

From: alison <

Sent: Tuesday, September 6, 2022 2:04 PM

To: Planning Redondo <Planningredondo@redondo.org>; AL Bailey <bruinprofab@gmail.com>

Subject: Catalina Village Project - Written comments for the Planning Commission

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Thank you for informing us about the current status of the EIR and the up-coming hearing and the chance to send in written comments. I was not surprised there is report of significant transportation effects even with mitigation measures.

The 30 dwelling units (some up to 6 bedrooms and 6 baths according to the previously shared plans) and several commercial elements for the development will mean a lot more congestion. I am also not sure why the plans for this new project do not include ample off-street parking in a commensurate sized lot or subterranean garage for both projected residents and patrons of the commercial elements of the proposed development.

Already prized on-street parking on N. Catalina, Diamond Street, Emerald Street for current townhome residents and guests in particular will be heavily impacted. The number of bedrooms in some of the planned dwelling units seems absurd - this is a neighborhood of 2-3 bedroom townhomes only. If several of the units are going to function as rooming houses (6+ bedrooms), every adult in them will have a vehicle most probably (despite availability of promised bus passes etc.) and so the number of parking spaces should match this demand. Currently it does not appear to.

I would like the Planning Commission to realistically address these major parking/congestion concerns (and or the RBPd to voice their opinion on future congestion along Diamond)) and for the Commission to transparently explain why the current design calls for more than the current 2-3 bedroom units now in this neighborhood.

Regards,
Alison Bailey

From: [Mark Nelson \(Home Gmail\)](#)
To: [Planning Redondo](#); [CityClerk](#)
Cc: [Sheila Lamb](#); [Gale Hazeltine](#); [Gwenn Godek](#); [Scott Berhrendt](#); [Douglas Boswell](#); [Robert Gaddis](#); [Matthew Hinsley](#)
Subject: Public Comment/EIR Comment - FEIR - Response 39.1 - Environmentally Superior Alternative Error and Recirculation Failure
Date: Tuesday, September 6, 2022 5:57:37 PM
Attachments: [image.png](#)

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With regard to the City and its consultant conclusion that the errata are not material - the City and its consultant err. Alternative 3 was incorrectly determined to have significant impacts, when it does not. Therefore, it is environmentally superior to the alternative being promoted by the City and its consultant and the public was denied that knowledge for comments, as reflected in the errata.

Further, the City has an obligation to the environment and residents, and the City has declared it is willing to accept unmitigatable damages to the environment in order to meet the profit motives of the commercial developer buried in the objective for market demand=market price rent=profit. The mere fact that the City allowed an objective that is clearly a profit metric is in error as well. Time and time again, we see failures in the CEQA process from over restrictive objectives that are ultimately invalid and intentionally targeted at constraining the CEQA process in the developer's favor and against the environment.

The City has an obligation to the environment and the residents that clearly transcends the commercial motives of the developer.

The City's argument that the "by right" development also has unmitigatable damages is a result of a failure in the City's ordinances. If the City, "by right" allows non-mitigatable significant environmental damages, then it must have a clear, quantitative, supportable analysis for its override. In this case, the City does not. 120+ bedrooms in 30 units has the likelihood to create damages far beyond the "by right" development, and other things equal, the City has failed to demonstrate the reduced net severity of the alternative it promotes.

In conclusion regarding recirculation, the City errs and must recirculate. Striking the word NOT in the statement "therefore, the Increased Affordable Housing Alternative would NOT be considered environmentally superior" denies the public the right to make the appropriate arguments in written comments for the clearly environmentally superior alternative that meets the overwhelming majority of objectives. The City cannot cater to a flawed objective (profit) and ignore the City's and consultant abject failure to recognize the environmentally superior Alternative 3 and disseminate it to the public.

In conclusion regarding certification, Alternative 3 with no significant impacts is superior and meets sufficient project objectives. Further, the City's nebulous and ill-defined policy to spread the lower income residents throughout the community is conveniently impossible to evaluate. The City's pro-developer choices are little more than a misguided choice to let a patient bleed out because the use of a tourniquet may save the life, but cost the limb. So be it with low income housing.

The City should not deny low income housing because of an appeal to purely subjective concentration "non-metrics" and that argument can be clearly made by the public during the recirculation of the EIR document.

COMMENTS: Leslie Ogg

DATE: January 15, 2022

Response 39.1

The commenter states that the City should consider Alternative 3 (Increased Affordable Housing) to the proposed project to increase affordable housing for families and adds that it is environmentally superior. The commenter adds that they don't think it necessary to build 26 market-rate units.

As discussed in Section 6, *Alternatives*, of the Draft EIR, Alternative 3 would provide 13 more below-market rate units than the proposed project, which would result in less total VMT. Implementation of all recommended Transportation Demand Management (TDM) measures would be sufficient to fully mitigate both residential and work VMT impacts to a less than significant level. Therefore, this alternative would result in less than significant transportation impacts with mitigation incorporated, which is less than that of the proposed project. As further detailed in Section 3, *Errata*, of this Final EIR, Section 6, *Alternatives*, of the Draft EIR has been revised as follows:

Alternative 3 would maintain the same uses and total number of units as the proposed project, but would not fulfill the same objectives. Objective 1 seeks a project that is "responsive to market demands" and includes the construction of "at least 26 market-rate units." Although this alternative would have less transportation impacts with mitigation incorporated, Alternative 3 would not include at least 26 market-rate units and would not meet Objective 1 due to the increase in affordable housing units from four units to 17 units of the total 30 units. The total number of new housing units would be the same, but rather than 26 units being market-rate, only 13 units would be market-rate.

The City's approval criteria for density bonus projects requires a dispersal of affordable units throughout the development. In addition, the project site would be unduly burdened in terms of proportional dispersal of affordable units under this alternative. The distribution of high-density and affordable housing throughout the community is a strategy of the City's Housing Element (Program 8: Residential Sites and Monitoring of No Net Loss-Residential Overlays). The City's goals and policies are intended to balance the location of affordable units, noting that previous decades of rezoning added significant density to south Redondo Beach.

Nonetheless, Alternative 3 would reduce a significant and unavoidable VMT impact to a less than significant level when compared to the proposed project. Therefore, the Increased Affordable Housing Alternative would not be considered environmentally superior.

Therefore, the Increased Affordable Housing Alternative would be considered the environmentally superior alternative.