

Martha Alvarez

From: Avan Franklin <avanfr@gmail.com>
Sent: Tuesday, February 2, 2021 4:38 PM
To: List - City Council
Cc: LTamira@citymb.info; Bruce Moe; Carrie Tai, AICP; Martha Alvarez; Ted Faturos
Subject: [EXTERNAL]
Attachments: Avan Franklin Letter to City Council.pdf; SewerSystemManagementPlan- city sewer map.pdf

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Avan Franklin
1181 Tennyson St, Manhattan Beach CA 90266

February 2, 2021

To the Mayor and City Council - City of Manhattan Beach

Re: The proposed hotel development at 600 S Sepulveda

My name is Avan Franklin and I live with my family on Tennyson Street.

I am asking the City Council not to grant the Sec 32 CEQA exemption and do not believe that the Staff Report adequately addresses the output of the sewage the proposed hotel, offices and retail development will put into the pipes leading from the site to the County processing site in Carson, eight miles away.

In order to grant the exemption the City council has to, among other matters certify that there is no adverse environmental impact. The Staff Report upon which the proposed resolution is based has 2 pages (of the over 1000) addressing Utilities and Public Service.

The section on wastewater is one paragraph and has one line on the sewage that will be generated.

The estimate of sewage to be generated is probably understated by 50% as will be explained below.

Further there is no analysis whatsoever of the capacity of existing infrastructure in the immediate area to the development site to ensure that the sewage generated by a 160 room hotel, a large bar and restaurant, shops and offices can get to the processing plant 8 miles away.

Without that analysis in the Staff Report or other evidence before the Council as part of this application the City has no basis upon which to certify that this development will have no adverse impact. It cannot make that statement.

An EIR would look at the existing infrastructure, and determine the adequacy or otherwise and what steps would need to be taken to ensure that the development is properly serviced.

The wording in the Staff Report dealing with this important issue is on P138 of 1060

P138: " For wastewater services, the City of Manhattan Beach operates and maintains its own sanitary sewer system, which consists of a network of gravity sewers, pump stations, and force mains that convey approximately 3 million gpd of untreated wastewater to the Los Angeles County Sanitation Districts' trunk sewer system.¹⁸ The Project's wastewater would be conveyed through the sewer system to the Sanitation Districts' system of water reclamation plants, including the Joint Water Pollution Control Plant in the City of Carson, which treats an average of 260 million gpd of wastewater and has a design capacity of 400 million gpd.¹⁹ This plant is located approximately 8 miles southeast of the Project Site. The Proposed Project would generate approximately 14,659 gpd of wastewater.²⁰ The Project's estimated wastewater generation would be a small fraction of the Sanitation Districts' existing capacity. Further, because the City's General Plan is used to assist with long-term sewer infrastructure planning efforts, the Project's consistency with the General Plan would ensure that the City's sewer infrastructure has sufficient capacity to serve the Proposed Project.

18 AKM Consulting Engineers, *City of Manhattan Beach Wastewater Master Plan, 2020, Section 5, p. 5-6.*
 19 Los Angeles County Sanitation Districts, *Joint Water Pollution Control Plant, accessed August 14, 2020, <https://www.lacsd.org/services/wastewater/wwfacilities/wwtreatmentplant/jwpcp/default.asp>.*
 20 City of Manhattan Beach Department of Public Works, *Will Serve Letter for 600 S. Sepulveda Boulevard, July 13, 2020.*"

The Developer's own report contains a similar statement about likely sewage output.

The Proposed Project would generate approximately 14,659 gpd of wastewater.²⁰ The Project's estimated wastewater generation would be a small fraction of the Sanitation Districts' existing capacity. Further, because the City's General Plan is used to assist with long-term sewer infrastructure planning efforts, the Project's consistency with the General Plan would ensure that the City's sewer infrastructure has sufficient capacity to serve the Proposed Project."

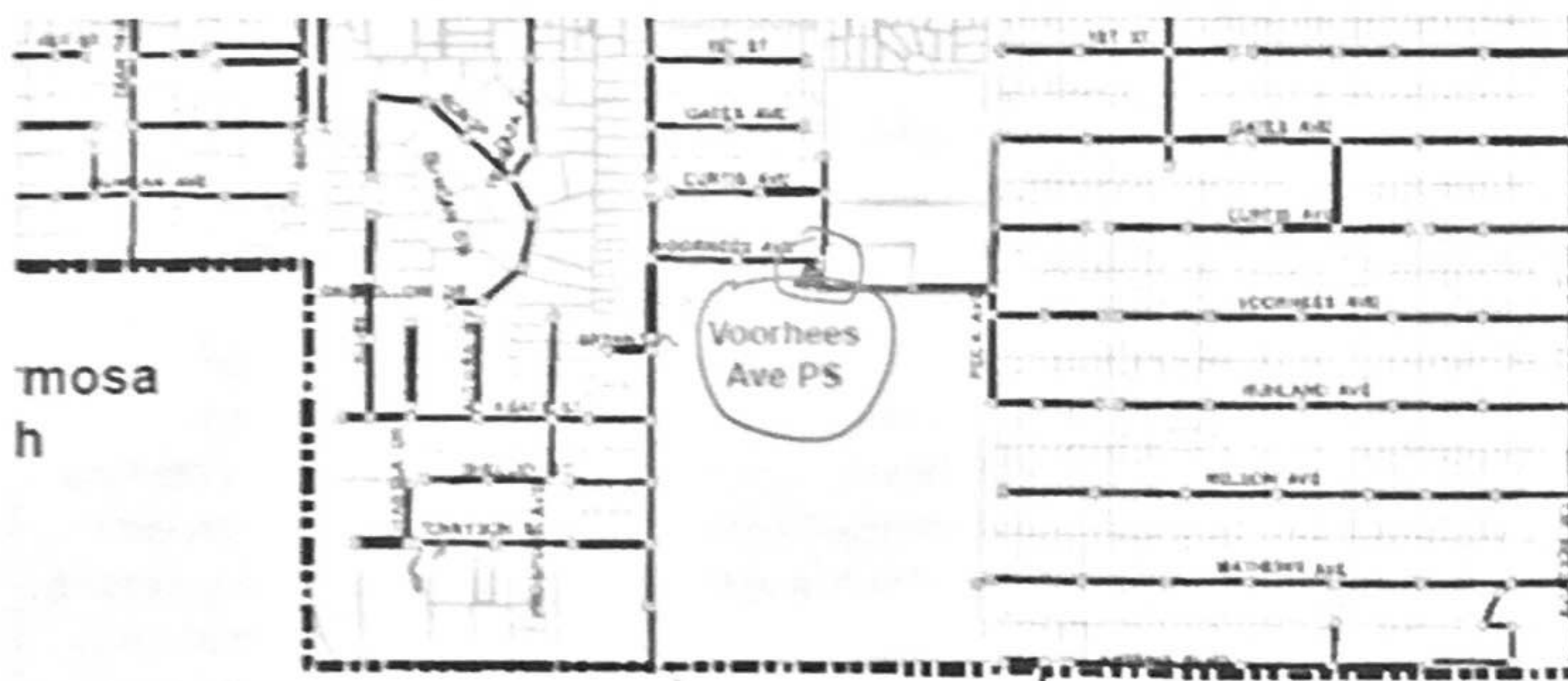
Consistency or otherwise with the General Plan provides no analysis on whether the existing sewers can cope with the new level of demand and compliance or otherwise with the General Plan has no bearing whatsoever on the size of the sewer pipes in the ground.

Current sewage generated by the parking lot is virtually nil. Prior usage by the Restaurant might equate to that of the proposed bar and restaurant in the new hotel but is certainly not comparable to the sewage that will be generated 162 rooms, bar, restaurant, shops and offices.

CURRENT INFRASTRUCTURE

Looking at the existing 8" sewer from the City's sewer map it is a terminal system that starts on Chabela (terminal end) that run South to Tennyson and intersects the sewer on Meadows then runs North to Voorhees where it run East to the existing Sewer Pump Station . From here its pumped-up hill

The line from Chabela to the Voorhees PS was designed to pick up the flow of just the houses on Tennyson maybe 15-20 service connections max.



PROJECTED DEMAND

Using a standard LA County wastewater usage chart: (see below from LA Co. design guideline estimated usage)

Estimated Average Daily Sewage Flows for Various Occupancies

Occupancy	Abbreviation	*Average daily flow
Apartment Buildings:		
Bachelor or Single dwelling units	Apt	150 gal/D.U.
1 bedroom dwelling units	Apt	200 gal/D.U.
2 bedroom dwelling units	Apt	250 gal/D.U.
3 bedroom or more dwelling units	Apt	300 gal/D.U.
Auditoriums, churches, etc.	Aud	5 gal/seat
Automobile parking	P	25 gal/1000 sq ft gross floor area
Bars, cocktails lounges, etc.	Bar	20 gal/seat
Commercial Shops & Stores	CS	100 gal/1000 sq ft gross floor area
Hospitals (surgical)	HS	500 gal/bed
Hospitals (convalescent)	HC	85 gal/bed
Hotels	H	150 gal/room
Medical Buildings	MB	300 gal/1000 sq ft gross floor area
Motels	MB	150 gal/unit
Office Buildings	Off	200 gal/1000 sq ft gross floor area
Restaurants, cafeterias, etc.	R	50 gal/seat
Schools:		
Elementary or Jr. High	S	10 gal/student
High Schools	HS	15 gal/student
Universities or Colleges	U	20 gal/student
College Dormitories	CD	85 gal/student

*Multiply the average daily flow by 2.5 to obtain the peak flow

Zoning Coefficients

Zone	Coefficient (cfs/Acre)
Agriculture	0.001
Residential*:	
R-1	0.004
R-2	0.008
R-3	0.012
R-4	0.016*
Commercial:	
C-1 through C-4	0.015*
Heavy Industrial:	
M-1 through M-4	0.021*

* Individual building, commercial or industrial plant capacities shall be the determining factor when they exceed the coefficients shown

* Use 0.001 (cfs/unit) for condominiums only

One hotel room typically generates 150 Gallons. So 162 rooms would generate 24,300 gallons not 14,659. That is an underestimate of estimate 40 % JUST ON THE HOTEL ROOMS ALONE. Add in the restaurant bar and offices and projected demand is probably understated by 50% or more

Whether the City agrees or disagrees with the above analysis using the County's own guidance table there is no analysis presented by the City in its own Staff report showing both a proper calculation of forecast demand and a factually supported basis for a statement that immediately adjacent infrastructure can cope.

CONSEQUENCES OF INADEQUATE LOCAL CONNECTIONS

If the immediate infrastructure is inadequate it is most likely that the entire sewer will have to be upsized/ replaced for 8 blocks along with increasing the capacity of the Voorhees Pump Station.

That would have entail the design, build, inspection the construction of: 8 blocks of new sewer lines, manholes, and upgrades to or new pump station

That would entail months of construction on Chabela, Tennyson Street, Meadows, and Voorhees

It would cause street closures, no / restricted parking during construction, and generate large amounts of noise, dust, and entail many heavy trucks journeys and the operation of heavy machinery for months.

All of those very foreseeable outcomes have adverse environmental impacts of various types. None of those have been analyzed.

There is also the question of who would pay for all of that. Such works would likely be in excess of a million dollars. A simple statement that the developer will cover costs relating to connection to services with no analysis also cannot be relied upon. **Should a sewer upgrade be required to service this private property the cost of the same should not fall to the City.**

The Staff Report concludes the section on Utilities and Public Services with the following statement that is not supported by any analysis or facts.

"Based on the above, the Project would result in less than significant impacts related to utilities and public services and the Project Site can be adequately served by all required utilities and public services."
[P140 of 1060]

The City Council cannot rely on the Staff report when it comes to forecast sewage output and cannot pass the proposed resolution.

Yours truly

Avan Franklin

Avan Franklin

Enc. City of MB Sewer System Management Plan (has Sewer Map in it)

**City of Manhattan Beach
Sewer System Management Plan**

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City of Manhattan Beach

Sewer System Management Plan

Introduction

On May 2, 2006 the State Water Resources Control Board (SWRCB) adopted a Statewide General Waste Discharge Requirements and Monitoring and Reporting Program (GWDR) by issuing Order No. 2006-003. The regulations in the Order were developed out of growing concern about the water quality impacts of Sanitary Sewer Overflows (SSOs), particularly those that cause beach closures, adverse effects to other bodies of water, or pose serious health and safety nuisance problems.

The two major components of the GWDR are:

1. Owners and operators of publicly owned collection Sewer Systems, a mile long or greater, apply for coverage under the GWDR; and
2. Owners and operators develop and implement a system specific Sewer System Management Plan (SSMP).

Document Organization

This SSMP is intended to meet the requirements of the Statewide GWDR. The organization of this document is consistent with the SWRCB requirements. The SSMP includes twelve elements, as listed below. Each of these elements forms a section of this document.

1. Goals
2. Organization
3. Overflow Emergency Response Plan
4. Fats, Oils and Grease Control Program
5. Legal Authority
6. Operation and Maintenance Program
7. Design and Performance Provisions
8. System Evaluation and Capacity Assurance Plan
9. Monitoring, Measurement, and Program Modifications
10. SSMP Audits
11. Communication plan
12. SSMP Completion and Certification

Supporting information for each element is references at the end of each element and is available for viewing at the Public Works Department located at 3651 Bell Avenue, Manhattan Beach, CA 90266.

City Service Area and Sewer System

The City of Manhattan Beach is located 19 miles southwest of Los Angeles on the southerly end of Santa Monica Bay, in Los Angeles County. The City of Manhattan Beach has a city area of 3.88 square miles. The City's owned and operated sewer collection system is made up of a network of gravity sewers, pump stations, and force mains. The gravity system consists of approximately 81.6 miles of pipe, and 2086 manholes and clean outs. The system also includes eight pump stations and 5,114 feet of associated forcemains.

Although the City maintains its sewer main lines, the lateral lines that connect individual homes and businesses to the main line are considered the responsibility of the property owner under the local ordinance: Title 5 – Sanitation and Health (MBMC 5.36.240). The majority of the local sewers lines tie into one of the Los Angeles County Sanitation District (LACSD) trunk sewers crossing the City. The sewage is then conveyed by gravity flow to the LACSD's Joint Water Pollution Control Plant in the City of Carson.

City of Manhattan Beach Sewer System Management Plan

I. Goal

The goal of the SSMP is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system. This will help reduce and prevent SSOs, as well as mitigate any SSOs that do occur.

Introduction

This SSMP element identifies goals the City has set for the management, operation and maintenance of the sewer system and discusses the role of the SSMP in supporting these goals. These goals provide focus for City staff to continue high-quality work and to implement improvements in the management of the City's wastewater collection system. This section fulfills the Goals requirement of the SWRCB SSMP requirements.

Regulatory Requirement

According to State Water Resources Control Board Order No. 2006-003, Item 13 (i), the collection system must develop goals to properly manage, operate, and maintain all parts of its wastewater collection system in order to reduce and prevent SSOs, as well as to mitigate any SSOs that occur.

Goals

The City of Manhattan Beach Public Works Department prides themselves in providing high quality services to the City's many residents and businesses. Providing safe, responsive, and reliable sewer service is a key component to fulfilling the City's goal. The Public Works Department is cautious and mindful of the importance of their role in the City's day-to-day functions. Accordingly, the Public Works Department provides safe, reliable, efficient, and cost-effective services to ensure continuity of operations throughout the City. In support of this goal the City has developed the following goals for the operation and maintenance of its sewer system.

1. Minimize sanitary sewer overflows.
2. Prevent public health hazards.
3. Minimize inconveniences by responsibly handling interruptions in service.
4. Protect the large investment in the collection system by maintaining adequate capacities and extending useful life.
5. Prevent unnecessary damage to public and private property.
6. Use funds available for sewer operations in the most efficient manner.
7. Convey wastewater to treatment facilities with a minimum of infiltration, inflow and exfiltration.
8. Provide adequate capacity to convey peak flows.
9. Perform all operations in a safe manner to avoid personal injury and property damage.

This SSMP supplements and supports the City's existing Operation and Maintenance Program and goals by providing high-level, consolidated guidelines and procedures for all aspects of the City's sewer system management. The SSMP will contribute to the proper management of the collection system and assist the City in minimizing the frequency and impacts of SSOs by providing guidance for appropriate maintenance, capacity management, and emergency response.

City of Manhattan Beach Sewer System Management Plan

II. Organization

Introduction

This section of the SSMP identifies City staff that is responsible for implementing the SSMP, responding to SSO events, and meeting the SSO reporting requirements. This section also includes the designation of the Authorized Representative to meet SWRCB requirements for completing and certifying spill reports. This section fulfills the Organization requirement of the SWRCB SSMP requirements.

Regulatory Requirement

According to State Water Resources Control Board Order No. 2006-003, Item 13 (ii), the collections system agency's SSMP must identify the:

1. Name of responsible or authorized representative;
2. Names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. Include lines of authority as shown in an organization chart or similar document with a narrative explanation; and
3. Chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Quality Control Board (RWQCB), Los Angeles County Department of Health (LACDH) and the State Office of Emergency Services (OES).

