclude that impacts on aesthetics, biological resources, and cultural resources may be greater with Alternative 2 than with PLAN Hermosa. The level of detail for the impact assessments for Alternative 2 is sufficient for informed decision-making. For the reasons stated above, no additional analysis is possible or warranted at this time.
GRED1-8	The commenter notes that the rate of carbon reductions needed to achieve carbon neutrality by 2030 is nearly four times the rate of reductions needed to achieve state goals. This is a correct statement, but it is not directed to the adequacy of the technical analysis or conclusions in the Draft EIR. No additional response is required.
GRED1-9	The commenter suggests that Alternative 2 (2030 Carbon Neutral Alternative), and specifically the implementation of potential measures to replace gas heating appliances, retrofits to homes prior to sale, or addition of electric vehicle infrastructure, could have adverse environmental effects associated with waste generated due to equipment or building materials being replaced before these resources have exhausted their naturally useful lifetimes. Implementation of any policies related to GHG emissions reduction in the form of a legislative act or ordinance will require City Council approval and will include specific program details regarding the naturally useful lifetime of equipment, phased-in implementation, and other mechanisms to prevent the unnecessary disposal of materials or equipment. Additionally, the City of Hermosa Beach has several programs and requirements to ensure the proper disposal and handling of building materials and equipment to minimize environmental impacts. This includes a requirement that at least 50 percent of a building's demolition waste be recycled, and programs/events such as the Household Hazardous Waste collection.
GRED2-1	The projected increase in regional population and employment from Hermosa Beach and other nearby cities by 2040 would lead to increased numbers of vehicle trips in Hermosa Beach unless changes to the land use and transportation system are implemented. When combined with the fact that

	Hermosa Beach has little or no capacity within the right-of-way to expand vehicular facilities, the result is a degradation in the level of service at Artesia and Aviation boulevards and Prospect and Manhattan avenues. At most of the study intersections, PLAN Hermosa actually leads to improved LOS when compared to 2040 conditions without the project. For those locations where capacity is insufficient, widening roadways to increase capacity would, in most cases, be inconsistent with other goals of PLAN Hermosa. More information for specific locations is available in Appendix G in the Draft EIR. PLAN Hermosa actions include substantial implementation of Transportation Demand Management measures, which are expected to reduce the expected growth in traffic compared with the 2040 without PLAN Hermosa scenario. Therefore, cumulative impacts on both local and state facilities would be reduced.
Art Krugler	
KRUA-1	The City appreciates the commenter's positive feedback regarding the Planning Commission's review of the Draft EIR. No additional response is required.
KRUA-2	The commenter expresses an opinion about the City's carbon neutral goal. The comment is not directed to the adequacy of the technical analysis or conclusions in the Draft EIR. The handout referenced in the comment concerns climate change, in general, and does not address climate change and GHG emissions in Hermosa Beach. Comments related to proposed policy will be presented to the City's decision-makers for consideration. It is also important to note that regardless of whether the City's decision-makers agree with the potential threats of climate change, the State of California has adopted long-term GHG reduction goals and requires jurisdictions to address GHG emissions under the California Environmental Quality Act and to demonstrate whether or not the project would generate GHG emissions that may have a significant impact on the environment.
G & J Moriyama	
MORG-1	The commenters express an opinion about the City's carbon neutral goal. The comment is not directed to the adequacy of the technical analysis or conclusions in the Draft EIR. No additional response is required.
Bette Mower	
MOWB-1	The commenter addresses a specific building in Hermosa Beach (Prospect Avenue School on 6th Street) and its condition and potential historic significance. The property (Assessor's Parcel No. 4160-026-900) was omitted from the initial screening of properties greater than 45 years old due to incomplete information provided through Los Angeles County Assessor's tax rolls and parcel data, which did not include a built date or indicate the structure on the property. The City's cultural resources consultant has conducted a records search and site evaluation for the property and determined, based on the structure's age and architecture, that it may be eligible for local listing. The property has been assigned a California Historical Resource Code of 5S3, meaning it appears to be individually eligible for local listing or designation through survey evaluation, and has been added to Table 4.4-1 in the Final EIR.

Jens Palsberg	
PALJ-1	The commenter expresses an opinion about the City's carbon neutral goal. The comment is not directed to the adequacy of the technical analysis or conclusions in the Draft EIR. No additional response is required.
Ken Sarno	
SARK-1	The commenter suggests that the presence of refineries in nearby cities should be considered in the air quality section of the plan and that the City should measure and analyze air quality impacts independently. The presence of refineries in surrounding cities is clearly stated on page 136 in PLAN Hermosa and in Appendix C-4 of the Draft EIR, which notes that the South Coast Air Quality Management District (SCAQMD) regulates air emissions from refinery emissions through its permitting process. The City of Hermosa Beach does not have any regulatory authority over the refineries or air quality emissions outside of the City's jurisdiction. Further, the purpose of the PLAN Hermosa Draft EIR is to evaluate and analyze the potential physical impacts that the implementation of PLAN Hermosa might have on the environment, rather than evaluating the environmental effects that existing uses may have in Hermosa Beach.
SARK-2	The commenter suggests that the City should incorporate additional air quality and monitoring policies. The specific suggestions do not address the adequacy of the EIR and do not require further response for purposes of the EIR's evaluation of air quality impacts. However, these suggestions are provided in a separate document for consideration by the City Council and Planning Commission in their review and adoption of PLAN Hermosa.
Heather Schneider	
SCHH-1	The commenter expresses an opinion about the City's carbon neutral goal. The comment is not directed to the adequacy of the technical analysis or conclusions in the Draft EIR. No additional response is required.
Pam Tatreau	
TATP1-1	The commenter expresses an opinion about the City's carbon neutral goal. The comment is not directed to the adequacy of the technical analysis or conclusions in the Draft EIR. No additional response is required.
TATP2-1	The commenter expresses an opinion about the City's carbon neutral goal. The comment is not directed to the adequacy of the technical analysis or conclusions in the Draft EIR. No additional response is required.
Coco Tuttle	
TUTC-1	This comment is directed to the policies of PLAN Hermosa and not the Draft EIR. Accessibility is addressed in PLAN Hermosa. For example, Policy 3.10 (page 125) requires that all public rights-of-way be designed per Americans with Disabilities Act (ADA) standards by incorporating crosswalks, curb ramps, pedestrian signals, and other components to provide ease of access for disabled persons. Policy 2.4 (page 205) directs the City to consider innovative funding strategies, such as cost-sharing, ADA accessibility grants, or sidewalk dedications, to improve the overall condition, safety, and accessibility of sidewalks. As future public or private projects are proposed, the City will be responsible for ensuring projects are constructed in compliance with ADA standards.

Planning Commission Meeting

Planning Commission Agenda Item 3: Public Hearing – PLAN Hermosa Draft Environmental Impact Report

Speaker: David Grethen, Hermosa Beach

Summary:

Most comments are in the area of carbon neutrality.

- In regards to local energy projects, it would be helpful to have a scenario which looks at how much solar would be needed to meet the entire energy usage of the city, both for the municipal and community scale, and how much area that might take up, and to compare that with available rooftop area we have for businesses and residences and whether we'd have to take up open space to satisfy that goal.
- Would like to know more about the stated amount of electric vehicle usage and the amount of kWh used for electric vehicles. Would also like to know the rate of vehicle conversion and how much room we would need in town for charging station infrastructure.
- The character retention alternative looks potentially appealing, the carbon neutral by 2030 less so. On the carbon neutrality alternative, it is a little bit unfortunate that we are lumping together the acceleration to 2030 and the lack of offsets because then it makes it hard to distinguish the effects of the two factors. that I gather that the bulk of the impact is due to the offsets and not the 2030 goal. It would be really nice if there was a better way to sort out the difference between 2030 and 2040.
- Why does state legislation need to be augmented by local policy in order to meet state goals. And is there something unique about Hermosa that does not get us to the state goals.

Transcription:

I will be submitting written comments, and most of them are in the area of carbon neutrality. So you'll be getting those and you'll look forward to getting those I hope. So I'll try to touch on some of the highlights just while I have the verbal opportunity to do so. One area where I'm looking for more information is where it talks about local energy projects and a statement about certain unknowns where it's hard to really tell if there's an impact. Something I've always been curious about is if we did a scenario where we looked at all solar to meet the entire energy usage of the city, both for the municipal and the community wide goals and to do some rough order of magnitude calculation to see the solar panel area and equipment area would be needed just to get a feel of the order of magnitude we are talking about. I'd also be interested then in comparing hat with how much available rooftop area we have for businesses and residences and if we'd have to go to the point of starting to take up open space to satisfy that goal. PUBM-1

Another area is talk about a stated amount of electric vehicle usage and a stated amount of kWh used. Would like to know more about the assumed amount of vehicle conversion of what

assumed amount we would go to among all the residents around town. And it would be interesting to see how that would affect how much room we would need in town for the charging station infrastructure. PUBM-1 cont.

A quick comment in looking at the alternatives that the character retention alternative looks potentially appealing, the carbon neutral by 2030 alternative does not look so appealing to me. On the carbon neutrality alternative, it is a little bit unfortunate that we are lumping together the acceleration to 2030 and the lack of offsets because then it makes it hard to distinguish the effects of the two factors. I will point out there's a table that shows where we are receiving about 30% of the reduction from community solar, and then the other scenario where we are receiving about 30% from offsets and from that I gather that the bulk of the impact is due to the offsets and not the 2030 goal. It would be really nice if there was a better way to sort out the difference between 2030 and 2040. PUBM-2

I also noticed something really interesting about the bar graph that helps explain, I'd like to see more discussion about that graph, and there's something that stuck out to me. My question is, why does state legislation need to be augmented by local policy in order to meet state goals. And is there something unique about Hermosa that does not get us to the state goals. I think the better we understood that, we might be able to better meet the goals.

In general, when we talk about local energy, what really sticks out is what we do locally vs what we do remotely. And I think that aspect should really be emphasized.

Speaker: Tracy Hopkins, Hermosa Beach

Summary:

- A resolution from the Republican National Committee was read that discusses the UN Sustainable Development Agenda.
- Suggested that our local communities are in peril because of a small group that seeks to convince us that unless we surrender our property and freedoms, and unless we subsume our individual rights to the good of the community that the planet will not survive.
- For over 200 years, Americans have protected our planet and our nation and our liberties and as communities we can pull together to create our own plans to improve the environment without the control of international groups and the seductive lure of easy federal grants.

Transcription:

I just want to read this statement about a resolution exposing the UN Sustainable Development Agenda since this document is full with sustainable development policies. Whereas the United Nations Sustainable Development is a comprehensive plan of extreme environmentalism, social engineering, and global political control that was initiated at the United Nations Conference on Environmental Development held in Rio de Janiero, Brazil in 1992, and whereas the United Nations Sustainable Development is being covertly pushed into local communities throughout the United States of America through the International Council of Local Environmental Initiatives PUBM-3

(ICLEI) through local sustainable development policies such as smart growth, resilient cities, regional visioning projects through green or alternative development projects, and whereas the United States through radical sustainable development goals, so called sustainable development, views American private property ownership, single-family homes, private care ownership, and individual travel choices, and privately owned farms, all as destructive to the environment, and whereas according to the United Nations Sustainable Development Policy social justice is described as the right and opportunity of all people to benefit equally from resources afforded us by society and the environment which would be accomplished by socialist/communist redistribution of wealth, whereas according to the United Nations Sustainable Development Policy where national sovereignty is deemed a social injustice, now therefore be resolved the Republic National Committee recognizes the destructive and insidious nature of the United Nations Sustainable Development and hereby exposes to the public and public policy makers the dangerous intent of the plan, and therefore be it further resolved that the US Government and no state or local government is legally bound by the UN Sustainable Development Treaty and that it has never been endorsed by the US Government, and therefore be it further resolved that the Federal and State and local governments across the country be well-informed of the underlying harmful implications of implementation of the United Nations Sustainable Development destructive strategies for sustainable development and we hereby endorse rejection of its radical policies and rejection of any grant monies attached to it.

PUBM-3 cont.

I would like to finish by suggesting that our local communities are in peril because of a small group that seeks to convince us that unless we surrender our property and freedoms, and unless we subsume our individual rights to the good of the community that the planet will not survive, yet this is a false choice. For over 200 years, Americans have protected our planet and our nation and our liberties and as communities we can pull together to create our own plans to improve the environment without the control of international groups and the seductive lure of easy federal grants. Together we can respect our environment and keep our rights and freedoms working together. That is the real choice.

Speaker: Mark Hopkins, Hermosa Beach

Summary:

- The January 5th date seems like it's not really far out enough as we are starting Thanksgiving right now and going through the holidays and I just don't think people are going to get enough time.
- Made reference to a survey of the American Meteorological Society Survey that was done this year.
- The survey received responses from 3,761 members and the question was asked, "Which of the following best describes the local effects of climate change over the next 50 years?" Among the responses, 47% said that the impacts will be primarily harmful, and another 3% said that they will be exclusively harmful which is just 50%.

Transcription:

The January 5th date seems like it's not really far out enough as we are starting Thanksgiving right now and going through the holidays and I just don't think people are going to get enough time to address that. PUBM-4

Just wanted to point out, and I pulled this up online is a survey of the American Meteorological Society Survey that was done this year. Basically it was given to thousands of members and this particular portion was 3,761 members who responded where the question was asked, "Which of the following best describes the local effects of climate change over the next 50 years?" And there are some bar graphs here and 47% said that the impacts will be primarily harmful, and another 3% said that they will be exclusively harmful so that's 50%. My point here is that we keep talking about the carbon neutrality here and in reality only half of the American Meteorological Society says that it's going to be harmful in the next 50 years. Anybody can look this up, it's not my survey, it's theirs. So I'm concerned that we keep working on the policies in this city, when yet the science is far from being solid. PUBM-5

http://www.forbes.com/sites/marshallshepherd/2016/03/24/96-of-american-meteorological-society-members-think-climate-change-is-happening-says-new-report/#2b3975803935

PLANNING COMMISSION MEETING (NOVEMBER 21, 2016)

Comment #	Response
PUBM-1	See responses GRED1-1 and GRED1-2, which address the written comments submitted by the commenter concerning solar energy and electric vehicle usage, respectively.
PUBM-2	See responses GRED1-4 and GRED1-5, which address the written comments submitted by the commenter concerning Character Retention Alternative 3 evaluated in the Draft EIR and the need for augmenting state legislation by local policy to meet state goals, respectively.
PUBM-3	The commenter expresses an opinion about sustainable development, in general. The comment is not directed to the adequacy of the technical analysis or conclusions in the Draft EIR. No additional response is required.
PUBM-4	The commenter's opinion about the close of the comment period ending on January 5, 2017, for the Draft EIR is noted. CEQA Guidelines Section 15105 requires a minimum 45-day review period for public review of a Draft EIR. The comment period for the PLAN Hermosa Draft EIR began October 26, 2016. The City has provided a review period of 72 days, which exceeds the 45-day requirement. No additional response is required.
PUBM-5	The commenter expresses an opinion about carbon neutrality, in general. The comment is not directed to the adequacy of the technical analysis or conclusions in the Draft EIR. No additional response is required.

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3.1 INTRODUCTION

This section includes minor revisions to the Draft EIR. These modifications resulted from responses to comments received during the Draft EIR public review period as well as staff-initiated changes. Changes are provided in revision marks (underline for new text and ~~strikeout~~ for deleted text).

Revisions herein do not result in new significant environmental impacts, do not constitute significant new information, and do not alter the conclusions of the environmental analysis.

3.2 REVISIONS TO THE DRAFT EIR

TABLE OF CONTENTS

Pages iv-vi, list of appendices, revised as follows to include additional documents:

Appendix C: Technical Background Report
C-1. Introduction
C-2. Aesthetics
C-3. Agricultural Resources
C-4. Air Quality
C-5. Climate Change Mitigation and Adaptation
C-6. Biological Resources
C-7. Cultural Resources
C-8. Energy
C-9. Geology and Soils
C-10. Hazards and Hazardous Material
C-11. Hydrology and Water Quality
C-12. Land Use and Planning
C-13. Mineral Resources
C-14. Population and Housing
C-15. Noise
C-16. Public Services and Utilities, and Recreation
C-17. Transportation
C-18. References
Appendix A1 Hermosa Beach Market Analysis
Appendix A2 Vulnerability and Adaptation to Sea Level Rise
Appendix B1 Natural Resources
Appendix B2 Special Status Species
Appendix B6 Archaeological and Paleontological Resources Assessment
Appendix B7 City of Hermosa Beach 2013-2021 Housing Element
Appendix D: Air Quality Assessment
Appendix E: Greenhouse Gas Assessment
E-1. Greenhouse Gas Emissions Reduction Assumptions
E-2. City of Hermosa Beach GHG Inventory, Forecast, and Target Setting Report
E-3. Hermosa Beach Carbon Planning Tool and User Guide
Appendix F: Noise Assessment
F-1. Noise Measurements

F-2. Traffic Model
Appendix G: Transportation Assessment
G-1. Lane Configurations
G-2. Traffic Counts
G-3. Peak Hour Turning Movement Traffic Volumes
G-4. LOS Worksheets
G-5. Traffic Methodology
G-6. VMT Reduction Methods and TDM+ Tool Outputs
Appendix H: Tribal Consultation

Pages v and vi, list of tables (excerpt), revised as follows:

Page viii, list of figures (excerpt), revised as follows:

SECTION 3.0 PROJECT DESCRIPTION

The Project Description has been updated based on changes to PLAN Hermosa recommended by the Planning Commission and a clean version is provided at the end of this attachment.

SECTION 4.1 (AESTHETIC AND VISUAL RESOURCES)

Update Figure 4.1-1 Character Areas with modified map from PLAN Hermosa.

Update Figure 4.1-2 Prominent Public Viewpoints with modified map from PLAN Hermosa.

Replace Policies and Implementation Actions from PLAN Hermosa with modified policies from City Council Final Draft.

