

city of hermosa beach

# PLAN Hermosa

**Final Environmental Impact Report  
Volume I: Final EIR**

SCH# 2015081009 • August 2017





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CITY OF HERMOSA BEACH  
**PLAN HERMOSA**  
FINAL ENVIRONMENTAL IMPACT REPORT

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SCH #2015081009

*Prepared for:*

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

*Prepared by:*

MICHAEL BAKER INTERNATIONAL  
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**Revised August 2017**



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**LIST OF ABBREVIATIONS****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.

## 1.0 INTRODUCTION

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### 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
<b>Agencies</b>		
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
<b>Tribes</b>		
GBMI	Gabrieleño Band of Mission Indians	October 30, 2016
<b>Individuals</b>		
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
<b>Planning Commission Meeting</b>		
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

**Attachment 1A**

*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.

CALTRANS-1

[https://www.opr.ca.gov/docs/Revised\\_VMT\\_CEQA\\_Guidelines\\_Proposal\\_January\\_20\\_2016.pdf](https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf)

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.
- 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-4

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



# 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](http://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](http://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

Mr. Ken Robertson

-2-

January 5, 2017

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](http://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.

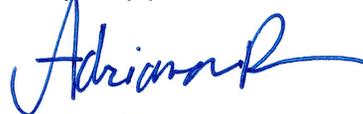
CSDLAC-2  
cont.

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

## 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](mailto: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.

The California Environmental Quality Act (CEQA)<sup>1</sup>, 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.<sup>2</sup> 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.<sup>3</sup> 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).<sup>4</sup> **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"<sup>5</sup>, 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."<sup>6</sup> Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.<sup>7</sup> 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<sup>8</sup> may also apply.

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

<sup>1</sup> Pub. Resources Code § 21000 et seq.

<sup>2</sup> Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)

<sup>3</sup> Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)

<sup>4</sup> Government Code 65352.3

<sup>5</sup> Pub. Resources Code § 21074

<sup>6</sup> Pub. Resources Code § 21084.2

<sup>7</sup> Pub. Resources Code § 21084.3 (a)

<sup>8</sup> 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](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](mailto: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.<sup>9</sup> 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)."<sup>10</sup>

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.<sup>11</sup>

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.<sup>12</sup>

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.<sup>13</sup>

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.<sup>14</sup>

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.<sup>15</sup>

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.<sup>16</sup>

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).<sup>17</sup>

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.

<sup>9</sup> Pub. Resources Code § 21080.3.1, subs. (d) and (e)

<sup>10</sup> Pub. Resources Code § 21080.3.1 (b)

<sup>11</sup> Pub. Resources Code § 21080.3.2 (a)

<sup>12</sup> Pub. Resources Code § 21080.3.2 (a)

<sup>13</sup> Pub. Resources Code § 21082.3 (c)(1)

<sup>14</sup> Pub. Resources Code § 21082.3 (b)

<sup>15</sup> Pub. Resources Code § 21080.3.2 (b)

<sup>16</sup> Pub. Resources Code § 21082.3 (a)

<sup>17</sup> 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.<sup>18</sup>  
***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](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.**<sup>19</sup>
- **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,<sup>20</sup> 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.<sup>21</sup>
- **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.<sup>22</sup>

#### **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](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.

<sup>18</sup> Pub. Resources Code § 21082.3 (d)

<sup>19</sup> (Gov. Code § 65352.3 (a)(2)).

<sup>20</sup> pursuant to Gov. Code section 65040.2,

<sup>21</sup> (Gov. Code § 65352.3 (b)).

<sup>22</sup> (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.<sup>23</sup>
- Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.<sup>24</sup>

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.<sup>25</sup> 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.

<sup>23</sup> (Civ. Code § 815.3 (c)).

<sup>24</sup> (Pub. Resources Code § 5097.991).

<sup>25</sup> 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

Attachment 1A RECEIVED

NOV 21 2016

COMMUNITY DEV. DEPT

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

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- AGOURA HILLS BRADBURY CUDAHY HAWTHORNE LA HABRA LYNWOOD PICO RIVERA SIGNAL HILL
ARTESIA CALABASAS DIAMOND BAR HIDDEN HILLS LA MIRADA MALIBU POMONA SOUTH EL MONTE
AZUSA CARSON DUARTE HUNTINGTON PARK LA PUENTE MAYWOOD RANCHO PALOS VERDES SOUTH GATE
BALDWIN PARK CERRITOS EL MONTE INDUSTRY LAKEWOOD NORWALK ROLLING HILLS TEMPLE CITY
BELL CLAREMONT GARDENA INGLEWOOD LANCASTER PALMDALE ROLLING HILLS ESTATES WALNUT
BELL GARDENS COMMERCE GLENDORA IRWINDALE LAWDALE PALOS VERDES ESTATES ROSEMEAD WEST HOLLYWOOD
BELLFLOWER COVINA HAWAIIAN GARDENS LA CANADA-FLINTRIDGE LOMITA PARAMOUNT SAN DIMAS WESTLAKE VILLAG
SANTA CLARITA WHITTIER