Organization

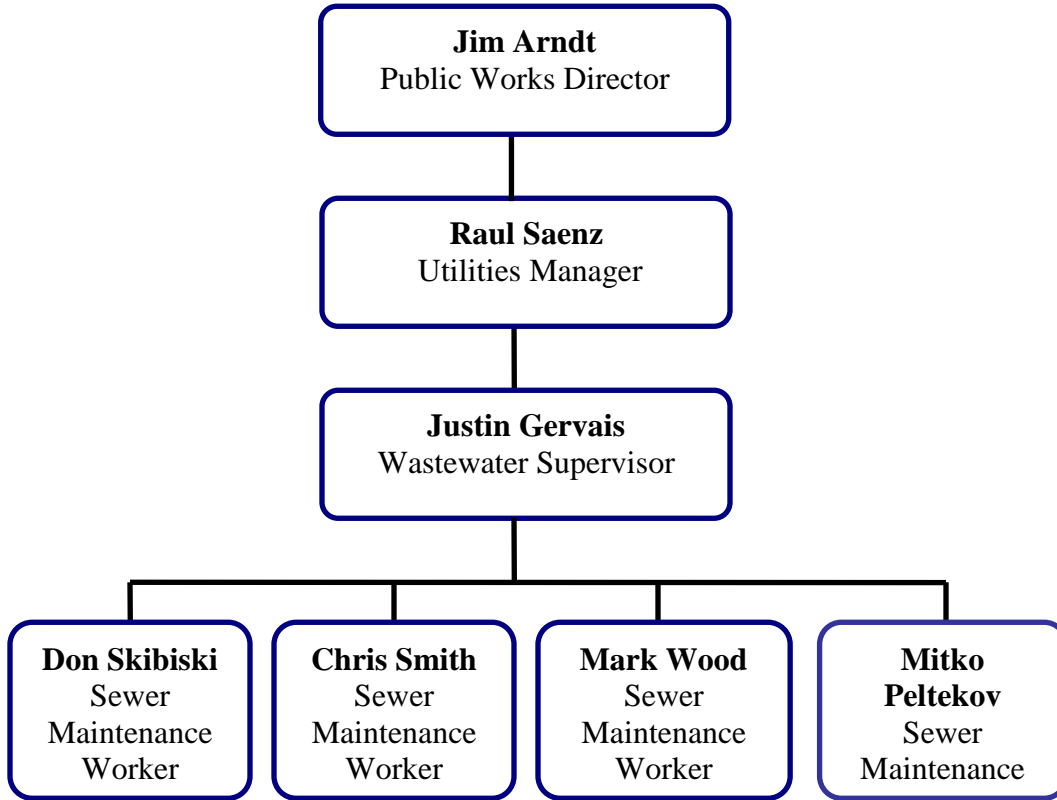
This section discusses and identifies the organization and roles of sewer staff, authorized representative to the SWRCB, and key staff responsible for implementing and maintaining the SSMP.

Department Organization

The organization chart for management, operation, and maintenance of the City's wastewater collection system is shown in Figure 1 - Organization Chart of Sewer Staff. The phone numbers for designated staff are included in Table 2.

**City of Manhattan Beach
Sewer System Management Plan**

Figure 1: Organization Chart of Sewer Staff



Description of General Responsibilities

Public Works Director: Approves Public Notifications of an SSO and Sewage Stoppage Report, communicates with media, as applicable.

Utilities Manager: Reviews Sewage Stoppage Report and provides to Public Works Director for approval, receives and conveys messages of after hour SSOs, completes online SSO reporting, communicates with media, as applicable.

Waste Water Supervisor: Monitors SCADA system, receives and conveys messages of SSOs to appropriate personnel, provides instructions for reporting to SSOs, provides Sewage Stoppage Report to Utilities Manager.

Sewer Maintenance Worker: Responds to SSOs, obtains onsite information regarding SSO, assist in containment, clean-up, and maintenance of the collection system.

**City of Manhattan Beach
Sewer System Management Plan**

Table 1: Contact Numbers for SSO Chain of Communication

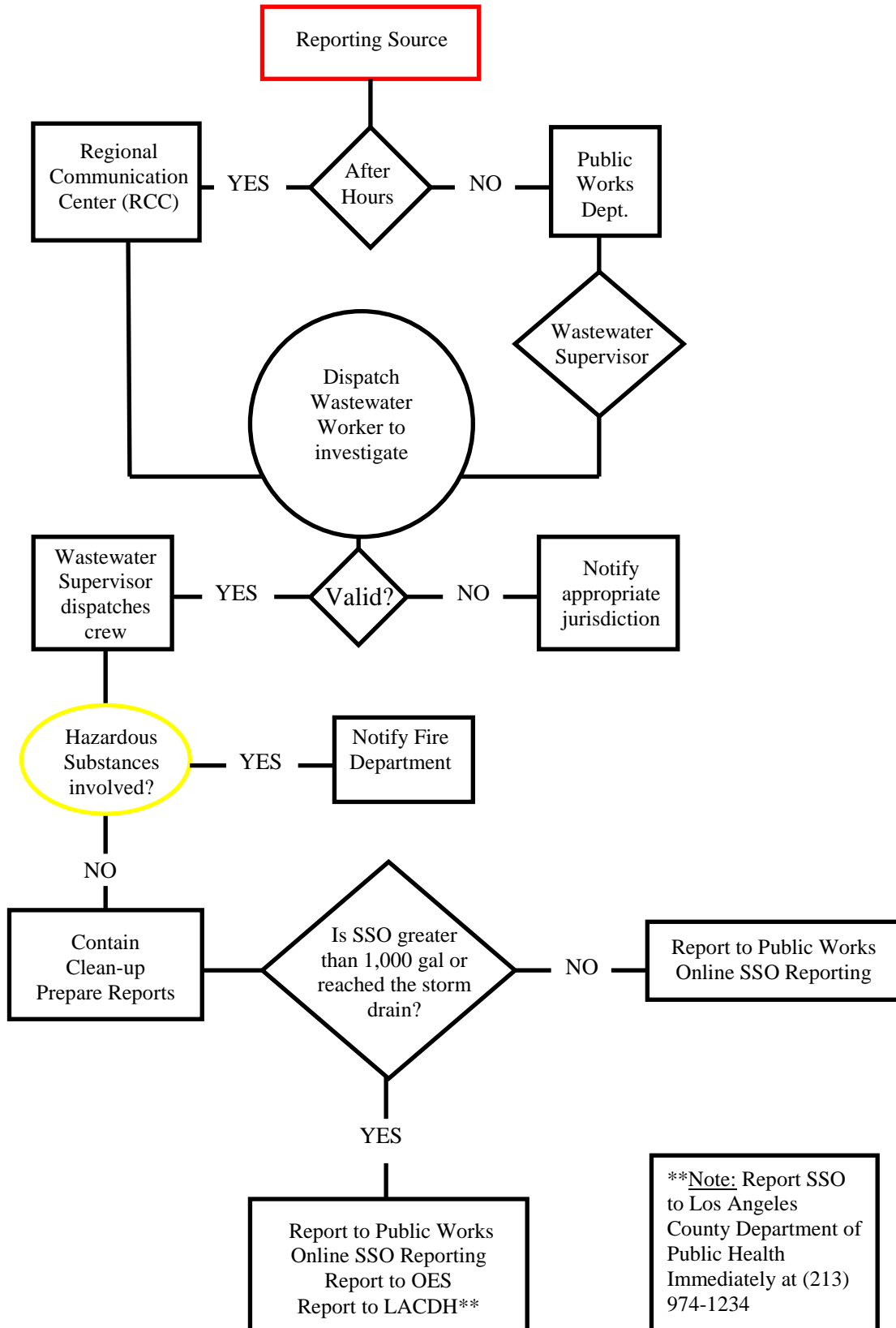
Contact	Phone Number
Utilities Division	(310) 802-5304
Public Works Department – After Hours	(310) 802-5000
Office of Emergency Services (OES)	(800) 852-7550
L. A. County Health Department (CHD)	(213) 974-1234
City Hall	(310) 802-5000
Police Department	(310) 802 -5104

SSO Reporting Chain of Communication

Figure 2: SSO Reporting Flow Chart depicts the chain of communication for responding to and reporting SSOs, from observation of an SSO to reporting the SSO to the appropriate regulatory agencies. Table 1 lists the contact phone numbers for the parties included in the chain of communication. The SSO Reporting process is described in more detail in Section 3.0 Overflow Emergency Response Plan.

City of Manhattan Beach Sewer System Management Plan

Figure 2: SSO Reporting Flow Chart



**City of Manhattan Beach
Sewer System Management Plan**

Table 2

Contact Information			
Name	Title	Phone Number	Pager
Jim Arndt	Director of Public Works	(310) 802-5303	N/A
Raul Saenz	Utilities Manager	(310) 802-5315	N/A
Justin Gervais	Wastewater Supervisor	(310) 802-5320	N/A
Christina Lopez	Utilities Secretary	(310) 802-5304	N/A
Don Skibiski	Sewer Worker	(310) 600-0475	(310) 716-2880
Chris Smith	Sewer Worker	(310) 600-0475	(310) 716-2880
Mark Wood	Sewer Worker	(310) 600-0475	(310) 716-2880
Mitko Peltekov	Sewer Worker	(310) 600-0475	(310) 716-2880

City of Manhattan Beach Sewer System Management Plan

III. Legal Authority

Each enrollee must demonstrate, through sanitary sewer system use ordinances, service agreements, or other legally binding procedures, that it possesses the necessary legal authority to:

(a) Prevent illicit discharges into its sanitary sewer system (examples may include I/I, stormwater, chemical dumping, unauthorized debris and cut roots, etc.)

The City of Manhattan Beach amended Title 5, Sanitation and Health to include Chapter 5.38 - FATS, OILS AND GREASE MANAGEMENT AND DISCHARGE CONTROL. The purpose of this chapter is to facilitate the maximum beneficial public use of the City's sanitary sewer collection system while preventing blockages of sewer lines resulting from discharges of FOG to the system, and to specify appropriate FOG discharge requirements for Food Service Establishments (FSEs) discharging into the City's sewer system. Sections that specifically limit the illicit discharges include:

5.36.250 - Depositing of industrial waste and solids in sewers.

It shall be unlawful for any person to place, throw or deposit, or cause or permit to be placed, thrown or deposited, in any public sewer or sewer connection any dead animal, offal, or garbage, or to place, throw or deposit or discharge, or cause or permit to be placed, thrown, deposited or discharged, in any such sewer any fish, fruit or vegetable waste or other solid matters or materials or obstructions of any kind whatever of such nature as shall clog, obstruct or fill such sewer, or which shall interfere with or prevent the effective use or operation thereof. It shall be unlawful for any person to cause or permit to be deposited or discharged into any such sewer any water, sewage or liquid waste of any kind containing chemicals, greases, oil, tar or other matters in solution which may by reason of precipitation clog, obstruct or fill the same, or which may in any way interfere with or prevent the effective use thereof, or which may necessitate or require frequent repair, cleaning out or flushing of such sewer to render the same operative.

5.36.260 - Dilution and neutralization of acids and corrosive liquids.

In no case shall acids or corrosive liquids liable to destroy or damage a public or house connection sewer be discharged into such sewer without being fully diluted and neutralized by passing through a properly constructed dilution and neutralizing sink or tank. Such sink or tank shall be automatically provided with a sufficient intake of water or neutralizing medium or substance so as to make its contents non-injurious before being discharged.

5.36.270 - Storm waters.

It shall be unlawful for any person to connect any roof conductor, yard drain or other conduit used for carrying off rain or surface water with any sanitary sewer of the City or house connection sewer leading thereto.

5.36.280 - Cellar and shower drainage.

Any cellar drain or any shower in a basement or roofed shower in a yard shall be protected to prevent the admission of sand, detritus and storm or surface water into the sewer. When necessary in the opinion of the Division Superintendent, a person shall trap such appurtenances by a sand interceptor constructed in accordance with the provisions of the Uniform Plumbing Code.

City of Manhattan Beach Sewer System Management Plan

5.36.290 - Swimming pools.

It shall be unlawful for any person to connect any swimming pool or tank to any public sewer in the City or house connection leading thereto, except in those instances where the topography, gradients, capacities and/or other features of the public sewer permit such over quantitative discharge, or control outlined by the Engineering Department.

5.36.300 - Over quantitative discharge.

Application must be made to the Public Works Department for permission to discharge water from swimming pools or other large quantities of water. A permit fee will be charged as established by the Council under separate resolution.

5.36.330 - Draining cesspools or septic tanks.

- A. No person shall connect or cause to be connected any cesspool or septic tank to any public sewer or house sewer connection leading thereto.
- B. No effluent from cesspools or septic tanks may be discharged or pumped into any house sewer connection or public sewer or manhole.

(b) Require that sewers and connections be properly designed and constructed.

The Public Works Department, Engineering Division develops and enforces standards that require all sewers constructed in the City comply with standard plans, specifications, policies and practices. This applies to private developer designed and constructed projects. These standards are continuously updated to incorporate new materials and construction methods to ensure that the completed installations meet the high performance standards of the City. Construction plans and technical specifications are prepared for all new or rehabilitation projects that document the standard of performance for the construction and the standards for acceptance. Service connections must be designed and constructed to meet the City of Manhattan Beach Plumbing Code. The City does not accept the installed components until they pass all required performance tests and a field acceptance from the Public Works Inspector.

(c) Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency.

The City does not maintain private lateral sewer lines. Property owners are responsible for proper installation, operation and maintenance of both upper and lower laterals, including laterals on the City-owned easement. Property owners are required to obtain permits from the Department of Community Development for work on private properties and the Department of Public Works for work in the public right-of-way.

(d) Limit the discharge of fats, oils, and grease and other debris that may cause blockages, and

The City of Manhattan Beach amended Title 5, Sanitation and Health to include Chapter 5.38 - FATS, OILS AND GREASE MANAGEMENT AND DISCHARGE CONTROL. The purpose of this chapter is to facilitate the maximum beneficial public use of the City's sanitary sewer collection system while preventing blockages of sewer lines resulting from discharges of FOG to the system, and to specify appropriate FOG discharge requirements for FSEs discharging into the City's sewer system. Sections that specifically limit the discharge of FOG that may cause blockages include:

City of Manhattan Beach Sewer System Management Plan

5.38.015 - FOG discharge requirement.

No FSE shall discharge or cause to be discharged into the sewer system FOG that exceeds a concentration level adopted by the City or that may accumulate and/or cause or contribute to blockages in the sewer system or at the sewer system lateral which connects the FSE to the sewer system.

5.38.020 - Prohibitions.

The following prohibitions shall apply to all FSEs:

- A. No person shall discharge, or cause to be discharged any wastewater from FSEs directly or indirectly into the sewer system without first obtaining an FOG wastewater discharge permit pursuant to this chapter.
- B. Discharge of any waste, including FOG and solid materials removed from the grease control device to the sewer system, is prohibited.
- C. Discharge of any waste or FOG to the sewer system which fails to comply with the FOG Discharge Manual is prohibited.
- D. Discharge of any waste or FOG to the sewer system in a manner which either violates the sewer WDRs or causes or contributes to a condition which fails to comply with the sewer WDRs is prohibited.

5.38.025 - Food grinders prohibited.

- A. No food grinder shall be installed in a plumbing system of new construction of an FSE.
- B. All food grinders shall be removed from an existing FSE upon:
 1. Major operational change to the FSE; or
 2. Any construction requiring the issuance of a building permit for either remodeling or construction of the FSE valued at fifty thousand dollars (\$50,000.00) or more.

All food grinders shall be removed from all existing FSEs within 180 days of the effective date of the ordinance from which this chapter was derived, except when expressly allowed by the Director.

5.38.030 - Best management practices required.

- A. All FSEs shall implement best management practices in its operation to minimize the discharge of FOG to the sewer system.
- B. All FSEs must implement and demonstrate compliance with best management practices (BMP) requirements as specified in the City's FOG Discharge Manual. Detailed requirements for best management practices are specified in the FOG Discharge Manual and may include kitchen practices and employees training that are essential in minimizing FOG discharges.

5.38.035 - FOG pretreatment required.

FSEs are required to install, operate and maintain an approved type and adequately sized grease interceptor necessary to maintain compliance with the objectives of this chapter in accordance with the FOG Discharge Manual and the requirements of 40 CFR § 403.5.

City of Manhattan Beach Sewer System Management Plan

5.38.045 - Multiple FSEs at commercial properties.

For properties at which multiple FSEs are operated on a single parcel, each FSE operator shall be individually and separately responsible for installation and maintenance of the grease interceptor serving its FSEs and for compliance with this chapter. Furthermore, owners of commercial properties at which multiple FSEs are operated on a single parcel shall be responsible for ensuring compliance by each FSE on the parcel. Such operators and/or property owner can comply with this chapter by installing and maintaining a grease interceptor or grease interceptors serving multiple FSEs upon approval by the Director on such terms and conditions that the Director may establish in his sole discretion.

5.38.050 - Grease disposal mitigation fee.

- A. FSEs that operate without a grease control interceptor may be required to pay an annual grease disposal mitigation fee to equitably cover the costs of increased maintenance and administration of the sewer system as a result of the FSEs' inability to adequately remove FOG from its wastewater discharge. This section shall not be interpreted to allow a new FSE or existing FSEs undergoing remodeling or change in operations, to operate without an approved grease interceptor unless the Director has determined that it is impossible to install or operate a grease control interceptor for the FSE under the provisions of this chapter.
- B. The grease disposal mitigation fee shall be established by resolution of the City Council, and shall be based on the estimated annual increased cost of maintaining the sewer system for inspection and removal of FOG and other viscous or solidifying agents attributable to the FSE resulting from the lack of a grease interceptor or grease control device and such other costs that the City Council considers appropriate.
- C. The grease disposal mitigation fee may not be waived or reduced when the FSE does not comply with the minimum requirements of this chapter and/or its discharge into the sewer system in the preceding twelve (12) months has caused or potentially caused or contributed alone or collectively, in sewer blockage or an SSO in the sewer downstream, or surrounding the FSE prior to the waiver request.
- D. At a minimum, the grease disposal mitigation fee shall be equivalent to the City's cost to:
 1. Conduct quarterly inspections of FSE premises for compliance with this chapter;
 2. Clean the city sewer line that is impacted by the FSEs waste water discharges twice a year; and
 3. Review the FSEs sewer lateral cleaning records.

5.38.055 - Sewer system overflows, public nuisance, abatement orders and cleanup costs.