Page 4.1-14, Impact 4.1-1 has been revised as follows:

IMPACT 4.1-1 ***Would PLAN Hermosa Cause Adverse Effects on Scenic Vistas and Viewsheds?*** *Future actions under PLAN Hermosa have the potential to encroach on views from prominent public viewpoints. Future actions also have the potential to degrade the visual quality of scenic vistas, through the introduction of incongruous features to the viewshed. However, PLAN Hermosa also includes policies and implementation actions that direct future discretionary projects to identify, evaluate, and to the extent reasonable avoid the substantial obstruction, interference or degradation of scenic vistas through the offering of exceptions to development standards that will allow for siting the project in a manner that avoids impacting scenic vistas. This impact would be* ***less than significant*** *because development under PLAN Hermosa would comply with the evaluation and design process to avoid adverse effects on scenic vistas.*

Page 4.1-14, paragraph 2 under Impact 4.1-1 discussion has been revised as follows:

PLAN Hermosa outlines the community's vision for proposed development in each of the city's distinctive zones and identifies policies and actions to reduce impacts to these public view corridors. For example, implementation actions PARKS-10 and 11~~, and 12~~ require discretionary design review for new development and public works projects based on specific criteria to be established in the Zoning Ordinance to evaluate ~~protect~~ scenic vistas. As such, utilities would be located underground when possible, and fences and walls would not block views from designated viewpoints, scenic roads, or other public viewing areas. Parks + Open Space Element Policy 5.1 states the intent to identify ~~protect~~ scenic vistas. Public vistas would also be protected through proposed implementation actions, as listed above.

Page 4.1-14, paragraph 4 under Impact 4.1-1 discussion has been revised as follows:

~~However, neither current City standards nor PLAN Hermosa policies or actions include specific provisions to protect public view corridors. Therefore adverse effects on scenic vistas and viewsheds would be **potentially significant** and mitigation measure **MM 4.1-1** would be required. Due to the built-out nature of Hermosa Beach, the limited reach of the views, and the small amount of new development, 50 feet is an appropriate distance for the protection of public views. This metric is based on similar project experience and conversations with the City about its goals for protecting scenic vistas.~~ The policies and actions as revised related to public views are designed to provide more specificity on the expectation and process for identifying, evaluating, and addressing potential impacts to scenic vistas in a manner that is consistent with the Coastal Act and the California Environmental Quality Act. The greater level of specificity contained within the policies and implementation actions further helps to appropriately guide City staff and decision makers in the future to objectively and consistently and reasonably evaluate and mitigate

impacts to scenic vistas, and provide the opportunity for setback, open space, landscaping or other relief to properties that may otherwise substantially obstruct, interrupt, or detract from a scenic vista. This allows the property owner to minimize the impact to a public view while providing the owner the same development privileges enjoyed by other similar properties in the vicinity (similar to a variance). The specific exception to be applied to each project will be evaluated on a project level to determine its appropriateness and compatibility with the neighborhood and the list of available exceptions will be specified in the zoning ordinance.

Through the public hearing process, the community and commissioners have had an opportunity to synthesize PLAN Hermosa Figure 5.3, which shows the proposed Prominent Public Views and Uninterrupted Viewing Areas. Based on community and commissioner input, the Figure has been revised to remove two sites that do not meet the criteria for Prominent Public Views. The two views deleted include 8th Street at Loma Drive and El Oeste Drive. The 8th/Loma location can be deleted because the view is already surrounded by properties that have been developed close to or at the maximum extent allowed and therefore, future development during the life of the plan will not further impact the view beyond the existing development. The El Oeste viewpoint can be deleted because, while it presents a highly intact uninterrupted view, it does not meet the prominent viewpoint criteria of having a large number of public viewers. This location is at the end of a dead end residential street where the general public does not typically access, pass or congregate. Therefore, it would be unlikely to have a large number of public viewers.

The language incorporated into the policies and actions has been changed such that properties adjacent to, rather than within 50 feet of, the Prominent Public Views and Uninterrupted Viewing Areas will be required to evaluate and reasonably mitigate any substantial impact to a public view. Additionally, portions of Implementation Action PARKS-12 have been removed because of their specificity to appropriate colors and textures and the portions of the actions pertaining to public works projects have been incorporated into PARKS-11. To specify appropriate colors or textures to private property owners would go against a long-standing community policy against judging or dictating design. These language changes are also appropriate because the 50 foot requirement, as well as the requirements for specific screening methods or use of certain materials may not be appropriate in all situations and do not allow for any site specific flexibility. Additionally, the language was too precise for policy language and implementation actions (and for the originally proposed mitigation measure). These types of details are better worked out through the implementation process and development of the ordinance. In some cases 50 feet may be too far, and in others it may not be far enough. There are site specific conditions like width of the road, setback requirements, and building height limits (vary from 25-35 feet) that may require variation in the distance needed to analyze impacts to views. It is further noted that the changes to the policies and implementation actions related to public views achieve the same purpose as proposed Mitigation Measure MM 4.1-1, that the potential impact to scenic vistas is adequately mitigated to a level that is less than significant, and that no new significant impacts to Aesthetics have been identified based on these changes.

Page 4.1-15, Mitigation Measures has been revised as follows:

None Required.

~~**MM 4.1-1** Projects located within 50 feet and within the directional arrow of a prominent public viewpoint, or within the uninterrupted viewing areas,~~

~~as identified in Figure 4.1-2, shall demonstrate that existing public views of scenic resources along the view corridors identified in Draft EIR Figure 4.1-2 are, at a minimum, maintained in their current condition and that no features are added in the viewshed that substantially obstruct or detract from the public views of the Pacific Ocean, the Palos Verdes Peninsula, the Santa Monica Mountains, and the Los Angeles Basin and the San Gabriel Mountains. This requirement shall be incorporated into the review process for precise development plans under Chapter 17.58 of the Zoning Ordinance.~~

~~Significance After Mitigation~~

~~Implementation of mitigation measure **MM 4.1-1** would ensure that existing view corridors which offer views of the Pacific Ocean, the Palos Verdes Peninsula, the Santa Monica Mountains, and the Los Angeles Basin and the San Gabriel Mountains are maintained. Therefore, this impact would be reduced to **less than significant**.~~

Page 4.1-15, Impact 4.1-2 has been revised as follows:

IMPACT 4.1-2 ***Would PLAN Hermosa Have Adverse Effects on Scenic Resources within a State Scenic Highway?*** *There are no designated state scenic highways in or near Hermosa Beach. However, PLAN Hermosa directs the City to ~~protect~~ beautify and enhance Pacific Coast Highway ~~as a potentially scenic highway~~ and would guide development and reuse projects in a manner that is consistent with the existing visual character of Pacific Coast Highway ~~so that it may be designated as a scenic highway at some point in the future~~. Therefore PLAN Hermosa would have a **less than significant** impact.*

Scenic resources can include man-made or natural features, viewpoints, or viewsheds. They can include visually significant features such as rocks, trees, and historic buildings, particularly if those features are within a state scenic highway. There are no designated state scenic highways in or near Hermosa Beach. ~~However, proposed Parks + Open Space Element Policy 5.5 directs the City to protect Pacific Coast Highway as a locally designated scenic highway and important view corridor. This policy is the basis for future planning decisions that enhance the local stretch of PCH as a scenic resource.~~ In its current state, Pacific Coast Highway's only significance as a scenic resource is its public views to the Pacific Ocean and the Palos Verdes Peninsula. As noted in the discussion above, significant public vistas from Pacific Coast Highway would be protected through proposed Policy 5.1 and implementation actions PARKS-10 and 11. ~~in combination with mitigation measure **MM 4.1-1**.~~

Page 4.1-17, Table 4.1-1, City of Hermosa Beach Existing Visual Character and Future Vision, has been updated to reflect the changes to the Future Vision of Character Areas from PLAN Hermosa.
Page 4.1-20, fourth paragraph has been revised as follows:

As outlined above, PLAN Hermosa's intent is to maintain and enhance the city's visual character through appropriate building massing, scale, and size. Adoption and implementation of PLAN Hermosa would not substantially alter any of the residential neighborhoods or areas of the city, but may alter certain areas near Downtown and The Strand, through new development and streetscape. PLAN Hermosa policies are meant to preserve the city's character, including those resources that are designated landmarks or architecturally distinctive. For example, Goal 5 is intended to specifically retain the city's

character as a small beach town. Further, Land Use + Design Element Policy 1.6 would require the City to consider new development's compatibility with the existing scale and context, and Parks + Open Space Element Policy 5.2 accommodates new buildings in a way that reflects the visual character of the community. None of the provisions of PLAN Hermosa would alter current land use patterns, height restrictions, or compatibility and buffering requirements currently established in the Zoning Ordinance (e.g., Sections 17.22.130, 17.26.050, and 17.28.030). PLAN Hermosa policies and implementation actions identified in this section implement and expand current General Plan and Coastal Land Use Plan policy provisions for the protection of the city's visual character identified above in subsection 4.1.3, Regulatory Setting.

Page 4.1-21, third paragraph has been revised as follows:

Land Use + Design Element Policies 1.6, 1.8, and 2.7 would also require new developments to be compatible with surrounding development, as well as enhance existing character and be sensitive to context. ~~Similarly, Land Use + Design Element Policy 10.6 requires attention to preservation of designated landmarks, potentially historic resources, and older buildings.~~ Implementation action LAND USE-2 directs the City to ~~develop building design guidelines~~ update the development standards within the Zoning Code to illustrate and articulate the appropriate building form, scale, and massing for each established character area in accordance with those key features and characteristics to ensure that the overall visual character of the neighborhoods, centers, and districts is preserved. This action would apply to individual neighborhoods and character areas as identified in **Figure 4.1-1** and in **Table 4.1-1**, as it would apply citywide. The proposed implementation action establishes the appropriate mechanism for developing zoning standards ~~design guidelines~~ that would prevent significant degradation of the built environment's visual character. As such, implementation of PLAN Hermosa policies and programs would reduce the impacts associated with visual character and visual sensitivity to a less than significant level because the City would implement ~~design review~~ development standards that require attention to and consistency with the surrounding area ~~neighboring structures~~ in form, line, massing, ~~and color~~ and existing visual character and identity. Therefore, the impact would be **less than significant**.

SECTION 4.2 (AIR QUALITY)

Replace Policies and Implementation Actions from PLAN Hermosa with modified policies from City Council Final Draft.

Page 4.2-11, second paragraph has been modified as follows:

By focusing planning and improvement efforts toward designing complete streets, promoting economic diversity, and enhancing communitywide mobility, PLAN Hermosa is anticipated to reduce vehicle miles traveled (VMT) within the city. Mobility Element Goal 3 would encourage multimodal and people-oriented transportation, which could minimize or eliminate certain mobile vehicle trips (see Section 4.14, Transportation, of this EIR for an analysis of anticipated vehicle miles traveled under PLAN Hermosa). Land Use + Design Element Goal 1 would promote a diverse mix of uses, which would reduce vehicle trips between residential uses and retail or employment uses. Land Use + Design Element Goal 4 would increase the accessibility of public transit to nearby residential uses, thus reducing vehicle miles traveled. Mobility Element Policy 5.5 encourages ~~smart growth in~~ land use policies to ensure more compact, ~~mixed,~~ connected, and multimodal development supports reduced trip generation, trip lengths, and greater ability to utilize alternative

modes. Implementing these policies and programs would strengthen Hermosa Beach's efforts to reduce air quality emissions from VMT, area sources, construction, and other miscellaneous sources beyond that of the existing General Plan, which is the basis for the existing regional air quality plan (i.e., 2012 Air Quality Management Plan [AQMP]).

Page 4.2-12, last paragraph has been modified as follows:

PLAN Hermosa policies include numerous measures that support transportation demand and accessibility management. Specifically, Sustainability + Conservation Element Policy 3.2 directs the City to support land use and transportation strategies to reduce ~~vehicle miles traveled and~~ emissions, including pollution from commercial and passenger vehicles. Policy 3.7 directs the City to consult with other agencies to improve air quality through regional efforts to reduce air pollution from mobile sources and other large polluters. PLAN Hermosa would promote land use and transportation investments that support greater transportation choice, greater local economic opportunity, and reduced number and length of automobile trips.

Page 4.2-13, third paragraph has been modified as follows:

A number of PLAN Hermosa policies, along with required SCAQMD rules and regulations, would help reduce short-term construction emissions. All construction projects in the city would be subject to SCAQMD Rule 403 (Fugitive Dust) to minimize fugitive particulate matter (PM) dust emissions during construction. In addition, Sustainability + Conservation Element Policy 7.2 would require future projects to minimize PM_{10} and $PM_{2.5}$ emissions by promoting best practices for controlling fugitive dust. Implementation actions SUSTAINABILITY-16 and 17~~, and 18~~ aim to control soil erosion during grading and other construction activities. Furthermore, Sustainability + Conservation Element Policy 2.~~7~~6 would require all discretionary projects to substantially mitigate all feasible greenhouse gas emissions, which would also affect the emissions of ozone precursors, PM_{10}, and $PM_{2.5}$ in the city.

SECTION 4.3 (BIOLOGICAL RESOURCES)

Replace Policies and Implementation Actions from PLAN Hermosa with modified policies from City Council Final Draft.

SECTION 4.4 (CULTURAL RESOURCES)

Page 4.4-2, first paragraph, has been revised as follows:

Hermosa Beach has not been surveyed previously; therefore, a citywide windshield survey was conducted by certified architectural historians to examine existing conditions and identify examples of ~~potentially eligible~~ property types, styles, and methods of construction that represent key periods of development in Hermosa Beach. ~~which included locating potential individual historical resources and concentrations or groups of intact resources that appear to be eligible as potential historic districts based on their age, architecture, and integrity.~~ There are approximately 3,600 parcels with improvements over 45 years old in Hermosa Beach. ~~A total of 218 improved parcels were identified as potentially eligible for local listing and were assigned California Historical Resource (CHR) status codes of 5S3, "appears to be individually eligible for local listing or designation through survey evaluation." In addition, the survey identified two groupings of single-family residences~~

~~that appear potentially eligible as beach cottage districts and were assigned CHR status codes of 5D3, "appears to be a contributor to a district that appears eligible for local listing or designation through survey evaluation." **Figure 4.4-1 (Potentially Eligible Historic Resources [Windshield Survey])** identifies the 218 parcels that have been identified as potentially eligible for local listing. An architectural overview, complete inventory list, and California Department of Parks and Recreation primary survey forms are provided in **Appendix C-7.**~~

Page 4.4-4, Figure 4.4-1, Potentially Eligible Historic Resources Map, has been removed and is replaced with a narrative describing the general history and time periods of development in Hermosa Beach as provided in the Existing Conditions Report.

Replace Policies and Implementation Actions from PLAN Hermosa with modified policies from City Council Final Draft.

Page 4.4-11, last paragraph is modified as follows:

> Implementation action LAND USE-~~23~~21 would require archaeological investigations, as necessary, by a qualified archaeologist for projects subject to CEQA involving ground-disturbing activities for areas not previously surveyed and/or that are determined sensitive for cultural resources and would require preparation and implementation of a treatment plan if buried resources would be affected by a proposed project. For example, an initial archaeological study (Phase I Assessment), at a minimum, would consist of the following tasks to identify known archaeological resources in a given project site: a cultural resources records search through the South Central Coastal Information Center of the California Historical Resources Information System, a pedestrian survey of the project site, a review of the land use history, and coordination with knowledgeable organizations or individuals (e.g., Hermosa Beach Historical Society, Native American tribes). If warranted, additional analyses such as archaeological test excavations and/or remote sensing methods would be implemented to identify resources.

Page 4.4-12, first paragraph is modified as follows:

> To identify if a project requires archaeological investigations, the City would review available geotechnical studies to determine whether excavation activities would impact native soils. If a geotechnical study is not available for review, then the City would need to make a determination based on a review of recent aerial photography of the project location, available data from adjacent or nearby sites, and professional judgement. Thus, with implementation action LAND USE-~~23~~21, future development and reuse projects under PLAN Hermosa would implement the appropriate treatment and/or preservation of resources if encountered. Therefore, potentially significant impacts on archaeological resources would be **less than significant**.

Page 4.4-14, last paragraph, and 4.14-15 first paragraph are modified as follows:

> The City does not have a comprehensive list of potentially eligible historic properties over 45 years old. During the preparation of the City's General Plan Land Use Element in 1994, 28 historical resources and two historic districts were identified as potentially eligible; however, some of these potential resources have been demolished or substantially altered. Furthermore, this list is now over 20 years old and many additional properties now meet the age threshold for consideration that would have not been considered in 1994. A new windshield survey was conducted to examine existing conditions and identify

examples of property types, styles, and methods of construction that represent key periods of development in Hermosa Beach. ~~As described in **Appendix C-7**, PCR conducted a windshield survey to identify potentially eligible individual historic resources and concentrations or groups of historic resources that appeared to be eligible as potential districts. Of the approximately 3,600 parcels over 45 years old in Hermosa Beach, 218 parcels are potentially eligible for local listing (5S3) and two potentially eligible groupings of single-family residences that appear to be eligible as beach cottage districts (5D3). The evaluation of historic resources during the windshield survey was based on architecture, and a more intensive survey could be conducted in the future to consider patterns of history, events, and significant persons.~~

~~Approximately 60 percent of the potentially eligible resources are single-family, one-story residential properties constructed between 1906 and 1930 located in the Walk Street, Sand Section, North End, and Hermosa Hills neighborhoods. There are also two groupings of residences located in the Walk Street and Hermosa Hills neighborhoods. The remaining 40 percent of potentially eligible properties include a variety of property types and styles, such as commercial and industrial buildings, institutional buildings, landscape architectural features, churches, parkettes, and greenbelts. These potential historical resources are located in the Downtown, Civic Center, and Cypress districts and along the Pacific Coast Highway corridor.~~

Page 4.4-15, paragraph five and six, and Page 4.14-16, first paragraph are modified as follows:

Provisions of the City's current preservation ordinance (Municipal Code Section 17.53) would not prevent the demolition or impairment of a historic building or structures that are not formally designated as a landmark under the City's preservation ordinance or listed on the City's potential historical resources list, but that meet the definition of historical resource for the purpose of CEQA. Demolition of such a historical resource would be a significant impact under CEQA. Furthermore, it is possible that some structures that have not yet been surveyed could be eligible historical resources. ~~Implementation actions LAND USE-3 and LAND USE-15 attempt to lessen impacts due to infill development adjacent to historical resources by recommending the preparation of design guidelines to ensure new development would not sharply contrast with nearby historic resources and the use of the Secretary of Interior's Standards to evaluate impacts of alterations or new development to historical resources.~~

Policies 10.1, 10.2, 10.3, 10.4, and 10.6 would encourage the voluntary designation of potentially eligible historic resources as landmarks or historic districts, ~~prohibit and~~ discourage the inappropriate alteration or demolition of designated landmarks, require the evaluation of ~~potentially eligible~~ historic resources associated with discretionary projects prior to demolition, and provide incentives for preservation of historic resources. The implementation actions set forth in PLAN Hermosa recommend a number of programs to support the goals and policies described above.

