III. COMMENTS AND RESPONSES TO COMMENTS

1. COMMENTS ON THE DRAFT IS/MND

The City of Manhattan Beach Community Development Department, Planning Division received a total of 93 letters that provided comments on the Draft IS/MND during the designated comment period (July 21, 2016 through August 22, 2016). Each comment letter has been assigned a corresponding letter, and comments within each comment letter are also numbered.

Written comments made during the public review period for the Draft IS/MND intermixed points and opinions relevant to project approval/disapproval with points and opinions relevant to the environmental review presented in the Draft IS/MND. Section 15204(b) of the State CEQA Guidelines[1] encourages reviewers to examine the sufficiency of the environmental document, particularly with regard to significant effects, and to explain why they believe an effect would occur and if the effect would be significant. Based on judicial interpretation of this section, the lead agency is not obligated to undertake every suggestion it is given, provided that the lead agency responds to significant environmental issues and makes a good faith effort at disclosure. Furthermore, Section 15204(c) advises reviewers that comments should be accompanied by factual support.

The responses to comments provided in this section of the Final IS/MND provide detailed responses to all comments related to the environmental review and discuss, as appropriate, the points raised by commenters regarding project design and opinions relating to project approval. As noted, the latter primarily consist of statements of opinion or preference regarding the project's design or overall thoughts relative to the desirability of the project, as opposed to points within the purview of an IS/MND: environmental impact and mitigation. However, all comments will be forwarded to the decision-makers for their review and consideration.

The organizations/persons that provided written comments on the Draft IS/MND to the City of Manhattan Beach Community Development Department, Planning Division are listed in Section II (List of Commenters).

2. MASTER RESPONSES TO COMMENTS ON THE DRAFT IS/MND

Many comments requested the same or similar information, or expressed similar concerns. Therefore, Master Responses (MR) have been prepared to provide responses and clarification to these comments and to reduce redundancy in this Response to Comments document.

MR-1: Environmental Review Process

Comments were received on the environmental review process stating that the City needed to prepare an EIR for the project, that an EIR was needed to mitigate impacts, or that the size of the project requires an EIR. Comments were received stating that the 30-day public review period should have been extended. Lastly, comments were received stating that the environmental document was not prepared by the City and that City residents were not provided access to the City's environmental consultant team. Although these comments are not related to the environmental analysis provided in the IS/MND, this response is provided for clarification.

[1] *California Code of Regulations Title 14, Chapter 3, Sections 15000-15387.*

As stated in CEQA Guideline § 15070, a public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

> (a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
>
> (b) The initial study identifies potentially significant effects, but:
>
> > (1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
> >
> > (2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

The decision to prepare an IS/MND was made by the City in light of the fact that, as described in the IS/MND, the project either would not result in significant impacts, or significant impacts would be reduced to less than significant through the incorporation of mitigation measures. Similar to an EIR, the IS/MND analyzed all 18 CEQA Guidelines Appendix G environmental factors. With the exception of analyzing alternatives to the project, an EIR would not include any additional analysis or mitigation measures not included in the IS/MND, which included adequate mitigation measures to reduce any potentially significant impacts to less than significant. An EIR is not required solely based on the perceived size of a project, nor is one required because a project has generated public controversy.

As stated in CEQA Guideline § 15073, the lead agency shall provide a public review period pursuant to Section 15105 of not less than 20 days. When a proposed negative declaration or mitigated negative declaration and initial study are submitted to the State Clearinghouse for review by state agencies, the public review period shall not be less than 30 days, unless a shorter period is approved by the State Clearinghouse under CEQA Guideline § 15105(d). Therefore, the 30-day public review period that was provided complies with the legal requirements.

The environmental document was reviewed by the City's environmental consultant, which provided input and technical expertise on the final content and analysis of the IS/MND. The IS/MND represents the independent judgment and analysis by the City of the project's impacts. All communications between the City's environmental consultant and the applicant's team passed through, and were monitored by, the City and there was no direct communication between the City's environmental consultant and the applicant's team. Therefore, the City is not required to provide access to its consultant other than through legally mandated comment periods, all of which were provided for here. The City also provided additional opportunities by making drafts of the IS/MND and other materials publicly available prior to their official release and accepting public comments on those.

As a matter of City procedures, any environmental document (whether an IS/MND or an EIR) prepared for a project would be reimbursed by the applicant. The standard City process for private development projects involves the City's collection of funding from private applicants to pay for the City's environmental consultant, as well as for City staff time for land use application and environmental review processing of any project coming before the City. This process ensures that the City is not using public or taxpayer funding for private development projects. In accordance with this process, the applicant has provided reimbursement to the City for the City's environmental consultant, and also for the City's staff time in reviewing the land use application and the Draft IS/MND.

Regarding public input on the Draft IS/MND itself, the City noticed the Draft IS/MND through the use of mailings to a radius list and to all parties that had asked to be notified of information about the project. Additionally, the City posted the environmental document on the City's website and copies were made available for public inspection at the City of Manhattan Beach, Community Development Department located at 1400 Highland Avenue, Manhattan Beach, CA 90266. The City provided contact information for parties to submit their comments during the public review period. The City will hold hearings on the project before the Planning Commission prior to taking any action on the IS/MND or making any project approval decisions.

MR-2: Parking

Allowable Parking Reductions

Comments were received stating that the project request for a shared parking reduction is more than the 15% cap permitted by Code.

The 15% cap referenced in these letters refers to MBMC Section 10.64.040. However, the applicant has requested reduced parking pursuant to MBMC Section 10.64.050. This provision requires that the Planning Commission make its decision after consideration of survey data, and limits the overall reduction that may be granted based on project parking demand determined by the survey data. In particular, Section 10.64.050 requires the Planning Commission to make the following findings in order to grant the requested parking reduction:

> *"The parking demand will be less than the requirement in Schedule A or B; and 2. The probable long-term occupancy of the building or structure, based on its design, will not generate additional parking demand."*

Here, the parking otherwise required for the project under Schedule A is 171 spaces. However, the parking demand study demonstrates that the peak parking demand for the project will only be 135 spaces. Therefore, the Planning Commission will evaluate the request for reduced parking in light of these required findings, based on the survey data and consideration of project-specific characteristics.