Notwithstanding any waiver of grease interceptor requirements under this chapter, FSEs determined by the Director to have contributed to a sewer blockage, SSOs or any sewer system interferences resulting from the discharge of wastewater or waste containing FOG, may be ordered by the Director to immediately install and maintain a grease interceptor, and may be subject to a plan determined by the Director to abate the nuisance and prevent any future health hazards created by sewer line failures and blockages, SSOs or any other sewer system interferences. SSOs may cause threat and injury to public health, safety, and welfare of life and property and are hereby declared public nuisances. Furthermore, sewer

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lateral failures and SSOs caused by FSEs alone or collectively are the responsibility of the private property owner and/or FSE, and individual(s) as a responsible officer or owner of the FSE. If the City must act immediately to contain and clean up an SSO caused by blockage of a private or public sewer lateral or serving an FSE, or at the request of the property owner or operator of the FSE, or because of the failure of the property owner or FSE to abate the condition causing immediate threat of injury to the health, safety, welfare, or property of the public, the City's costs for such abatement may be entirely borne by the property owner or operator of the FSE, and individual(s) as a responsible officer or owner of the FSE(s) and may constitute a debt to the City and become due and immediately payable upon the City's request for reimbursement of such costs.

5.38.060 - FOG wastewater discharge permit required.

- A. FSEs proposing to discharge or currently discharging wastewater-containing FOG into the City's sewer system shall obtain an FOG wastewater discharge permit from the City within either:
 - 1. One hundred eighty (180) days from the effective date of this chapter; or
 - 2. At the time any FSE applies for or renews its annual business license from the City. Compliance with this chapter must be demonstrated at the time any business license is issued, provided that the Director may extend the compliance date for no more than ninety (90) days after the date of the issuance of the license.
- B. FOG wastewater discharge permits shall be expressly subject to all provisions of this chapter and all other regulations, charges for use, and fees established by the City. The conditions of FOG wastewater discharge permits shall be enforced by the City in accordance with this chapter and applicable State and Federal regulations.
- C. The City shall not issue a certificate of occupancy for any new construction, or occupancy unless an FSE has fully complied with the provisions of this chapter.

5.38.065 - FOG wastewater discharge permit application.

Any person required to obtain an FOG wastewater discharge permit shall complete and file with the City prior to commencing discharges, an application in a form prescribed by the Director and shall provide the City such plans, information, and documents as the Director determines is necessary and appropriate to properly evaluate the application. The applicable fees shall accompany this application. After evaluation of the data furnished, the Director may issue an FOG wastewater discharge permit, subject to terms and conditions set forth in this chapter and as otherwise determined by the Director to be appropriate to protect the City's sewer system.

5.38.070 - FOG wastewater discharge permit condition.

The issuance of an FOG wastewater discharge permit may contain any of the following conditions or limits as determined by the Director:

- A. Limits on discharge of FOG and other priority pollutants;
- B. Requirements for proper operation and maintenance of grease interceptors and other grease control devices;
- C. Grease interceptor maintenance frequency and schedule;

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- D. Requirements for implementation of best management practices and installation of adequate grease interceptor and/or grease control devices;
- E. Requirements for maintaining and reporting status of best management practices;
- F. Requirements for maintaining and submitting logs and records, including waste hauling records and waste manifests;
- G. Requirements to self-monitor;
- H. Requirements for the FSE to construct, operate and maintain, at its own expense, FOG control device and sampling facilities;
- I. Consent by the operator of the FSE for the City and other regulatory agencies to inspect the FSE to confirm compliance with this chapter, the NPDES permit and other applicable laws, rules and regulations;
- J. Additional requirements as otherwise determined to be reasonably appropriate by the Director to protect the City's system or as specified by other regulatory agencies; or
- K. Other terms and conditions, which may be reasonably applicable to ensure compliance with this chapter as determined by the Director.

5.38.105 - Grease interceptor requirements.

- A. No waste water discharges from FSEs shall be introduced into the sewer system until the required grease interceptors have been approved by the Director.
- B. Grease interceptors shall be maintained in efficient operating condition in accordance with the FOG Discharge Manual.
- C. Grease interceptors must be cleaned, maintained, and FOG must be removed from grease interceptors at regular intervals.
- D. FOG removed from grease interceptors shall be waste hauled periodically as part of the operation and maintenance requirements for grease interceptors and disposed of at an approved location in a proper manner and at regular intervals.

(e) Enforce any violation of its sewer ordinances

The City's Ordinance provides the authority to carry out all inspection, surveillance and monitoring procedures necessary to determine, independent of information supplied by FSE's, compliance or noncompliance by industrial users with applicable pretreatment standards and requirements. The Ordinance gives the Director of public Works the power, jurisdiction, and supervision over places of discharge of wastewater into the sewer system, necessary to adequately enforce and administer all applicable State and Federal laws as follows:

5.38.110 - Monitoring and reporting conditions.

- A. Monitoring for Compliance with FOG Wastewater Discharge Conditions and Reporting Requirements.
 - 1. The Director may require periodic reporting of the status of implementation of best management practices, in accordance with the FOG control program and the FOG Discharge Manual.
 - 2. The Director may require visual and other monitoring at the sole expense of the permitted to observe the actual conditions of the FSEs sewer lateral and sewer lines downstream.

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3. The Director may require reports for self-monitoring of wastewater constituents and FOG characteristics of the permitted needed for determining compliance with any conditions or requirements as specified in the FOG wastewater discharge permit or this chapter. Monitoring reports of the analyses of wastewater constituents and FOG characteristics shall be in a manner and form approved by the Director and shall be submitted upon request of the Director.
 4. Failure by the permitted to perform any required monitoring, or to submit monitoring reports required by the Director constitutes a violation of this chapter and shall be cause for the City to initiate all necessary tasks and analyses to determine the wastewater constituents and FOG characteristics for compliance with any conditions and requirements specified in the FOG wastewater discharge permit or in this chapter.
 5. The permitted shall be responsible for any and all expenses of the City in undertaking such monitoring analyses and preparation of reports.
 6. Other reports may be required such as compliance schedule progress reports, FOG control monitoring reports, and any other reports deemed reasonably appropriate by the Director to ensure compliance with this chapter.
- B. Record Keeping Requirements. The permitted shall be required to keep all documents identified by the Director relating to its compliance with this chapter, including manifests, receipts and invoices of all cleaning, maintenance, grease removal of/from the grease control device, disposal carrier and disposal site location for no less than two (2) years. The permitted shall, upon request, make the manifests, receipts and invoices available to any City representative, or inspector. These records may include:
1. A logbook of grease interceptor, and/or other grease control device cleaning and maintenance practices;
 2. A record of best management practices being implemented including employee training;
 3. Copies of records and manifests of waste hauling interceptor contents;
 4. Records of sampling data and sludge height monitoring for FOG and solids accumulation in the grease interceptors; or
 5. Any other information deemed appropriate by the Director to ensure compliance with the ordinance from which this chapter was derived.
- C. Falsifying Information or Tampering with Process. It shall be unlawful to make any false statement, representation, record, report, plan or other document that is filed with the City, or to tamper with or knowingly render inoperable any grease control device, monitoring device or method or access point required under this chapter.

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5.38.115 - Inspection and sampling conditions.

- A. The Director may inspect or order the inspection and sample the wastewater discharges of any FSE to ascertain whether the intent of this chapter is being met and the permitted is complying with all requirements. The permitted shall allow the City access to the FSE premises, during normal business hours, for purposes of inspecting the FSE's grease control devices and/or interceptor, reviewing the manifests, receipts and invoices relating to the cleaning, maintenance and inspection of the grease control devices or interceptor.
- B. The Director shall have the right to place or order the placement on the FSE's property or other locations as determined by the Director, such devices as are necessary to conduct sampling or metering operations. Where an FSE has security measures in force, the permitted shall make necessary arrangements so that representatives of the City shall be permitted to enter without delay for the purpose of performing their specific responsibilities.
- C. For the Director to determine the wastewater characteristics of the discharger for purposes of determining the annual use charge and for compliance with permit requirements, the permitted shall make available for inspection and copying by the City all notices, monitoring reports, waste manifests, and records including, but not limited to, those related to wastewater generation, and wastewater disposal without restriction but subject to the confidentiality provision set forth in this chapter. All such records shall be kept by the permitted a minimum of two (2) years.

5.38.120 - Right of entry.

Persons or occupants of premises where wastewater is created or discharged shall allow the Director, or City representatives, reasonable access to all parts of the FSE and all wastewater generating and disposal facilities for the purposes of inspection and sampling during all times the discharger's facility is open, operating, or any other reasonable time. No person shall interfere with, delay, resist or refuse entrance to City representatives attempting to inspect any FSE or facility involved directly or indirectly with a discharge of wastewater to the City's sewer system.

5.38.125 - Notification of spill.

- A. In the event a permitted is unable to comply with any permit condition due to a breakdown of equipment, accidents, or human error or the permitted has reasonable opportunity to know that his/her/its discharge will exceed the discharge provisions of the FOG wastewater discharge permit or this chapter, the discharger shall immediately notify the City by telephone at the number specified in the permit. If the material discharged to the sewer has the potential to cause or results in sewer blockages or SSOs, the discharger shall immediately notify the City, the Los Angeles County Department of Public Health, the Regional Water Quality Control Board, and the California State Office of Emergency Services if the SSO is 1,000 gallons or more.

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- B. Confirmation of this notification shall be made in writing to the Director at the address specified in the permit no later than five (5) working days from the date of the incident. The written notification shall state the date of the incident, the reasons for the discharge or spill, what steps were taken to immediately correct the problem, and what steps are being taken to prevent the problem from recurring.
- C. Such notification shall not relieve the permitted of any expense, loss, damage or other liability which may be incurred as a result of damage or loss to the City or any other damage or loss to person or property; nor shall such notification relieve the permitted of any fees or other liability which may be imposed by this chapter or other applicable law.

5.38.130 - Enforcement.

- A. The City Council finds that, in order for the City to comply with the laws, regulations, and rules imposed upon it by regulatory agencies and to ensure that the City's sewer facilities are protected and are able to operate with the highest degree of efficiency, and to protect the public health and the environment, specific enforcement provisions must be adopted to govern the discharges to the City's sewer system by FSEs.
- B. To ensure that all interested parties are afforded due process of law and that violations are resolved as soon as possible, a permitted, or applicant for a permit, may appeal any determination made by the Director, including but not limited to a denial of a discharge permit, a notice of violation, permit suspension or revocation, or a compliance schedule agreement (CSA), pursuant to the procedures set forth in Section 5.38.185.
- C. The City, at its discretion, may utilize any one, combination, or all enforcement remedies provided in this chapter in response to any FOG wastewater discharge permit or chapter violations.

5.38.135 - Violations.

- A. The owner and operator of an FSE or permitted shall be in violation of this chapter if such owner or operator or permitted:
 - 1. Fails to install an approved grease control device as required by this chapter;
 - 2. Makes any false statement, representation, record, report, plan or other document that is filed with the City;
 - 3. Tampers with or knowingly renders inoperable any grease control device required under this chapter;
 - 4. Fails to clean, maintain or remove grease from a grease control device within the required time for such cleaning, maintenance or grease removal;
 - 5. Fails to keep up-to-date and accurate records of all cleaning, maintenance, and grease removal and upon request to make those records available to any City code enforcement representative, or his or her designee, any representative of a local sanitation agency that has jurisdiction over the sanitary sewer system that services the food facility, or any authorized inspector that has jurisdiction under the water quality chapter;

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6. Refuses a City code enforcement representative, or his or her designee, a representative of a local sanitary sewer agency that has jurisdiction over the sanitary sewer system that services the food facility, or any authorized inspector, reasonable access to the food facility for the purposes of inspecting, monitoring, or reviewing the grease control device manifests, receipts and invoices of all cleaning, maintenance, grease removal of/from the grease control device, and/or to inspect the grease control device;
 7. Disposes of, or knowingly allows or directs FOG to be disposed of, in an unlawful manner;
 8. Fails to remove all food grinders located in the food facility by the date specified by this chapter;
 9. Introduces additives into a wastewater system for the purposes of emulsifying FOG without the written, specific authorization from the sanitary sewer agency that has jurisdiction of the sanitary sewer system that services the food facility;
 10. Fails to pay the grease disposal mitigation fee as specified in this chapter when due;
 11. Fails to comply with the FOG Discharge Manual; or
 12. Otherwise fails to comply with the provisions of this chapter or any permit issued by the City under this chapter.
- B. Violations under this section shall be subject to the procedures, penalties and remedies set out in this chapter and Chapter 1.04. All costs for the investigations, enforcement actions, and ultimate corrections of violations under this section, incurred by the City shall be reimbursed by the owner/operator of the FSE.

5.38.140 - Compliance schedule agreement (CSA).

- A. Upon determination by the Director that a permitted or other owner or operator of an FSE or owner of a property is in noncompliance with the terms and conditions specified in its permit or any provision of this chapter, or needs to construct and/or acquire and install a grease control device or grease interceptor, the Director may require the permitted, owner or operator to enter into a CSA.
- B. The issuance of a CSA may contain terms and conditions as determine appropriate by the Director, including but not limited to requirements for installation of a grease control device, grease interceptor and facilities, submittal of drawings or reports, audit of waste hauling records, best management and waste minimization practices, payment of fees, or other provisions to ensure compliance with this chapter.
- C. The Director shall not enter into a CSA until such time as all amounts owed to the City, including user fees, noncompliance sampling fees, or, or other amounts due are paid in full, or an agreement for deferred payment secured by collateral or a third party, is approved by the Director. If compliance is not achieved in accordance with the terms and conditions of a CSA during its term, the Director may issue an order suspending or revoking the discharge permit pursuant to this chapter.

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5.38.145 - Permit suspension.

- A. The Director may suspend any permit when it is determined that a permitted:
1. Fails to comply with the terms and conditions of a CSA order;
 2. Knowingly provides a false statement, representation, record, report, or other document to the City;
 3. Refuses to provide records, reports, plans, or other documents required by the City to determine permit terms or conditions, discharge compliance, or compliance with this chapter;
 4. Falsifies, tampers with, or knowingly renders inaccurate any monitoring device or sample collection method;
 5. Refuses reasonable access to the Permittee's premises for the purpose of inspection and monitoring;
 6. Does not make timely payment of all amounts owed to the City for user charges, permit fees, or any other fees imposed pursuant to this chapter;
 7. Causes interference, sewer blockages, or SSOs with the City's collection, treatment, or disposal system; or
 8. Violates grease interceptor maintenance requirements, any condition or limit of its discharge permit or any provision of this chapter.
- B. When the Director has reason to believe that grounds exist for permit suspension, he/she shall give written notice thereof by certified mail to the permitted setting forth a statement of the facts and grounds deemed to exist.
- C. Effect.
1. Upon an order of suspension by the Director, the permitted shall immediately cease and desist its discharge and shall have no right to discharge any wastewater containing FOG directly or indirectly to the City's system for the duration of the suspension. All costs for physically terminating and reinstating service shall be paid by the permitted.
 2. Any owner or responsible management employee of the permitted shall be bound by the order of suspension.

5.38.150 - Permit revocation.

- A. Revocation. The Director may revoke any FOG wastewater discharge permit when it is determined that a permitted has failed to comply with this chapter.
- B. Notice of Revocation. When the Director has reason to believe that grounds exist for the revocation of a permit, he/she shall give written notice by certified mail thereof to the permitted setting forth a statement of the facts and grounds.

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C. Effect of Revocation.

1. Upon an order of revocation by the Director becoming final, the permitted shall permanently lose all rights to discharge any wastewater containing FOG directly or indirectly to the City's system. All costs for physical termination shall be paid by the permitted.
2. Any owner or responsible management employee of the permitted shall be bound by the order of revocation.
3. Any future application for a discharge permit at any location within the City by any person associated with an order of revocation will be considered by the City after fully reviewing the records of the revoked permit, which records may be the basis for denial of a new permit.
4. An order of permit revocation issued by the Director of Public Works shall be final in all respects on the sixteenth (16th) day after it is mailed to the permitted.

5.38.155 - Damages to facilities or interruption of normal operations.

- A. Any person who discharges any waste, including but not limited to those listed under 40 CFR § 403.5, which causes or contributes to any sewer blockage, SSOs, obstruction, interference, damage, or any other impairment to the City's sewer facilities or to the operation of those facilities shall be liable for all costs required to clean or repair the facilities together with expenses incurred by the City to resume normal operations. The total amount shall be payable within forty-five (45) days of invoicing by the City.
- B. Any person who discharges a waste which causes or contributes to the City violating its discharge requirements established by any regulatory agency incurring additional expenses or suffering losses or damage to the facilities, shall be liable for any costs or expenses incurred by the City, including regulatory fines, penalties, and assessments made by other agencies or a court.

5.38.160 - Public nuisance.

Discharge of wastewater in any manner in violation of this chapter or of any order issued by the Director, as authorized by this chapter, is hereby declared a public nuisance and shall be corrected or abated as directed by the Director. Any person creating a public nuisance is guilty of a misdemeanor.

5.38.165 - Termination of service.

- A. The City, by order of the Director, may physically terminate sewer service and water service to any FSE, as follows:
 1. On a term of any order of suspension or revocation of a permit; or
 2. Upon the failure of a person not holding a valid discharge permit to immediately cease the discharge, whether direct or indirect, to the City's sewer facilities after the notice and process as provided herein.
- B. All costs for physical termination shall be paid by the owner or operator of the FSE or permitted as well as all costs for reinstating service.

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5.38.170 - Emergency suspension order.

The City may, by order of the Director, suspend sewer service and/or water service when the Director determines that such suspension is necessary in order to stop an actual or impending discharge which presents or may present an imminent or substantial endangerment to the health and welfare of persons, or to the environment, or may cause SSOs, sewer blockages, interference to the City's sewer facilities, or may cause the City to violate any State or Federal law or regulation. Any discharger notified of and subject to an emergency suspension order shall immediately cease and desist the discharge of all wastewater containing FOG to the sewer system.

5.38.175 - Civil penalties.