PLAN Hermosa policies and implementation actions requiring the identification and protection of historic resources, along with adherence to existing federal, state, and City regulations, would provide greater protections to locally designated and potential historical resources. Other implementation actions address amending CEQA documentation and the initial study program to ensure historic resources are adequately addressed (LAND USE-13) ~~and the establishment of design review procedures and guidelines (LAND USE-18)~~. However, implementation of PLAN Hermosa would not prevent the demolition of or substantial adverse change to potentially eligible historic buildings and

structures that qualify as historical resources pursuant to CEQA, but have not been formally designated under the City's preservation ordinance or listed on the City's potential landmark list. Therefore, this impact would be **potentially significant**.

Page 4.4-16, Mitigation Measures have been revised as follows:

Mitigation Measures

~~**MM 4.4-4a** The City shall establish an updated list of potential historic resources to be maintained by the Community Development Director. The list shall be updated every 10 years, at a minimum, to identify as-yet-unknown historical resources (as defined in CEQA Guidelines Section 15064.5) as potential resources are identified through citywide surveys and on a project-by-project basis.~~

MM 4.4-4~~b~~a The City shall require project applicants of discretionary projects to conduct historical resources studies, surveys, and assessment reports on a project-by-project basis, when a project proposes to alter, demolish, or degrade a designated landmark or a potential historic ~~resource~~ landmark as defined by Hermosa Beach Municipal Code Section 17.53.

MM 4.4-4~~c~~b The City shall maintain the "Historical Resources in Hermosa Beach" guide, and shall update the guide so that it is informed by current resource data and its goals and policies are consistent with the Land Use + Design Element.

MM 4.4-4~~d~~c The City shall develop procedures and nomination applications to facilitate and streamline the designation of local historic sites and historic districts.

MM 4.4-4~~e~~d Historical resources studies, surveys, and assessment reports shall be performed by persons who meet the Secretary of the Interior's Professional Qualification Standards for Archaeology and Historic Preservation (48 CFR 44716).

~~**MM 4.4-4f** For historical resources that may be adversely impacted, conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and application of the State Historical Building Code shall be required to protect significant character-defining features and protect the eligibility of potential historical resources.~~

Significance After Mitigation

Implementation of mitigation measures **MM 4.4-4a** through **MM 4.4-4f~~f~~d** would reduce impacts on historical resources to the extent feasible. However, impacts on potentially eligible historic structures could occur depending on the proposed uses, the cost of rehabilitation, and safety considerations. Thus, it may not be feasible in all circumstances to rehabilitate a structure and retain its historic significance. ~~If a project applicant proposes to demolish an eligible structure, the City would consider the project's impacts prior to approval.~~ Given this uncertainty, this impact would be **significant and unavoidable.**

Discussions under Impacts 4.4-5, 4.4-6 have been updated to reference LAND USE-21 implementation action.

Discussions under Impact 4.4-8 has been updated to reflect new mitigation measures identified in 4.4-4 to reference MM4.4-4a – MM4.4-4d.

SECTION 4.5 (GEOLOGY AND SOILS)

Replace Policies and Implementation Actions from PLAN Hermosa with modified policies from City Council Final Draft.

SECTION 4.6 (GREENHOUSE GAS EMISSIONS)

Replace Policies and Implementation Actions from PLAN Hermosa with modified policies from City Council Final Draft

Page 4.6-9, second paragraph, last sentence, is revised as follows:

> ~~The Carbon Planning Tool includes the links and sources used for each data point and assumptions used to calculate emissions reductions.~~ **Appendix E-1 (PLAN Hermosa Greenhouse Gas Reduction Assumptions)** details the sources and assumptions used in the Carbon Planning Tool to estimate the potential emissions reductions from each strategy. The analysis relies on assumptions based on current technology (e.g., the average electrical output of 1 kilowatt [kW] of solar in Hermosa Beach is currently 1,488 kilowatt hours [kWh] annually) unless regulation or peer-reviewed research can reasonably project the effect that future technology would have on reducing GHG emissions (e.g., state and federal fuel efficiency standards for light-duty passenger vehicles mandate that the average fuel efficiency of a vehicle fleet will increase from 34 miles per gallon in 2016 to 55 miles per gallon by 2025).

Page 4.6-22, third through fifth paragraphs are modified as follows:

> Finally, PLAN Hermosa also includes several policies to support the reduction of GHG emissions that are not specific to a certain activity or sector. For instance, Sustainability + Conservation Element Policy 2.1 states that Hermosa Beach will reduce its GHG emissions in alignment with state targets and goals ~~and will also achieve carbon neutrality no later than 2040~~. Implementation action SUSTAINABILITY-1 will establish a GHG impact fee for all future discretionary development projects to offset their ~~fair share of~~ GHG contribution above established thresholds, and SUSTAINABILITY-5 requires the City to regularly monitor and evaluate Hermosa Beach's progress toward community-wide ~~carbon neutrality~~ greenhouse gas reductions.
>
> ~~Sustainability + Conservation Element Policy 2.5 directs the City to purchase carbon offsets when necessary to achieve community-wide carbon neutrality goals. The emissions reductions achieved from the purchase of carbon offsets or implementation of projects outside of Hermosa Beach to achieve carbon neutrality are included in the emissions reductions calculations to demonstrate achievement toward carbon neutrality, but they are excluded from demonstrating the community's ability to achieve the greenhouse gas reduction targets by 2040 consistent with long-term state goals. While offsets are included to achieve a carbon neutral goal, the degree to which they can be relied upon to demonstrate consistency with state goals is limited at this time. While the California Air Resources Board has developed guidance for organizations or operators subject to cap-and-trade regulation on how to select, verify, and register offset projects counted toward~~

~~cap-and-trade compliance, this guidance has not yet been approved for use or to demonstrate compliance by organizations or jurisdictions that are excluded from cap-and-trade regulation.~~

As noted in the Thresholds of Significance discussion above, PLAN Hermosa needs to demonstrate an ability to achieve long-term statewide goals by reducing community GHG emissions by approximately 66 percent below 2005 levels by 2040 to be considered a less than significant impact. Full implementation of the policies and actions in PLAN Hermosa has the potential to reduce emissions through local projects by at least 66 percent below 2005 levels by 2040 ~~and up to 100 percent by 2040 through the purchase of additional offsets. Additional emissions reductions to achieve the community carbon neutral goal contained in the Sustainability + Conservation Element would come from emissions reduction projects outside of Hermosa Beach or through the purchase of carbon offsets or credits.~~

Table 4.6-6, on Page 4.6-23, is modified as follows:

TABLE 4.6-6
SUMMARY OF ANNUAL EMISSIONS REDUCTIONS BY SECTOR IN 2040

	Share of Carbon Reductions (%)	Annual Carbon Reduction ($MTCO_2e$)
Baseline 2005 Emissions		137,160
2012 Emissions	-7.7%	126,610
BAU Emissions (2040)	+5.0%	133,430
State Programs (2040)	-27.7%	38,010
Local Remaining Emissions to Be Reduced		95,420
Building Efficiency		
New Construction Residential Efficiency	-1.3%	1,810
Existing Buildings Residential Efficiency	-4.4%	6,100
New Construction Nonresidential Efficiency	-2.0%	2,810
Existing Buildings Nonresidential Efficiency	-2.0%	2,770
Subtotal	**-9.8%**	**13,490**
Renewable Energy Generation		
Rooftop Solar	-5.9%	8,100
Community Solar	-0.4%	550
Renewable Energy Procurement	-7.3%	10,010
Purchased Renewables (Green Rate)	-0.0%	0
Subtotal	**-13.6%**	**18,660**
Transportation + Land Use		
Land Use & Transportation Alternatives	-4.0%	5,500
Additional Transportation Strategies	-1.9%	2,560

	Share of Carbon Reductions (%)	Annual Carbon Reduction ($MTCO_2e$)
Electric Vehicles	-7.4%	10,100
Subtotal	**-13.0%**	**18,160**
Other Sectors + Offsets		
Waste + Recycling	-2.5%	3,480
Water + Wastewater	-0.2%	330
~~Purchase Offsets~~	~~-30.1%~~	~~41,310~~
Subtotal	**-2.7%**	**3,810**
TOTAL	**-69.9%**	**54,110**

Source: City of Hermosa Beach 2016

Page 4.6-24 Mitigation Measures updated as follows:

MM 4.6-1a The City of Hermosa Beach will utilize the climate action plan, under development by the South Bay Cities Council of Governments, ~~or~~ and other appropriate tools to research current data gaps, identify and take specific actions, and define the responsible parties and time frames needed to achieve the greenhouse gas reduction goals (monitoring milestones) identified in mitigation measure MM 4.6-1b.

MM 4.6-1b The City of Hermosa Beach will re-inventory community GHG emissions and evaluate implementation progress of policies to reduce GHG emissions for the calendar year of 2020 and a minimum of every five years thereafter. The interim reduction goals to be achieved for consistency with long-term state goals include:

- 2020: 15 percent below 2005 levels
- 2025: 31 percent below 2005 levels
- 2030: 49 percent below 2005 levels
- 2035: 57 percent below 2005 levels
- 2040: 66 percent below 2005 levels

MM 4.6-1c The City will revise PLAN Hermosa and/or the City's Climate Action Plan, and other appropriate tools when, upon evaluation required in mitigation measure MM 4.6-1b, the City determines that Hermosa Beach is not on track to meet the applicable GHG reduction goals. Revisions to PLAN Hermosa, the Climate Action Plan, or other City policies and programs will include additional regulatory measures or incentives that provide a higher degree of certainty that emissions reduction targets will be met. Use of an adaptive management approach would allow the City to evaluate progress by activity sector (e.g., transportation, energy, water, waste) and prescribe additional policies or programs to be implemented in the intervening five years for activity sectors that are not on track to achieve the GHG reduction goals.

Page 4.6-28, under Impact 4.6-2, a new paragraph and table are inserted as follows:

A numeric summary of the relevant GHG emissions reduction goals articulated through state legislation or executive orders and locally adopted planning documents, along with

the level of GHG reductions that are anticipated to be achieved through the implementation of policies in PLAN Hermosa, is presented in **Table 4.6-7**.

TABLE 4.6-7 (NEW TABLE ADDED TO EIR)
GREENHOUSE GAS REDUCTION GOALS AND ACHIEVEMENTS

	Percent Emissions Reduction Below 2005 Levels			
GHG Emissions Reduction Goals				
Goal Origination	**2020**	**2030**	**2040**	**2050**
State Legislation (adopted)	15% (AB 32)	49% (SB 32)		
State Executive Order				83% (E.O. S-3-05)
Local Plans (Adopted)	15% (Sustainability Plan)			
Trajectory Needed to Meet Goals	15%	49%	66%	83%
PLAN Hermosa				
PLAN Hermosa			66%	
PLAN Hermosa EIR Alternative 2 (without offsets)		100%		

Source: City of Hermosa Beach, 2016.

Page 4.6-29, paragraph two is modified to read as follows:

In 2015, the City of Hermosa Beach adopted a local goal to become a carbon neutral municipal organization no later than 2020 through adoption of the Municipal Carbon Neutral Plan. ~~This plan set the City up to demonstrate environmental leadership at the municipal level and identified carbon reduction programs and initiatives to achieve the carbon neutral goal.~~ The Hermosa Beach Municipal Carbon Neutral Plan was funded by a grant from the Southern California Association of Governments to identify and explore emissions reduction opportunities for municipal facilities and operations. The Municipal CN Plan also identifies the elements of setting a greenhouse gas reduction goal including the time frame, magnitude, and scope of emissions/activities included. The Municipal CN Plan explored a range of greenhouse gas reduction goals and ultimately adopted a goal to reach carbon neutrality for municipal facilities and operations by the end of 2020.

Examples of implementation measures in the Municipal CN Plan included pursuing Community Choice Aggregation (CCA), accelerating implementation of the Clean Fleet Policy, upgrading street lighting to LED lighting, installing solar photovoltaic systems on municipal property, and dedicating staff to implement employee commute reduction programs. Implementation of these measures was projected to reduce direct municipal emissions by at least 40% by 2020. To reach a goal of carbon neutrality, the Municipal CN Plan identified that the remaining emissions would need to be offset by either generating additional local renewable energy or purchasing offsets, though in 2016 Council provided direction to staff not to pursue the latter option to purchase offsets.

Given the progress between 2005 and 2015, the projects recently completed or anticipated to be completed in the next few years, and the previous direction from City Council not to pursue the use of carbon credits or offsets, the City is on course to reduce municipal emissions by

approximately 58% by 2020 from 2005 levels, which exceeds the direct emissions reductions identified in the Municipal Carbon Neutral Plan, but does not reach the carbon neutral goal for municipal facilities by 2020.

PLAN Hermosa includes Sustainability + Conservation Element Goal 1 to meet or exceed an 80% reduction in municipal greenhouse gas emissions from 2005 levels by 2030 through projects that will directly reduce emissions from municipal facilities and operations (rather than through offsets). While the goal does not commit to carbon neutrality for the municipality as previously indicated in the Municipal Carbon Neutral Plan, Goal 1 and the associated policies will lead to a greater level of direct, measureable reductions in greenhouse gas emissions than identified in the Municipal Carbon Neutral Plan~~(carbon neutral municipal facilities and operations by 2020 and sustained into the future), which is consistent with the goal adopted in 2015 to be a carbon neutral municipal organization by 2020.~~ To further support the goal, Policies 1.1 through 1.10 speak to prioritizing projects that provide the highest return on investment, aligning projects to reduce emissions with the current sources of emissions, and using pilot or demonstration projects. The policies included in PLAN Hermosa mirror the Municipal Carbon Neutral Plan recommendations to pursue a diverse mixture of emissions reduction projects, to utilize offsets, and to evaluate the costs and savings/benefits of various projects prior to implementing.

SECTION 4.7 (HAZARDS AND HAZARDOUS MATERIALS)

Page 4.7-4 description of City of Hermosa Beach Local Hazard Mitigation Plan is updated as follows:

- **City of Hermosa Beach Local Hazard Mitigation Plan:** The City's Local Hazard Mitigation Plan ~~last updated in 2005,~~ has been updated in 2017 to meet~~s~~ the requirements of the Disaster Mitigation Act of 2000. The act requires local governments to prepare plans that identify hazards and risks within a community, and create appropriate mitigation. The purpose of the plan is to integrate hazard mitigation strategies into the City's daily activities and programs.

Replace Policies and Implementation Actions from PLAN Hermosa with modified policies from City Council Final Draft.

References updated as follows:

City of Hermosa Beach. 2014. *E&B Oil Drilling & Production Project Final Environmental Impact Report*.http://www.hermosabch.org/ftp/oil_docs/FEIR%20Hermosa%20beach%20Oil%20Project_All%20Sections.pdf.

———. 2016. *City of Hermosa Beach Emergency Operations Plan*. Accessed January 2014. http://www.hermosabch.org/modules/showdocument.aspx?documentid=7802

———. 2017. City of Hermosa Beach 2017 Draft *Local Hazard Mitigation Plan*. http://www.hermosabch.org/modules/showdocument.aspx?documentid=9252

———. 2017. *PLAN Hermosa.*

SECTION 4.8 (HYDROLOGY AND WATER QUALITY)

Replace Policies and Implementation Actions from PLAN Hermosa with modified policies from City Council Final Draft.

References updated as follows:

———. 2017. City of Hermosa Beach 2017 Draft *Local Hazard Mitigation Plan*. http://www.hermosabch.org/modules/showdocument.aspx?documentid=9252

———. 2017. *PLAN Hermosa.*

SECTION 4.9 (LAND USE AND PLANNING)

Replace Policies and Implementation Actions from PLAN Hermosa with modified policies from City Council Final Draft.

Replace Figure 4.9-1 with updated Land Use Designation Maps from PLAN Hermosa.

SECTION 4.10 (MINERAL RESOURCES)

No changes.

SECTION 4.11 (NOISE AND VIBRATION)

Replace Policies and Implementation Actions from PLAN Hermosa with modified policies from City Council Final Draft.

SECTION 4.12 (POPULATION AND HOUSING)

Replace Policies and Implementation Actions from PLAN Hermosa with modified policies from City Council Final Draft.

SECTION 4.13 (PUBLIC SERVICES, COMMUNITY FACILITIES, AND UTILITIES)

Replace Policies and Implementation Actions from PLAN Hermosa with modified policies from City Council Final Draft.

Update Figure 4.13-1 Parks and Public Facilities with modified map from PLAN Hermosa.

Update Table 4.13-2 Parks and Community Facilities in Hermosa Beach with modified table form PLAN Hermosa.

Page 4.13-35, second to last sentence in the second paragraph under the Wastewater subheading is revised as follows:

> The LACSD trunk lines flow to the Joint Water Pollution Control Plant (JWPCP), located in Carson. The JWPCP is one of the largest wastewater plants in the world and is the largest of the LACSD wastewater treatment plants. The facility provides both primary and secondary treatment and has a total permitted capacity of 400 million gallons per day (mgd).[3] The plant serves a population of approximately 3.5 million people throughout Los Angeles County. Treated discharge from the plant is transported to the Pacific Ocean through a network of outfalls, which extend 1.5 miles off the Palos Verdes Peninsula, to a depth of 200 feet (LACSD 2013). The JWPCP currently processes an average flow of ~~263.1~~ 254.1 mgd (LACSD 2015; LACSD 2017). The projected flow to the JWPCP in its service area for 2050 is 359 mgd.[4]

Page 4.13-43, first paragraph in the discussion of Impact 4.13.7-1 is revised as follows:

> The increased population resulting from implementation of PLAN Hermosa could generate additional wastewater flows that would be treated by the Joint Water Pollution Control

Plant located in Carson. The LACSD has estimated wastewater flows generated by the additional 300 residential units and 630,400 square feet of nonresidential development to be approximately 251,680 gallons per day (or 0.252 mgd) of wastewater (LACSD 2015).[6] Currently, the JWPCP treats an average of ~~263.1~~ 254.1 mgd, which includes flows from Hermosa Beach. The addition of flows from PLAN Hermosa (0.252 mgd) would increase treated flows to approximately ~~263.4~~ 254.4 mgd, which would not exceed the current 280-mgd primary and secondary treatment capacity or the 400-mgd permitted capacity of the JWPCP. PLAN Hermosa's additional flows would represent less than an approximately 0.1 percent contribution to flows.

Page 4.13-62, two new sentences have been added to the end of the second paragraph under the "Automotive Fuel Consumption" subheading as follows:

Implementation of PLAN Hermosa's proposed policies and implementation actions that are designed to promote pedestrian, bicycle, and transit forms of transportation would further reduce dependency on fossil fuels. As shown in Table 4.13-7, under PLAN Hermosa, the amount of transportation fuels consumed would be reduced to approximately 1.4 million gallons or almost 77 percent when compared to existing (2015) conditions, but would also increase electricity consumption due to the increase in use of electric vehicles. The reduction of transportation fuel consumed by 2040 compared to 2015 (77 percent) is a result of greater fuel efficiency from conventionally fueled vehicles, a reduction in overall vehicle miles traveled through land use changes, and a greater shift to electric vehicles or fossil-free vehicles. By 2040 it is estimated that approximately 75 percent of new vehicles in Hermosa Beach will be electric or fossil-free vehicles, compared to approximately 5 percent in 2015. This information, along with all other assumptions associated with the calculation of energy or fuel use and greenhouse gas reductions, is presented in **Appendix E-1**.