In contrast, Section 10.64.040 provides an alternative mechanism by which a project's parking may be reduced. It does not mandate that survey data be prepared – although it may be considered - and specifically limits the overall parking reduction to 15%. Section 10.64.040 also requires that the Planning Commission make different findings than under 10.64.050 in order to grant the request. The project applicant did not request a parking reduction pursuant to this section, although the section is germane to this project because it evidences the City's recognition and acceptance of the shared parking concept. The IS/MND and IS/MND Traffic and Parking Study should have cited to both sections and made clear that the project applicant has applied for a parking reduction in accordance with MBMC Section 10.64.050. This has been corrected in the IS/MND and IS/MND Traffic and Parking Study.

Adequacy of Parking Supply

Comments were received stating that the parking for the project is insufficient and would therefore create spillover parking on the side streets. Additionally, some comments stated that the parking provided in the offsite parking lot is inadequate because the spaces: (1) are not guaranteed for the life of the project (they are only leased); (2) would displace cars using those parking spots now, and/or (3) would not be used by employees who would instead park on the surrounding streets.

As described on Page 4.16-17 of the IS/MND, the City's standard parking requirements contained in MBMC Section 10.64.030 Schedules A and B assume that each use classification operates as a standalone use. For multiple uses on a single site, this requirement can result in the provision of more parking than is actually needed to satisfy a site's peak parking demand. This is because each of the different uses within a project exhibits hourly parking demand fluctuations. Further, the individual uses may not "peak" at the same time, and thus do not require the peak amount of parking at all times. Additionally, some individuals visit multiple uses on a single visit to the site (i.e., stop at the bank and at the store on one visit) so one parking space may suffice for multiple visits).

Recognizing this, MBMC Section 10.64.050 provides that a use permit may be approved to reduce the total parking required when survey data, such as a shared parking study, demonstrates that the actual parking demand will be less than total parking otherwise required by MBMC Section 10.64.030. Shared parking provisions of this nature are typical for commercial centers with multiple uses that have differing characteristics, and shared parking studies are common for such projects to demonstrate a site's actual peak parking demand.

Here, the shared parking study conducted for the project demonstrates that the peak parking demand for the proposed supermarket, prepared food, and financial service uses would be less than the off-street parking otherwise required by City Code if these uses were treated as standalone uses. Specifically, the shared parking analysis set forth in the IS/MND on pages 4.16-16 through 20 and further detailed in the IS/MND Traffic and Parking Study on Pages 40 through 50 establishes that the project would produce a peak/maximum parking demand of 135 spaces. Based on an available parking supply of 135 spaces consisting of 119 parking spaces at the primary project site and 16 spaces at the auxiliary employee parking site adjacent to the primary project site on the north side of 8th street, the study demonstrates that the parking supply is sufficient to accommodate the total maximum parking demands for the project.

Furthermore, a variance would not be required for the use of the auxiliary employee parking site to satisfy the project's parking requirements because the site fully complies with the location and ownership provisions contained in MBMC Section 10.64.020.F. Specifically, the auxiliary employee parking site: (1) is owned and controlled by the project applicant; (2) would provide parking exclusively for the project within 400 feet of the project's public entrance; and (3) would be permanently available and maintained for project parking. Importantly, the auxiliary employee parking site is not utilized by any other existing uses in the area to satisfy parking requirements; therefore, its use as employee parking exclusively for the project would not displace other cars or otherwise cause spillover parking onto residential streets.

Although not required to address project parking demands, the project applicant has also leased additional surplus parking for employees consisting of: (1) five parking spaces at the office building parking lot on the south side of 6th street near the project site; and (2) 20 parking spaces two blocks north of the site on the west side of Sepulveda at 10th Street. The five parking spaces at the office building would be available to project employees during weekends, when the office building is otherwise closed for business and does not require parking. As such, use of these spaces would not displace parking at the office building. The 20 parking spaces at 10th Street would be available exclusively to project employees during weekdays and weekends. This site was formerly leased by the U.S. Post Office for surplus parking but the Post Office did not need the surplus parking and therefore did not renew the lease. Further, this parking is not utilized by other existing uses in the area to satisfy parking requirements. Accordingly, the project's use of these spaces would not displace the parking needs of the

Post Office or other existing uses in the area. Based on the above, the project's use of the surplus spaces would not cause spillover parking onto residential streets.

Further, the surplus parking is not required to address project parking needs, and is being offered by the applicant only as supplemental space. As a result, the project applicant may terminate the use of these spaces at any time. Additionally, because the spaces are not being counted toward the overall parking requirement, the spaces are not required to meet the location and ownership provisions of MBMC Section 10.64.020.F.

Finally, the project would be implementing a Parking Management Plan to further ensure that an adequate supply for customers is maintained at the project site, that employees park in designated employee parking spaces, and that there would be no spillover parking onto residential streets. The Parking Management Plan is described in detail in the IS/MND on Pages 4.16-19 – 20. The Parking Management Plan would be a condition of the project approval and is thus enforceable. Furthermore, the Parking Management Plan requires site management to continuously monitor project parking to ensure spillover parking does not occur within the neighborhood, and would provide a telephone number that local residents can use to contact Gelson's directly if abuses by employees are observed.

Collectively, the shared parking study and the Parking Management Plan constitute substantial evidence that adequate parking would be provided on site and within designated parking areas and that the parking provided would not displace parking required for other uses in the area. As such, there would be no spillover parking of customers or employees on residential streets.

Adequacy of Shared Parking Study

Commenters questioned a number of aspects of the shared parking study, and specifically raised the issue of the adequacy of the data used for the shared parking study (i.e., whether the Hollywood Gelson's is a comparable store, whether the use of ULI parking data for grocery use is appropriate, whether the parking demand estimates accounted for employees and whether the project would eliminate required street parking).

The shared parking analysis contained in the IS/MND Traffic and Parking Study is both accurate and conservative. Specifically, project parking demand was examined under the following two separate shared parking scenarios, and applied to hourly demand rates defined by the Urban Land Institute Shared Parking to ensure reliability and accuracy in determining the project's peak parking demand:

(1) Total peak demand factors defined by the Institute of Transportation Engineers (ITE) source Parking Generation for grocery stores, in combination with City Code stand-alone parking standards for the prepared food service seating area and bank uses (Tables 11B, and 11C of the MND Traffic and Parking Study); and

(2) Actual survey demand data from a comparable Gelson's Market located in the Hollywood neighborhood of Los Angeles (including demand from both the supermarket sales floor area and the prepared food uses at the survey site) in combination with City Code stand-alone parking standards for the prepared food service seating area and bank uses (Tables 12A, and 12B of the MND Traffic and Parking Study).