- A. In addition to criminal penalties and administrative penalties authorized by this Code, all users of the City's system and facilities are subject to enforcement actions administratively or judicially by the City, U.S. EPA, State of California Regional Water Quality Control Board, or the County of Orange Los Angeles, and other regulatory agencies. Said actions may be taken pursuant to the authority and provisions of several laws, including but not limited to:
1. Federal Water Pollution Control Act, commonly known as the Clean Water Act (33 U.S.C.A. Section 1251 et seq.);
 2. California Porter-Cologne Water Quality Control Act (California Water Code Section 13000 et seq.);
 3. California Hazardous Waste Control Law (California Health & Safety Code Section 25100 et seq.);
 4. Resource Conservation and Recovery Act of 1976 (42 U.S.C.A Section 6901 et seq.); and
 5. California Government Code, Sections 54739—54740.
- B. In the event the City is subject to the payment of fines or penalties pursuant to the legal authority and actions of other regulatory or enforcement agencies based on a violation of law or regulation or its permits, and said violation can be established by the City, as caused by the discharge of any user of the City's system which is in violation of any provision of the City's chapter or the user's permit, the City shall be entitled to recover from the user all costs and expenses, including, but not limited to, the full amount of said fines or penalties to which it has been subjected.
- C. Pursuant to the authority of California Government Code Sections 54739—54740, any person who violates any provision of this chapter; any permit condition, prohibition or effluent limit; or any suspension or revocation order shall be liable civilly for a sum not to exceed twenty-five thousand dollars (\$25,000.00) per violation for each day in which such violation occurs. Pursuant to the authority of the Clean Water Act, 33 U.S.C. Section 1251 et seq., any person who violates any provision of this chapter, or any permit condition, prohibition, or effluent limit shall be liable civilly for a sum not to exceed twenty-five thousand dollars (\$25,000.00) per violation for each day in which such violation occurs.

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The City Attorney of the City, upon request of the Director, shall petition the Superior Court to impose, assess, and recover such penalties, or such other penalties as the City may impose, assess, and recover pursuant to Federal and/or State legislative authorization.

- D. Administrative Civil Penalties. Pursuant to the authority of California Government Code Sections 54740.5 and 54740.6, the City may issue an administrative complaint to any person who violates:
1. Any provision of this chapter;
 2. Any permit condition, prohibition, or effluent limit; or
 3. Any suspension or revocation order.

5.38.180 - Criminal penalties.

Any person who violates any provision of this chapter is guilty of a misdemeanor, which upon conviction is punishable by a fine not to exceed one thousand dollars (\$1,000.00), or imprisonment for not more than six (6) months, or both. Each violation and each day in which a violation occurs may constitute a new and separate violation of this chapter and shall be subject to the penalties contained herein.

Reference

- City of Manhattan Beach Municipal Code, Title 5, Sanitation and Health – Chapter 5.38 - *FATS, OILS AND GREASE MANAGEMENT AND DISCHARGE CONTROL*.
- City of Manhattan Beach FOG Source Control Manual

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IV. Operation and Maintenance Program

Operation and Maintenance Program: The SSMP must include those elements listed below that are appropriate and applicable to the Enrollee's system:

(a) Maintain an up-to-date map of the sanitary sewer system, showing all gravity line segments and manholes, pumping facilities, pressure pipes, valves and applicable stormwater conveyance facilities;

The City's GIS mapping data base shows all features of the sanitary sewer system, including lift stations and pumping facilities, gravity line segments, manholes, clean-outs, force mains, valves. Other information layers are used for recording and tracking CCTV identified defects, such as broken pipe, holes in pipes, offset joints, roots, and grease. The maps are routinely updated to include new or rehabilitated sewer system components. The Public Works Engineering and Utilities Divisions are responsible for providing as-built information to the GIS section for updating the maps. These records serve as reference for all future Capital Improvement planning.

(b) Describe routine preventive operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more frequent cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders;

The City operates and maintains a sewer system that serves a population of approximately 34,000 people within a four square mile service area. The City's system consists of approximately 86 miles of sewer lines, 2100 manholes and clean-outs, 6 pump/lift stations, and 5,200 feet of associated force mains. The entire 86 miles of sewer lines are cleaned twice a year. "Extra attention" lines, those with known root and grease issues, are cleaned twice a month. The City's six wet wells are inspected and skimmed twice a week, and completely vacuumed out once a year. Pump stations are inspected once a week by the Utilities Electrician and Sewer Maintenance Worker. The Pump station motor controls centers are annually diagnosed for operational efficiency and safety by the Southern California Edison Company. Data gathered from this diagnosis is used to perform preventive, predictive and corrective maintenance. Scheduled and completed tasks are catalogued and tracked by work orders in a maintenance management system.

Sewer System Preventive and Proactive Maintenance

The City has a proactive and preventive maintenance program for its sewer system. The maintenance yard is strategically located in an area such that travel time is minimized when addressing routine and emergency situations. Given the City's proximity to the sea, a sewer-system-overflow can reach the ocean in a relatively short period of time. Accordingly, the City's sewer system preventative maintenance program is aggressive so as to obviate raw sewage reaching the ocean. The Waste Water Staff respond to all sewer emergency calls received 24/7, regardless of nature and ownership – public and private. During business hours, all reported and observed problem sewers are inspected and addressed within 15 minutes. During after-hours, all reported and observed sewer problems are inspected and addressed within sixty minutes.

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Problem sewers are identified, prioritized and scheduled for maintenance based on a comprehensive review of the maintenance history and system characteristics of all the sewers in the City including overflows, blockages, age, material and condition. Maintenance includes high velocity sewer cleaning, vacuuming, bucketing, and mechanical and manual rodding. Closed circuit television inspections are performed at the site of all sewer overflows within eight hours to identify any necessary repairs or special maintenance needs. These may trigger further reviews to determine cause and/or immediate or accelerated corrective actions. Corrective action schedules are set based on the severity of the problem.

- **Fats, Oils, and Grease (FOG) Cleaning**

Overflows caused by blockages from FOG are monitored for location and needed cleaning frequency. The City performs increased rotation of cleaning in sewers with known FOG concentrations.

The City's FOG Ordinance provides the legal authority to regulate and thus minimize FSE FOG contribution to the sewer system; and FOG Source Control Program Manual provides the FSE's with information on FOG control Best Management Practices.

- **Root Control Strategy**

The City performs routine mechanical root removal in areas of known root intrusion.

- **Odor Control Strategy**

The City's aggressive sewer line cleaning program has served to effectively control odor. The entire 86 miles of sewer lines are cleaned twice a year. "Extra attention" line, those with known root and grease issues, are cleaned twice a month. The City's six wet wells are inspected and skimmed twice a week, and completely vacuumed out once a year.

- **Pump Stations Maintenance**

The Public Works Utilities office serves as the main center for SCADA monitoring and control of all pump stations. Southern California Edison is contracted to perform overall plant energy efficiency testing, infrared panel inspections, meg ohm testing, vibration analysis and electric panel cleaning. The City's six sewage pump stations have built-in backup emergency and redundancy power systems with automatic transfer switches. The power systems are start tested weekly by staff, and undergo motor and generator servicing bi-annually by Power Plus, Inc.

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(c) Develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Rehabilitation and replacement should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally, the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed for the capital improvement plan;

In 2009, the City initiated a five year program to inspect its approximately 2100 manholes, conduct CCTV inspections of its 86 miles of sewer lines and perform a structural rehabilitation analysis of the findings.

The CCTV recordings are prioritized per the database summary developed through the analysis. Each reach will be assigned a condition grade per the PACP standards and prioritization will be based on the type and number of defects identified in each recording. Pipes that are believed to be at higher risk of collapse and blockages, and therefore have a greater potential for causing a sanitary sewer overflow will be given the highest priority. Operation and maintenance (O&M) defects such as grease, roots, and deposits are considered separately.

For each of the identified structural deficiencies, a Rehabilitation and Replacement Plan is developed along with an Engineer's cost estimate. The estimates include the construction cost, as well as the design, inspection, administration costs and contingencies. The Rehabilitation and Replacement Plan implementation entails a variety of short- and long-term activities that ensure the sustainability of the sanitary sewer system infrastructure.

Short, Medium and Long-Term CIP Schedule

The City recently implemented a program to visually inspect and document the condition of each of the approximately 2,100 man holes in the City's 88 mile sewer line system. CCTV inspections and physical inspections provide up-to-date data that is used by the City to evaluate the hydraulic and structural condition of its sanitary sewer system. From this assessment, deficiencies are identified, evaluated, improvement projects identified and scheduled.

To assess the condition of CCTV inspected sewers, the City uses a five category rating system based on the types and severity of defects. The Categories range from Category A (Excellent) to Category E (Emergency Condition). The condition ratings trigger a follow-up action that includes either rehabilitation within a certain time frame or a follow-up inspection. Rehabilitation projects are developed and scheduled for implementation on a prioritized basis with other identified needs. Category A and B Sewers are in excellent to good condition and are scheduled for continued inspections and monitoring. Category C condition sewers fall into the long-term CIP schedule. They are considered to be in fair condition and are scheduled for follow-up inspections every five years until repairs have been completed. Category D condition sewers fall into the medium-term CIP schedule.

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They are considered to be in a condition that requires close monitoring and may require rehabilitation within five years. Preventive measures are intensified, as appropriate, to avoid emergency situations and follow-up inspections are conducted annually. Category E condition sewers fall into the short-term CIP schedule. They are considered to be in need of emergency repair. These are sewers where a pipe failure has already occurred or there is a full flow obstruction/blockage and immediate repairs are initiated.

The City has identified medium and long-term plans through the development of a rolling Five-Year Capital Improvement Program.

(d) Provide training on a regular basis for staff in sanitary sewer system operations and maintenance, and require contractors to be appropriately trained;

- Sewer Maintenance Workers are initially trained in the proper operation and maintenance of all major wastewater equipment and facilities by the Wastewater Supervisor.
- Critical equipment training is facilitated by outside contractors in areas of fork lift operation, backhoe and bob-cat operation, crane operation
- Every staff member receives periodic formal safety training in confined space entry, trench shoring, traffic control, heat illness, and hazardous materials management.
- On-the-Job cross training is actively pursued to ensure staff has a proficient working knowledge of all aspects of sewer system maintenance.
- Task proficiency is a requirement for all job positions, and training records are maintained to monitor completed classes.
- Disaster training exercises are conducted twice a year. One drill is a table-top exercise, and one involves a field exercise. Both drills are conducted using the City's Emergency Operations Center format.
- Staff is trained in the Best Management Practices of the Fats, Oils, and Grease (FOG) Control Ordinance, and has been instructed to report violations when encountered in the course of a working day.
- Staff are provided with 24/7 emergency contact numbers for contractors who perform sewer system repair, in addition to contact numbers for three neighboring cities – Hawthorne, El Segundo and Redondo Beach – who can lend aid in the form of equipment and personnel.

(e) Provide equipment and replacement part inventories, including identification of critical replacement parts.

The City maintains an inventory of equipment, replacement parts, and supplies and follows a structured process to ensure an up-to-date accounting and complete inventory of equipment and replacement parts for their specific duties. Parts that are needed for preventive maintenance are identified ahead of time for each specific maintenance task. Parts are secured prior to the start of preventive maintenance. Redundancy is provided for key pump station equipment and all pump stations have backup power to minimize the risk of a complete shut-down. As a backup, managers have credit authority to purchase needed materials and supplies from local vendors of non-stock items when they are critically needed.

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The City maintains equipment and performs weekly testing to guarantee a ready state for immediate deployment in an emergency.

Sewer Line Cleaning Equipment

- 1 Vac-Con Combination truck with capacity for clearing 800 feet of sewer or storm drain pipe
- 1 Serico Hydro Jet truck with 600 foot cleaning capacity, one inch hose
- Replacement leader hoses and an array of cleaning nozzles for sewer and storm drain cleaning
- 1 replacement spool of 400 feet of $\frac{3}{4}$ inch high pressure hose for the Vac-Con

Light/Heavy Equipment

- 1 Case 580L backhoe, 1 four yard front end loader, 1 medium duty dump and flat bed truck, one 10,000 lb boom crane, 1 medium duty single axle-6 wheel dump truck
- 2 six inch diesel pumps – these pumps can be used for bypassing sewer lift stations or moving large amounts of storm water from retention basins.
- 2 twenty three foot suction hoses
- 800 feet of four inch flat poly discharge hose

Sewer Lift Stations

- 1 replacement pump for six sewer lift stations – Voorhees, Meadows, Poinsettia, Pacific, Palm and Bell. These pumps are to be set in place on a temporary basis until repairs or replacements on permanent pumps can be done.
- 1 replacement pump for Pier lift station
- 4 six inch check valves
- 1 four inch check valve
- 3 sets of floats
- 3 transformers
- Replacement fuses for each station – located at each station
- 2 Siemens transducers for the hydroranger level controls

Sewer Pipe

- 28 feet total of four inch clay pipe with repair couplings and 3 twenty-two and $\frac{1}{2}$ degree, 5 forty-five degree and 1 ninety degree 4 inch pipe fittings and 1 eight inch by four inch Y
- 50 feet of six inch clay pipe with repair couplings and 7 twenty-two and $\frac{1}{2}$ degree, 3 ninety degree (elbow style) 6 inch pipe fittings and 4 six inch by six inch Y's and 3 six inch saddles
- 35 feet of eight inch clay pipe with repair couplings and 1 twenty-two and $\frac{1}{2}$ degree, 5 forty-five degree, and 3 ninety degree 8 inch pipe fittings and 2 eight inch by eight inch Y's and 1 eight inch T
- 5 feet of twelve inch clay pipe with repair couplings
- 7 feet of fifteen inch clay pipe with repair couplings
- 6 feet of eighteen inch clay pipe with repair couplings

City of Manhattan Beach Sewer System Management Plan

Reference

- City of Manhattan Beach Wastewater Master Plan - *Section 8 – Condition Assessment; and Section 9 – Operations and Maintenance*
- *City of Manhattan Beach Five Year Capital Improvement Program*

City of Manhattan Beach Sewer System Management Plan

V. Design and Performance Provisions

(a) Design and construction standards and specifications for the installation of new sanitary sewer systems, pump stations and other appurtenances; and for the rehabilitation and repair of existing sanitary sewer systems;

Establishing performance standards is an important part of evaluating wastewater collection systems, as it forms the basis for system analysis and system improvement recommendations. These standards include methodology for estimating wastewater design flows and minimum design standards for the collection system pipes, pump stations, and force mains.

Average wastewater flows can be reasonably estimated from land use and their corresponding unit flow factors. The results are then compared to measured flows. Peaking factors are needed for estimating peak dry weather and peak wet weather flows. Peak wet weather flows include an allowance for inflow and infiltration (I/I).

Collection system design standards include minimum pipe size, minimum flow velocity, and depth of flow to pipe diameter ratio (d/D). Pump station criteria include the capacity and number of pumps, wet well and force main sizes, redundancy, emergency power, remote monitoring capabilities, as well as safety and regulatory agency requirements. Finally, facility useful lives are needed for adequately scheduling replacement of the aging infrastructure.

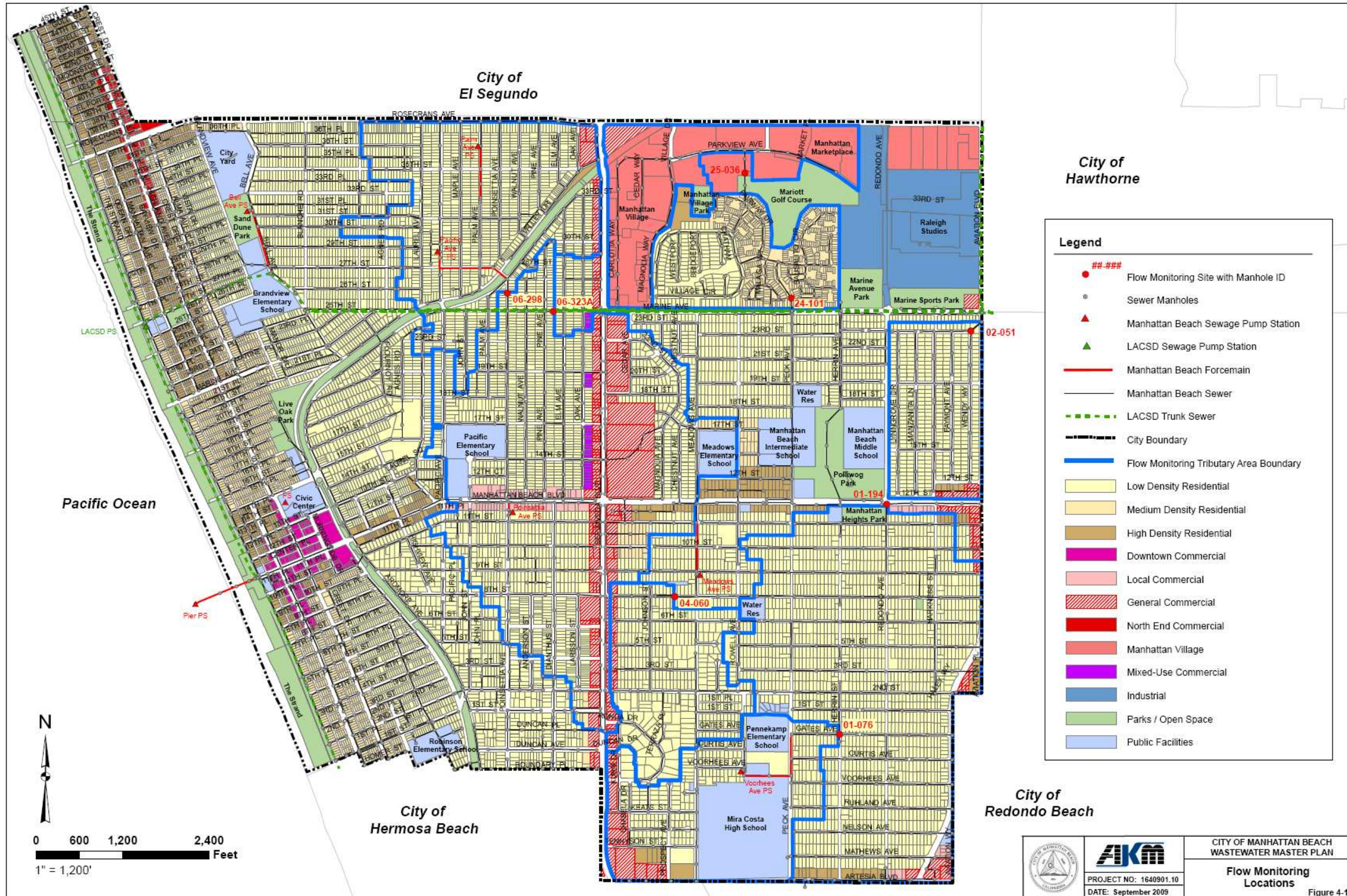
Flow Monitoring

Data collection and review is essential in developing unit flow factors, calibrating the system model, and estimating the ultimate average day and peak flows.