Page 4.13-62, a new paragraph has been added immediately following Table 4.13-7 as follows:

The data in Table 4.13-7 have been developed using the same assumptions used for the greenhouse gas emissions analysis in Section 4.6, Greenhouse Gas Emissions, which concludes that PLAN Hermosa will reduce emissions locally by at least 66 percent by 2040.

Page 4.13-67, a new reference is added as follows:

LACSD (Sanitation Districts of Los Angeles County). 2012. *Clearwater Program Final Master Facilities Plan*.

———. 2013. Wastewater Facilities. http://www.lacsd.org/wastewater/wwfacilities/default.asp#map.

———. 2015. Plan Hermosa: City of Hermosa Beach General Plan and Local Coastal Program Update [comment letter on Notice of Preparation dated September 8, 2015, included in Appendix B]

———. 2017. Response to DEIR for the PLAN Hermosa: City of Hermosa Beach General Plan and Local Coastal Program Update [comment letter on Draft EIR dated January 5, 2017, included in Section 2.0, Responses to Comments, in the Final EIR].

SECTION 4.14 (TRANSPORTATION)

Replace Policies and Implementation Actions from PLAN Hermosa with modified policies from City Council Final Draft. Update Table 4.14-14 to match proposed bicycle facilities map.

TABLE 4.14-14
PLANNED HERMOSA BEACH BICYCLE FACILITIES

Class	Street/Path	From	To
Proposed Class I and IV Facilities			
I	Marvin Braude Bike Trail (The Strand)	North City Limits	South City Limits
IV	Prospect Avenue	Artesia Boulevard	South City Limits
IV	Hermosa Avenue	North City Limits	26th Street
Proposed Class II and Class III Facilities			
II	Aviation Boulevard	Pacific Coast Highway	Harper Avenue
II	Artesia Boulevard	Pacific Coast Highway	Harper Avenue
II/III	Hermosa Avenue	North City Limits	South City Limits
II/III	27th Street/Gould Avenue	Hermosa Avenue	Pacific Coast Highway
III	Pier Avenue	Hermosa Avenue	Pacific Coast Highway
III	16th Street	Hermosa Avenue	Prospect Avenue
III	Longfellow Avenue	Hermosa Avenue	Valley Drive
III	Valley Drive	Longfellow Avenue	Herondo Street
III	Morningside Drive	35th Street	26th Street
III	5th Street/6th Street	Hermosa Avenue	Prospect Avenue
III	10th Street	The Strand	Prospect Avenue
III	22nd Street/Monterey Boulevard	The Strand	Herondo Street
III	21st Street	Ardmore Avenue	Prospect Avenue

Source: City of Hermosa Beach 2015

APPENDIX C

Appendix C-7 is modified to delete Figure 7.2: Potential Historic Resources

Appendix C is modified to include the following appendices prepared as part of the Technical Background Report (appendices numbered as they appear in the Technical Background Report). These appendices are included on CD at the back of this Final EIR.

- Appendix A1 Hermosa Beach Market Analysis
- Appendix A2 Vulnerability and Adaptation to Sea Level Rise
- Appendix B1 Natural Resources
- Appendix B2 Special Status Species
- Appendix B6 Archaeological and Paleontological Resources Assessment
- Appendix B7 City of Hermosa Beach 2013-2021 Housing Element

APPENDIX H (NEW)

A new Appendix H (Tribal Consultation) has been added to document the Tribal Consultation process completed by the City for this project in compliance with AB 52 and SB 18. The documents in Appendix H are confidential to comply with AB 52 and protect the confidential information provided by California Native American Tribes. They are included in the administrative record for the EIR and are on file with the City of Hermosa Beach.

4.1 MITIGATION MONITORING PROGRAM

As the Lead Agency under the California Environmental Quality Act (CEQA), the City of Hermosa Beach (City) is required to adopt a program for reporting or monitoring regarding the implementation of mitigation measures for PLAN Hermosa, if it is approved, to ensure that the adopted mitigation measures are implemented as defined in this environmental impact report (EIR). This Lead Agency responsibility originates in Public Resources Code Section 21081.6(a) (Findings) and the CEQA Guidelines Sections 15091(d) (Findings) and 15097 (Mitigation Monitoring or Reporting).

4.2 MONITORING AUTHORITY AND ENFORCEMENT RESPONSIBILITY

The purpose of a Mitigation Monitoring, and Reporting Program (MMRP) is to ensure that the measures adopted to mitigate or avoid significant impacts are implemented. An MMRP can be a working guide to facilitate not only the implementation of mitigation measures by the City and/or future project applicants (as appropriate), but also the monitoring, compliance, and reporting activities of the City and any monitors it may designate. The City may delegate duties and responsibilities for monitoring to other environmental monitors or consultants as deemed necessary. The City or its designee(s), however, will ensure that each person delegated any duties or responsibilities is qualified to monitor compliance. Any mitigation measure study or plan that requires the approval of the City must allow at least 60 days for adequate review time. When a mitigation measure requires that a mitigation program be developed during the design phase of a specific project, the applicant must submit the final program to City for review and approval for at least 60 days before any construction activity begins. Other agencies and jurisdictions may require additional review time. It is the responsibility of the environmental monitor to ensure that appropriate agency reviews and approvals are obtained. The City or its designee will also ensure that any deviation from the procedures identified under the monitoring program is approved by the City. Any deviation and its correction shall be reported immediately to the City or its designee by the environmental monitor.

The City is responsible for enforcing the procedures adopted for monitoring through the environmental monitor. Any assigned environmental monitor shall note problems with monitoring, notify appropriate agencies or individuals about any problems, and report the problems to the City or its designee.

4.3 MITIGATION COMPLIANCE RESPONSIBILITY

The City and/or future project applicant, as applicable, is responsible for successfully implementing the mitigation measures in the MMRP, and is responsible for assuring that these requirements are met by all of its contractors and field personnel. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as coordination with a resource agency or avoiding a specific impact entirely. Other mitigation measures include performance standards. Additional mitigation success thresholds will be established by applicable agencies with jurisdiction through the permit process and through the review and approval of plans for the implementation of mitigation measures.

4.4 GENERAL MONITORING PROCEDURES

Environmental Monitors. The City and the environmental monitor(s) are responsible for integrating the mitigation monitoring procedures into the construction or operation process in coordination with project applicants. To oversee the monitoring procedures and to ensure success, the environmental monitor assigned to a project must be on-site during that portion of the construction or operation that has the potential to create a significant environmental impact or

other impact for which mitigation is required. The environmental monitor is responsible for ensuring that all procedures specified in the monitoring program are followed.

General Reporting Procedures. Site visits and specified monitoring procedures performed by other individuals will be reported to the environmental monitor. A monitoring record form will be submitted to the environmental monitor by the individual conducting the visit or procedure so that details of the visit can be recorded and progress tracked by the environmental monitor. A checklist will be developed and maintained by the environmental monitor to track all procedures required for each mitigation measure and to ensure that the timing specified for the procedures is adhered to. The environmental monitor will note any problems that may occur and take appropriate action to rectify the problems.

Public Access to Records. The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports will be made available for public inspection by the City or its designee on request.

4.5 MITIGATION MONITORING AND REPORTING TABLE

Table 4.0-1 lists the monitoring and reporting plan requirements for the mitigation measures identified in Section 4.1 through Section 4.14 of the Draft EIR for PLAN Hermosa. Table 4.0-1 provides the following information, by column:

- Mitigation Measure (description of the mitigation measure, listed in the order they appear in the Draft EIR);
- Compliance Verification (monitoring or plan requirements necessary to verify compliance with the mitigation measure);
- Responsible Party (this is the entity responsible for implementing the mitigation measure)
- Timing (this identifies when the action needs to be taken on the mitigation measure)
- Verification Method (this is how the agency responsible for ensuring the mitigation measure has been implemented); and
- Verification Responsibility (this is the agency that is responsible for assuring compliance with the mitigation measure).

TABLE 4.0-1
PLAN HERMOSA - MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Mitigation Requirements	Compliance Verification			
		Responsibility Party	Timing	Verification Method	Verification Responsibility
4.2 Air Quality					
MM 4.2-2a	Construction projects within the city shall demonstrate compliance with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403: • All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD Rule 403. Wetting could reduce fugitive dust by as much as 50 percent. • The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind. • All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust. • All dirt/soil loads shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust. • All dirt/soil materials transported off-site shall be required to cover their loads as required by California Vehicle Code Section 23114 to prevent excessive amount of dust. • General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. • Trucks having no current hauling activity shall not idle but shall be turned off.	Project applicant	During construction	Verification through site inspection	City of Hermosa Beach
MM 4.2-2b	In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to 5 minutes at any location.	Project applicant	During construction	Verification through site inspection	City of Hermosa Beach
MM 4.2-2c	Construction projects within the city shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.	Project applicant	During construction	Verification through site inspection	City of Hermosa Beach

TABLE 4.0-1
PLAN HERMOSA - MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Mitigation Requirements	Compliance Verification			
		Responsibility Party	Timing	Verification Method	Verification Responsibility
MM 4.2-2d	Construction projects within the city shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.	Project applicant	During construction	Verification through site inspection	City of Hermosa Beach
MM 4.2-2e	Project applicants shall identify all measures to reduce air pollutant emissions below SCAQMD thresholds prior to the issuance of building permits. Should attainment of SCAQMD thresholds be determined to be infeasible, construction contractors shall provide evidence of this to the City and will be encouraged to apply for SCAQMD SOON funds.	Project applicant	At least 60 days prior to issuance of construction permits	Verification during plan review of project	City of Hermosa Beach
4.3 Biological Resources					
MM 4.3-1	Construction of facilities on the beach that must occur between the months of April and August (roosting season for snowy plovers) will require preconstruction surveys to determine the presence of western snowy plovers or California least terns. If these species are present, no construction may occur until the species leave the roost based on review by a qualified biologist and consultation with the California Department of Fish and Wildlife (CDFW) and the US Fish and Wildlife Service (USFWS). If the project is within a Special Protection Zone, construction activities will not be allowed until western snowy plovers are no longer present. If the area is not within a Special Protection Zone, a qualified biologist will survey the area for western snowy plovers using established protocols and in coordination with the USFWS and CDFW to determine if plovers are present. If they are present, no work will occur until after snowy plovers leave the roost site for the season. The qualified biologist will also survey the area for California least terns using established protocols and in coordination with the USFWS and CDFW to determine if California least terns are present. If surveys are negative for western snowy plovers or California least terns, work may proceed during the roosting period and the biologist will be present to monitor the establishment of the beach landing sites to ensure that no western snowy plovers or California least terns are injured or killed, should they arrive in the area subsequent to work commencing. The project will include fencing/walls that will prevent western snowy plovers or California least terns from entering the work areas. The biologist will conduct weekly site visits to ensure that fencing/walls are intact until construction activities	Project applicant	Prior to construction	Verify preconstruction surveys, agency consultation, and reporting completed	City of Hermosa Beach

TABLE 4.0-1
PLAN HERMOSA - MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Mitigation Requirements	Compliance Verification			
		Responsibility Party	Timing	Verification Method	Verification Responsibility
	are finished at the sites and all equipment is removed from the beach. The results of the preconstruction survey will be submitted to the City prior to the establishment of beach landing sites. All biological monitoring efforts will be documented in monthly compliance reports to the City.				
4.4 Cultural Resources					
MM 4.4-3	As a standard condition of approval for future development projects implemented under PLAN Hermosa that involve ground disturbance or excavation: • For any project where earthmoving or ground disturbance activities are proposed at depths that encounter older Quaternary terrace deposits, a qualified paleontologist shall be present during excavation or earthmoving activities. • If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work in the vicinity of the find and notify the City. The project applicant(s) shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines (1996). The recovery plan may include, but is not limited to, a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the lead agency to be necessary and feasible shall be implemented before construction activities can resume at the site where the paleontological resources were discovered.	Project applicant	During construction	Verification during plan review of project	City of Hermosa Beach
MM 4.4-4a	The City shall require project applicants of discretionary projects to conduct historical resources studies, surveys, and assessment reports on a project-by-project basis, when a project proposes to alter, demolish, or degrade a designated landmark or a potential historic landmark as defined by Hermosa Beach Municipal Code Section 17.53.	Project applicant	At least 60 days prior to issuance of construction permits	Verification during plan review of project	City of Hermosa Beach
MM 4.4-4b	The City shall maintain the "Historical Resources in Hermosa Beach" guide, and shall update the guide so that it is informed by current resource data and its goals and policies are consistent with the Land Use + Design Element.	City of Hermosa Beach	Ongoing, and reviewed every five years at a minimum	Self-reporting	City of Hermosa Beach

TABLE 4.0-1
PLAN HERMOSA - MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Mitigation Requirements	Compliance Verification			
		Responsibility Party	Timing	Verification Method	Verification Responsibility
MM 4.4-4c	The City shall develop procedures and nomination applications to facilitate and streamline the designation of local historic sites and historic districts.	City of Hermosa Beach	By 2020 and revisited as the potential historic resources list is updated	Self-reporting	City of Hermosa Beach
MM 4.4-4d	Historical resources studies, surveys, and assessment reports shall be performed by persons who meet the Secretary of the Interior's Professional Qualification Standards for Archaeology and Historic Preservation (48 CFR 44716).	Project applicant	At least 60 days prior to issuance of construction permits	Verification during plan review of project	City of Hermosa Beach
4.6 Greenhouse Gas Emissions					
MM 4.6-1a	The City of Hermosa Beach will utilize the climate action plan, under development by the South Bay Cities Council of Governments, and other appropriate tools to research current data gaps, identify and take specific actions, and define the responsible parties and time frames needed to achieve the greenhouse gas reduction goals (monitoring milestones) identified in mitigation measure MM 4.6-1b.	City of Hermosa Beach	Ongoing	Self-reporting	City of Hermosa Beach
MM 4.6-1b	The City of Hermosa Beach will re-inventory community GHG emissions and evaluate implementation progress of policies to reduce GHG emissions for the calendar year of 2020 and a minimum of every five years thereafter. The interim reduction goals to be achieved for consistency with long-term state goals include: • 2020: 15 percent below 2005 levels • 2025: 31 percent below 2005 levels • 2030: 49 percent below 2005 levels • 2035: 57 percent below 2005 levels • 2040: 66 percent below 2005 levels	City of Hermosa Beach	Beginning in 2020 and every five years thereafter until 2040	Self-reporting	City of Hermosa Beach
MM 4.6-1c	The City will revise PLAN Hermosa and/or the City's Climate Action Plan, and other appropriate tools when, upon evaluation required in mitigation measure MM 4.6-1b, the City determines that Hermosa Beach is not on track to meet the applicable GHG reduction goals. Revisions to PLAN Hermosa, the Climate Action	City of Hermosa Beach	Beginning in 2020 and every five years thereafter until 2040	Self-reporting	City of Hermosa Beach

TABLE 4.0-1
PLAN HERMOSA - MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Mitigation Requirements	Compliance Verification			
		Responsibility Party	Timing	Verification Method	Verification Responsibility
	Plan, or other City policies and programs will include additional regulatory measures or incentives that provide a higher degree of certainty that emissions reduction targets will be met. Use of an adaptive management approach would allow the City to evaluate progress by activity sector (e.g., transportation, energy, water, waste) and prescribe additional policies or programs to be implemented in the intervening five years for activity sectors that are not on track to achieve the GHG reduction goals.				
4.7 Hazards and Hazardous Materials					
MM 4.7-2a	For any development activities that would encroach upon or take place at the City's Maintenance Yard, the City shall require the preparation and implementation of a Human Health Risk Assessment (HHRA) and a Remedial Action Plan (RAP) to be approved by the appropriate agencies.	Project applicant	Prior to issuance of construction permits	Verification during plan review of project	City of Hermosa Beach
MM 4.7-2b	Future discretionary projects involving the use of hazardous materials that may be accidentally released or encountered during construction shall be required to implement the following procedures: • Stop all work in the vicinity of any discovered contamination or release. • Identify the scope and immediacy of the problem. • Coordinate with responsible agencies (Department of Toxic Substances Control, Regional Water Quality Control Board, or US Environmental Protection Agency). • Conduct the necessary investigation and remediation activities to resolve the situation before continuing construction work as required by state and local regulations.	Project applicant	During construction	Reporting to City and verification by City	City of Hermosa Beach
4.11 Noise and Vibration					
MM 4.11-2	For development located at a distance within which acceptable vibration standards would be exceeded, the City shall require the applicant to have a structural engineer prepare a report demonstrating the following: • Vibration level limits based on building conditions, soil conditions, and planned demolition and construction methods to ensure vibration levels	Project applicant	At least 60 days prior to issuance of construction permits	Verification during plan review of project	City of Hermosa Beach

TABLE 4.0-1
PLAN HERMOSA - MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Mitigation Requirements	Compliance Verification			
		Responsibility Party	Timing	Verification Method	Verification Responsibility
	would not exceed acceptable levels where damage to structures using vibration levels in Draft EIR Table 4.11-4 as standards. • Specific measures to be taken during construction to ensure the specified vibration level limits are not exceeded. • A monitoring plan to be implemented during demolition and construction that includes post-construction and post-demolition surveys of existing structures that would be impacted. Examples of measures that may be specified for implementation during demolition or construction include but are not limited to: • Prohibition of certain types of impact equipment. • Requirement for lighter tracked or wheeled equipment. • Specifying demolition by non-impact methods, such as sawing concrete. • Phasing operations to avoid simultaneous vibration sources. • Installation of vibration measuring devices to guide decision-making for subsequent activities.				

Hermosa Beach City Council Project Findings and Statement of Overriding Considerations For Adoption of PLAN Hermosa

The Hermosa Beach City Council makes the following PLAN Hermosa Project findings.

1.0 CEQA FINDINGS

Findings pursuant to Public Resources Code Section 21081 and the California Environmental Quality Act Guidelines Sections 15090, 15091, 15092, 15162 and 15163.