ITE Analysis Scenario

ITE – the Institute of Transportation Engineers – is the industry-standard and approved methodology of the City for determining parking demand. ITE is an international educational and scientific association of transportation professionals founded in the 1930's. Its members include engineers, transportation planners, consultants, educators and researchers. According to its website, ITE "facilitates the application of technology and scientific principles to research, planning, functional design, implementation, operation, policy development and management for any mode of ground transportation. Through its products and services, ITE promotes professional development of its members, supports and encourages education, stimulates research, develops public awareness programs and serves as a conduit for the exchange of professional information." http://www.ite.org/aboutite/index.asp.

Use of the ITE methodology is both reliable and accurate. ITE parking demand rates are based on numerous surveys of representative land uses throughout the United States, including specialty grocery stores, takeout food service, and banks. (IS/MND, Page 4.16-18; IS/MND Traffic and Parking Study, page 42.) The ITE shared parking analysis determined that the project's maximum peak parking demand would be 135 spaces at 5:00 p.m. on weekdays and 131 spaces at 2:00 p.m. on weekends. (IS/MND, Pages 4.16-18-19; IS/MND Traffic and Parking Study, page 43.)

Survey Data and City Code Analysis Scenario

The Hollywood Gelson's Market survey data provides an accurate and reliable representation of the expected parking demand associated with the proposed project because, like the proposed Gelson's, the Hollywood Gelson's is: (1) a specialty grocery store; (2) approximately the same size; and (3) located in an urbanized area with similar demographics. (IS/MND Traffic Study, page 45.)

Some commenters have suggested that the Hollywood Gelson's Market uses offsite parking sites and that overflow parking is prevalent. This is incorrect. The Hollywood Gelson's Market does not use any off-site parking to meet its required parking supply. This has been verified by the head of Gelson's store operations. Moreover, the parking demand study shows that the Hollywood Gelson's parking was contained on-site and that there was a surplus of parking spaces available at all times during the peak study periods. (IS/MND Traffic Study, page 45 and Appendix H.) Therefore, the survey conducted at the Hollywood site encompassed all parking demand generated at that location.

Some commenters have suggested that the Hollywood Gelson's Market is not a comparable use because it is located in a higher density neighborhood where more people may walk to the site. Area population density is only one factor in analyzing the trip-generating characteristics of a project. Mode choice (auto, walk, bike, etc.), geographic spacing of similar uses (i.e., proximity of other grocery stores in the area), land use mix/patterns, area income and other factors may also influence trip generation. In this case, the area north of Franklin Avenue (generally south and southeast of Gelson's Hollywood) primarily consists of low density single family homes in the Hollywood Hills, while commercial and denser multi-family residential uses are generally located west, south, and southwest of the site. Additionally, a Ralph's grocery store is located near the Gelson's Hollywood site on Hollywood Boulevard and Western Avenue, close to the denser multi-family residential area to the south. This would further limit the Gelson's Hollywood trade area and the degree to which Gelson's Hollywood would draw customers from the denser multi-family residential area. Thus, it is not a forgone conclusion that the Hollywood Gelson's market area has a higher population density as compared to the proposed project.

Regardless, a higher population density can result in more customers overall for commercial uses, including both pedestrian and vehicle trips. In this case, due to the type of use (supermarket) and the need for vehicles to transport larger purchase amounts (bags of groceries), more vehicles trips likely would result from the higher density of residential units in the area as compared to the proposed project. Further, the likely higher proportion of rental units in the Hollywood area would lead generally to a higher number of persons per unit versus lower residential densities and likely higher residential ownership in Manhattan Beach, and therefore would increase supermarket demand even more. Therefore, the Hollywood Gelson's site likely has a higher parking demand as compared to the proposed project.

Accordingly, the survey data is conservative and can be reliably applied to the proposed project to accurately estimate its parking demand. Based on the survey data for the grocery store use and applying City Code parking requirements for the food service and bank uses (again, which are conservatively treated as if they were stand-alone uses), the Survey Data and City Code shared parking analysis determined that the project's maximum peak parking demand would be 115 spaces at 4:00 p.m. on weekdays and 127 spaces at 2:00 p.m. on weekends. (IS/MND Traffic and Parking Study, Page 43.)

The ITE Analysis Scenario indicated the highest peak parking demand of the two shared parking scenarios at 135 spaces. Accordingly, this higher demand number was conservatively applied to the project.

ULI Hourly Demand Rate

The shared parking analysis used the Urban Land Institute (ULI) hourly demand rate for both scenarios. The shared parking analysis methodology defined by ULI is based on surveys of individual uses in multiple-use commercial centers located across the United States. The surveyed data provides for hourly intensity, expressed as the percentage of total demand, for each use, to determine how demand across multiple uses is combined within each hour across a typical day (both weekday and weekend). With this methodology, the balancing of parking demand generated by uses across the day can be estimated and analyzed, as described on Pages 45 to 46 of the IS/MND Traffic and Parking Study. This is appropriate for the proposed project uses because commercial centers are often anchored by supermarkets, large retail stores or pharmacies that have similar hour-by-hour parking demand/activity levels throughout the day, due to nature of shopping demand and when they occur. The shopping center category within the ULI methodology includes all of these potential anchor uses, among others. As such, the use of the commercial center data for this use is appropriate.

Conclusion

Two scenarios for analyzing parking demand were examined. The scenario using ITE rates and conservatively including the prepared food use as a separate use provided higher demand numbers. That scenario was used to define the expected parking demand for the proposed project, resulting in the conclusion that a maximum of 135 parking spaces is required for the project.

Employee Parking

Both of the shared parking scenarios accounted for employees in determining the project's peak parking demand of 135 spaces. Specifically, the City Parking Code, the surveyed parking data, and ITE *Parking Generation* demand rates all account for both employees and customers in their data on commercial uses. As in definitions for trip generation rates, all activity (both employees and customers) is included per unit of area based on total activity generated by any type of vehicle trip that enters/exits a site.