A temporary flow monitoring study was conducted by ADS Environmental Services from December 21, 2008 to March 14, 2009 at eight locations. The selected flow monitoring locations and a summary of the results are shown on Figure 4-1 and in Table 4-1. The measured flows are graphically depicted on Figure 4-2. Detailed flow monitoring data can be found in Appendix 1.

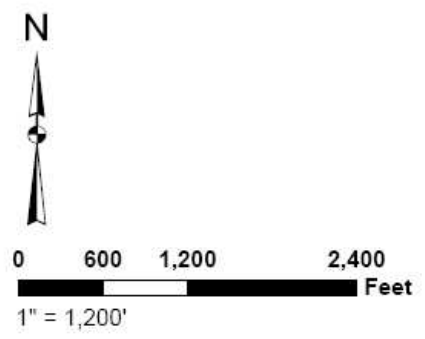
The flow monitoring sites were strategically selected to aid in the development of unit flow factors and calibration of the model. Sites were selected in an attempt to get a good sampling of data across the study area. At the same time, the areas tributary to each site must generate depths of flow large enough to develop accurate wastewater flows.

City of Manhattan Beach Sewer System Management Plan



Legend

- ### Flow Monitoring Site with Manhole ID
- Sewer Manholes
- ▲ Manhattan Beach Sewage Pump Station
- ▲ LACSD Sewage Pump Station
- Manhattan Beach Forcemain
- Manhattan Beach Sewer
- - - LACSD Trunk Sewer
- - - City Boundary
- Flow Monitoring Tributary Area Boundary
- Low Density Residential
- Medium Density Residential
- High Density Residential
- Downtown Commercial
- Local Commercial
- General Commercial
- North End Commercial
- Manhattan Village
- Mixed-Use Commercial
- Industrial
- Parks / Open Space
- Public Facilities



City of Redondo Beach

AKM
PROJECT NO: 1640901.10
DATE: September 2009

CITY OF MANHATTAN BEACH
WASTEWATER MASTER PLAN

Flow Monitoring Locations

Figure 4-1

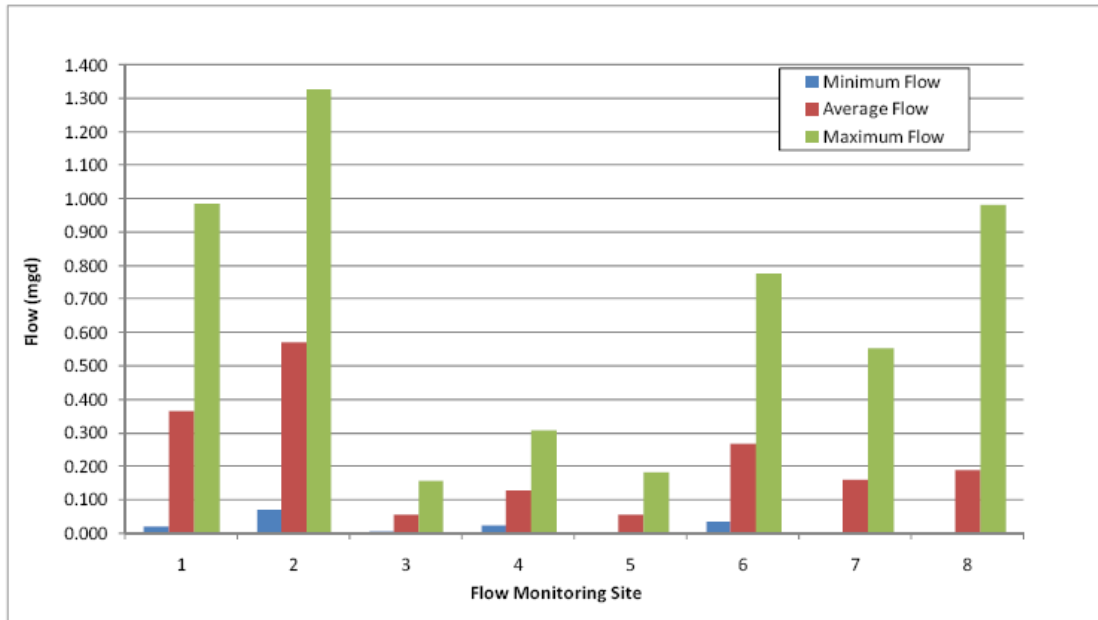
**City of Manhattan Beach
Sewer System Management Plan**

**Table 4-1
Flow Monitoring Results**

Site ID	Pipe ID	Manhole ID	Location	Pipe Size (in)	Reason	Gross Area (Ac)	Depth (in)			Velocity (ft/s)			Flow (mgd)		
							Min	Ave	Max	Min	Ave	Max	Min	Ave	Max
1	01194-01195	01-194	Redondo Ave and Manhattan Beach Blvd	18	Unit Flow Factor	422	1.8	3.9	5.9	0.3	1.9	3.4	0.017	0.367	0.987
2	06311-06323A	06-323A	Marine Ave between Pine Ave and Elm Ave	18	Calibration	516	1.9	4.7	7.2	0.9	2.2	3.3	0.071	0.572	1.329
3	04059-04060	04-060	8th St between Johnson St and Meadows Ave	12	Unit Flow Factor	92	1.1	2.2	3.5	0.2	0.8	1.3	0.006	0.057	0.159
4	25035-25036	25-036	On the easement west of Parkview Ave, between Park Way and Village Dr	12	Unit Flow Factor	86	1.3	2.4	3.9	0.8	1.7	3.1	0.024	0.128	0.308
5	02051-02052	02-051	On the easement between intersection of Wendy Way & 23rd St and Aviation Blvd	8	Unit Flow Factor	70	0.2	2.3	4.1	0.3	0.9	1.8	0.001	0.057	0.182
6	24100-24101	24-101	Marine Ave and Gateway Dr	15	Unit Flow Factor	81	1.6	3.4	5.7	0.5	1.9	3.1	0.033	0.270	0.777
7	01073-01076	01-076	Gates Ave and Herrin St	8	D/S of Voorhees PS Forcemain & Unit Flow Factor	118	0.4	2.8	5.9	0.1	1.9	4.6	0.001	0.163	0.553
8	06297-06298	06-298	Poinsettia Ave and Marine Ave; downstream of Pacific Pump Station	8	D/S of Pacific PS Forcemain & Unit Flow Factor	172	0.2	1.3	3.2	1.1	5.9	11.6	0.002	0.190	0.982

City of Manhattan Beach Sewer System Management Plan

Figure 4-2
Measured Flow Data



Unit Flow Factors

Unit flow factors utilized in this study were developed based upon the existing land uses obtained from the City's GIS, and results of the flow monitoring studies discussed in Sub-section 4-2. Water use records, aerial photographs and field reviews supplemented this information.

The average daily flow recorded at each flow monitoring site was utilized in determining calibrated existing unit flow factors for each land use, which are shown in Table 4-2. The flow factors were developed in units of gallons per day per acre.

**City of Manhattan Beach
Sewer System Management Plan**

**Table 4-2
Unit Flow Factors**

Land Use Description		Unit Flow Factor (gpd/ac)
Downtown Commercial	DC	1,500
General Commercial	GC	1,500
High Density Residential - District 1 & 2	HDR	3,000
High Density Residential - District 3 & 4	HDR3	4,200
Industrial	IND	2,000
Local Commercial	LC	1,500
Low Density Residential - District 1	LDR1	1,100
Low Density Residential - District 2	LDR2	1,400
Low Density Residential - District 3	LDR3	3,800
Medium Density Residential - District 1	MDR1	1,400
Medium Density Residential - District 2	MDR2	1,600
Medium Density Residential - District 3	MDR3	4,000
Mixed-Use Commercial	MUC	1,500
Manhattan Village	MV	1,600
North End Commercial	NEC	1,500
Parks/Open Space	OS	200
Public Facilities	PF	1,200

Peaking Factors

Peak Dry Weather (WHAT IS THIS?)

The wastewater unit flow factors discussed in Sub-section 4-3 are used to generate average dry weather flows (ADWF) entering the collection system. However, the adequacy of a sewage collection system is based upon its ability to convey the peak flows. At any point in the system, peak dry weather flow (PDWF) is estimated by converting the total average flow upstream of the point in question to peak dry weather flow by an empirical peak-to-average relationship.

The peaking formula commonly used in sewerage studies is of the following form:

$$PDWF = a \times ADWF^b$$

where PDWF = Peak Dry Weather Flow
ADWF = Average Dry Weather Flow
a, b = Peaking Formula Coefficients

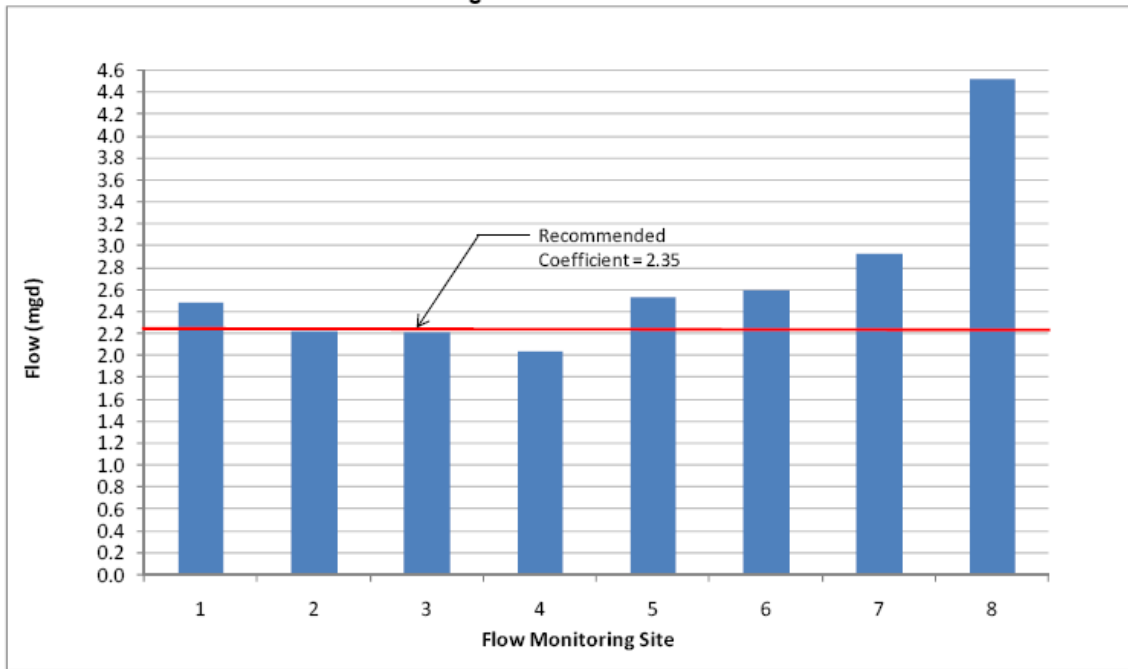
The temporary flow monitoring data was reviewed to develop peaking relationships at each site. As expected, these relationships varied from site to site depending upon the makeup and size of the tributary land use. Coefficient “b” is typically found to be in the range of 0.91 to 0.92 based on empirical studies. Using a coefficient “b” of 0.92, the resulting coefficient “a” can be calculated from the measured flow data.

The calculated coefficient “a” for each flow monitoring site is shown graphically on Figure 4-3. The following peaking relationship was selected for this study:

$$PDWF \text{ (mgd)} = 2.35 \times ADWF \text{ (mgd)}^{0.92}$$

City of Manhattan Beach Sewer System Management Plan

Figure 4-3
Peaking Formula Coefficient "a"



It should be noted that Site 7 and Site 8 were located downstream of a sewer pump station force main discharge location. The peaking coefficients are believed to be unusually high and were therefore not incorporated into the development of the recommended coefficient.

Peak Wet Weather

The peak wet weather flow (PWWF) has two components: peak dry weather flow (PDWF) and rainfall dependent inflow/infiltration (I/I) as expressed by the following equation:

$$\text{PWWF} = \text{PDWF} + \text{I/I}$$

Inflow and infiltration is discussed further in Sub-section 4-5.

Although the flow monitoring effort for this study covered the normal wet weather period, significant precipitation did not occur to develop what would be considered peak wet weather flows. Until wet weather flow data can be collected, it is recommended that the peak wet weather flow be estimated as the following:

$$\text{Peak Wet Weather Flow (PWWF)} = 1.35 \times \text{Peak Dry Weather Flow (PDWF)}$$

Although the PWWF/PDWF factor of 1.35 may not cover all situations, it is not reasonable or feasible to design the sewer system to carry the flows that would result from the use of a larger ratio. Instead, it is recommended that the City concentrate on projects such as replacing manhole covers, installing plugs in manhole covers, and replacing or relining cracked pipes to reduce inflow and infiltration.

City of Manhattan Beach

Sewer System Management Plan

Inflow and Infiltration

Inflow is the surface water that typically gains entry to the sewer system through perforated or unsealed manhole covers during rainfall events. Infiltration is defined as water entering the collection system from the ground through defective pipes, pipe joint connections, or manhole walls. The sewer system design capacity must include allowances for these extraneous flow components, which inevitably become a part of the total flow. The amount of inflow and infiltration (I/I) that enters the system typically depends upon the availability, adequacy, and location of the storm water drainage facilities; age and condition of structures; materials and methods of construction; the location of the groundwater table; and the characteristics of the soil. In the absence of flow monitoring data, many regulating agencies utilize commonly accepted practices for estimating I/I. For example, I/I is often estimated based on the diameter and length of pipeline (100 to 400 gpd/ in. dia/ mile) or as a percentage of the peak flow or pipeline capacity.

AKM's experience from other master planning studies and review of limited flow monitoring information available during severe rainfall events indicate that the peak wet weather flow can vary from 110 percent of peak dry weather flows in steeper areas with adequate drainage facilities, to over 200 percent of peak dry weather flows in flat areas that lack significant drainage facilities.

For this study, extraneous flow due to inflow and infiltration is included in the peak wet weather flow formula described above. If better data becomes available subsequently for specific areas, the analysis should be updated based upon that information.

Sewer Design Criteria

Design criteria are established to ensure that the wastewater collection system can operate effectively under all flow conditions. Each pipe segment must be capable of carrying peak wet weather flows in the hydraulically stable zone of the pipe. Low flows must be conveyed at a velocity that will prevent solids from settling and blocking the system. The design capacity of a gravity pipeline is the calculated capacity of the pipeline based on the Manning formula:

$Q = 1.486 A R^{2/3} S^{1/2} / n$, where

Q = flow in cubic feet per second

R = hydraulic radius in feet = A / P

A = cross-sectional area of flow in the pipe in square feet

P = wetted perimeter in feet

S = slope of pipe in feet of rise per foot of length

n = Manning's friction factor

Sewer system capacity is established using a Manning's friction factor of 0.013 for vitrified clay pipe. The design and analysis of sewer pipes is typically based upon the depth to diameter ratio (d/D). In this study, **existing** pipes are considered capacity deficient if the d/D is above 0.64 at peak dry weather flows. This d/D ratio was arrived at by taking 75 percent of a pipe's maximum stable flow capacity, which is at a d/D of 0.82. The area above a d/D of 0.82 is considered hydraulically unstable. This provides capacity for 25 percent of peak dry weather flow for inflow and infiltration. Calculated capacity deficiencies should be verified through flow monitoring prior to replacing facilities.

City of Manhattan Beach Sewer System Management Plan

The extra pipeline capacity allows for the possibility that actual wastewater flows may be slightly higher than anticipated, especially during the hours when instantaneous or intermittent peaks may occur. These peaks are generally observed between the hours of 6:00 a.m. and 9:00 a.m. and 7:00 p.m. and 9:00 p.m. during weekdays and somewhat later in the morning hours during weekends in the predominantly residential areas. They may also be observed during rainfall events due to inflow and infiltration. Additionally, the area above the water surface helps to keep the sewage aerated, reducing the possibility of septic conditions and odors.

For **new construction**, the design and analysis of gravity sewer pipes should be based on the following depth to diameter ratios:

- Pipes **12-inches and smaller** in diameter shall be designed to flow at a maximum **d/D of 0.50** under peak dry weather flows
- Pipes **15-inches and greater** in diameter shall be designed to flow at a maximum **d/D of 0.64** under peak dry weather flows
- For either group, the depth of flow to diameter ratio shall not exceed 0.82 with peak wet weather flows

At a minimum, all pipes should be 8 inches or larger in diameter and the velocity of flow in the pipe should be greater than 2 feet per second at average dry weather flow (ADWF). This velocity will prevent deposition of solids in the sewer and help to resuspend any materials that may have already settled in the pipe. The minimum corresponding slopes for various pipe sizes are shown in Table 4-3.

**Table 4-3
Minimum Sewer Sizes**

Sewer Size	2 ft/s Velocity Slope
8"	0.0057
10"	0.0042
12"	0.0033
15"	0.0019
18"	0.0014
21"	0.0011
24"	0.0008
27"	0.0008
30"	0.0007
33"	0.0006
36" & larger	0.0005

It is important to note that the slopes listed above assume the depth of flow in the pipe is 50 or 64 percent full. If there is insufficient flow to create this condition, greater slopes than those shown may be required.

The peak flow velocity should be less than 10 feet per second in vitrified clay pipe and 5 feet per second in poly vinyl chloride (PVC) pipe.