Ken Robertson, Director  
November 16, 2016  
Page 2

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

KTJ:ac

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## AGENCIES

Comment #	Response
<i>California Department of Transportation (Caltrans)</i>	
CALTRANS-1	<p>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.</p> <p>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.</p>
CALTRANS-2	<p>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.</p> <p>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&amp;B Oil Development Project EIR.</p>
CALTRANS-3	<p>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:  <a href="http://www.hermosabch.org/modules/showdocument.aspx?documentid=5706">http://www.hermosabch.org/modules/showdocument.aspx?documentid=5706</a>.</p>

## AGENCIES

Comment #	Response
	<p>The Aviation Boulevard Master Plan is also under development. Documentation of a public meeting for the project's early conceptualization is available at: <a href="http://hermosabeach.granicus.com/MetaViewer.php?view_id=4&amp;clip_id=2462&amp;meta_id=126846">http://hermosabeach.granicus.com/MetaViewer.php?view_id=4&amp;clip_id=2462&amp;meta_id=126846</a>.</p> <p>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.</p>
CALTRANS-4	<p>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.</p> <p>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.</p>
CALTRANS-5	<p>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.</p>
<i>County Sanitation Districts of Los Angeles County</i>	
CSDLAC-1	<p>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</p>

## AGENCIES

Comment #	Response
	<p>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.</p>
CSDLAC-2	<p>This is an informational comment about the district's sewerage fee program. It does not address the analysis in the Draft EIR.</p>
CSDLAC-3	<p>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.</p> <p>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).</p>
<i>Native American Heritage Commission</i>	
NAHC-1	<p>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.</p> <p>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).</p>

## AGENCIES

Comment #	Response
	<p>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 <b>Appendix H</b> 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.</p> <p>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.</p> <p>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).</p> <p>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</p>

## AGENCIES

Comment #	Response
	<p>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.</p> <p>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):</p> <p style="padding-left: 40px;"><u>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.</u> 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.</p>
	<i>County of Los Angeles Fire Department</i>
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**

<b>Comment #</b>	<b>Response</b>
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]; Henry Pedregon [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 attachment

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](mailto:gabrielenoindians@yahoo.com)  
website: [www.gabrielenoindians.org](http://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

<i>Gabrieleño Band of Mission Indians–Kizh Nation</i>	
<b>Comment #</b>	<b>Response</b>
GBMI-1	<p>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.</p> <p>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).</p> <p>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.</p>
GBMI-2	<p>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.</p>

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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.

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]

ADLS  
-1

## 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.

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]

The actual break down looked like this:

27% is CLEAN

33% is moderately CLEAN

BARP  
-1BARP  
-2

40% is unspecified\*\*\*\*\*

And 24% of this power is RENEWABLE

\*\*\*\*\* 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.

BARP  
-2  
cont.

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 &lt;generalplan@hermosabch.org&gt;;

Here are a few comments for the PLAN Hermosa DEIR 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.

	Carbon Reduction % 2005 Level			
	2020	2030	2040	2050
California	-15	-49		-80
Hermosa Sustainability 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			

BERC-1

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.

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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

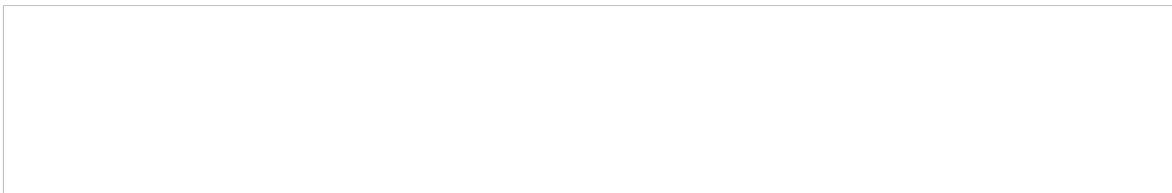
----- Forwarded message -----

From: **City of Palo Alto** <[cityofpaloalto@service.govdelivery.com](mailto: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]



# Climate Action: Taking our Next Big Step

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## 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...[\[Read More...\]](#)

## 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. [\[Read More\]](#)



## 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. [\[Read More\]](#)

## 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).

## 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](#)

## 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](#)

The City has a variety of e-news topics that may be of interest to you. Join other e-news topics, update your subscriptions, modify your password or e-mail address, or stop subscriptions at any time on your [Subscriber Preferences Page](#). You will need to use your e-mail address to log in. If you have questions or problems with the subscription service, please contact [subscriberhelp.govdelivery.com](#).