1.1 CONSIDERATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT

The Final Environmental Impact Report (FEIR) was presented to the Hermosa Beach City Council and all voting members of the City Council have reviewed and considered the FEIR and associated appendices prior to making a recommendation on the PLAN Hermosa. In addition, all voting members of the City Council have reviewed and considered testimony and additional information presented at or prior to the public hearings on July 11, 2017 and July 17, 2017. The FEIR reflects the independent judgment of the City Council and the City of Hermosa Beach and is adequate for this proposal.

1.2 FULL DISCLOSURE

The City Council finds and certifies that the FEIR constitutes a complete, accurate, adequate and good faith effort at full disclosure under CEQA. The City Council further finds and certifies the FEIR has been completed in compliance with CEQA and Tribal Consultation requirements implemented under Assembly Bill 52 (2014). The omission of some detail or aspect of the Final EIR does not mean that it has been rejected by the City.

1.3 LOCATION OF RECORD OF PROCEEDINGS

The documents and other materials that constitute the record of proceedings upon which this decision is based are in the custody of the City Clerk, City of Hermosa Beach, 1315 Valley Drive, Hermosa Beach, CA 90254.

1.4 FINDINGS REGARDING THE DRAFT PLAN HERMOSA AND THE FINAL EIR

In response to comments from the public and other public agencies, the project has incorporated changes subsequent to publication of the Draft EIR. All of the changes to the Draft EIR are described in Chapter 3 of the Final EIR. Pursuant to CEQA, on the basis of the review and consideration of the Final EIR, the City finds:

1. Factual corrections and minor changes have been set forth as clarifications and modifications to the Draft EIR;
2. The factual corrections and minor changes to the Draft EIR are not substantial changes in the Draft EIR that would deprive the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the Proposed Project, a feasible way to mitigate or avoid such an effect, or a feasible project alternative;
3. The factual corrections and minor changes to the Draft EIR will not result in new significant environmental effects or substantially increase the severity of the previously identified significant effects disclosed in the Draft EIR;

4. The factual corrections and minor changes in the Draft EIR will not involve mitigation measures or alternatives which are considerably different from those analyzed in the Draft EIR that would substantially reduce one or more significant effect on the environment; and
5. The factual corrections and minor changes to the Draft EIR do not render the Draft EIR so fundamentally inadequate and conclusory in nature that meaningful public review and comment would be precluded.

Thus, none of the conditions set forth in CEQA requiring recirculation of a Draft EIR have been met. Incorporation of the factual corrections and minor changes to the Draft EIR into the Final EIR does not require the EIR be circulated again for public comment.

Since the release of the Public Review Draft PLAN Hermosa (December 2015), the Planning Commission, Public Works Commission, Parks and Recreation Commission, and Emergency Preparedness Advisory Commission held public meetings to review the 2015 Public Review Draft of PLAN Hermosa between January 2016 and June 2016, and have recommended modifications to the document. The Planning Commission held a study session in November 2016 to review and take input on the Draft EIR. The Planning Commission then held public hearings in February and March 2017, continued over six meetings to hear from the community and go through the proposed plan line by line. Through that process the Commission further refined the proposed policies and implementation actions to reflect the community's long-term vision for the City.

The changes to PLAN Hermosa that the Planning Commission recommended to the City Council were incorporated into the Planning Commission Recommended Draft of PLAN Hermosa. These changes included input from the Public Works Commission, Parks and Recreation Commission, Emergency Preparedness Advisory Commission, and the public and were included as part of the Planning Commission's recommendation for City Council consideration. The City Council held four Study Sessions to review the Planning Commission recommendations and identify additional changes to PLAN Hermosa.

The proposed changes to the project largely clarify and refine policy language without changing the intent of the PLAN's goals and objectives. A summary of the changes to PLAN Hermosa and associated implementation actions are provided below by area of environmental analysis:

- **Aesthetics and Visual Resources** – The Planning Commission recommended modifications to policies and implementation actions that add greater specificity and certainty to the process of evaluating future impacts to scenic vistas and methods to avoid significant impacts by including a new map that establishes prominent public viewpoints and uninterrupted scenic viewing areas to PLAN Hermosa. The Planning Commission also recommended deletion of a policy that would direct the City to explore designation of Pacific Coast Highway as a State Scenic Highway. Since it is not currently designated as such, it would not create a new significant impact. Additionally, while changes have been made to policies and implementation actions used in the analysis of visual character and shade/shadow impacts, the changes do not substantially alter the intent or direction provided in the implementation action. The intent was to maintain the public scenic vistas, and through the CEQA process the policies and implementation actions have been improved to provide more certainty as to

how public scenic vistas will be maintained and considered when adjacent development is proposed. *Further discussion of the changes to Aesthetics Mitigation Measures is provided in Section 1.5.*

- **Air Quality** – The Planning Commission recommended modifications to policies that are considered minor clarifications that do not alter the intent or objective of the policies used in the analysis of impacts to air quality or create new significant impacts because the policies and actions still address short-term construction emissions. The Planning Commission also recommended deletion of an implementation action related to grading and landform, however, the extent to which significant amounts of grading may occur on already undisturbed land in Hermosa Beach, because the community is largely built out, is limited and would still be subject to rules and regulations enforced by the South Coast Air Quality Management District. Therefore the removal of this implementation action would not create a new or increased significant air quality impact.
- **Biological Resources** – The Planning Commission did not recommend any significant modifications to policies or implementation actions that are used in the analysis of biological resources.
- **Cultural Resources** – The Planning Commission recommended modification to one of the implementation actions associated with the analysis of archaeological and paleontological resources in response to comments from the Native American Heritage Commission and the Gabrieleño Band of Mission Indians. The change to the implementation action associated with archaeological and paleontological resources was made to add greater specificity and certainty to the process of avoiding resources during ground disturbance activities and would not create a new significant impact. The Planning Commission has recommended the modification and removal of policies and implementation actions related to historical resources to be clear that the designation of historic landmarks is a voluntary program, however the EIR already identified that the PLAN policies could result in a significant and avoidable impact related to historic resources. *Further discussion of the changes to mitigation measures related to historic resources and findings that they are infeasible is provided in Section 1.5.*
- **Geology and Soils** - The Planning Commission recommended modifications to policies that are considered minor clarifications that do not alter the intent or objective of the policies used in the analysis of impacts to geology and soils that would create new significant impacts. The Planning Commission also recommended deletion of an implementation action related to grading and landform, however, the extent to which significant amounts of grading may occur on already undisturbed land in Hermosa Beach, because the community is largely built out, is limited and would still be subject to development standards and application requirements that address potential geology and soils hazards, therefore the removal of this implementation action would not create a new or increased significant geology and soils impact.
- **Greenhouse Gas Emissions** – The Planning Commission recommended modifications to several policies associated with the analysis of impacts to greenhouse gas emissions that are considered minor clarifications that do not alter the intent or objective of the policy. The Planning Commission also recommended the removal of policies associated with the purchase of carbon

offsets and to not pursue carbon neutrality, however the analysis presented in Table 4.6-6 of the Draft EIR demonstrates that the "Purchase Offsets" line item, representing 30.1% of the emissions reductions, could be eliminated and the greenhouse gas thresholds to reduce emissions consistent with long-term State greenhouse gas reduction goals (66% below 2005 levels by 2040) would still be met or exceeded with a reduction of approximately 69.9%. The analysis in the Draft EIR related to greenhouse gas emissions specifically did not rely upon offsets to determine whether or not State goals would be met through the implementation of policies and therefore, the removal of policies related to offsets would not create a new significant impact related to greenhouse gas emissions.

The City Council has also recommended modifications to the municipal greenhouse gas reduction goal based on further evaluation and deliberation. Rather than setting a goal to reach municipal carbon neutrality by 2020, Council has recommended a goal to meet or exceed an 80% reduction in municipal greenhouse gas emissions by 2030 in comparison to 2005 levels. Given the progress between 2005 and 2015, the projects recently completed or anticipated to be completed in the next few years, and the previous direction from City Council not to pursue the use of carbon credits or offsets, the City is on course to reduce municipal emissions by approximately 58% by 2020 from 2005 levels, which exceeds the direct emissions reductions identified in the Municipal Carbon Neutral Plan, but does not reach the previously adopted carbon neutral goal for municipal facilities by 2020. PLAN Hermosa includes Sustainability + Conservation Element Goal 1 to meet or exceed an 80% reduction in municipal greenhouse gas emissions from 2005 levels by 2030 through projects that will directly reduce emissions from municipal facilities and operations (rather than through offsets). While the goal does not commit to carbon neutrality for the municipality as previously indicated in the Municipal Carbon Neutral Plan, Goal 1 and the associated policies will lead to a greater level of direct, measureable reductions in greenhouse gas emissions than identified in the Municipal Carbon Neutral Plan. Given that the revised goal would result in a greater level or direct and measurable reductions in municipal greenhouse gas emissions, this change to the municipal greenhouse gas reduction goal would not create a new significant impact related to greenhouse gas emissions.

- **Hydrology and Water Quality** - The Planning Commission did not recommend any significant modifications to policies or implementation actions that are used in the analysis of hydrology and water quality. The Planning Commission recommended the inclusion of new maps within PLAN Hermosa that more clearly depict the range of potential scenarios associated with sea level rise, however these updated maps do not present any greater flooding extent than was previously identified by the maps included in the Draft EIR and therefore would not create a new significant impact related to hydrology and water quality.
- **Land Use and Planning** - The Planning Commission recommended modifications to several policies and implementation actions associated with the analysis of impacts to land use and planning. These changes are considered minor clarifications that do not alter the intent or objective of the policies but add

greater specificity and certainty to how the City will achieve consistency between the General Plan, Coastal Land Use Plan, and future updates to the Zoning Code. The Planning Commission has also recommended minor refinements to the Land Use Designations Map that covers less than a dozen parcels along PCH that had a Land Use Designation in the adopted General Plan of commercial uses, but zoning that allowed for residential development and over the course of the General Plan update have been redeveloped for residential use. These changes represent less than a fraction of a percent of the land area in Hermosa Beach and therefore would not create a new significant impact to land use and planning.

- **Mineral Resources** - The Planning Commission did not recommend any modifications to policies or implementation actions that are used in the analysis of mineral resources.
- **Noise and Vibration** - The Planning Commission did not recommend any significant modifications to policies or implementation actions that are used in the analysis of noise and vibration.
- **Population and Housing** - The Planning Commission did not recommend any significant modifications to policies or implementation actions that are used in the analysis of population and housing.
- **Public Services, Community Facilities, and Utilities** - The Planning Commission recommended modifications to several policies and implementation actions associated with the analysis of public services, community facilities, and utilities. The Planning Commission did not propose changes to the policies or implementation actions used in the analysis that would increase demand for: fire protection and emergency medical services; law enforcement services; public schools; library facilities; or water supply and service, wastewater service, storm drainage. The Planning Commission has recommended changes to policies and implementation actions associated with the analysis of impacts to parks and recreation, solid waste disposal, and energy resources, but these changes are considered minor clarifications that do not alter the intent or objective of the policies that would create new significant impacts. The Planning Commission has also recommended modifications to the map of parks, open space and public facilities in Hermosa Beach to highlight some of the City's existing facilities such as the skate park that is located at the community center and to add smaller parkettes that were not previously identified. These changes to the map do not increase demand for parks and recreation, rather they highlight additional facilities that are already available to meet current and future demand and therefore would not create a new significant impact.
- **Transportation** - The Planning Commission recommended modifications to several policies and implementation actions associated with the analysis of impacts to transportation. These changes are considered minor clarifications that do not alter the intent or objective of the policies but adds greater specificity and certainty to how the City will achieve consistency between the General Plan, Coastal Land Use Plan, and future updates to the Zoning Code. The Planning Commission also recommended minor refinements to the street classifications, pedestrian network, and bicycle and multi-use network maps and the addition of a proposed safe routes to school network to be incorporated into PLAN Hermosa. These changes to the map do not increase demand for such

facilities, rather they highlight certain routes that may be ideal for various bike and pedestrian improvements that would not affect level of service capacity, but could help to improve safety and therefore would not create a new significant impact.

Pursuant to Section 15088.5 of the State CEQA Guidelines, the changes would not result in any new significant environmental impacts nor substantially increase the severity of significant impacts described in the EIR. In reviewing the Implementation Actions, the Commission reviewed which implementation actions were specifically used in the EIR impact analysis to make sure that the changes would not alter the ultimate conclusions or analysis in the EIR. These changes to the implementation action are provided in the revised project description in Attachment 1B. The minor revisions/clarifications to the policy language would not change any of the conclusions in the EIR. Substantial revisions to the EIR are not necessary and, recirculation of the EIR is not required.

1.5 FINDINGS ADDRESSING THE ISSUES ANALYZED IN THE FEIR

1.5.1 FINDINGS THAT NATIVE AMERICAN CONSULTATION WAS CONDUCTED

In accordance with Senate Bill 18 (SB 18) and Government Code 69352.3, and Assembly Bill 52 (AB 52) and Government Code 21000, the City of Hermosa Beach requested a list of Tribal Organization contacts from the Native American Heritage Commission in April 2014. The City of Hermosa Beach sent notifications to the appropriate tribal organizations in January 2015 in compliance with SB 18, and again in August 2015 to comply with AB 52.

In response to these letters, the City received requests from the Soboba Band of Luiseño Indians and the Gabrieleño Band of Mission Indians – Kizh Nation to conduct formal consultation with the tribes. Both tribes requested that an experienced, trained, and certified Native American monitor be present during ground disturbing activities related to the project.

Following the initial request for consultation from the Soboba Band of Luiseño Indians, the City pursued consultation. However, the Band has failed to provide comments to the City, or otherwise failed to engage, in the consultation process. Therefore, consultation with the Soboba Band of Luiseño Indians has concluded under Cal. Pub. Res. Code § 21082.3(d)(2).

The City has engaged in lengthy consultation with the Gabrieleño Band of Mission Indians – Kizh Nation, as noted in the Responses to Comment in the Final EIR NAHC 1 and GMBI-1-2. Since PLAN Hermosa is a program-level document that will not directly result in physical changes to the environment, the City proposed policies and implementation actions that take into consideration the tribal organization requests for subsequent projects with ground disturbance activities that may occur through implementation of PLAN Hermosa. To more explicitly address the Band's request for a Native American monitor to be present during ground disturbing activities, the City proposes amending implementation action LAND USE-23 to explicitly require the City to weigh and consider available evidence to determine whether there is a potential risk for disturbing or damaging any cultural or tribal resources and whether any precautionary measures can be required to reduce or eliminate that risk. Those precautions may include requiring construction workers to complete a training on

archaeological and tribal resources before any ground disturbance activity and/or requiring a qualified archaeologist or tribal representative to monitor some or all of the ground disturbance activities.

This is an appropriate response for a Program-level analysis, since site specific impacts cannot be detailed at this time and would be speculative. This implementation action, as amended, would ensure the consultation requirements of AB 52 are followed by the City as a Lead Agency, and that requirements for Native American monitors to be present during ground-disturbing activities in which a tribe or archaeological investigation indicate the potential for tribal resources to be found are clear.

Following multiple requests for feedback on the City's proposed response, the Band has not provided a formal response. The City has acted in good faith and has provided a reasonable effort to respond to the Band's request for monitors, but without a timely response, the City is unable to reach a mutual agreement. Consultation is hereby concluded.

1.5.2 FINDINGS THAT CERTAIN UNAVOIDABLE IMPACTS ARE MITIGATED TO THE MAXIMUM EXTENT FEASIBLE

The FEIR for PLAN Hermosa identifies impacts in three resource areas – air quality, cultural resources, and transportation-- that cannot be fully mitigated and are therefore considered significant and unavoidable. The impact areas pertain to short-term impacts to air quality; potential changes to the significance of historical resources; and reductions to transportation and circulation Level of Service (LOS) performance standards at three intersections and one roadway segment. To the extent that the impacts remain significant and unavoidable such impacts are acceptable when weighed against the overriding social, economic, legal, technical, and other considerations, including the beneficial effects of the project to the existing circulation and infrastructure, described in the Statement of Overriding Considerations included herein. For each of these significant and unavoidable impacts identified by the FEIR, feasible changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect, as discussed below:

a. <u>4.2-2 Violate Air Quality Standards – Short-Term Impacts</u>

Impact:

Implementation of PLAN Hermosa would guide future development in the city in a manner that could generate air pollutant emissions from short-term construction. Although PLAN Hermosa policies and programs and enforcement of current SCAQMD rules and regulations would help reduce short-term emissions, construction emissions would result in a **significant impact**.

Mitigation Measures:

MM 4.2-2a	Construction projects within the city shall demonstrate compliance with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403: • All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD Rule 403. Wetting could reduce fugitive dust by as much as 50 percent. • The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind. • All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust. • All dirt/soil loads shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust. • All dirt/soil materials transported off-site shall be required to cover their loads as required by California Vehicle Code Section 23114 to prevent excessive amount of dust. • General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. • Trucks having no current hauling activity shall not idle but shall be turned off.
MM 4.2-2b	In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to 5 minutes at any location.
MM 4.2-2c	Construction projects within the city shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.
MM 4.2-2d	Construction projects within the city shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.
MM 4.2-2e	Project applicants shall identify all measures to reduce air pollutant emissions below SCAQMD thresholds prior to the issuance of building permits. Should attainment of SCAQMD thresholds be determined to be infeasible, construction contractors shall provide evidence of this to the City and will be encouraged to apply for SCAQMD SOON funds.

Finding:

Even with the implementation of Mitigation Measures **MM 4.2-2a** through **4.2-2e**, SCAQMD Rule 403 and PLAN Hermosa policies, it is still anticipated that some projects would have the potential to generate daily construction emissions that exceed the SCAQMD thresholds of significance. Because the intensity and schedule of construction activities cannot be determined at the time of this program-level analysis, it would be speculative to conclude that any level of mitigation would reduce daily construction emissions below the SCAQMD thresholds of significance. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean-up of off-road diesel vehicles, such as heavy duty construction equipment. In many cases, because of the amount of construction required for a project, even if all feasible mitigation is implemented, daily emissions could still exceed the significance thresholds.

The City Council finds that the impact as stated above is substantially reduced by the identified mitigation measures and that all feasible mitigation measures that are

appropriate at the Program-level have been incorporated. The City Council further finds that although this impact would be significant and unavoidable, the impact is acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 1.6 of these Findings).

b. 4.2-7 Cumulative Air Quality Impacts

Impact:

Implementation of PLAN Hermosa in addition to anticipated growth in the South Coast Air Basin would increase the amount of air quality emissions occurring within the basin and could affect the region's ability to attain ambient air quality standards. This would result in a **cumulatively considerable** impact.

Mitigation Measures:

Implement mitigation measures **MM 4.2-2a through MM 4.2-2e**.