Traffic and parking studies also account for the fact that not all project employees would be on-site at the same time. As with retail facilities in general, employees of both the proposed Gelson's specialty market and bank would work in shifts.

Regarding the bank parking specifically, the City sets Parking Code requirements based on floor area of the proposed use and not desks shown on a site plan. Early versions of the project site plan included a draft conceptual furniture/fixture layout for the bank use; however, these plans were for interior space planning and not created to indicate actual employee density within the building. Conservatively, the parking study assumed the City Code requirement for the proposed bank use, using rates for typical bank uses. Again, the parking rate is conservative because it assumes the bank is a standalone use. Further, the parking analysis uses rates for regular retail banks, notwithstanding that this bank is proposed as a financial center and does not have the volume of customer traffic created by a regular retail bank. The analysis of the bank use remains valid, and adjustments to the analysis are not necessary. In conclusion, the shared parking study demonstrates that the project can accommodate the peak parking demand for employees and customers.

Street Parking Spaces

The project would not eliminate any street parking that is required for its use or any other existing uses in the area. While it is not part of the project, the City is planning to remove approximately three on-street parking spaces on the south curb of 8th Street, at the eastbound approach to the Sepulveda Boulevard intersection as part of future intersection improvements. That parking must be removed to provide for an additional right-turn lane at this approach created by the City's improvements. In addition, the widened roadway shoulder for the inbound right-turn movement into the project site on Sepulveda Boulevard would require the removal of approximately five parking spaces (which is prohibited from 3:00 p.m. to 7:00 p.m. on weekdays).

Further, neither the elimination of the parking on Sepulveda Boulevard nor the elimination of the parking on 8th Street, would affect the project parking study conclusions, as the parking analysis demonstrates that the project provides adequate parking to meet its maximum parking demands.

MR-3: Traffic Congestion, Access, and Safety

Comments were received stating that the traffic impact assessment is inadequate; that there was no information provided in the traffic study for the peak traffic demand for the center, which is likely during the weekend; that a traffic impact at 8th Street and Sepulveda is likely; that truck access represents a safety problem; that the proposed ingress and egress is unacceptable; that there would be a disruption to traffic flow on Sepulveda Boulevard and that the proposed widened shoulder on Sepulveda Boulevard is inadequate; that the traffic study does not specifically address residential traffic impacts; and increased traffic would create safety issues along residential neighborhood streets.

MR-3.0: Traffic Study Methodology

The IS/MND Traffic and Parking Study determined that the project would result in an approximate net new total of 3,062 daily weekday trips, including 151 trips during the AM peak hour and 152 trips during the PM peak hour. These trip generation estimates are based on the most recent trip rates established by the Institute of Transportation Engineers (ITE) publication *Trip Generation* (9th Edition). (IS/MND, Pages 4.16-6 -8; IS/MND Traffic and Parking Study, Pages 17-22.) *Trip Generation* is the industry-accepted standard by which to determine trip generation for land use categories, and is based on

extensive survey data from sites throughout the United States. It is also accepted by the City for use in traffic studies.

The IS/MND Traffic and Parking Study provided a conservative analysis of the project's traffic impacts because it assumes that: (1) the indoor/outdoor food service area would be a separate fast food restaurant which has a higher trip generation rate than a specialty grocery store (this assumption alone accounts for 39% of the total trips generated by the project as shown in the project trip generation table (Table 4) of the IS/MND Traffic and Parking Study); (2) the indoor/outdoor food service area would accommodate 52 seats (instead of the proposed 28 seats in the revised project description); (3) the pad tenant would be a walk-in bank, when the use more likely would be a financial services/investment company that would operate similar to a general office building and generate approximately 70 to 90% less traffic than a walk-in bank, according to ITE *Trip Generation* rates for general office uses versus walk-in bank uses; and (4) the pad tenant would consist of 7,000 square feet of floor area instead of the currently anticipated 6,648 square feet identified in the site plans. Therefore, due to the use of these conservative assumptions and analysis, project trips are overstated and the actual project trips would likely be less.

The IS/MND Traffic and Parking Study applied the City's significance thresholds, which are defined in the 2010 Congestion Management Program for Los Angeles County, to determine if the proposed project would result in a significant change in traffic under existing and future traffic conditions. Specifically, per the City's threshold, a significant impact would occur when traffic generated by a project would increase the calculated volume to capacity (v/c) ratio by 2% when an intersection is operating at LOS F.

Taking into account existing and future projected traffic conditions without the project, the IS/MND Traffic and Parking Study demonstrates that the project would only incrementally increase traffic in the area, including with respect to the study intersections along the Sepulveda Boulevard commercial corridor, as well as within the residential neighborhood at Larsson Street and 8th Street, Dianthus Street and 8th Street, and Larsson and 6th Street. The traffic added by the project would not cause existing or future projected AM or PM peak levels of service that are acceptable without the project to worsen to unacceptable levels or cause intersections experiencing LOS F operations without the project to be further delayed by a ratio of 2% v/c or greater such that a significant traffic impact would occur. (See IS/MND Traffic and Parking Study Pages 23 - 36.) Notably, the greatest increase in the calculated v/c attributed to project generated traffic would be 1.1% at the intersection of Sepulveda Boulevard/6th Street, which is substantially less than the 2% significance threshold as shown in the IS/MND on Page 4.16-16 and on Pages 35-36 of the IS/MND Traffic and Parking Study.

The study intersections are located at or near the perimeter of the project site, or are arterial/arterial intersections on the Sepulveda Boulevard corridor. These were selected for analysis because they represent the intersections that are most likely to receive the highest volumes of project traffic based on proximity to the project site, project traffic distribution and related anticipated major routes to and from the project, and/or because they are known to have existing poor level of service/operations. Other intersections that were not specifically studied, such as neighborhood intersections at Larsson Street/3rd Street to the south and Dianthus Street/9th Street to the north, would experience similar or less project traffic than the studied neighborhood intersections due to trip dispersion. Trip dispersion means that traffic from a project would diminish along a travel route, as trips end or more trips turn to other roadways from a corridor with each unit of distance from the project site. Therefore, at points farther away from the project site, there would be fewer vehicle trips present that might cause

significant impacts. For these reasons, the IS/MND Traffic and Parking Study concludes that the project's traffic impacts are less than significant and would not change with the inclusion of additional intersections to the traffic impact analysis.