This service is provided to you at no charge by the [City of Palo Alto](#).

This email was sent to [REDACTED] using GovDelivery, on behalf of: City of Palo Alto · 250 Hamilton Ave · Palo Alto, CA 94301 · [650-329-2100](#)



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Robert Fortunato [REDACTED]  
President [REDACTED]

[www.ForStrategy.com](http://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<sub>2e</sub> to be reduced by local policy to achieve state goals and a remaining gap of 95,420 MTCO<sub>2e</sub> 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:

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

GRED1-2

- “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

GED1-2  
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:***

- 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

GED1-3

- 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)

GRED1-3  
cont.

***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.

-----

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.

GRED1-4

***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).***

-----

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.

GRED1-5

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

-----

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.

GRED1-6

***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.***

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.

GED1-6  
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, 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"

GED1-7

**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 rate 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 rate of nearly 4x what might normally be needed based on state measures.**

-----

GED1-8

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

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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.***

**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.***

GREDD  
2-1

## Comments; EIR / City Planning Commission

Art Krugler [REDACTED]

Sun 12/4/2016 8:28 PM

To: Leeanne Singleton &lt;generalplan@hermosabch.org&gt;;

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.

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.**

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]  
[REDACTED]

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

Further bio information is available @ [REDACTED]

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KRUA  
-2

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.



Fri 11/18/2016 1:52 PM

To: Leeanne Singleton &lt;generalplan@hermosabch.org&gt;;

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.

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

MOWB  
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**From:** Jens Palsberg [REDACTED]

**Attachment 1A**

**Date:** November 20, 2016 at 4:41:54 PM PST

**To:** Peter Hoffman <[phoffman@hermosabch.org](mailto:phoffman@hermosabch.org)>, Michael Flaherty <[mflaherty@hermosabch.org](mailto:mflaherty@hermosabch.org)>, Rob Saemann <[rsaemann@hermosabch.org](mailto:rsaemann@hermosabch.org)>, Marie Rice <[mrice@hermosabch.org](mailto:mrice@hermosabch.org)>, David Pedersen <[dpedersen@hermosabch.org](mailto: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.

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]

PALJ-1

## General Plan Air Quality Section

Ken Sarno [REDACTED]

Wed 11/2/2016 3:06 PM

To: LEEANNE SINGLETON &lt;generalplan@hermosabch.org&gt;;

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  
-2Ken Sarno  
[REDACTED]

## Carbon neutrality

Heather Schneider [REDACTED]

Fri 12/2/2016 3:01 PM

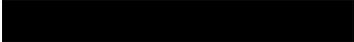
To: Leeanne Singleton &lt;generalplan@hermosabch.org&gt;;

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** Hermosa'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 

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](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.

Thank you,  
Coco Larson-Tuttle

Sent from my iPad

TUTC  
-1

## INDIVIDUALS

Comment #	Response
<i>Steve Adler</i>	
ADLS-1	<p>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.</p> <p>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.</p>
<i>Peggy Barr</i>	
BARP-1	<p>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.</p> <p>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.</p>
BARP-2	<p>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.</p> <p>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.</p> <p>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</p>

	(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.
<i>Claudia Berman</i>	
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).
<i>Robert Fortunato</i>	
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.
<i>David Grethen</i>	
GRED1-1	<p>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?</p> <p>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.</p>
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

	<p>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.</p> <p>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).</p>
GRED1-3	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>This information has been added to Section 4.13, Public Services, Community Facilities, and Utilities (see Chapter 3.0, Revisions to the Draft EIR).</p>
GRED1-4	<p>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</p>

	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	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
GRED1-7	<p>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.</p> <p>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</p>

	<p>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.</p> <p>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.</p> <p>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.</p>
GRED1-8	<p>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.</p>
GRED1-9	<p>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.</p> <p>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.</p>
GRED2-1	<p>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</p>

	<p>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.</p> <p>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.</p>
<i>Art Krugler</i>	
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	<p>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.</p> <p>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.</p>
<i>G &amp; J Moriyama</i>	
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.
<i>Bette Mower</i>	
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.

<i>Jens Palsberg</i>	
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.
<i>Ken Sarno</i>	
SARK-1	<p>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.</p> <p>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.</p>
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.
<i>Heather Schneider</i>	
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.
<i>Pam Tatreau</i>	
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.
<i>Coco Tuttle</i>	
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 that 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.

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

PUBM-1

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 Janeiro, 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 5<sup>th</sup> 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 5<sup>th</sup> 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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