Finding:

Even with the implementation of Mitigation Measures **MM 4.2-2a through 4.2-2e**, SCAQMD Rule 403 and PLAN Hermosa policies, it is still anticipated that future construction projects, in combination with other construction in the SCAQMD area, could have the potential to generate construction emissions that exceed the SCAQMD thresholds of significance on a cumulative basis. While the City of Hermosa Beach has the ability to reduce air quality impacts through the implementation of mitigation measures **MM 4.2-2a through MM 4.2-2e**, when combined with potential exceedances of SCAQMD thresholds of significance by other projects in the SCAQMD region, the contribution of projects in Hermosa Beach may be cumulatively considerable**.**

The City Council finds that the impact as stated above is substantially reduced by the identified mitigation measures and that no other feasible mitigation measures within the scope of the project are available, and the City of Hermosa Beach jurisdiction to implement mitigation measures is limited to projects within Hermosa Beach. The City Council further finds that although this impact would be significant and unavoidable, the impact is acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 1.6 of these Findings).

c. 4.4-4 Historical Resources

Impact:

Implementation of PLAN Hermosa would provide for future development and reuse projects in the city in a manner that could cause a substantial change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. Although implementation of PLAN Hermosa policies and actions would protect historical resources, this would be a **significant and unavoidable** impact.

Mitigation Measures:

MM 4.4-4a	The City shall require project applicants of discretionary projects to conduct historical resources studies, surveys, and assessment reports on a project-by-project basis, when a project proposes to alter, demolish, or degrade a designated landmark or a potential landmark as defined by Hermosa Beach Municipal Code Section 17.53.
MM 4.4-4b	The City shall maintain the "Historical Resources in Hermosa Beach" guide, and shall update the guide so that it is informed by current resource data and its goals and policies are consistent with the Land Use + Design Element.
MM 4.4-4c	The City shall develop procedures and nomination applications to facilitate and streamline the designation of local historic sites and historic districts.
MM 4.4-4d	Historical resources studies, surveys, and assessment reports shall be performed by persons who meet the Secretary of the Interior's Professional Qualification Standards for Archaeology and Historic Preservation (48 CFR 44716).

Finding:

- The Final EIR included a Mitigation Measure MM 4.4-4a that upon further review has been determined to be infeasible and the Planning Commission recommended this mitigation measure be removed in its entirety. First, it is unclear how this measure applies in Hermosa Beach, because the Municipal Code definitions for resources and landmarks are not the same as under CEQA, creating confusion as to what properties must be on a potential resource list. Second, CEQA already requires that environmental analysis be completed for any discretionary project that may impact an historic resource. CEQA applies to discretionary projects regardless of whether the City maintains a list of potential resources and by preparing a list of potential resources that identifies specific properties, the list could be misconstrued as a list of designated landmarks, which carry a different level of review and procedures established in the Historic Preservation Ordinance of the Municipal Code. For this reason, the proposed mitigation in infeasible.
- MM4.4-4a is amended to clarify that discretionary projects are required under CEQA to conduct an historical assessment. The City does not have authority to require studies for ministerial projects and those projects only require ministerial building permits and do not receive any discretionary planning review. The measure is also amended to reflect the definition of landmark, as that term is used in the Hermosa Beach Historic Resource Preservation Ordinance.
- The Final EIR included a Mitigation Measure MM 4.4-4f that upon further review has been determined to be infeasible and the Planning Commission recommended this mitigation measure be removed in its entirety. While the intent of MM 4.4-4f was to apply to designated historical landmarks, the wording could be interpreted more broadly and would effectively prohibit any changes to buildings considered to be potential historic resources and when modified to only apply to designated historical landmarks, it becomes duplicative with requirements under State Law regarding the treatment of designated historical resources, and interpreted more broadly could impede the City's greenhouse gas reduction and sustainability goals by (for example) preventing upgrades to structures to be more energy efficient.

Implementation of the remaining mitigation measures **MM 4.4-4a** through **MM 4.4-4d** would reduce impacts on historical resources to the extent feasible. However,

impacts on potentially eligible historic structures could occur depending on the proposed uses, the cost of rehabilitation, and safety and other considerations. Thus, it may not be feasible in all circumstances to rehabilitate a structure and retain its historic significance. If a project applicant proposes to demolish an eligible structure, the City would consider the project's impacts prior to approval.

The City Council finds that the impact as stated above is substantially reduced by the identified mitigation measures, that all feasible mitigation measures that are appropriate at the Program-level have been incorporated, and that no other feasible mitigation measures within the scope of the project are available. The Final EIR included a Mitigation Measure MM 4.4-4f that upon further review has been determined to be infeasible and that the City Council recommends this mitigation measure be removed in its entirety. While the intent of MM 4.4-4f was to apply to designated historical landmarks, the wording could be interpreted more broadly and would effectively prohibit any changes to buildings considered to be potential historic resources and when modified to only apply to designated historical landmarks, it becomes duplicative with requirements under State Law regarding the treatment of designated historical resources, and interpreted more broadly could impede the City's greenhouse gas reduction and sustainability goals. The City Council further finds that although this impact would be significant and unavoidable, the impact is acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 1.6 of these Findings).

d. <u>4.4-8 Cumulative Effects on Historical Resources</u>

Impact:

Implementation of PLAN Hermosa in addition to anticipated future development in the South Bay Cities COG planning area could cause a substantial change in the significance of a historical resource. The loss of some historical resources may be prevented through implementation of PLAN Hermosa policies and similar policies in other communities. However, this would not ensure that these resources can be protected and preserved. This impact would be **cumulatively considerable.**

Mitigation Measures:

Implement mitigation measures **MM 4.4-4a** through **MM 4.4-d.**

Finding:

Implementation of mitigation measures **MM 4.4-4a** through **MM 4.4-4d** would not ensure that all historical resources would be protected and preserved within the South Bay Cities COG planning area. As described in the analysis presented in Impact 4.4-4, impacts on historic resources could still occur and the impact cannot be reduced to less than significant.

The City Council finds that the impact as stated above is substantially reduced by the identified mitigation measures, that no other feasible mitigation measures within the scope of the project are available, and the City of Hermosa Beach jurisdiction to implement mitigation measures is limited to projects within Hermosa Beach. The City Council further finds that although this impact would be significant and

unavoidable, the impact is acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 1.6 of these Findings).

e. 4.14-1a Intersections

- **Pacific Coast Hwy and Artesia Blvd**

  Impact:

  The intersection at Pacific Coast Highway and Artesia Boulevard would be significantly impacted by PLAN Hermosa-related traffic in both the morning and evening peak periods. Opportunities for physical mitigations are limited by Caltrans's plan to remove a travel lane in each direction on Pacific Coast Highway and alignment issues, as well as major change in roadway characteristics, east to west from Artesia Boulevard to Gould Avenue. Additionally, physical mitigations would conflict with the SBBMP Class III bicycle facility planned for Gould Avenue, as well as PLAN Hermosa Mobility Element policies 1.1, 2.1, 3.6, 7.2, 7.5.

  Due to the above-mentioned conflicts between physical mitigations and PLAN Hermosa and adopted plans, the significant transportation impacts on traffic operations at the intersection of Pacific Coast Highway & Artesia Boulevard cannot be mitigated to a less than significant level; therefore this would be a **significant and unavoidable impact**.

  Mitigation Measures:

  No feasible mitigation measures are available to address the significant transportation and circulation impact.

  Finding:

  Opportunities for physical mitigation measures, such as restriping of intersection approaches to add turn lanes, were investigated. The emphasis was to identify physical improvements that could be implemented efficiently and maintain consistency with PLAN Hermosa goals. Mitigation measures were reviewed for compliance or conflict with PLAN Hermosa goals and policies, as well as adopted policies, plans, and programs regarding public transit, bicycle, or pedestrian facilities. Mitigations that decrease the performance or safety of such facilities were not considered. No mitigation measures could be applied to significantly impacted locations at which a vehicular-capacity based mitigation without creating a conflict with PLAN Hermosa goals or other adopted plans.

  The City Council finds that there are no feasible mitigation measures within the scope of the project available to address or lessen the impact without conflicting with PLAN Hermosa goals and policies or decreasing the performance or safety of the facility. The City Council further finds that although this impact would be significant and unavoidable, the impact is acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 1.6 of these Findings).

- **Pacific Coast Hwy and Aviation Blvd**

  Impact:

  The intersection at Pacific Coast Highway and Aviation Boulevard is significantly impacted by PLAN Hermosa-related traffic in the morning peak period. Opportunities for physical mitigations are limited by Caltrans's plan to remove a travel lane in each direction on Pacific Coast Highway and improvement plans for the intersection included in the Aviation Boulevard Master Plan, including enhanced crosswalks and repurposing of public right of way for parkettes, pedestrian space, or a crossing refuge. Additionally, physical mitigations would conflict with the SBBMP Class II bicycle facility planned for Aviation Boulevard, as well as PLAN Hermosa Mobility Element policies 1.1, 2.1, 3.6, 7.2, 7.5.

  Due to the above-mentioned conflicts between physical mitigations to improve level of service and PLAN Hermosa and adopted plans, the significant transportation impacts to traffic operations at the intersection of Pacific Coast Highway & Aviation Boulevard cannot be mitigated to a less than significant level; therefore this would be a **significant and unavoidable impact**.

  Mitigation Measures:

  No feasible mitigation measures are available to address the significant transportation and circulation impact.

  Finding:

  Opportunities for physical mitigation measures, such as restriping of intersection approaches to add turn lanes, were investigated. The emphasis was to identify physical improvements that could be implemented efficiently and maintain consistency with PLAN Hermosa goals. Mitigation measures were reviewed for compliance or conflict with PLAN Hermosa goals and policies, as well as adopted policies, plans, and programs regarding public transit, bicycle, or pedestrian facilities. Mitigations that decrease the performance or safety of such facilities were not considered. No mitigation measures could be applied to significantly impacted locations at which a vehicular-capacity based mitigation without creating a conflict with PLAN Hermosa goals or other adopted plans.

  The City Council finds that there are no feasible mitigation measures within the scope of the project available to address or lessen the impact without conflicting with PLAN Hermosa goals and policies or decreasing the performance or safety of the facility. The City Council further finds that although this impact would be significant and unavoidable, the impact is acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 1.6 of these Findings).

- **Manhattan Ave and 27th St**

  Impact:

  The intersection at Manhattan Avenue & 27th Street is significantly impacted by PLAN Hermosa-related traffic in the morning peak period. Opportunities for physical mitigations are limited by existing narrow roadway widths. Additionally,

physical mitigations would conflict with the SBBMP Class III bicycle facility planned for 27th Street, and PLAN Hermosa Mobility Element policies 1.1, 2.1, 3.6, 7.2, 7.5.

Due to the above-mentioned conflicts between physical mitigations to improve level of service and PLAN Hermosa policies and adopted plans, the significant transportation impacts to traffic operations at the intersection of Manhattan Avenue & 27th Street cannot be mitigated to a less than significant level; therefore this would be a **significant and unavoidable impact**.

Mitigation Measures:
No feasible mitigation measures are available to address the significant transportation and circulation impact.

Finding:
Opportunities for physical mitigation measures, such as restriping of intersection approaches to add turn lanes, were investigated. The emphasis was to identify physical improvements that could be implemented efficiently and maintain consistency with PLAN Hermosa goals. Mitigation measures were reviewed for compliance or conflict with PLAN Hermosa goals and policies, as well as adopted policies, plans, and programs regarding public transit, bicycle, or pedestrian facilities. Mitigations that decrease the performance or safety of such facilities were not considered. No mitigation measures could be applied to significantly impacted locations at which a vehicular-capacity based mitigation without creating a conflict with PLAN Hermosa goals or other adopted plans.

The City Council finds that there are no feasible mitigation measures within the scope of the project available to address or lessen the impact without conflicting with PLAN Hermosa goals and policies or decreasing the performance or safety of the facility. The City Council further finds that although this impact would be significant and unavoidable, the impact is acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 1.6 of these Findings).

f. <u>4.14-1b Roadway Segments</u>

- **<u>Prospect Ave (Aviation Blvd to 2nd St)</u>**

  Impact:
  Through implementation of PLAN Hermosa, the roadway segment on Prospect Avenue from Aviation Boulevard to 2nd Street would be degraded from its current operation at an LOS C to an LOS D by 2040. While this is improved from the projected LOS E that would be experienced under the 2040 scenario without PLAN Hermosa, it still represents a significant impact. In other words, even though the PLAN Hermosa policies will reduce the degree of impact from the scenario where the PLAN is not adopted, the change in traffic still exceeds the threshold of significance.

In order to reduce the projected LOS impacts along Prospect Avenue, the City would need to consider expanding the roadway to accommodate additional vehicles or consider policies that reduce the number of vehicles traveling along the corridor. However, the opportunities for expanding Prospect Avenue to reduce the impacts to LOS are limited by the narrow roadway widths and presence of on-street parking. Additionally, physical mitigations to expand roadway capacity along Prospect Avenue would conflict with the intent of SB 743 and many of the proposed PLAN Hermosa policies. Under SB 743 Section 21099(b)(2), vehicular capacity and traffic congestion would no longer be eligible as considerations of significant impact under CEQA. Guidelines established for the implementation of SB 743 further state that roadway capacity expansions in a congested corridor are presumed to cause a significant impact under CEQA due to their effects on induced travel. Physical mitigations would also conflict with the SBBMP bicycle friendly street bicycle facility planned for Prospect Avenue, and PLAN Hermosa Mobility Element policies 1.1, 2.1, 3.6, 7.2, 7.5. Due to the above-mentioned conflicts between capacity expansion mitigations and SB 743, the SBBMP, and PLAN Hermosa policies, the significant transportation impact to traffic operations along the segment of Prospect Avenue from Aviation Boulevard to 2nd Street cannot be mitigated to a less than significant level; therefore this would be a **significant and unavoidable impact**.

Mitigation Measures:
No feasible mitigation measures are available to address the significant transportation and circulation impact.

Finding:
Opportunities for physical mitigation measures, such as restriping of intersection approaches to add turn lanes, were investigated. The removal of on-street parking along this roadway segment to accommodate an additional lane of travel would create untenable conditions in Hermosa Beach where parking supply is limited. Therefore it is not feasible. The emphasis was to identify physical improvements that could be implemented efficiently and maintain consistency with PLAN Hermosa goals. Mitigation measures were reviewed for compliance or conflict with PLAN Hermosa goals and policies, as well as adopted policies, plans, and programs regarding public transit, bicycle, or pedestrian facilities. Mitigations that decrease the performance or safety of such facilities were not considered. No mitigation measures could be applied to significantly impacted locations at which a vehicular-capacity based mitigation without creating a conflict with PLAN Hermosa goals or other adopted plans.

The City Council finds that there are no feasible mitigation measures within the scope of the project available to address or lessen the impact without conflicting with PLAN Hermosa goals and policies or decreasing the performance or safety of the facility. The City Council further finds that although this impact would be significant and unavoidable, the impact is acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 1.6 of these Findings).

g. 4.14-7 Cumulative Exceedance of LOS Performance Standards

Impact:

PLAN Hermosa would guide future development and reuse projects in the City in a manner that would not increase overall demand for travel within the city. Both the City's and Caltrans's existing level of service standards for intersections and roadway segments would be maintained at the majority of intersections and segments analyzed. Nonetheless, three intersections and one segment would experience a **cumulatively considerable** impact.

Mitigation Measures:

No feasible mitigation measures are available to address the significant transportation and circulation impact.

Finding:

Opportunities for physical mitigation measures, such as restriping of intersection approaches to add turn lanes, were investigated. The emphasis was to identify physical improvements that could be implemented efficiently and maintain consistency with PLAN Hermosa goals. Mitigation measures were reviewed for compliance or conflict with PLAN Hermosa goals and policies, as well as adopted policies, plans, and programs regarding public transit, bicycle, or pedestrian facilities. Mitigations that decrease the performance or safety of such facilities were not considered. No mitigation measures could be applied to significantly impacted locations at which a vehicular-capacity based mitigation without creating a conflict with PLAN Hermosa goals or other adopted plans.

The City Council finds that there are no feasible mitigation measures within the scope of the project available to address or lessen the impact without conflicting with PLAN Hermosa goals and policies or decreasing the performance or safety of the facility. The City Council further finds that although this impact would be significant and unavoidable, the impact is acceptable when weighed against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations (Section 1.6 of these Findings).

1.5.3 FINDINGS THAT CERTAIN IMPACTS ARE MITIGATED TO INSIGNIFICANCE

The FEIR identifies subject areas for which the project is considered to cause or contribute to potentially significant environmental impacts. For each of these impacts identified by the FEIR, feasible mitigation measures have been incorporated into the project to reduce the environmental effect to a level that is less than significant, as discussed below:

a. 4.1-1 Scenic Vistas and Viewsheds

Impact:

The City Council finds that the potentially significant impacts are substantially reduced by changes to the PLAN Hermosa Policies and Implementation Actions to a level that is considered to be less than significant. The PLAN Hermosa policies and implementation actions, as revised, would ensure that existing view corridors that provide views of the Pacific Ocean, the Palos Verdes Peninsula, the Santa Monica

Mountains, and the Los Angeles Basin and the San Gabriel Mountains are maintained by identifying prominent and uninterrupted public views, specifying an evaluation process and offering development standard exceptions to projects that may substantially impede one of the identified public scenic vistas.

Finding:
The EIR reached the original impact conclusion (that mitigation was required) for Impact 4.1-1 because the policies and implementation actions did not include "specific provisions to protect public view corridors." Thus, mitigation was required. The proposed changes to the policies and actions related to public views are designed to provide more specificity on the expectation and process for identifying, evaluating, and addressing potential impacts to scenic vistas in a manner that is consistent with the Coastal Act and the California Environmental Quality Act. The greater level of specificity contained within the policies and implementation actions further helps to appropriately guide City staff and decision makers in the future to objectively and consistently and reasonably evaluate and mitigate impacts to scenic vistas, and provide the opportunity for setback, open space, landscaping or other relief to properties that may otherwise substantially obstruct, interrupt, or detract from a scenic vista. This allows the property owner to minimize the impact to a public view while providing the owner the same development privileges enjoyed by other similar properties in the vicinity (similar to a variance). The specific exception to be applied to each project will be evaluated on a project level to determine its appropriateness and compatibility with the neighborhood and the list of available exceptions will be specified in the zoning ordinance.