MR-3.1: Weekend Traffic Analysis

The IS/MND's weekday impact analysis demonstrates that no significant traffic impacts per City guidelines would occur. A weekend analysis was assumed to not yield different results because the highest traffic volumes on the adjacent streets occur during the weekday AM/PM peak periods and not on weekends. Thus, the IS/MND's analysis represents worst-case conditions for the purposes of determining the project's potential to significantly impact traffic.

Traffic volumes in the area are generally higher on weekdays because there are no major weekend commercial uses in the area such as regional malls, major movie theaters, dramatic theaters, sporting event venues, or other similar uses that would draw additional traffic during this time period. Further, peak-period volumes are generally lower during the weekend because most commuters are not traveling to work or school and the typical compressed/peak activity periods are not present on weekends. Therefore, weekday peak traffic conditions represent the worst-case conditions that must be analyzed at this location. Further, the project traffic added would not be significantly more such that a significant traffic impact would occur.

To confirm this, supplemental weekday (October 6, 2016) and weekend (October 8, 2016) peak-period counts were taken at the Sepulveda Boulevard/Manhattan Beach Boulevard and Sepulveda Boulevard/8th Street study intersections. (Appendix C) The count collection effort also included daily counts conducted on Sepulveda Boulevard adjacent to the project site on the same days as the peak-period counts. These intersections were chosen in order to analyze an intersection performing at LOS F in both peak periods in the future conditions analysis (with and without the project-generated trips), and to analyze the intersection closest to the site.

The primary results from a review of the daily roadway segment traffic counts (Sepulveda Boulevard adjacent to the project site) are as follows:

- On Thursday, 10/6, the total 24-hour vehicle volume was 54,372.
- On Saturday, 10/8, the total 24-hour vehicle volume was 41,210.
- The weekday daily volume was 32 percent higher than the Saturday volume.
- The highest peak-hour weekday volumes of 4,185 and 3,991 were 32 percent and 31 percent higher, respectively, than the weekend peak-hour volumes of 3,173 and 3,057.

The primary results from a review of the AM and PM peak-hour intersection traffic counts are as follows:

- The peak-hour supplemental weekday counts conducted at the study intersection of Sepulveda Boulevard/8th Street indicated that total peak-hour volumes were 4,358 in the a.m. and 4,205 in the p.m.

- The peak-hour supplemental weekday counts conducted at the study intersection of Sepulveda Boulevard/Manhattan Beach Boulevard indicated that total peak-hour volumes were 5,856 in the a.m. and 5,747 in the p.m.
- The related Saturday early afternoon peak-hour volumes at the same intersections were 2,748 at the Sepulveda Boulevard /8th Street intersection and 4,867 at the Sepulveda Boulevard/Manhattan Beach Boulevard intersection
- The average weekday peak-hour volumes were 55 percent and 19 percent higher than the comparative weekend peak hour volumes.

In addition, an analysis was conducted to compare the supplemental weekday PM peak-hour counts from October 2016 to the weekday PM peak-hour volumes in the existing conditions analysis for the MND Traffic and Parking study at two study locations: Sepulveda Boulevard/8th Street and Sepulveda Boulevard/Manhattan Beach Boulevard. It was found that the PM weekday peak hour volumes were within two percent of the respective values at both locations. This exercise verifies that weekday peak hour volumes for the two study periods were substantially similar, and therefore, the supplemental counts are representative of existing conditions.

Table 3.1.A provides a summary of the peak hour weekday and weekend volumes for both between the supplemental traffic counts taken in October 2016 and comparable weekday data from the IS/MND Traffic and Parking Study taken in March 2014. Negative percentage values in the two right-most columns indicate that in all cases the weekend volume data was lower than that for the weekday.

Table 3.1.A – Comparison of Weekday/Weekend Peak-Hour Volumes on Sepulveda Boulevard

Location	PM Weekday Peak Hour Volume (2014) *	Weekday Peak PM Hour Volume (2016)	Weekend Peak Hour Volume (2016)	% Difference Weekend vs. PM Weekday (2014)	% Difference Weekend vs. PM Weekday (2016)
Sepulveda Blvd. /8th Street	4,260	4,301	2,748	-55.0%	-56.5%
Sepulveda Blvd./Manhattan Beach Blvd.	6,019	5,859	4,867	-23.7%	-20.4%

** As analyzed in the IS/MND Traffic and Parking Study*

A level of service (LOS) analysis of the weekend traffic data at the two study intersections examined for this exercise indicated the following:

- Under future cumulative weekend peak conditions, the intersection of Sepulveda Boulevard/Manhattan Beach Boulevard operates at LOS D, and with weekend project traffic would remain at LOS D. The LOS status at D is not significant as the City traffic impact thresholds are based on LOS F conditions only.
- Under future cumulative weekend peak conditions, the intersection of Sepulveda Boulevard/8th Street operates at LOS A, and with weekend project traffic would continue to operate at LOS A. The operating conditions are good with and without the project and a significant impact would not occur as the City traffic impact thresholds are based on LOS F conditions only.

The LOS D and LOS A conditions identified above illustrates that there would be sufficient capacity remaining at these locations to handle project related traffic, as capacity conditions are not reached until LOS F operations are identified. The use of cumulative conditions included the same planned project and ambient growth inputs as those uses in the weekday analysis within the IS/MND Traffic and Parking Study.

Table 3.1.B provides a summary of the supplemental weekend LOS analysis conducted for these two intersections. The weekend traffic count summaries and the LOS worksheets are provided in Appendix C.

Table 3.1.B – Supplemental Analysis of Future Cumulative Weekend LOS Conditions

	Study Intersections	Weekend Peak without Project		Weekend Peak with Project	
		V/C or Delay (sec.)	LOS	V/C or Delay (sec.)	LOS
1	Sepulveda Boulevard & Manhattan Beach Boulevard	0.821	D	0.836	D
2	Sepulveda Boulevard & 8th Street	0.515	A	0.566	A

In conclusion, the weekend peak-period counts and daily counts conducted were all lower than the comparable volumes for the weekday counts, and the supplemental weekday counts are comparable to those used in the IS/MND Parking and Traffic Study. The weekday analysis is therefore more conservative than any analysis that would be undertaken for a weekend impact analysis.

