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February 13, 2020

By Email: Didar.Khandker@Redondo.org

Mr. Didar Khandker, P.E., MSCE
City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90227.

Re: Initial Study / Negative Declaration re: Addition of Northbound Right Turn Lane
from Aviation Blvd to Artesia Blvd in the City of Redondo Beach
Madani Family Trust – property owner 1700 Artesia Blvd., Redondo Beach

Dear Mr. Khandker:

On behalf of the owner of the Shell gas station property at 1700 Artesia Blvd. (“Subject Property”), the Madani Family Trust, this letter sets forth comments regarding the City’s Initial Study and consideration of adoption of a Negative Declaration relating to the Addition of Northbound Right Turn Lane from Aviation Blvd to Artesia Blvd in the City of Redondo Beach Project (“Project”).

First, the Madani Family Trust has and continues to object to and oppose this Project on various grounds, including without limitation, that it is unnecessary, will not provide a public benefit, and will significantly damage the Subject Property. Moreover, it appears there are other alternative improvements that could provide substantial benefits at the Aviation Blvd / Artesia Blvd intersection.

Furthermore, the City’s Initial Study is flawed in several respects and fails to establish, based on substantial evidence, that the Project (or any aspect of the Project either individually or cumulatively) will not cause a significant effect on the environment. Thus, the Madani Family Trust contends that the Initial Study is improper and a Negative Declaration should not be approved.

1. The Initial Study is Flawed Because the Traffic Analysis on Which it is Based is More than 10 Years Old.

The Initial Study references traffic analysis data in describing the Project Background (p. 8, etc.), including references to level of service and proposed future conditions with and without the Project. This traffic analysis is apparently from the Project Study Report Equivalent prepared by the City in April 2009. Thus, the data and analysis upon which the Initial Study is based is more than 10 years old. The City’s failure to obtain and utilize current data to evaluate and analyze the Project is improper and completely undermines its efficacy for determining potential environmental impacts of

the Project. Obviously, current data is required to properly analyze and evaluate the Project and any potentially significant environmental impacts.

2. The 10 Year Old Traffic Analysis Fails to Establish any Public Benefit of the Project.

The Initial Study references projected Future 2030 level of service (LOS) conditions at the intersection with and without the Project (p. 8, etc.). Overall, there is no change in the future LOS conditions with or without the Project – under both scenarios the LOS remains F for both the am and pm hours. The LOS requirement of the Redondo Beach Circulation Element Policy 9 seeks to achieve LOS D, which the proposed Project fails to meet. Moreover, the analysis indicates that the volume to capacity ratio (v/c) would *worsen* the Future 2030 pm peak hour condition under the “with project” scenario. Thus, rather than improve the projected future condition - the Project actually makes it worse – a significant environmental impact. Of course, this assumes that it would be proper to base such an analysis on 10 year old data in the first place – which, as set forth above, the Madani Family Trust contends would be improper.

Accordingly, the City’s general contentions that the Project will provide a benefit or somehow meet the City’s goals of improving infrastructure lacks a reasonable factual basis. The data relied upon indicates that a significant environmental impact would result (worsening future condition of the intersection).

3. The City’s Initial Study Contains Other Inaccuracies Undermining its Validity.

There are several other inaccuracies in the Initial Study, including without limitation, the following:

- *City Fails to Accurately Describe Ground Disturbance Associated with the Project*

In describing the Project Construction (p. 9, etc.), the city states that ground disturbance would be less than 3 feet below existing ground surface. However, the Project will actually involve much greater ground disturbance related to the relocation of a signal pole. The signal pole foundation will require a ground disturbance of between 9 – 12 feet. This could result in a significant environmental impact, which was not properly considered or evaluated.

- *The City Fails to Accurately Identify Impacts to Fuel Delivery at the Shell Station*

The City contends that it analyzed the ability of vehicle and fuel delivery trucks to safely maneuver within the Shell station during construction (p. 57, etc.). However, the City actually completely failed to analyze the situation during construction, relying on a truck turn analysis after the project is complete. During construction, the construction of the roadway improvements, including

Mr. Didar Khandker, P.E., MSCE
City of Redondo Beach
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street, curb, gutter and sidewalk, will actually preclude access to the site via the adjacent driveways – as such work will necessarily involve ground disturbance, pouring of concrete and laying of asphalt. Furthermore, each driveway will need to be reconfigured and such work will also preclude access via the respective driveways. Accordingly, fuel delivery trucks to the station will be impeded and precluded at certain times (for at least days at a time, and perhaps weeks) during construction of the Project. This appears to be a significant environmental impact.