Through the public hearing process, the community and commissioners have had an opportunity to synthesize PLAN Hermosa Figure 5.3, which shows the proposed Prominent Public Views and Uninterrupted Viewing Areas. Based on community and commissioner input, the Figure has been revised to remove two sites that do not meet the criteria for Prominent Public Views. The two views deleted include 8th Street at Loma Drive and El Oeste Drive. The 8th/Loma location can be deleted because the view is already surrounded by properties that have been developed close to or at the maximum extent allowed and therefore, future development during the life of the plan will not further impact the view beyond the existing development. The El Oeste viewpoint can be deleted because, while it presents a highly intact uninterrupted view, it does not meet the prominent viewpoint criteria of having a large number of public viewers. This location is at the end of a dead end residential street where the general public does not typically access, pass or congregate. Therefore, it would be unlikely to have a large number of public viewers.

The language incorporated into the policies and actions has been changed such that properties adjacent to, rather than within 50 feet of, the Prominent Public Views and Uninterrupted Viewing Areas will be required to evaluate and reasonably mitigate any substantial impact to a public view. Additionally, portions of Implementation Action PARKS-12 have been removed because of their

specificity to appropriate colors and textures and the portions of the actions pertaining to public works projects have been incorporated into PARKS-11. To specify appropriate colors or textures to private property owners would go against a long-standing community policy against judging or dictating design. These language changes are also appropriate because the 50 foot requirement, as well as the requirements for specific screening methods or use of certain materials may not be appropriate in all situations and does not allow for any site specific flexibility. Additionally, the language was too precise for policy language and implementation actions (and for the originally proposed mitigation measure). These types of details are better worked out through the implementation process and development of the ordinance. In some cases 50 feet may be too far, and in others it may not be far enough. There are site specific conditions like width of the road, setback requirements, and building height limits (vary from 25-35 feet) that may require variation in the distance needed to analyze impacts to views. It is further noted that the changes to the policies and implementation actions related to public views achieve the same purpose as proposed Mitigation Measure MM 4.1-1, that the potential impact to scenic vistas is adequately mitigated to a level that is less than significant, and that no new significant impacts to Aesthetics have been identified based on these changes.

b. <u>4.3-1 Special-Status Species</u>

Impact:

PLAN Hermosa would guide future development and reuse projects in the city in a manner that could result in the development or expansion of beach-supporting uses that could adversely affect western snowy plover and California least tern. This would be a potentially significant impact.

Mitigation Measures:

MM 4.3-1	Construction of facilities on the beach that must occur between the months of April and August (roosting season for snowy plovers) will require preconstruction surveys to determine the presence of western snowy plovers or California least terns. If these species are present, no construction may occur until the species leave the roost based on review by a qualified biologist and consultation with the California Department of Fish and Wildlife (CDFW) and the US Fish and Wildlife Service (USFWS). If the project is within a Special Protection Zone, construction activities will not be allowed until western snowy plovers are no longer present. If the area is not within a Special Protection Zone, a qualified biologist will survey the area for western snowy plovers using established protocols and in coordination with the USFWS and CDFW to determine if plovers are present. If they are present, no work will occur until after snowy plovers leave the roost site for the season. The qualified biologist will also survey the area for California least terns using established protocols and in coordination with the USFWS and CDFW to determine if California least terns are present. If surveys are negative for western snowy plovers or California least terns, work may proceed during the roosting period and the biologist will be present to monitor the establishment of the beach landing sites to ensure that no western snowy plovers or California least terns are injured or killed, should they arrive in the area subsequent to work commencing. The project will include fencing/walls that will prevent western snowy plovers or California least terns from entering the work areas. The biologist will conduct weekly site visits to ensure that fencing/walls are intact until construction activities are finished at the sites and all equipment is removed from the beach. The results of the preconstruction survey will be submitted to the City prior to the establishment of beach landing sites. All biological monitoring efforts will be documented in monthly compliance reports to the City.

Finding:

The City Council finds that the potentially significant impacts, as stated above, are **substantially reduced by the identified mitigation measures to a level that is considered to be less than significant**. Implementation of mitigation measure MM 4.3-1 would specifically require that western snowy plovers or California least terns that roost on the beach are protected if they occur in an area proposed for beach-supporting facilities.

c. 4.4-3 Paleontological Resources, Site, or Geologic Feature

Impact:

Implementation of PLAN Hermosa would guide future development and reuse projects in the city in a manner that could damage previously unknown unique paleontological resources, sites, or unique geologic features. This impact would be potentially significant.

Mitigation Measures:

MM 4.4-3	As a standard condition of approval for future development projects implemented under PLAN Hermosa that involve ground disturbance or excavation: • For any project where earthmoving or ground disturbance activities are proposed at depths that encounter older Quaternary terrace deposits, a qualified paleontologist shall be present during excavation or earthmoving activities. • If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work in the vicinity of the find and notify the City. The project applicant(s) shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines (1996). The recovery plan may include, but is not limited to, a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the lead agency to be necessary and feasible shall be implemented before construction activities can resume at the site where the paleontological resources were discovered.

Finding:

The City Council finds that the potentially significant impacts, as stated above, are **substantially reduced by the identified mitigation measures to a level that is considered to be less than significant**. Implementation of mitigation measure **MM 4.4-3** would provide for the appropriate treatment and/or preservation of paleontological resources, if encountered. For instance, a paleontological resource evaluation would consist of a paleontological resources records search through the Natural History Museum of Los Angeles County, a pedestrian survey of the project site (if applicable), a review of the land use history, and a review of geologic mapping and/or geotechnical reports. At that point, appropriate project-specific mitigation would be developed and implemented to mitigate impacts on the paleontological resource before construction activities can resume.

d. 4.4-7 Cumulative Effects on Paleontological Resources

Impact:

Ground disturbance, earthmoving, and excavation activities associated with implementation of PLAN Hermosa combined with construction activities in the

South Bay Cities COG planning area could damage previously unknown unique paleontological resources. This impact would be cumulatively considerable.

Mitigation Measures:
Implement mitigation measure **MM 4.4-3.**

Finding:
The City Council finds that the potentially significant impacts, as stated above, are **substantially reduced by the identified mitigation measures to a level that is considered to be less than significant**. Ground disturbance, earthmoving, and excavation activities would occur under PLAN Hermosa and in the South Bay Cities COG planning area. Implementation of Mitigation Measure **MM 4.4-3** would reduce impacts on paleontological resources by requiring that fossil specimens be recovered and recorded and undergo appropriate curation, in the event that resources are encountered during construction activities in Hermosa Beach. Thus, the city will not be contributing to any cumulative impact in the South Bay planning area.

e. <u>4.6-1 Generate GHG Emissions</u>

Impact:
PLAN Hermosa would guide future development and reuse projects in the city in a manner that could result in additional greenhouse gas emissions generated. However, the plan also includes numerous policies and actions to reduce or eliminate GHG emissions from both new and existing development through incentives and voluntary actions that will meet or exceed the long-term greenhouse gas reduction goals to reduce emissions at least 66 percent below 2005 levels by 2040 (see discussion on page 4.6-22) through direct and local programs. However, since the City is relying on incentive-based or voluntary actions to achieve GHG reduction goals, there is a lower degree of certainty that the emissions reductions thresholds would be met compared to regulatory or mandatory actions. This impact would be potentially significant.

Mitigation Measures:

MM 4.6-1a	The City of Hermosa Beach will utilize the climate action plan, under development by the South Bay Cities Council of Governments, or other appropriate tools to research current data gaps, identify specific actions, and define the responsible parties and time frames needed to achieve the greenhouse gas reduction goals (monitoring milestones) identified in mitigation measure MM 4.6-1b.
MM 4.6-1b	The City of Hermosa Beach will re-inventory community GHG emissions and evaluate implementation progress of policies to reduce GHG emissions for the calendar year of 2020 and a minimum of every five years thereafter. The interim reduction goals to be achieved for consistency with long-term state goals include: • 2020: 15 percent below 2005 levels • 2025: 31 percent below 2005 levels • 2030: 49 percent below 2005 levels • 2035: 57 percent below 2005 levels • 2040: 66 percent below 2005 levels
MM 4.6-1c	The City will revise PLAN Hermosa and/or the City's Climate Action Plan when, upon evaluation required in mitigation measure MM 4.6-1b, the City determines that Hermosa Beach is not on track to meet the applicable GHG reduction goals. Revisions to PLAN Hermosa, the Climate Action Plan, or other City policies and programs will include

	additional regulatory measures that provide a higher degree of certainty that emissions reduction targets will be met. Use of an adaptive management approach would allow the City to evaluate progress by activity sector (e.g., transportation, energy, water, waste) and prescribe additional policies or programs to be implemented in the intervening five years for activity sectors that are not on track to achieve the GHG reduction goals.

Finding:

The City Council finds that the potentially significant impacts, as stated above, are **substantially reduced by the identified mitigation measures to a level that is considered to be less than significant**. Implementation of Mitigation Measures 4.6-1 a through c, commits the City of Hermosa Beach to achieving specific emissions reduction targets within every five-year time period and modifying policies and programs, including the addition of new policies or modification of existing policies to become mandatory, to achieve greater levels of emissions reductions if the City falls short of meeting the established targets in MM 4.6-1b. The implementation of PLAN Hermosa policies to reduce greenhouse gas emissions, in conjunction with mitigation measures MM 4.6-1a through MM 4.6-1c, will add the degree of certainty needed to determine that PLAN Hermosa would have a less than significant impact on greenhouse gas emissions and would not be cumulatively considerable.

f. 4.7-2 Accidental Release of Hazardous Materials

Impact:

Implementation of PLAN Hermosa would guide future development in the city in a manner that could lead to accidental release of hazardous materials into the environment. Compliance with existing federal and state regulations and implementation of PLAN Hermosa policies would reduce risks associated with the accidental release of hazardous materials. However, development of the City's Maintenance Yard or other sites in the city could release known or unknown hazardous materials which would be potentially significant.

Mitigation Measures:

MM 4.7-2a	For any development activities that would encroach upon or take place at the City's Maintenance Yard, the City shall require the preparation and implementation of a Human Health Risk Assessment (HHRA) and a Remedial Action Plan (RAP) to be approved by the appropriate agencies.
MM 4.7-2b	Future discretionary projects involving the use of hazardous materials that may be accidentally released or encountered during construction shall be required to implement the following procedures: • Stop all work in the vicinity of any discovered contamination or release. • Identify the scope and immediacy of the problem. • Coordinate with responsible agencies (Department of Toxic Substances Control, Regional Water Quality Control Board, or US Environmental Protection Agency). • Conduct the necessary investigation and remediation activities to resolve the situation before continuing construction work as required by state and local regulations.

Finding:

The City Council finds that the potentially significant impacts, as stated above, are **substantially reduced by the identified mitigation measures to a level that is considered to be less than significant**. Implementation of Mitigation Measures MM

4.7-2a and MM 4.7-2b would ensure that accidental release of hazardous materials into the environment, either from redevelopment at the City Yard of from unknown contamination, would be remediated in accordance with state and local regulations in a manner that would protect public health during construction activities and later use of the site.

g. 4.11-2 Groundborne Vibrations or Groundborne Noise Levels

Impact:

PLAN Hermosa would guide future development and reuse projects in the city in a manner that may expose persons to or generate excessive groundborne vibration or groundborne noise levels. This is a potentially significant impact.

Mitigation Measures:

MM 4.11-2	For development located at a distance within which acceptable vibration standards would be exceeded, the City shall require the applicant to have a structural engineer prepare a report demonstrating the following: • Vibration level limits based on building conditions, soil conditions, and planned demolition and construction methods to ensure vibration levels would not exceed acceptable levels where damage to structures using vibration levels in Draft EIR Table 4.114 as standards. • Specific measures to be taken during construction to ensure the specified vibration level limits are not exceeded. • A monitoring plan to be implemented during demolition and construction that includes post-construction and post-demolition surveys of existing structures that would be impacted. Examples of measures that may be specified for implementation during demolition or construction include but are not limited to: • Prohibition of certain types of impact equipment. • Requirement for lighter tracked or wheeled equipment. • Specifying demolition by non-impact methods, such as sawing concrete. • Phasing operations to avoid simultaneous vibration sources. • Installation of vibration measuring devices to guide decision-making for subsequent activities.

Finding:

The City Council finds that the potentially significant impacts, as stated above, **are substantially reduced by the identified mitigation measures to a level that is considered to be less than significant**. Implementation of mitigation measure MM 4.11-2 would minimize impacts on sensitive structures from groundborne vibration to acceptable levels.

1.5.4 FINDING THAT MITIGATION OF CERTAIN IMPACTS IS WITHIN THE RESPONSIBILITY AND JURISDICTION OF ANOTHER PUBLIC AGENCY

No mitigation measures identified in the FEIR are within the responsibility or jurisdiction of another public agency.

1.5.5 FINDINGS THAT IDENTIFIED PROJECT ALTERNATIVES OR MITIGATION MEASURES ARE NOT FEASIBLE

All mitigation measures discussed herein are feasible. Where potential mitigation has been deemed infeasible, it is discussed in the DEIR and above sections. All feasible

mitigation has been recommended and incorporated into the Mitigation Monitoring and Reporting Program for this project.

The FEIR examines three alternatives:

- Alternative 1 – Retain Existing General Plan/ Coastal Land Use Plan
- Alternative 2 – Achieve Carbon Neutrality by 2030
- Alternative 3 – Stronger Retention of Visual and Cultural Resources

a. Alternative 1: Retain Existing General Plan/ Coastal Land Use Plan

Alternative:

This alternative assumes that PLAN Hermosa would not be implemented and that future development would proceed as indicated in the existing General Plan and Coastal Land Use Plan. Hermosa Beach would continue to grow and develop consistent with currently allowable land uses according to the existing 1980 Land Use Element (Figure 33); however, redevelopment patterns would be expected to be similar to PLAN Hermosa because the same infill properties would be vacant or available for redevelopment, resulting in increased intensity of development within an identical development footprint as PLAN Hermosa. Table 6.0-2 provides an estimate of what density or intensity of development is estimated to be allowed under the adopted General Plan, compared to the proposed densities and intensities of PLAN Hermosa. Note that the existing General Plan does not include Floor Area Ratios (FAR) but has setback and height requirements which can be used to calculate an estimate of FAR allowed based on recent approved or constructed projects.

Table 6.0-2
Comparison of Allowed/Estimated Density and Intensity

	No Project Alternative	Proposed under PLAN Hermosa		Allowed Density/Intensity Comparison of No Project to PLAN Hermosa
Land Use Designation	**Max**	**Min**	**Max**	
Low Density (du/ac)	13.0	2.0	13.0	Similar
Medium Density (du/ac)	25.0	13.1	25.0	Similar
High Density (du/ac)	33.0	25.1	33.0	Similar
Mobile Home (du/ac)	13.0	2.0	13.0	Similar
Neighborhood Commercial (FAR)	1.0	0.5	1.0	Similar
Community Commercial (FAR)	1.75	0.5	1.25	Greater
Recreational Commercial (FAR)	2.5	1.0	1.75	Greater
Gateway Commercial (FAR)	1.5	1.0	2.0	Lesser
Service Commercial (FAR)	1.0	0.25	0.5	Greater
Light Industrial Creative (FAR)	0.75	0.25	1.0	Lesser
Public Facilities (FAR)	n/a	0.1	1.0	Similar
Open Space (FAR)	n/a	0.0	0.1	Similar
City Beach (FAR)	n/a	0.0	0.05	Similar

Source: City of Hermosa Beach, 2015.
Italicized lines indicate new or altered land use designations introduced through PLAN Hermosa.

This alternative is analyzed in this EIR, as it is required under CEQA Guidelines Section 15126.6(e). According to CEQA Guidelines Section 15126.6(e)(2), the "no project" analysis shall discuss "what is reasonably expected to occur in the foreseeable future if

the project were not approved, based on current plans and consistent with available infrastructure and community services."

As shown in Table 6.0-2, the No Project Alternative would allow for similar levels of residential development as PLAN Hermosa. For nonresidential development, the No Project Alternative would allow for greater levels of development in the Community Commercial, Recreational Commercial, Service Commercial designations, and lesser levels of development in the Gateway Commercial and Light Industrial Creative designation than is proposed under PLAN Hermosa. All other nonresidential or institutional categories propose similar levels of allowed development intensity for both PLAN Hermosa and the No Project Alternative.

Additionally, as shown in **Table 6.0-3 (No Project/Existing General Plan Vehicle Miles Traveled (VMT) and Vehicle Trips Generated)**, Alternative 1 would result in 30,000 more VMT per day and 2,600 more daily vehicle trips compared to PLAN Hermosa.

Table 6.0-3 No Project/Existing General Plan Vehicle Miles Traveled (VMT) and Vehicle Trips Generated

Scenario	Daily Vehicle Miles Traveled	Daily Vehicle Trips
2040No Project Alternative	356,000	37,200
2040 PLAN Hermosa	326,000	34,600

Source: City of Hermosa Beach Traffic Study 2015

Finding:

The City Council finds that:

- **Project Objectives**

  The No Project Alternative would only partially meet the project objectives established for PLAN Hermosa. The existing General Plan and Coastal Land Use Plan can reasonably achieve project objectives to enhance and support a strong, diverse, and vibrant local economy (Objective 2) and provide a safe and clean natural environment (Objective 4) by relying on the existing policies and programs related to economic development and resource conservation. Additionally, the existing General Plan contains an element on Urban Design, however it fails to establish various character areas and identify the unique characteristics of each area, making it difficult to effectively achieve project Objective 1, to preserve the city's small beach town character. Finally, while the existing General Plan and Coastal Land Use Plan contain policies and programs to reduce vehicle miles traveled and expand alternative modes of transportation, these documents do not identify promoting healthy and active lifestyles (Objective 3) and achieving a low-carbon future (Objective 5) as the primary motivation for including such policies, nor do the mobility policies and programs contained within the existing General Plan advance the reduction in VMT enough to claim that they can effectively achieve Objectives 3 and 5.

- **Comparison of Environmental Impacts**

  The No Project Alternative would not lessen any environmental impacts compared to the proposed project, and instead would have greater impacts to aesthetics and visual resources, air quality, greenhouse gas emissions, hydrology and water quality, land use and planning, noise and vibration, public services, community facilities, and utilities, and transportation.