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Pump Station Design Criteria

It is desirable to develop a sewer collection system with as few pump stations as possible due to the associated cost and maintenance required. Pump stations must be designed to be reliable, and sized with sufficient capacity. They must contain redundant equipment, an emergency power supply, bypass pumping capability, sufficient wet well storage, and be able to notify the appropriate personnel in the event of failure.

The primary components of a typical pump station are the wet well, motors, valves, dry well, pumps, ventilation, electrical, controls and the force main. The following general criteria are recommended.

The wet well stores the incoming wastewater until a pump is activated to discharge it to a gravity facility for further conveyance. It should be designed with sufficient capacity to prevent short cycles whereby the pumps frequently start and stop, yet small enough that it will regularly evacuate sewage from the wet well to prevent the wastewater from becoming septic. Generally, the desired number of pump cycles should be limited to no more than 6 per hour for motors up to 10 horsepower. Motors up to 75 horsepower should start no more than 4 times per hour. Larger motors should cycle less frequently. Pump stations should also have sufficient volume to store sewage in the event of mechanical or electrical failures, until the City can respond to the failure and prevent overflows. The necessary emergency storage is dependent upon how rapidly the City can respond to a failure and mitigate it. A minimum emergency storage of 30 minutes at peak wet weather flow should be provided.

The pumps should be sized to efficiently handle the peak wet weather flows. A minimum of two pumps sized at the peak wet weather flow to the station should be provided so that sufficient standby capacity is available when one pump is removed for repairs or experiences a mechanical failure. The pumps should be able to pass a minimum solid size of 3 inches without clogging. The shafts, seals and impellers should be constructed of wear resistant material to provide long life. Tungsten Carbide seals, Ni-Hard impellers, and 316 stainless steel pump shafts are recommended. For services where aggressive agents may be found in the sewage, such as at golf courses, complete stainless steel construction is recommended. This includes the pump bowl, shaft, impeller, and motor housing.

The dry well houses the valves, pumps, motors and electrical equipment and controls. It must be well ventilated and provide unobstructed access to all equipment. A minimum 3-foot clearance from all obstructions should be provided. Greater clearances may be required for equipment with special maintenance needs. Provisions for equipment removal including hatches, large door openings, and hoists should also be provided.

The force mains should be selected to operate within a 3 feet per second to 5 feet per second velocity range, but should not be smaller than 4-inches in diameter.

While submersible pump stations may be utilized for the small flows, the larger pump stations should be the wet well/dry well type. They should be designed with easy access to all equipment. The National Electric Code classifies the wet wells of wastewater pumping stations as Class I, Group D, Division 1 facilities if ventilated at less than 12 air changes per hour, and Division 2 if continuously ventilated at 12 or more air changes per hour. Dry wells, which are physically separated from wet wells, if ventilated at less than 12 air changes per hour, are classified as Class I, Group D, Division 2 locations. Wet wells, and under certain circumstances dry wells, are considered confined spaces and should be entered in accordance with the corresponding requirements of Occupational Safety and Health Administration (OSHA).

City of Manhattan Beach Sewer System Management Plan

All pump stations should incorporate redundant control systems for operation of the pumps. A float system should be used as a backup for a primary control system that utilizes an ultrasonic device or a bubbler system for level measurement and pump operation.

Telemetry equipment which includes a telephone dialer as a minimum, must be provided at all sewer pump stations. When an alarm or failed condition occurs, the dialer calls pre-programmed telephone numbers in sequence until the call is acknowledged, indicating response will be provided by City staff. If the alarm or failed condition is not corrected within a set time, the dialer will call the pre-programmed numbers again. The dialer can also be used to remotely check the status of the station if desired. A summary of sewer system design criteria is listed in Table 4-4.

**Table 4-4
Sewer System Criteria**

Collection System	
Minimum Pipe Size	8-inch
Minimum Velocity	2.0 ft/sec at average flow 3.0 ft/sec at peak dry weather flow
Pipe Depth to Diameter Ratio for <i>Existing Pipes</i>	0.64 for all pipe sizes at peak dry weather flow 0.82 for all pipe sizes at peak wet weather flow
Pipe Depth to Diameter Ratio for <i>New Construction</i>	0.50 for pipes 12-inches and smaller at peak dry weather flow 0.64 for pipes 15-inches and larger at peak dry weather flow 0.82 for all pipe sizes at peak wet weather flow
Pump Stations	
Pumps	<ul style="list-style-type: none"> ▪ Minimum 2 each sized at peak wet weather flow ▪ Minimum solids handling capacity 3"
Wet Wells	<ul style="list-style-type: none"> ▪ Sized to limit pump cycling to less than 4 to 6 times/hr ▪ Provide sufficient storage at peak wet weather flow to allow response to a failure ▪ Equipment to be maintained must be accessible without entering structure
Ventilation	<ul style="list-style-type: none"> ▪ 12 -air changes/hour minimum in dry well and as required by NFPA 820 ▪ 30-air changes/hour minimum in wet well if not operated continuously ▪ 12-air changes/hour minimum in wet well if operated continuously
Controls	Redundant system. Float operated back-up controls.
Emergency Power	Stationary source with automatic transfer switch
Telemetry	Dialer system at all pump stations to alert personnel in the event of a station failure.
Force Mains	<ul style="list-style-type: none"> ▪ Minimum velocity 3.0 ft/sec, maximum velocity 5 ft/sec. ▪ Minimum size 4" ▪ Air/Vacs installed in vaults ▪ Plumb Air/Vac piping back to wet well to avoid discharges of raw sewage to vaults

City of Manhattan Beach Sewer System Management Plan

Service Life of Pipe and Lift Station Equipment

In addition to the design criteria discussed in previous sections, the useful lives for which one can expect relatively trouble-free service is also of great importance when assessing an existing or future sewer system. Once the service life of a facility is exceeded, it becomes subject to failure and is often expensive to maintain. The determination of useful life can be difficult and depends on many different considerations including the following:

- Type of materials used and recorded performance of similar installations
- Velocities and flow rates expected in the system
- Chemical and biological conditions of the wastewater
- Construction methods and installation

The values listed in Table 4-5 are generally accepted as prudent planning criteria and are used as benchmarks for replacement recommendations in this study.

**Table 4-5
Planning Criteria for Facility Useful Life**

Facility	Description	Useful Life (Years)
Gravity Sewers:	Cast Iron Pipe (CIP)	20
	Plastic Pipe	65
	Vitrified Clay Pipe (VCP)	75
Force Mains:	Asbestos-Cement Pipe (ACP)	40
	Ductile Iron Pipe (DIP)	40
	Plastic Pipe	30
Pump Stations:	Structure	60
	Piping	30
	Valving	20
	Mechanical	15
	Electrical	15

Criteria For Specific Plans and Development Subareas

Each party wishing to pursue development of a tract or area within the City's study area shall develop a Sub-Area Master Plan (SAMP). The developer's plans for providing adequate sewer service to all users within the proposed development, how the local sewer system will connect to the backbone and regional system, and the impact of the proposed development to the downstream facilities (starting at the local system and extending to the regional system) shall be fully described in the SAMP. The local sub-area sewers shall meet the sewer design criteria provided in this document and the City Standard Drawings for Sewer Construction. At a minimum, sewage flow calculations shall be based upon the unit flow factors described in Section 4-3, or higher factors if specific conditions require it.

City of Manhattan Beach Sewer System Management Plan

A typical Sub-Area Sewer Master Plan Report shall include, but not be limited to the following:

- Map showing project boundaries and drainage areas
- Detailed land use description and map
- Average dry weather, peak dry weather, and peak wet weather flow calculations
- Exhibit showing all proposed sewer facilities and connections to the downstream regional system
- Phasing of development and wastewater flows
- Hydraulic calculations for phased and fully developed ultimate conditions, from the development to the regional system, meeting all sewer design criteria

(b) Procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects.

The Public Works Department, Engineering Division, provides inspection on all rehabilitation and new sewer system construction contracts. Written inspection procedures are followed to ensure that sewer system facilities are built to conform to the plans and specifications. Inspections are conducted both on the jobsite and at material fabricators during manufacture and testing. The City does not accept the installed components until they pass all required performance tests and a field acceptance from the Public Works Inspector. New or rehabilitated system components are placed into service upon certification by the Public Works Inspector that they have been installed in accordance with plans and specifications.

References

- City of Manhattan Beach Wastewater Master Plan – *Section 4, Criteria*
- City of Manhattan Beach Plumbing Code
- Building News, “Standard Specifications for Public Works Construction,” (Anaheim, California, Latest Edition)
- Building News, “Public Works Inspectors’ Manual,” Anaheim, California, Latest Edition
- Standard Specifications for Public Works Construction (Green Book), the 2006 Edition

**City of Manhattan Beach
Sewer System Management Plan**

VIII. Overflow Emergency Response Plan

Overflow Emergency Response Plan: Each Enrollee shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan must include the following:

(a) Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner;

The City of Manhattan Beach Utilities Division maintains an up-to-date Sanitary Sewer Overflow Response Plan as mandated by the State Water Resources Control Board, which the City follows to provide formal notice to the Los Angeles County Department of Health (LACDH) and the Office of Emergency Services (OES). The City encourages citizens to report overflows to the Utilities Division via the Regional Communication Center by using the toll free telephone number "911". Utilities Division Staff is available 24 hours per day, seven days per week to receive and respond to calls, regardless of whether they originate on public or private property. Once verified, all sewer overflows regardless of volume or potential impact are reported to all parties in the chain of communication within the City and to the appropriate regulatory agencies, as shown in Figures 1 and 2 of the *Goals* element of this SSMP. Sewer overflows that enter the waters of the state, such as the ocean, must be reported OES immediately within 15 minutes of the knowledge of an overflow event. Immediate reporting also takes place when an overflow could potentially reach the waters of the State based on the Wastewater staff knowledge of the sewer and storm drain infrastructure. All other overflows must be reported to the LACDH and the RWQCB within two hours of the knowledge of overflow event.

(b) A program to ensure an appropriate response to all overflows;

The City's Overflow Response Plan presents a strategy for the mobilization of labor, materials, tools and equipment to correct or repair any condition which may cause or contribute to an SSO. The procedure requires full, immediate, and appropriate attention and response to a sanitary sewer overflow with the ultimate goal of minimizing impacts to public health and safety and the environment. Telephone calls to report overflows or other maintenance problems are answered 24 hours per day, 7 days per week. Wastewater personnel are immediately notified upon receipt of a reported potential sewer overflow and are instructed to respond immediately, regardless of whether the cause of the problem originates on public or private property. Written procedures are provided for assessing the overflow, notifying supervisors, documenting the overflow, estimating the volume of the overflow, sampling and laboratory analysis, posting warning signs and following up.

All construction contractors working on the City's sewer system are required to have Department of Public Works approved sewage flow bypass system and Emergency Response Plan in place prior to start of construction. Contractors are instructed to take immediate action to stop any overflow and to contact City personnel immediately.

**City of Manhattan Beach
Sewer System Management Plan**

(c) Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the MRP. All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Water Board WDRs or NPDES permit requirements. The SSMP should identify the officials who will receive immediate notification;

The City's Sanitary Sewer Overflow Response Plan outlines notification steps and includes a comprehensive contact and notification list. Notification depends on the severity and potential impact of the overflow. All sewer overflows that enter the waters of the state, such as the ocean, must be reported immediately – within 15 minutes of the knowledge of an overflow event, and/or when the Utilities Division's personnel determine that an overflow could potentially reach the waters of the State based on their knowledge of the sewer and storm drain infrastructure. In addition, immediate notification of the public and health agencies of overflows "that may imminently and substantially endanger human health" is required. All other overflows must be reported to the OES and the RWQCB within two hours of knowledge of overflow event.

The notification lists are updated to keep officials names and positions current. Construction contractors are required to take immediate measures to mitigate and report overflows as soon as they are discovered. The Department of Public Works inspectors report construction-related overflows to the Utilities Division and document the time, location, cause, estimated quantity, and any impact of the overflow, and take mitigation measures as needed.

(d) Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained;

All Utilities Division personnel have participated in a workshop on the City's Standard Operating Procedures (SOP) for the Sanitary Sewer System. The SOP is an active element of the City's Emergency Operations Center training program. All wastewater operation and maintenance staff are trained on emergency response procedures twice a year – one tabletop exercise and one field drill. New employees receive this training as part of their orientation and this training is reinforced during tailgate training sessions. Public Works Inspectors are also trained in emergency response procedures. The City emphasizes its goal to have no construction-related overflows during pre-bid and pre-construction meetings. Construction contractors are required to submit and obtain approval of all flow bypasses and emergency response plans prior to the start of construction.

(e) Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities;

Public health and safety are of paramount importance when a sewer system overflow occurs. Accordingly, City personnel are trained to utilize the *Work Area Control Handbook* in traffic and crowd control. The control systems and signage serve to provide safe and effective work areas, and to warn, control, protect and facilitate vehicular and pedestrian traffic. The City has implemented sewer system overflow response and reporting procedures that include timely reporting to regulatory agencies, tables for estimating overflow volume, and follow-up CCTV inspection to accurately determine cause and prevention methods. Adequate staff is placed on standby status to supplement existing staff as needed or respond to an emergency after hours.

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The City maintains a list of pre-qualified on-call contractors who provide specific equipment, materials, and crews to the City in emergency operations. The City's Police Department, Fire Department, and Public Works Department can be utilized to assist in emergency situations.

(f) A program to ensure that all reasonable steps are taken to contain and prevent the discharge of untreated and partially treated wastewater to waters of the United States and to minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.

The City seeks to protect public health & safety and the environment through the implementation of all Federal and State laws, standards, and orders applicable to untreated wastewater. Through a comprehensive and systematic program of cleaning, condition assessment, repair, and upgrade of its sewer system, the City has minimized all reasonable risks associated with the accidental discharge of sewage into the ocean. When an overflow occurs, the highest priorities are to contain the overflow and minimize, if not prevent, the overflow discharge into the storm drain system, and to minimize or eliminate exposure to the public and impact on public health. The City's Sanitary Sewer Overflow Response Plan provides guidance to the crews in order to accomplish this objective. A comprehensive investigation is performed for each overflow event to diagnose cause and take remedial measures to prevent and mitigate similar future events.

References

- City of Manhattan Beach Sanitary Sewer Overflow Response Plan
- Standard Operating Procedures for the City of Manhattan Beach Sanitary Sewer System
- Work Area Traffic Control Handbook, Latest Edition
- Standard Specifications for Public Works Construction (Green Book), the 2006 Edition

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VII. Fats, Oils, and Grease (FOG) Control Program

The City of Manhattan Beach amended Title 5, Sanitation and Health to include Chapter 5.38 - FATS, OILS AND GREASE MANAGEMENT AND DISCHARGE CONTROL. The purpose of this chapter is to facilitate the maximum beneficial public use of the City's sanitary sewer collection system while preventing blockages of sewer lines resulting from discharges of FOG into the sewer system, and to specify appropriate FOG discharge requirements for Food Service Establishments (FSEs) discharging into the City's sewer system.

(a) An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG;

The City of Manhattan Beach public education and outreach program is an ongoing effort that includes topics such as proper FOG management disposal procedures, as well as a general overview of the FOG Ordinance. Four outreach FOG workshops were provided to FSEs. Educational brochures and posters describing the FOG Control Program and Kitchen Best Management Practices are distributed to FSEs in English and Spanish. The City also maintains an up to date website, which serves as an additional source of information to the food service industry and the community at large. The FOG Ordinance, FOG Source Control Manual, and general information about eliminating FOG discharges into the sewer system are among the information items provided on the website.

(b) A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area;

The City does not own or operate any FOG disposal facilities. And the City does not allow FOG waste haulers to discharge waste FOG into the sewer system either. However, the Los Angeles County Sanitation District accepts FOG from its member agency service areas, of which the City of Manhattan Beach is a part, at its Joint Water Pollution Control Plant in the City of Carson.

(c) The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;

The City of Manhattan Beach implements the following FOG discharge prohibitions, which are set forth in the Municipal Code- Title 5, Sanitation and Health, Chapter 5.38 - SEWERS, SEWAGE DISPOSAL—CITY SEWAGE SYSTEM:

5.38.020 - Prohibitions.

The following prohibitions shall apply to all FSEs:

- A. No person shall discharge, or cause to be discharged any wastewater from FSEs directly or indirectly into the sewer system without first obtaining an FOG wastewater discharge permit pursuant to this chapter.
- B. Discharge of any waste, including FOG and solid materials removed from the grease control device to the sewer system, is prohibited.
- C. Discharge of any waste or FOG to the sewer system which fails to comply with the FOG Discharge Manual is prohibited.
- D. Discharge of any waste or FOG to the sewer system in a manner which either violates the sewer WDRs or causes or contributes to a condition which fails to comply with the sewer WDRs is prohibited.

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(d) Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements;

The City of Manhattan Beach implements the following requirements set forth in the Municipal Code- Title 5, Sanitation and Health, Chapter 5.36 - SEWERS, SEWAGE DISPOSAL—CITY SEWAGE SYSTEM:

5.38.030 - Best management practices required.

- A. All FSEs shall implement best management practices in its operation to minimize the discharge of FOG to the sewer system.
- B. All FSEs must implement and demonstrate compliance with best management practices (BMP) requirements as specified in the City's FOG Discharge Manual. Detailed requirements for best management practices are specified in the FOG Discharge Manual and may include kitchen practices and employees training that are essential in minimizing FOG discharges.

5.38.105 - Grease interceptor requirements.

- A. No waste water discharges from FSEs shall be introduced into the sewer system until the required grease interceptors have been approved by the Director.
- B. Grease interceptors shall be maintained in efficient operating condition in accordance with the FOG Discharge Manual.
- C. Grease interceptors must be cleaned, maintained, and FOG must be removed from grease interceptors at regular intervals.
- D. FOG removed from grease interceptors shall be waste hauled periodically as part of the operation and maintenance requirements for grease interceptors and disposed of at an approved location in a proper manner and at regular intervals.

5.38.110 - Monitoring and reporting conditions.