MR-3.2: Sepulveda Boulevard and 8th Street Intersection: Left-Turn Protected Signal Phasing

The IS/MND Traffic and Parking Study describes that the City is in the process of installing northbound and southbound left-turn protected signal phasing at the Sepulveda Boulevard and 8th Street intersection. (IS/MND Traffic and Parking Study, Page 8.) This would improve traffic flow and safety at this intersection overall and better facilitate project traffic movement into the site. This improvement in operations was included in the traffic analysis for future pre-project conditions, as explained on Page 8 and analyzed on Pages 26- to 30 of the IS/MND Traffic and Parking Study.

The City has indicated that this improvement will be installed by the second quarter of 2017, which would be prior to the anticipated project opening date in the third quarter of 2017. The installation of this improvement is certain and may be relied upon for the purposes of the traffic analysis because the City Council has approved the project and it is included in the City's 2016 Capital Improvement Plan (see Page 64), the design work is 80% complete, and 100% of the required funding has been committed and reserved for this project to ensure that the improvement will be constructed.

MR-3.3: Sepulveda Boulevard and 8th Street Intersection: Turn Pocket Capacity

A supplemental engineering analysis was conducted for northbound movements at the Sepulveda Boulevard/8th Street intersection to confirm that **t**he northbound left-turn pocket at the Sepulveda Boulevard/8th Street intersection is adequate to accommodate anticipated traffic, including cars and delivery trucks from the project. Specifically, Highway Design Manual Section 400-24 sets forth the following engineering design standard for turn pocket storage length at signalized intersections:

"At signalized intersections, the storage length may be based on one and one-half (1.5) to two (2) times the average number of vehicles that would store per signal cycle depending on cycle length, signal phasing, and arrival and departure rates." This included factor allows for the random arrival of vehicles, and is a factor to provide a conservative increase in the queue length for the occasional longer queue within the peak hour."

The IS/MND Traffic and Parking Study describes that the calculated AM peak-hour northbound left-turn movement volume at the Sepulveda Boulevard/8th Street intersection is 68 vehicles (IS/MND Traffic and Parking Study, Figure 14, Page 32.) The existing northbound left-turn prohibition during the PM peak period would be removed by the City before project opening. Therefore, the baseline existing turn movement volume could be higher than was actually measured. To compensate for this difference, some of the northbound turn movement volumes at the Sepulveda Boulevard/6th Street intersection to the south would likely relocate to this intersection. The future estimated northbound left-turn movement volume at the 6th Street intersection for the future post-project period is 38 vehicles, for the highest peak period. Taking half of the volumes as a conservative estimate and moving them to the 8th Street intersection results in a total future AM peak hour turning volume of 87 (68+19) including the project.

Existing and expected truck volumes were assumed in the IS/MND's Traffic and Parking Study's level of service analysis; thus, both trucks and vehicles are accounted for in the overall typical queue length for each cycle in the highest peak hour, which occurs in the afternoon. The assumed length per typical vehicle is 25 feet, and truck volumes are typically assumed to be 2.5 times greater than an equivalent standard vehicles, due their speed, maneuverability, and length.

The existing turn pocket length (storage capacity from the edge of the intersection, south to the end of the turn pocket) is approximately 100 feet in length. Applying the HDM design standard calculation to the AM peak hour volume yields a design length of 95.5 feet, which is within the 100-foot length of the existing turn pocket. The calculation is as follows:

- There are 3,600 seconds within an hour, so with a typical 90-second cycle length, there are 40 cycles per typical hour.
- Dividing the number of vehicles in the highest peak hour as referenced above at 87 vehicles by the number of cycles per typical hour at 40 equals 2.18 vehicles.
- Multiplying by the middle range of the storage length factor[2] (for typical randomness of vehicle arrivals and queue length) at 1.75 equals 3.82 vehicles.
- Multiplying this number at 3.82 vehicles by a typical vehicle length at 25 feet equals 95.5 feet for the storage pocket requirement.

The weekday PM peak hour level of service calculations were checked as well, adding in the potentially diverted northbound left-turn movement volumes from the Sepulveda Boulevard/6th Street intersection to the Sepulveda Boulevard/8th Street intersection with the removal of the turn prohibition. This diverted volume would not significantly increase the PM peak hour volume-to-capacity ratio value and LOS value (from 0.818 at LOS D to 0.830 at LOS D). As LOS F conditions would not be reached with this

[2] *See discussion of Highway Design Manual Section 400-24, above.*

potential volume diversion, the City significant impact threshold would not be triggered. Therefore, the project turn-pocket length of 100 feet is adequate for the expected volumes, including trucks, to accommodate project needs. Thus, modifications to the turn pocket are not necessary.

MR-3.4: Truck Deliveries

Project truck delivery traffic would consist of two to three daily standard "semi" type tractor-trailers approximately 61 feet in length. Other smaller single-unit trucks and vans would be used as well; these vehicles would not require the larger turning radii of the tractor-trailer vehicles.

Truck deliveries to the site would be controlled by the Gelson's Logistics Team, which requires strict compliance with prescribed delivery routes. For this project, Gelson's would require that all semi-trucks travelling to the site travel northbound on Sepulveda Boulevard and make a left on 8th Street to gain access into site. Therefore, all semi-trucks would not make any southbound right-turn movements from Sepulveda Boulevard onto 8th Street. Project conditions of approval would ensure that this requirement is maintained by the operator.

Tractor trailer delivery truck movements were examined in a turning radius diagram, which is included in Appendix A, to ensure that they can safely turn onto 8th Street without crossing over onto oncoming traffic or driving over curbs. Specifically, the two to three daily tractor-trailer trucks that would serve the project site would travel to the site via a northbound left-turn movement from Sepulveda Boulevard to 8th Street, and then into the north site driveway. Trucks would exit the site via the right-out only driveway on Sepulveda Boulevard. Based on the review of these turning radius calculations on the site plan, the turning movement analysis demonstrates that trucks would not encroach on any curb and can turn onto 8th Street from Sepulveda Boulevard and onto Sepulveda Boulevard from the project site without multiple turning movements. Additionally, due to the City and project-related removals of parking, no cars would be parked along 8th Street to conflict with truck movements. Therefore, there would be no conflict from truck turning movements onto Sepulveda Boulevard from the project site or onto 8th Street from Sepulveda Boulevard.