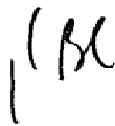
- *The City Fails to Accurately Identify Impacts to Transit Service During Construction*

The City incorrectly contends that the Project will have no effect on transit facilities or services in the area (p. 87 - 88, etc.). However, the bus stop on Artesia Blvd in front of the Shell gas station, just east of Aviation Blvd, will necessarily be impacted, and probably unavailable, during construction of the proposed roadway improvements at the corner of the intersection (sidewalk, curb, gutter, ADA pedestrian curb ramps, reconfiguration of Artesia Blvd driveway, etc.) as this work will require closure of the eastbound curb lane of traffic on Artesia Blvd.). Closure of this traffic lane will obviously disrupt or impact the bus stop during this construction work (for at least a period of days, and perhaps weeks). This appears to be a significant environmental impact.

4. Conclusion

Contrary to the City's contentions, this Project (northbound right turn lane improvements) is not identified in the Redondo Beach General Plan Circulation Element as a necessary improvement for future (year 2030) conditions. (General Plan, Circulation Element, p. 28). Furthermore, as set forth herein, the City's Initial Study is flawed and inaccurate in several respects and lacks substantial evidence to evaluate or determine whether the Project will cause any significant environmental impacts.

Very truly yours,



Glenn L. Block
California Eminent Domain Law Group,
a Professional Corporation



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

February 14, 2020

Didar Khandker
Redondo Beach, City of
415 Diamond Street
Redondo Beach, CA 90227

Subject: Northbound Right-Turn Improvements: Aviation Boulevard at Artesia Boulevard
SCH#: 2020019044

Dear Didar Khandker:

The State Clearinghouse submitted the above named MND to selected state agencies for review. The review period closed on 2/13/2020, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act, please visit: <https://ceqanet.opr.ca.gov/2020019044/2> for full details about your project.

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
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FEB 21 2020



*Making Conservation
a California Way of Life.*

February 11, 2020

Didar Khandker, P.E., MSCE
City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90227

RE: Northbound Right Turn Lane from Aviation
Boulevard to Artesia Boulevard
Negative Declaration (ND)
GTS# 07-LA-2020-03105
Vic. LA-1/ PM 21.629

Dear Mr. Khandker:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would widen the northbound travel lanes along Aviation Boulevard to add a 15-foot-wide right-turn lane onto Artesia Boulevard. Existing utilities, signage, sidewalk, and landscaping along Aviation Boulevard would be relocated to accommodate the widened roadway and right-turn lane. A 10-ft wide strip of land will be acquired along Aviation Boulevard from the existing Shell gas station.

The nearest State facility to the proposed project is State Route 1 (SR-1), also known as Pacific Coast Highway, located approximately one mile away. After reviewing the Negative Declaration (ND), Caltrans does not expect project approval to adversely impact State facilities.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please contact project coordinator Mr. Carlo Ramirez, at carlo.ramirez@dot.ca.gov and refer to GTS# 07-LA-2020-03105.

Sincerely,

A handwritten signature in blue ink, appearing to read "Miya Edmonson", is written over the word "Sincerely,".

MIYA EDMONSON
IGR/CEQA Branch Chief



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Notice of Intent to Adopt An Initial Study/ Mitigated Negative Declaration

January 22, 2020

City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90227

Good Afternoon Didar Khandker,

We have received your Notice of Intent to adopt a Negative Declaration for the North Bound Right Turn Lane from Aviation Boulevard to Artesia Boulevard in the location of the City of Redondo Beach. Our Tribal Government is requesting the retention of a Native American Tribal Consultant to monitor all ground disturbance conducted for this project.

Sincerely,
Gabrieleno Band of Mission Indians/Kizh Nation
(1844) 390-0787 Office

Andrew Salas, Chairman
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary
Richard Gradias, Chairman of the council of Elders

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