- A. Monitoring for Compliance with FOG Wastewater Discharge Conditions and Reporting Requirements.
 - 1. The Director may require periodic reporting of the status of implementation of best management practices, in accordance with the FOG control program and the FOG Discharge Manual.
 - 2. The Director may require visual and other monitoring at the sole expense of the permittee to observe the actual conditions of the FSEs sewer lateral and sewer lines downstream.
 - 3. The Director may require reports for self-monitoring of wastewater constituents and FOG characteristics of the permittee needed for determining compliance with any conditions or requirements as specified in the FOG wastewater discharge permit or this chapter. Monitoring reports of the analyses of wastewater constituents and FOG characteristics shall be in a manner and form approved by the Director and shall be submitted upon request of the Director.
 - 4. Failure by the permittee to perform any required monitoring, or to submit monitoring reports required by the Director constitutes a violation of this chapter and shall be cause for the City to initiate all necessary tasks and analyses to determine the wastewater constituents and FOG characteristics for compliance with any conditions and requirements specified in the FOG wastewater discharge permit or in this chapter.

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5. The permittee shall be responsible for any and all expenses of the City in undertaking such monitoring analyses and preparation of reports.
 6. Other reports may be required such as compliance schedule progress reports, FOG control monitoring reports, and any other reports deemed reasonably appropriate by the Director to ensure compliance with this chapter.
- B. Record Keeping Requirements. The permittee shall be required to keep all documents identified by the Director relating to its compliance with this chapter, including manifests, receipts and invoices of all cleaning, maintenance, grease removal of/from the grease control device, disposal carrier and disposal site location for no less than two (2) years. The permittee shall, upon request, make the manifests, receipts and invoices available to any City representative, or inspector. These records may include:
1. A logbook of grease interceptor, and/or other grease control device cleaning and maintenance practices;
 2. A record of best management practices being implemented including employee training;
 3. Copies of records and manifests of wastehauling interceptor contents;
 4. Records of sampling data and sludge height monitoring for FOG and solids accumulation in the grease interceptors; or
 5. Any other information deemed appropriate by the Director to ensure compliance with the ordinance from which this chapter was derived.
- C. Falsifying Information or Tampering with Process. It shall be unlawful to make any false statement, representation, record, report, plan or other document that is filed with the City, or to tamper with or knowingly render inoperable any grease control device, monitoring device or method or access point required under this chapter.

(e) Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG ordinance;

The City of Manhattan Beach implements the following requirements set forth in the Municipal Code- Title 5, Sanitation and Health, Chapter 5.36 - SEWERS, SEWAGE DISPOSAL—CITY SEWAGE SYSTEM:

5.38.120 - Right of entry.

Persons or occupants of premises where wastewater is created or discharged shall allow the Director, or City representatives, reasonable access to all parts of the FSE and all wastewater generating and disposal facilities for the purposes of inspection and sampling during all times the discharger's facility is open, operating, or any other reasonable time. No person shall interfere with, delay, resist or refuse entrance to City representatives attempting to inspect any FSE or facility involved directly or indirectly with a discharge of wastewater to the City's sewer system.

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5.38.130 - Enforcement.

- A. The City Council finds that, in order for the City to comply with the laws, regulations, and rules imposed upon it by regulatory agencies and to ensure that the City's sewer facilities are protected and are able to operate with the highest degree of efficiency, and to protect the public health and the environment, specific enforcement provisions must be adopted to govern the discharges to the City's sewer system by FSEs.
- B. To ensure that all interested parties are afforded due process of law and that violations are resolved as soon as possible, a permitted, or applicant for a permit, may appeal any determination made by the Director, including but not limited to a denial of a discharge permit, a notice of violation, permit suspension or revocation, or a compliance schedule agreement (CSA), pursuant to the procedures set forth in Section 5.38.185.
- C. The City, at its discretion, may utilize any one, combination, or all enforcement remedies provided in this chapter in response to any FOG wastewater discharge permit or chapter violations.

(f) An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section;

SSOs caused by blockages from FOG are monitored for location and required cleaning frequency. All blockages are plotted on a GIS overlay map. Locations with a high number of Sewers prone to FOG accumulation or blockages are given high priority and cleaned more frequently in an effort to prevent FOG-related overflows. All reaches, including “non-problem” sewers, are included in a routine preventive maintenance cleaning schedule. Scheduled and completed tasks are catalogued and tracked by work orders. The maintenance program includes preventive, proactive, predictive, and corrective maintenance; maintenance engineering; and quality control.

(g) Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified in (f) above.

The City’s FOG Ordinance requires FSEs to have an industrial wastewater permit, comply with source control measures for all sources of grease, implement Best Management Practices, install grease interceptors as applicable, and are subject to annual inspections to verify continuous compliance.

The FOG Ordinance provides the City with the legal authority to inspect FSE premises and monitor the implementation of Best Management Practices. As part of routine inspection activities, the City’s contracted inspector determines permit requirements and verifies observance of FOG Ordinance provisions. Additionally, information and training materials such as multi-language Best Management Practices posters, an ordinance summary, and lists of licensed grease waste haulers are provided to help FSEs comply with the FOG Ordinance.

Installation of grease interceptors is required at all FSEs that have the potential to generate FOG, unless a Conditional Waiver is granted. In the event an industrial discharger fails to comply with the requirements of the FOG Control Ordinance, Director of Public Works takes immediate enforcement action by applying one or more of the following sections of the FOG Ordinance:

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5.38.140 - Compliance schedule agreement (CSA).

- A. Upon determination by the Director that a permittee or other owner or operator of an FSE or owner of a property is in noncompliance with the terms and conditions specified in its permit or any provision of this chapter, or needs to construct and/or acquire and install a grease control device or grease interceptor, the Director may require the permittee, owner or operator to enter into a CSA.
- B. The issuance of a CSA may contain terms and conditions as determine appropriate by the Director, including but not limited to requirements for installation of a grease control device, grease interceptor and facilities, submittal of drawings or reports, audit of waste hauling records, best management and waste minimization practices, payment of fees, or other provisions to ensure compliance with this chapter.
- C. The Director shall not enter into a CSA until such time as all amounts owed to the City, including user fees, noncompliance sampling fees, or, or other amounts due are paid in full, or an agreement for deferred payment secured by collateral or a third party, is approved by the Director. If compliance is not achieved in accordance with the terms and conditions of a CSA during its term, the Director may issue an order suspending or revoking the discharge permit pursuant to this chapter.

5.38.145 - Permit suspension.

- A. The Director may suspend any permit when it is determined that a permittee:
 - 1. Fails to comply with the terms and conditions of a CSA order;
 - 2. Knowingly provides a false statement, representation, record, report, or other document to the City;
 - 3. Refuses to provide records, reports, plans, or other documents required by the City to determine permit terms or conditions, discharge compliance, or compliance with this chapter;
 - 4. Falsifies, tampers with, or knowingly renders inaccurate any monitoring device or sample collection method;
 - 5. Refuses reasonable access to the Permittee's premises for the purpose of inspection and monitoring;
 - 6. Does not make timely payment of all amounts owed to the City for user charges, permit fees, or any other fees imposed pursuant to this chapter;
 - 7. Causes interference, sewer blockages, or SSOs with the City's collection, treatment, or disposal system; or
 - 8. Violates grease interceptor maintenance requirements, any condition or limit of its discharge permit or any provision of this chapter.
- B. When the Director has reason to believe that grounds exist for permit suspension, he/she shall give written notice thereof by certified mail to the permittee setting forth a statement of the facts and grounds deemed to exist.
- C. Effect.
 - 1. Upon an order of suspension by the Director, the permittee shall immediately cease and desist its discharge and shall have no right to discharge any wastewater containing FOG directly or indirectly to the City's system for the duration of the suspension. All costs for physically terminating and reinstating service shall be paid by the permittee.
 - 2. Any owner or responsible management employee of the permittee shall be bound by the order of suspension.

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5.38.150 - Permit revocation.

- A. Revocation. The Director may revoke any FOG wastewater discharge permit when it is determined that a permittee has failed to comply with this chapter.
- B. Notice of Revocation. When the Director has reason to believe that grounds exist for the revocation of a permit, he/she shall give written notice by certified mail thereof to the permittee setting forth a statement of the facts and grounds.
- C. Effect of Revocation.
 - 1. Upon an order of revocation by the Director becoming final, the permittee shall permanently lose all rights to discharge any wastewater containing FOG directly or indirectly to the City's system. All costs for physical termination shall be paid by the permittee.
 - 2. Any owner or responsible management employee of the permittee shall be bound by the order of revocation.
 - 3. Any future application for a discharge permit at any location within the City by any person associated with an order of revocation will be considered by the City after fully reviewing the records of the revoked permit, which records may be the basis for denial of a new permit.
 - 4. An order of permit revocation issued by the Director of Public Works shall be final in all respects on the sixteenth (16th) day after it is mailed to the permittee.

5.38.165 - Termination of service.

- A. The City, by order of the Director, may physically terminate sewer service and water service to any FSE, as follows:
 - 1. On a term of any order of suspension or revocation of a permit; or
 - 2. Upon the failure of a person not holding a valid discharge permit to immediately cease the discharge, whether direct or indirect, to the City's sewer facilities after the notice and process as provided herein.
- B. All costs for physical termination shall be paid by the owner or operator of the FSE or permittee as well as all costs for reinstating service.

5.38.170 - Emergency suspension order.

The City may, by order of the Director, suspend sewer service and/or water service when the Director determines that such suspension is necessary in order to stop an actual or impending discharge which presents or may present an imminent or substantial endangerment to the health and welfare of persons, or to the environment, or may cause SSOs, sewer blockages, interference to the City's sewer facilities, or may cause the City to violate any State or Federal law or regulation. Any discharger notified of and subject to an emergency suspension order shall immediately cease and desist the discharge of all wastewater containing FOG to the sewer system.

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5.38.175 - Civil penalties.

In addition to criminal penalties and administrative penalties authorized by this Code, all users of the City's system and facilities are subject to enforcement actions administratively or judicially by the City, U.S. EPA, State of California Regional Water Quality Control Board, or the County of Orange Los Angeles, and other regulatory agencies. Said actions may be taken pursuant to the authority and provisions of several laws, including but not limited to:

1. Federal Water Pollution Control Act, commonly known as the Clean Water Act (33 U.S.C.A. Section 1251 et seq.);
 2. California Porter-Cologne Water Quality Control Act (California Water Code Section 13000 et seq.);
 3. California Hazardous Waste Control Law (California Health & Safety Code Section 25100 et seq.);
 4. Resource Conservation and Recovery Act of 1976 (42 U.S.C.A Section 6901 et seq.); and
 5. California Government Code, Sections 54739—54740.
- A. In the event the City is subject to the payment of fines or penalties pursuant to the legal authority and actions of other regulatory or enforcement agencies based on a violation of law or regulation or its permits, and said violation can be established by the City, as caused by the discharge of any user of the City's system which is in violation of any provision of the City's chapter or the user's permit, the City shall be entitled to recover from the user all costs and expenses, including, but not limited to, the full amount of said fines or penalties to which it has been subjected.
- B. Pursuant to the authority of California Government Code Sections 54739—54740, any person who violates any provision of this chapter; any permit condition, prohibition or effluent limit; or any suspension or revocation order shall be liable civilly for a sum not to exceed twenty-five thousand dollars (\$25,000.00) per violation for each day in which such violation occurs. Pursuant to the authority of the Clean Water Act, 33 U.S.C. Section 1251 et seq., any person who violates any provision of this chapter, or any permit condition, prohibition, or effluent limit shall be liable civilly for a sum not to exceed twenty-five thousand dollars (\$25,000.00) per violation for each day in which such violation occurs. The City Attorney of the City, upon request of the Director, shall petition the Superior Court to impose, assess, and recover such penalties, or such other penalties as the City may impose, assess, and recover pursuant to Federal and/or State legislative authorization.
- C. Administrative Civil Penalties. Pursuant to the authority of California Government Code Sections 54740.5 and 54740.6, the City may issue an administrative complaint to any person who violates:
1. Any provision of this chapter;
 2. Any permit condition, prohibition, or effluent limit; or
 3. Any suspension or revocation order.

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5.38.180 - Criminal penalties.

Any person who violates any provision of this chapter is guilty of a misdemeanor, which upon conviction is punishable by a fine not to exceed one thousand dollars (\$1,000.00), or imprisonment for not more than six (6) months, or both. Each violation and each day in which a violation occurs may constitute a new and separate violation of this chapter and shall be subject to the penalties contained herein.

References

- City of Manhattan Beach Municipal Code, Title 5, Sanitation and Health – Chapter 5.38 - FATS, OILS AND GREASE MANAGEMENT AND DISCHARGE CONTROL.
- City of Manhattan Beach FOG Source Control Manual

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VIII. System Evaluation and Capacity Assurance Plan

The Enrollee shall prepare and implement a capital improvement plan (CIP) that will provide hydraulic capacity of key sanitary sewer system elements for dry weather peak flow conditions, as well as the appropriate design storm or wet weather event. At a minimum, the plan must include:

(a) **Evaluation:** Actions needed to evaluate those portions of the sanitary sewer system that are experiencing or contributing to a Sanitary Sewer Overflow (SSO) discharge caused by hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events.

To perform a detailed evaluation of the capacity of the sewer collection system, it is convenient to create a mathematical model that is capable of simulating the operating characteristics of the system. The simulations for this study were performed on a Microsoft Windows based computer utilizing software designed for the analysis of sewer systems. The software selected for this study is InfoSewer. It is an ArcGIS-based computer program with the ability to perform steady state analyses of the flows in the sewer system. InfoSewer offers direct ArcGIS integration allowing GIS analysis and hydraulic modeling to exist in a single environment. The program also manages and maintains the database that stores the sewer analysis input and output results. Manning's Equation is used for depth of flow calculations in the gravity sewer pipes.

Geometric Model

As a part of this Master Plan project, the City's Wastewater GIS was developed. As-built plans were georeferenced and the wastewater facilities were then digitized. Data was collected from the as-built plans and input into the GIS. The developed Wastewater GIS served as the basis of the system geometric model. Data utilized included upstream and downstream manhole invert elevations, pipe sizes and pipe lengths. Design pipe slopes were calculated from the invert elevations and reach lengths.

Inverts for approximately 4.8 percent of the system (99 reaches out of 2,078) were not found through a search of the City's available construction plans. Invert elevations for these reaches were obtained through field surveying. Detailed survey information is provided in Appendix 2 of the Wastewater Master Plan.

The hydraulic model includes the entire sewer system that is owned and operated by the City, from the uppermost reaches of the system to its confluence with a Los Angeles County Sanitation District (LACSD) trunk sewer or until the flow exits the City into an adjacent agency facility. Excluded from the model are laterals, private sewers, and any areas within the City that are provided sewer service by other agencies. The pipe information utilized in the model, including size, material, length, and upstream/downstream manhole elevations is listed in Appendix 3 of the Wastewater Master Plan.

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Land Use

The parcel layer, which provides the City's 2003 General Plan land use information, was used as the land use base map. The land uses within the City boundaries are shown on Figure 3-4 of the Wastewater Master Plan. Since the City's service area is mostly developed, the hydraulic analyses were conducted assuming fully developed and occupied tributary areas.

Split Manholes and Flow Patterns

The existing system consists of 16 split manholes (more than one pipe exiting the manhole) were identified in the collection system. Most of the split manholes occur at high points in the system, where the manhole is typically dry. In general, the flows at the split manholes were divided by calculations based on invert elevations, downstream pipes sizes, and downstream slopes at the split manhole.

**Table 7-1
Flow Split Locations**

No.	Manhole ID	Location	Flow Directions from Split Manhole	Comments
1	06-009	Cedar Ave & 16th St	East-West	High Point
2	06-011	Sepulveda Blvd & 17th St	North-South	High Point
3	06-040	Meadows Ave & 12th St	North-South	High Point
4	06-168	Dianthus St & 11th St	East-West	High Point
5	06-193	Pacific Ave & 23rd St	North-South	High Point
6	06-203	Poinsettia Ave & 18th St	North-South	High Point
7	06-225	Pine Ave & 19th St	North-South	High Point
8	06-230	Elm Ave & Marine Ave	North-South	High Point
9	06-245	Palm Ave & 23rd St	North-South	High Point
10	06-277	Sepulveda Blvd & 30th St	North-South	High Point
11	06-287	Elm Ave & 30th St	North-South	High Point
12	10-148	Ingleside Dr & 1st St	South- Southeast	-
13	11-001	19 th St & Ardmore Ave	East-West	High Point
14	16-021	Bell Ave & 27th St	North-Northwest	-
15	17-027	36th Pl & Blanche Rd	East-West	High Point
16	20-059	Manhattan Ave & 24th St	North-West	-

Tributary Areas

Polygons were created around individual sewer manholes to define the tributary area to each manhole. Most manholes have a tributary area assigned to it unless there are multiple manholes in the same area. Approximately 1,530 polygons were created for the existing and ultimate system analysis. A sample area, displaying the tributary area polygons is shown on Figure 7-1.