While semi-trucks would be restricted to the required Gelson's Logistic Team routes and only make left turns from Sepulveda Boulevard at the 8th Street intersection, smaller delivery trucks would be able to use the Sepulveda Boulevard entrance. Although there would be no impacts on Sepulveda Boulevard from traffic entering the site, including from smaller delivery trucks, the project applicant would provide a widened shoulder on Sepulveda Boulevard to facilitate southbound right-turn movements into the project site.

MR-3.5: Site Ingress/Egress Generally

Regarding site access and its impact on traffic, the IS/MND Traffic and Parking Study thoroughly examined the potential for traffic queues from inbound vehicle left-turn movements into the site from 8th Street, right turns into the site from 8th Street, and right-turn movements into the site from Sepulveda Boulevard on Pages 37 – 38 and in Appendix G. The IS/MND Traffic and Parking Study applied standard intersection operations using the Highway Capacity Manual methodology accepted by the City of Manhattan Beach and published by the Transportation Research Board of the National Academy of Sciences, and demonstrates that site access was appropriately designed and would not create significant traffic impacts.

With respect to the project driveway on 8th Street, the IS/MND Traffic and Parking Study describes that it would experience on average a queue of less than one vehicle for westbound left-turn ingress/entering movements during AM and PM peak hours. Also, left turns out of the site would be prohibited from this driveway, which would further reduce the potential for queues and neighborhood traffic. This would allow traffic to freely flow into the site and not lead to any backup on 8th Street.

With respect to the project driveway on Sepulveda Boulevard, the IS/MND Traffic and Parking Study describes that it would be limited to right-turn inbound and right-turn outbound only restrictions to minimize traffic conflicts and ensure safe and efficient site ingress and egress. Importantly, on-site queuing of vehicles waiting to turn onto southbound Sepulveda Boulevard would not affect public roadways (as existing right-turn movements would simply wait for a gap in Sepulveda Boulevard traffic created by traffic lights or for other reasons, as is typical). Furthermore, cars backing out of parking spots closest to the Sepulveda driveway location should not substantially interrupt traffic flow into the site as they would have sufficient room to back out of the parking space and into the drive aisle without interfering with southbound right-turn inbound movements at the Sepulveda Boulevard driveway. With regard to internal parking lot circulation, the project parking lot design would meet all standards of the City for layout and dimensions of spaces and drive aisles.

On the rare occasion that a car backing out of the two or three parking spots closest to the Sepulveda driveway takes a wider angle than necessary and interferes with site ingress, such delay would not cause cars to queue off the site and spillover into the southbound through lane on Sepulveda Boulevard because the delay would be momentary, lasting only a fraction of a minute that it would take for the car to back up and move on. Further, any incoming cars entering the site could otherwise generally be accommodated on site within the drive apron and landscaping buffer area without spilling over into oncoming traffic. There would be no other traffic conflicts that would cause traffic delays or necessitate additional traffic controls at this driveway location.

MR-3.6: Site Ingress/Egress: Widened Shoulder/Deceleration Area on Sepulveda Boulevard

The IS/MND found that there would be no significant project traffic impacts and that the site could safely and efficiently accommodate project traffic entering the site at the Sepulveda Boulevard driveway location. Nevertheless, as described at Pages 2-18 and 4.16-4 of the IS/MND, the project would dedicate land to allow for the construction of a wider paved shoulder area for deceleration approximately 78 feet long and 10 feet wide on Sepulveda Boulevard. Importantly, the deceleration/shoulder area is not required to mitigate project traffic impacts. Absent the shoulder area, cars traveling southbound on Sepulveda Boulevard can safely and efficiently circulate into the project site by making a right turn into the driveway without stopping or otherwise queuing onto Sepulveda Boulevard and interrupting through traffic. This is a typical configuration for most commercial parcels along Sepulveda Boulevard. The inclusion of the 78-foot shoulder area, however, further enhances overall traffic circulation by removing project traffic entirely from the southbound through lane. Lastly, the applicant has agreed to further lengthen the widened shoulder area to approximately 110 feet long to provide additional room for vehicles turning into the site (See Appendix B for the updated Site Plan). Because the project does not generate any significant traffic impacts, the provision of the shoulder and the lengthening from the previous site plan are not necessary to address any identified traffic impacts. Therefore, these additional measures are not mitigation measures for the project, but rather have been volunteered by the project applicant as a feature to further enhance project operations and design.

The roadway widening provided for the inbound right-turn movement at the Sepulveda Boulevard site driveway would serve as an unstriped shoulder that would help facilitate turning movements into the site. Table 302.1 (Mandatory Standards for Paved Shoulder Widths on Highways) in Section 300-4 of the Caltrans Highway Design Manual specifies that six-lane highways require a shoulder of eight feet. Here, the shoulder width is proposed to be approximately 10 feet. Caltrans does not specify a standard length for unstriped shoulders of this type. As project traffic would flow freely into the site from this location without any substantial interruption or queuing, the approximately 110-foot shoulder length is more than adequate to accommodate project traffic and further facilitate safe and efficient access to the site. This supplemental shoulder would therefore comply with geometric requirements of Caltrans.

MR-3.7: Traffic Signal at Sepulveda Boulevard Driveway

A traffic signal at the Sepulveda Boulevard project driveway would not be appropriate based on Caltrans design standards. Signals are required to be 300 feet or more apart per signalized intersection guidelines of the California Manual of Uniform Traffic Control Devices (CA-MUTCD), in order to provide adequate visibility of signal indications to approaching drivers between adjacent traffic signals as well as to maintain proper signal coordination. A traffic signal at the Sepulveda driveway would be approximately 260 feet from the existing signal at Sepulveda Boulevard and 8th Street, and would therefore not meet the minimum spacing requirement of 300 feet per the CA-MUTCD.