- **Feasibility**
  Alternative 1 is infeasible as it would not meet the updated goals and policies clearly expressed by the City of Hermosa Beach and set forth in the PLAN Hermosa such as reducing greenhouse gas emissions, creating a vibrant local economy and a fostering a healthy and safe environment. The City is committed to providing the community with a current, long-range planning document that is reflective of the changing conditions and new state requirements (i.e., AB 32 and SB 375), as well as consistent with current planning trends, as proposed in the PLAN Hermosa. The existing General Plan does not address current planning trends or new state requirements. Because of these factors, the existing General Plan would not adequately address the economic, environmental, and social needs of the community. Given that this alternative would not achieve the project objectives and also would not lessen any environmental impacts compared to the proposed project, the City Council finds that this alternative is infeasible.

b. Alternative 2: Achieve Carbon Neutrality by 2030

Alternative:
This alternative would be focused on achieving a community-wide goal of carbon neutrality by 2030. Carbon neutrality is the state of achieving net zero carbon emissions, generally by balancing a measured amount of carbon released with an equivalent amount sequestered or offset by the community. There are two primary differences between this alternative and the Public Review draft of PLAN Hermosa which included a goal to achieve carbon neutrality no later than the year 2040:

1. expediting achievement of a carbon neutral goal by ten years from 2040 to 2030 and
2. bypassing the use of carbon credits to offset carbon emissions that could not be eliminated.

Changing these two parameters would have a number of effects on the proposed project. While the total level of local reductions needed to achieve a carbon neutral goal by 2030 or 2040 are virtually identical, the number of years to achieve the goal would be reduced from 24 years to just 14. A 2030 goal would necessitate the implementation of new policies and programs each year to reduce emissions at a rate of 6,750 MTCO2e/yr, compared to annual reductions of 3,975 MTCO2e/yr for a 2040 goal.

To do this, the following steps would be taken to modify PLAN Hermosa to increase and accelerate the rate of carbon emissions reductions from the energy, waste and transportation sectors:

- Require onsite renewable energy generation and Zero Net Energy as part of all new construction and major building renovations.
- Mandate retrofits to existing buildings to improve energy efficiency at time of sale, through rental inspections, and prior to issuance of building permits.

- Eliminate the use of natural gas within the city through the installation of biogas technologies and electrification of heating and cooking appliances and fixtures within the building stock.
- Participate in a Community Choice Aggregation program or other similar program and procure or generate renewable energy to account for 100% of the energy portfolio by increasing the rate of installation for local renewable energy generation sources or procuring long-term renewable energy contracts for sources outside of the city.
- Modify Land Use Designations to facilitate mixed-use development and increase commercial and residential densities within the Community Commercial and Gateway Commercial designations to facilitate shorter trips lengths and increase the number of trips captured internally.
- Mandate public and private clean fuel and electric vehicle infrastructure to facilitate deployment of electric vehicles, neighborhood electric vehicles and/or clean fuel vehicles.
- Modify parking standards and programs to disincentivize conventionally fueled automobile use, and incentivize alternative modes of transportation and zero-emission vehicle use through programs that include, but are not limited to: increases in the cost of public-parking, elimination of parking minimums and establishment of maximums for new development, elimination of practices to assign parking spaces to particular uses, and changes to the preferential parking permit program.
- Pursue regional transportation projects and infrastructure to facilitate carbon-free regional travel options.
- Mandate Transportation Demand Management (TDM) programs for institutions and businesses.
- Accelerate the implementation of pedestrian and bicycle network investments, electric vehicle and alternative fuel infrastructure, programs to achieve zero waste, and net zero energy requirements.

This Carbon Neutral by 2030 Alternative with the added or modified policies would result in greater levels of emissions reductions compared to the policies and programs proposed in PLAN Hermosa, as noted in Table 6.0-4.

Table 6.0-4
Comparison of Emissions Reduction Scenarios 2030 vs 2040

	2030 Scenario		2040 Scenario	
	Share of Carbon Reductions (%)	Annual Carbon Reduction ($MTCO_2e$)	Share of Carbon Reductions (%)	Annual Carbon Reduction ($MTCO_2e$)
Baseline 2005 Emissions		137,160		137,160
2012 Emissions	-7.7%	126,610	-7.7%	126,610
BAU Emissions (2040)	+1.2%	128,290	+5.0%	133,430
State Programs (2040)	-24.6%	33,750	-27.7%	38,010
Local Remaining Emissions to be Reduced		94,540		95,420
Building Efficiency				
New Construction Residential Efficiency	-0.8%	1,090	-1.3%	1,810
Existing Buildings Residential Efficiency	-4.4%	6,100	-4.4%	6,100
New Construction Non-Residential Efficiency	-1.2%	1,690	-2.0%	2,810
Existing Buildings Non-Residential Efficiency	-2.0%	2,770	-2.0%	2,770
Sub Total	**-8.5%**	**11,650**	**-9.8%**	**13,490**
Renewable Energy Generation				
Rooftop Solar	-5.8%	8,020	-5.9%	8,100
Community Solar	-27.0%	36,990	-0.4%	550
Renewable Energy Procurement	-7.5%	10,290	-7.3%	10,010
Purchased Renewables (Green Rate)	-0.0%	0	-0.0%	0
Sub Total	**-40.3%**	**55,300**	**-13.6%**	**18,660**
Transportation + Land Use				
Land Use & Transportation Alternatives	-8.1%	11,130	-4.0%	5,500
Additional Transportation Strategies	-3.2%	4,450	-1.9%	2,560
Electric Vehicles	-5.7%	7,750	-7.4%	10,100
Sub Total	**-17.0%**	**23,330**	**-13.0%**	**18,160**
Other Sectors + Offsets				
Waste + Recycling	-2.5%	3,430	-2.5%	3,480
Water + Wastewater	-0.6%	840	-0.2%	330
Purchase Offsets	-0.0%	0	-30.1%	41,310
Sub Total	**-3.1%**	**4,270**	**-32.9%**	**45,120**
TOTAL	**-100.0%**	**94,540**	**-100.0%**	**95,420**

Source: City of Hermosa Beach Carbon Planning Tool 2015.

Finding:
The City Council finds that:

- **Project Objectives**
  The Carbon Neutral by 2030 Alternative has the ability to substantially support each of the project objectives identified. Implementation of this alternative would prioritize the achievement of a low or no carbon future (Objective 5), while also providing a safe and clean natural environment (Objective 4) and promoting healthy and active lifestyles through land use and transportation investments (Objective 3) by reducing air quality and transportation impacts compared to the proposed project. This alternative would also meet Objective 2, enhance and support a strong, diverse, and vibrant local economy, as many of the land use and transportation policies that reduce vehicle miles traveled do so by providing a greater range of daily services and employment opportunities within closer proximity so that residents may reasonably choose to utilize alternative modes of transportation.

- **Comparison of Environmental Impacts**
  This alternative could pose greater impacts to aesthetics and biological resources due to increased use of renewable energy systems such as solar, wind, or ocean-based renewable energy sources, and greater impacts to cultural resources due to greater alteration or demolition of designated or potentially eligible historic resources to construct high energy performance buildings. While the impacts to aesthetics, biological resources, and cultural resources may be greater than the proposed project, it is unknown whether they would rise to the level of being considered a significant impact, because the specific design and location of additional renewable energy projects cannot be determined at this time.
  This alternative would also have far reaching environmental benefits for Hermosa Beach by decreasing impacts related to air quality, greenhouse gas emissions, noise and vibration, and transportation. Air pollutants associated with the burning of fuel for building energy and transportation uses would be reduced. Noise levels would likely be somewhat better as the primary source of noise in Hermosa Beach is automobile use. Reduced automobile use and an increase in electric vehicles, which are quieter than gasoline and diesel powered vehicles, would reduce noise levels. Transportation impacts would also likely be decreased as this alternative would result in a reduction in vehicle trips and vehicle miles traveled.

- **Feasibility**
  Alternative 2 is infeasible because this alternative could pose greater environmental impacts compared to the proposed project to aesthetics and visual resources, biological resources, and cultural resources. Additionally, it could be cost prohibitive, with mandates that are overly-burdensome on residents if they are carried out to require upgrades prior to the end of useful life of vehicles, equipment or other building materials. It is also burdensome to limit natural gas from homes, restaurants and hotels.

c. Alternative 3: Stronger Retention of Visual and Cultural Resources

Alternative:
This alternative would focus on implementing additional policies or implementation actions that would facilitate greater retention of visual and cultural resources in Hermosa Beach. While PLAN Hermosa includes several goals and policies to address community character, historic buildings, and scenic views, they largely do so in a manner that encourages rather than mandates the protection of these resources. To facilitate greater retention of the existing visual and cultural resources in Hermosa Beach the steps taken to modify PLAN Hermosa would include:

- Reduction in density or establishment of Floor Area Ratios (FAR) for Medium and High Density Residential (reduce capacity to encourage retention of existing buildings that contribute to the character of residential neighborhoods).
- Establishment of an overall cap or reduction in development intensity for the Community Commercial and Recreational Commercial land use designations to limit the scale and amount of additional development or increased redevelopment within those areas.
- Addition of mixed use designation to allow limited residential development, in conjunction with commercial uses, accommodating the projected population growth reduced through changes to medium and high-density designations.
- Development of design standards (as opposed to guidelines) to address the compatibility of building scale, design aesthetics, and community character for residential and commercial neighborhoods.
- Addition of historic resource protection policies, including City initiation of historic landmark designation of potentially eligible historic resources.
- Achievement as a Certified Local Government (CLG) by the California Office of Historic Preservation, including establishment of an historic preservation commission.
- Development of a historic preservation plan, historic context statement, and/or historic preservation element of the General Plan.
- Establishment of view protection ordinances and development standards to physically depict building form/massing in the evaluation of a project's impact on views.
- Change the issuance of a demolition permit from a ministerial action to a discretionary action for those properties that have been identified as a potentially eligible historic resource.

This Character Retention Alternative, with the added or modified policies, would result in greater levels of certainty that cultural and visual resources would be retained, compared to the policies and programs proposed in PLAN Hermosa. However, the policies in this alternative may also discourage the redevelopment, reuse, or renovation of existing buildings and structures which will be necessary to improve energy efficiency and reduce carbon emissions.

Finding:
The City Council finds that:

- **Project Objectives**
  The Character Retention Alternative prioritizes achievement of Objective 1, preserve the city's small beach town character, and Objective 2, to enhance and support a strong, diverse and vibrant local economy through safe and

beautiful commercial corridors, but would not conflict or prevent the achievement of the other project objectives. This alternative would provide similar policies and implementation actions to PLAN Hermosa related to the mobility network, transportation enhancements, and resource conservation, meaning it would equally achieve project Objective 3 to promote healthy and active lifestyles and project Objective 4 to provide a safe and clean environment including clean air and water.

While this alternative may have a slightly greater impact on greenhouse gas emissions, it would carry forward similar policies to PLAN Hermosa related to reducing emissions from transportation sources, water conservation, and diverting solid waste from landfills to support a reduction in greenhouse gas emissions partially consistent with Project Objective 5, to achieve a low or no carbon future. However, reductions in the amount of new development allowed could mean limited opportunities to realize certain sustainability programs.

- **Comparison of Environmental Impacts**

  This Character Retention Alternative would pose greater impacts to greenhouse gas emissions compared to PLAN Hermosa. The challenge of renovating or constructing high energy performance buildings in a manner that does not diminish the significance of a historical resource or cause potentially eligible historic resources to become ineligible due to alterations that are inconsistent with standards for the treatment of historical resources is presented in this alternative.

  This alternative would also reduce impacts associated with aesthetics and visual resources, air quality, and cultural resources, where both construction related air quality impacts and significance of a historical resource are both considered significant and unavoidable impacts under implementation of PLAN Hermosa. However, it is unknown whether this alternative would lessen these impacts to levels that are considered less than significant.

- **Feasibility**

The Final EIR included an Alternative focused on Greater Retention of Character (Alternative 3). Alternative 3 is not feasible because it would potentially cause greater impacts to one category, greenhouse gas emissions. Additionally, the City does not have the staff or expertise to establish a historic preservation commission. Throughout the years, the community has opposed design restrictions (often referred to as art juries) in favor of allowing individual property owners to design as they please within the confines of development standards. To do otherwise would go against a long-standing community policy. The community has also consistently rejected the idea of a private view protection ordinance, because a view protection ordinance favors the views of those who have already built to the height limit over those properties that have not yet built up. Rather, the community values a more fair system, whereby each property can build to a set height limit that applies universally to the entire zone.

Environmentally Superior Alternative:
CEQA requires a lead agency to identify the "environmentally superior alternative". Based on the alternative analysis, both the Carbon Neutral by 2030 and Character Retention Alternatives would reduce several of the categories listed as Potentially Significant or Significant and Unavoidable under the proposed project. The No Project Alternative would have potentially greater impacts to several categories, including: aesthetics and visual resources, air quality, cultural resources, greenhouse gas emissions, hydrology and water quality, land use and planning, noise and vibration, public services, and transportation. The Carbon Neutrality by 2030 Alternative would also have potentially greater impacts to aesthetics and visual resources, biological resources, and cultural resources, while the Character Retention Alternative would only cause potentially greater impacts to one category, greenhouse gas emissions.

1.6 STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to CEQA Section 21081(b) and the CEQA Guidelines Section 15093, the City has balanced the benefits of the proposed PLAN Hermosa against the unavoidable adverse impacts associated with the proposed project and has adopted all feasible mitigation measures. The City has also examined alternatives to the proposed project, and has determined that adoption and implementation of the proposed project is the most desirable, feasible, and appropriate action.

1.6.1 SIGNIFICANT UNAVOIDABLE IMPACTS

The proposed project would result in the following unavoidable significant adverse impacts after mitigation:

1. Implementation of PLAN Hermosa would guide future development in the city in a manner that could generate air pollutant emissions from short-term construction. Although PLAN Hermosa policies and programs and enforcement of current SCAQMD rules and regulations would help reduce short-term emissions, construction emissions would result in a significant impact.
2. Implementation of PLAN Hermosa in addition to anticipated growth in the South Coast Air Basin would increase the amount of air quality emissions occurring within the basin and affect the region's ability to attain ambient air quality standards. This would result in a cumulatively considerable impact.
3. Implementation of PLAN Hermosa would provide for future development and reuse projects in the city in a manner that could cause a substantial change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. Although implementation of PLAN Hermosa policies and actions would protect historical resources, this would be a potentially significant impact.
4. Implementation of PLAN Hermosa in addition to anticipated future development in the South Bay Cities COG planning area could cause a substantial change in the significance of a historical resource. The loss of some historical resources may be prevented through implementation of PLAN Hermosa policies and similar policies in other communities. However, this would not ensure that these resources can be protected and preserved. This impact would be cumulatively considerable.

5. The intersection at Pacific Coast Highway and Artesia Boulevard would be significantly impacted by PLAN Hermosa-related traffic in both the morning and evening peak periods.
6. The intersection at Pacific Coast Highway and Aviation Boulevard is significantly impacted by PLAN Hermosa-related traffic in the morning peak period.
7. The intersection at Manhattan Avenue & 27th Street is significantly impacted by PLAN Hermosa-related traffic in the morning peak period.
8. Through implementation of PLAN Hermosa, the roadway segment on Prospect Avenue from Aviation Boulevard to 2nd Street would be degraded from its current operation at an LOS C to an LOS D by 2040. While this is improved from the projected LOS E that would be experienced under the 2040 scenario without PLAN Hermosa, it still represents a significant impact.
9. PLAN Hermosa would guide future development and reuse projects in the City in a manner that would not increase overall demand for travel within the city. Both the City's and Caltrans's existing level of service standards for intersections and roadway segments would be maintained at the majority of intersections and segments analyzed. Nonetheless, three intersections and one segment would experience a cumulatively considerable impact.

1.6.2 *PROJECT BENEFITS*

The City has balanced the proposed project's benefits against its significant and unavoidable impacts. The City finds that the proposed project's benefits outweigh the significant and unavoidable impacts and, therefore, that those impacts are acceptable in light of the proposed project's benefits. The City finds that each of the following benefits is an overriding consideration, independent of the other benefits, that warrants approval of the proposed project notwithstanding the proposed project's significant and unavoidable impacts related to air quality, cultural resources, and transportation. The proposed project would provide several public benefits as described below:

1. Provides a comprehensive update to the City's General Plan, last adopted in 1979, and the City's Coastal Land Use Plan, certified by the Coastal Commission in 1982, to reflect the community's values and vision for the City, provides updated policy directives to guide development in the City over the next 25 years, and addresses topics that have emerged as important priorities since the last update including greenhouse gas emissions, sea level rise, complete streets, infrastructure.
2. The proposed PLAN is more focused and user-friendly, comprehensively addresses recent changing conditions in the City, and would implement smart growth principles, concepts of sustainable development and resource management, and environmental protection.
3. Preserves the city's small beach town character through policies and design standards that maintain buildings at an appropriate scale and size with existing ones and recognizes the unique features of the city's eclectic residential neighborhoods.
4. Enhances and supports a strong, diverse, and vibrant local economy through policies that stimulate sustainable businesses and jobs, enhance safe and

beautiful commercial corridors, articulate clear and consistent standards for new businesses, and provide convenient services to residents, employees, and visitors.
5. Promotes healthy and active lifestyles through land use and transportation improvements that enhance pedestrian, transit, and bike safety and access to a variety of destinations in the city.
6. Provide a safe and clean natural environment – including clean air and water - and stewardship of our ocean resources, open space, and other natural resources.
7. Will help the City achieve a low-carbon future through the reduction of greenhouse gas emissions by reducing fuel consumption, diverting solid waste from landfills, conserving water and improving the efficiency of energy use and utilizing renewable energy sources, benefitting the local and global environment.
8. The transportation system in the PLAN strategically links land use and transportation to make efficient use of the existing roadway capacity through the promotion of a multi-modal circulation system, including improvements to the pedestrian, transit, and bicycling environment in the City of Hermosa Beach.
9. Through its sustainability policies, the PLAN would help promote energy efficiency, the conservation of water resources, and encourage the reduction of waste through recycling, providing a local, statewide, national and ultimately global benefit.

Finding:
The proposed project represents a balance between several competing objectives in the City of Hermosa Beach. After balancing the specific economic, legal, social, and technological, and other benefits of the proposed project, the Planning Commission has determined that the unavoidable adverse environmental impacts identified may be considered acceptable due to the specific considerations listed above which offset the unavoidable, adverse environmental impacts that will be caused by implementation of the project.

Based on the foregoing findings and the information contained in the record it is hereby determined that:

- All significant Aesthetics, Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Noise and Vibration, and Transportation effects on the environment due to approval of the project have been eliminated or substantially lessened where feasible; and
- Any remaining significant Air Quality, Cultural Resources, and Transportation effects on the environment found to be unavoidable are acceptable due to the factors described in the Statement of Overriding Considerations above.

1.7 ENVIRONMENTAL REPORTING AND MONITORING PROGRAM

Public Resources Code Section 21081.6 and CEQA Guidelines Section 15091(d) require the City to adopt a reporting or monitoring program for the changes to the project that it has adopted or made a condition of approval in order to avoid or substantially lessen significant effects on the environment. The monitoring program is hereby adopted for the project. The monitoring program is designed to ensure compliance with required mitigation measures.