Also, as the project driveway location on Sepulveda Boulevard would be a right-in/right-out access only configured intersection, it would not meet traffic signal warrants based on the absence of conflicting volumes as well as failure to meet minimum overall peak hour traffic volumes. In particular, the CA-MUTCD defines minimum conditions under which installing traffic control signals might be justified. Among these are that the volume on the same minor street approach (one direction only) equals or exceeds 100 vehicles per hour (vph) for one moving lane of traffic or 150 vph for two moving lanes. The Sepulveda Boulevard site driveway is estimated to have 37 vehicle trips in the AM peak hour exiting the site via the driveway (the minor intersection approach in this case) and 41 vehicles in the PM peak hour, not meeting the standard of 100 vph. Because the project does not meet the minimum side street traffic volumes required by the applicable standards, a traffic signal at the Sepulveda Boulevard site driveway would not be warranted. (Appendix D: Traffic Signal Warrant Checklist)

MR-3.8: Traffic Safety Features

The project would install and/or cooperate with the City in the installation of a number of safety features that would improve traffic flow, visibility and general safety at the periphery of the project site including:

- The project would remove the existing structure on the project site near the corner of the Sepulveda Boulevard/8th Street intersection, improving the sight distance at that intersection.
- The project would locate the proposed project driveway on Sepulveda Boulevard farther away from the Sepulveda Boulevard/8th Street intersection than the current configuration, which would reduce conflicts between entering traffic and vehicle turning movements at the intersection.
- The project would provide a widened shoulder on Sepulveda Boulevard for inbound right-turn movements to improve traffic flow into the site.

- The project would close the existing site driveway on 6th Street, eliminating traffic conflicts with thru traffic on 6th Street.
- The project would prohibit left turns from the northern site driveway onto 8th Street into the residential neighborhood.

Thus, the project would improve existing conditions within the project vicinity.

Additionally, the City is installing new traffic signal phasing improvements that would improve traffic flow at the eastbound approach of the Sepulveda Boulevard/8th Street intersection (a new eastbound dedicated/protected left-turn movement signal phase).

Regarding traffic safety on Sepulveda Boulevard, the posted speed limit on Sepulveda Boulevard is 35 mph, in the vicinity of the project site. The stopping distance length at this speed, as defined by the Caltrans Highway Design Manual Chapter 200, Topic 201, is 250 feet. This is the stopping distance required for a vehicle to stop appropriately if another vehicle pulls out in front of that vehicle. This stopping distance, as measured back from the north side of the 8th Street intersection along the southbound travel lanes of Sepulveda Boulevard, reaches to a point before the crest of the hill at the 9th Street intersection. Therefore, from a point where vehicles at the 8th Street intersection come into view, motorists traveling southbound on Sepulveda Boulevard have adequate stopping distance to avoid an accident.

MR-3.9: Residential Cut-Through Traffic

The IS/MND Traffic and Parking Study specifically analyzed the potential for traffic impacts in the residential area adjacent to the project site. In addition to studying intersections along the commercial corridor on Sepulveda Boulevard, the IS/MND Traffic and Parking Study also studied intersections in the immediate residential neighborhood at Larsson Street and 8th Street, Dianthus Street and 8th Street, and Larsson and 6th Street. Of the residential intersections in the vicinity of the project, these intersections are likely to experience the highest amount of project traffic due to their proximity to the site and likely travel routes to and from the site (providing routes around the site on roadways to the south, west, and north). Importantly, the IS/MND Traffic and Parking Study demonstrates that these intersections would operate at "excellent" LOS A without and with project traffic under existing and future 2017 conditions. Additionally, residential intersections further from the site would experience less project traffic because traffic disperses as distance increases. Thus, the residential intersections studied at Larsson Street and 8th Street, Dianthus Street and 8th Street, and Larsson and 6th Street represent the worst case scenario because they would receive the highest volume of project traffic, and these would continue to operate at LOS "A."

Intersections are critical points and would experience traffic impacts first, well before roadway segments would approach capacity due to project traffic. As no significant impacts were identified at the neighborhood roadway intersections surrounding the project site, there is no evidence that the project would cause or exacerbate any traffic safety issues within the local residential neighborhoods. Also, the project would close the existing site driveway on 6th Street and prohibit left turns onto 8th Street to further discourage traffic in the residential neighborhood. Therefore, no mitigation is required.

Finally, although not required because this project does not result in any impacts, the City does have in place a Neighborhood Traffic Management Program to address other concerns of its residents. In cooperation with its residents, the City can evaluate the safety and livability of its neighborhood streets and implement appropriate traffic control measures if warranted in the future.

MR-3.10: Pedestrian Pathways

Along the project frontage, both Sepulveda Boulevard and 8th Street have continuous sidewalks, 6th Street provides a partial sidewalk, and Larsson Street does not have a sidewalk. The project would improve conditions for local pedestrians walking to the site and beyond to Sepulveda Boulevard by constructing a continuous sidewalk along 6th Street from Sepulveda Boulevard to Larsson Street and, subject to City Public Works approval, constructing a sidewalk along Larsson Street between 6th and 8th Street. Moreover, the project would provide a direct path of travel from the Gelson's store entrance via the 8th Street sidewalk to the adjacent bus stop located at Sepulveda Boulevard and 8th Street.

As pedestrian access to and from the project site would be provided by continuous sidewalks at the periphery of the project site, the project would improve existing conditions and would not significantly impact pedestrian access or safety. The lack of sidewalks on other local residential roadways is an existing condition that is neither caused nor controlled by the project. Further, the sidewalk along Sepulveda Boulevard would be reconstructed to meet all applicable standards, including those required by the Americans with Disability Act (ADA).

MR-3.11: On-Street Parking and Roadway Width

On-street parking on 8th Street would not conflict with truck movements to and from the project site, as on-street parking would be prohibited by the City between the project driveway on 8th Street and the Sepulveda Boulevard/8th Street intersection. This restriction would allow sufficient room for adequate truck movements into the 8th Street site driveway.

The general curb-to-curb widths of 6th Street and the remainder of 8th Street in the vicinity of the project site are typical of residential roadway in this portion of the City. Therefore, the project would not exacerbate any existing conditions related to on-street parking or roadway widths.

MR-3.12: Emergency Response

Regarding emergency response and evacuation plans, as shown in the City of Manhattan Beach General Plan Emergency Shelters and Evacuation Routes Map (Figure CS-5), Sepulveda Boulevard is designated as an evacuation route. However, as stated in Section 4.16 of the Draft IS/MND, the project would not create any significant traffic impacts per City standards. By law, vehicular traffic must yield and make way for fire and emergency vehicles; therefore, traffic in the area would be required to move aside to allow fire and emergency vehicles to use the roadway and would not impact the emergency response time. Any effects on emergency vehicle delay would therefore be minimal and mitigation measures are not required.