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Figure 1 Tributary Area Polygons



Model Loads

For each tributary area, the existing land uses (discussed in Subsection 3-5) and the developed unit flow factors (see Table 4-2 of the Wastewater Master Plan) were utilized to apply the average loads to the hydraulic model. Peak dry weather flows are calculated in the model by a user defined relationship. The peaking formula used in the City's sewer model is as follows:

$$\text{PDWF (cfs)} = 2.35 \times \text{ADWF(cfs)}^{0.92}$$

Pumped Flows

There are two separate analysis methods that can be used on the City's sewer collection system to evaluate the effect of pumped flows downstream of the existing 8 pump stations. A description of each of the analysis methods is as follows:

Method 1: The average tributary flow to each pump station was transferred to the manholes located at the discharge end of the respective forcemains. The total average flow was peaked and the downstream sewer depth to diameter ratios were evaluated based on the calculated peak dry weather flows, or

$$Q_{pdw} = (2.35 \times Q_{adw}^{0.92}) \text{ (in mgd)}$$

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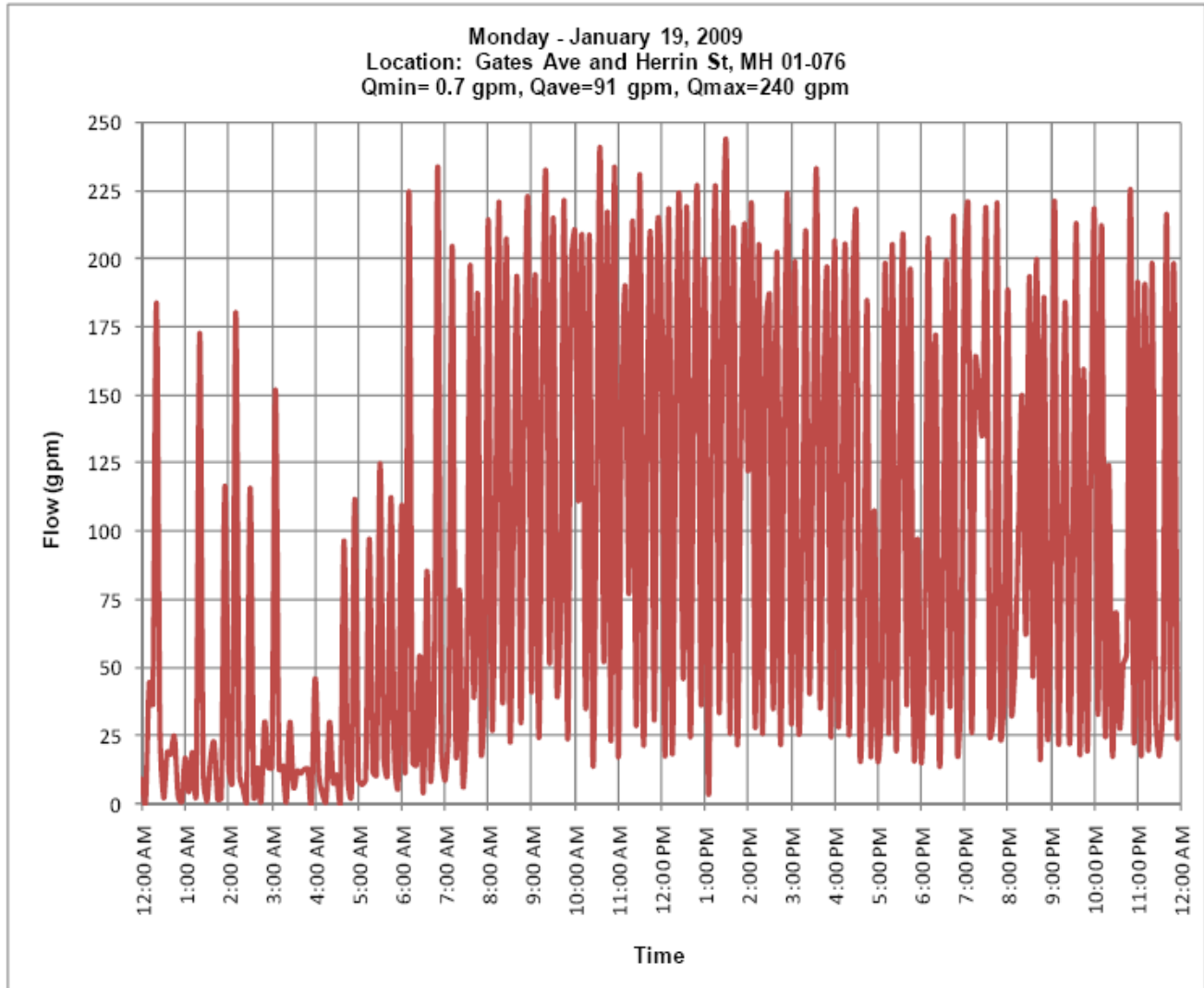
Method 2: The pump capacity of each pump station was transferred to the manholes located at the discharge end of the respective forcemains. The pump capacities were not peaked, but added to the peak dry weather flow at each manhole located downstream of the pump station. The downstream sewer depth to diameter ratios were evaluated based on the calculated peak dry weather flows plus the pump capacities (Q_{pump}), or

$$Q_{pdw} = (2.35 \times Q_{adwf}^{0.92}) + Q_{pump} \text{ (in mgd)}$$

Flow monitoring results have shown that pump discharge becomes more and more attenuated the further downstream in the system the monitor is placed. Often times, only the first few reaches located immediately downstream of the discharge point will experience a rush of flow that reflects the pump capacity as displayed on Figure 7-2. In this study, the pump capacity was only considered in the first few reaches downstream of the pump discharge locations. For the pipes located a far distance from the pump discharge point, the calculated peak dry weather flow based on land use and unit flow factors was utilized for analysis.

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Figure 2
Flow Monitoring of 8" Sewer with Influence from Voorhees Pump Station



Hydraulic Analysis Results

At the completion of a modeling run, output data is created for viewing on the screen or for printing. Output data for pipes include flow rate, velocity, full pipe capacity, ratio of flow depth to diameter, and required size of replacement or relief pipes to satisfy the established criterion. Appendix 4 of this Wastewater Master Plan contains the results of hydraulic analyses of the sewer collection system.

The depth to diameter ratio exceeded the established criteria of 0.64 at the following locations:

1. Bell Avenue at 25th Street (Pipe ID 15084-070L4)
10" diameter sewer with peak $d/D > 1.00$
No pump station influence
As-built plans show a slope of 0.00 and a length of 10 feet. The downstream manhole 070L4 is a LACSD manhole. It is recommended that the slope of this sewer be verified.

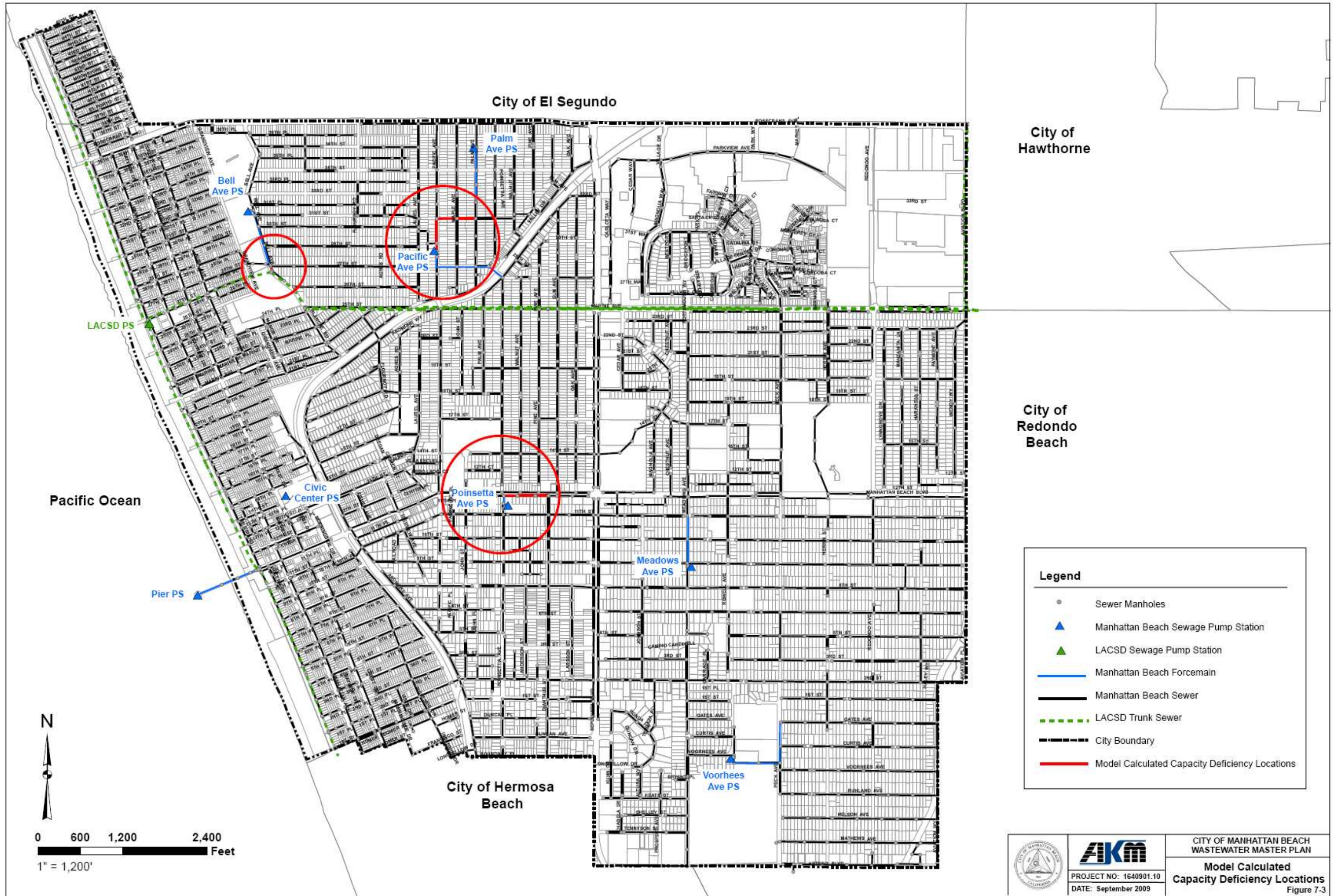
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2. Pacific Avenue north of 27th Street (Pipe ID 08077-08082)
 8" diameter sewer with peak $d/D=0.66$ with no pump station influence
 8" diameter sewer with peak $d/D>1.00$ with pump station influence from Palm Avenue PS (see Table 7-2 and description below)

A few reaches downstream of the Poinsettia Avenue Pump Station, Palm Avenue Pump Station, and Bell Avenue Pump Station discharge locations resulted in d/D ratios greater than 0.64 when the pump capacities were implemented (Method 2). These locations are listed in Table 7-2 and shown on Figure 7-3. It is recommended that flow monitoring be conducted in these areas to verify the d/D ratios prior to implementing any replacement projects.

**Table 7-2
Pipes with Model Calculated Capacity Deficiencies Downstream of Pump Discharge Points**

Pipe ID	U/S MH ID	D/S MH ID	Dia (in)	Length (ft)	Slope	ADWF (mgd)	Pumped Flow (mgd)	PDWF (mgd)	PDWF Vel (ft/s)	PDWF d/D	PDWF Depth (ft)	Full Flow (mgd)	Comments
06173-06174	06-173	06-174	8	192	0.0040	0.0019	0.7363	0.7437	3.30	1.00	0.67	0.4959	D/S of Poinsettia PS
06174-06175	06-174	06-175	8	254	0.0040	0.0028	0.7363	0.7469	3.31	1.00	0.67	0.4962	D/S of Poinsettia PS
06175-06176	06-175	06-176	8	190	0.0136	0.0033	0.7363	0.7485	4.51	0.69	0.46	0.9125	D/S of Poinsettia PS
08037-08052	08-037	08-052	8	262	0.0040	0.0446	0.4085	0.5430	2.41	1.00	0.67	0.4957	D/S of Palm PS
08052-08055	08-052	08-055	8	281	0.0040	0.0583	0.4085	0.5805	2.57	1.00	0.67	0.4944	D/S of Palm PS
08055-08077	08-055	08-077	8	350	0.0040	0.0637	0.4085	0.5951	2.64	1.00	0.67	0.4953	D/S of Palm PS
08077-08082	08-077	08-082	8	110	0.0040	0.0858	0.4085	0.6538	2.90	1.00	0.67	0.4951	D/S of Palm PS
16019-16022	16-019	16-022	8	68	0.0099	0.0131	0.5728	0.6164	3.84	0.67	0.45	0.7809	D/S of Bell PS
16022-070L3	16-022	07-0L3	10	18	0.0028	0.0135	0.5728	0.6176	2.38	0.69	0.58	0.7504	D/S of Bell PS
Total				1,725									



		CITY OF MANHATTAN BEACH WASTEWATER MASTER PLAN
		Model Calculated Capacity Deficiency Locations
		Figure 7-3

PROJECT NO: 1640901.10
DATE: September 2009

City of Manhattan Beach Sewer System Management Plan

(b) Design Criteria: Where design criteria do not exist or are deficient, undertake the evaluation identified in (a) above to establish appropriate design criteria;

Establishing performance standards is an important part of evaluating a wastewater collection system, as it forms the basis for system analysis and system improvement recommendations. These standards include methodology for estimating wastewater design flows and minimum design standards for the collection system pipes pump stations, and force mains.

Average wastewater flows can be reasonably estimated from land use and their corresponding unit flow factors. The results are then compared to measured flows. Peaking factors are needed for estimating peak dry weather and peak wet weather flows. Peak wet weather flows include an allowance for inflow and infiltration.

Collection system design standards include minimum pipe size, minimum flow velocity and depth of flow to pipe diameter ration. Pump station criteria include the capacity and number of pumps, wet wells and force main sizes, redundancy, emergency power, remote monitoring capabilities, as well as safety and regulatory agency requirements. Finally, facility useful lives are needed for adequately scheduling replacement of the aging infrastructure.

A comprehensive set of criteria for planning and design of new sewers, pump stations, force mains, and appurtenances, and for the rehabilitation of existing sewers are used to address:

- Flow Monitoring
- Unit Flow Factors
- Peaking Factors – Dry Weather and Wet Weather
- Inflow and Infiltration
- Sewer Design Criteria
- Pump Station Design Criteria – wet wells, pumps, dry well, force mains, SCADA
- Service Life of Pipe and Lift Station Equipment
- Sewer System Operation and Maintenance

(c) Capacity Enhancement Measures: The steps needed to establish a short- and long-term CIP to address identified hydraulic deficiencies, including prioritization, alternatives analysis, and schedules. The CIP may include increases in pipe size, I/I reduction programs, increases and redundancy in pumping capacity, and storage facilities. The CIP shall include an implementation schedule and shall identify sources of funding.

The primary goal of the Capital Improvement Program (CIP) is to provide the City of Manhattan Beach with a long-range planning tool for implementing its sewer infrastructure improvements in an orderly manner and a basis for financing of these improvements. To accomplish this goal, the program is phased based upon the implementation cost of the facilities, the quantity of work the City can reasonably administer each year, and the funds available for these projects.

City of Manhattan Beach Sewer System Management Plan

Capital Improvement Projects Priorities

The capital improvement projects were selected primarily with consideration of the health and safety of the public and protection of the environment by minimizing the possibility of overflows. The projects that will eliminate the capacity deficiencies in the gravity collection system are prioritized based upon the hydraulic analyses conducted during this Wastewater Master Plan. As the City completes CCTV inspection of the system, severe and major defects identified should be incorporated into the CIP and addressed. When the CCTV inspection is completed and a full condition assessment has been conducted, the capital improvement project priorities should be reevaluated.

Collection System Capacity Improvement Projects

The collection system capacity improvement projects include the areas identified with a capacity deficiency in the hydraulic model when pump capacities were implemented. It is recommended that the identified locations be flow monitored to verify the d/D ratios prior to implementing any replacement projects. Operations staff has not indicated that these areas are a problem. Therefore, until the deficiencies are verified in the field, these projects are considered low in priority. Details of the project locations are presented in Table 7-2 of Wastewater Master Plan.

Collection System Condition Improvement Projects

The condition improvement projects are prioritized solely on the condition of the pipe as determined from reviews of the CCTV recordings. The condition deficiencies with critical structural damage and severe obstructions were given the highest priority. Sewer pipes with conditions categorized as “Severe” or “Major” and manholes categorized as in poor condition are included in the recommended improvements. Details of the projects are presented in Table 8-3 and Table 8-4 of the Wastewater Master Plan.

The planning level recommendations are based upon the ranking and pipe defects from the CCTV inspection reports, and reviews of recordings. It may be possible to reline, repair or perform root treatment on some of the existing gravity pipes, in lieu of replacing them. Actual improvements should be designed based upon further detailed reviews of each recording, taking into consideration other factors such as location, age, capacity of the pipe, existing utilities, and concurrent infrastructure construction projects. The useful life gained from replacing the deficient facilities will be longer than repairs and relining projects. Root treatment is usually a temporary solution. Unless the source is removed, it is likely that the roots will get thicker as time passes and the root intrusion will continue until the pipe is replaced.

Pump Station Improvements

The recommended pump station capital improvement projects have been based upon condition assessment of each facility, capacity analysis, and conformance with the adopted criteria. The implementation priorities should be based upon the likelihood of a failure that may result in a spill, the volume of spill, and its impact on the public and the environment. The condition assessment and analysis results are described in detail Section 6 for each pump station.

City of Manhattan Beach Sewer System Management Plan

Capital Improvement Program

The Capital Improvement Program is developed based upon the results of the hydraulic analyses and the established priorities. The recommended improvement project locations are illustrated on Figure 10-1. Gravity collection system projects are listed in Table 10-1 and Table 10-2 of the Wastewater Master Plan by priority, along with cost estimates. The cost estimates presented in Table 10-1 and Table 10-2 reflect replacement of the existing facilities. Replacement costs are generally more conservative and will therefore allow the City more flexibility for each project. The pipeline construction costs are based upon \$45 / diameter inch / ft. Preliminary design studies should be conducted utilizing detailed utility information to identify and evaluate project alternatives such as parallel pipes and/or diversions prior to final design. When sewers are replaced, they should be relocated into the walk ways or right-of-ways as much as possible if they are currently in a location that cannot be easily accessed.

The City of Manhattan Beach is largely occupied and there are many existing utilities to consider. Therefore, the costs of replacing sewer facilities will be generally higher than in an area that is undeveloped. The total costs shown in Table 10-1 and Table 10-2 include engineering, administration and contingency costs, estimated at 35% of the construction cost. The manhole rehabilitation and replacement projects are listed in Table 10-3 of the Wastewater Master Plan. The pump station and forcemain improvement projects are listed in Table 10-4 of the Wastewater Master Plan. The recommended projects have been based upon the best information currently available. It should be updated as new information becomes available from sources such as CCTV inspections and from maintenance crew observations. The project priorities may be revised to correspond to changed conditions, such as impending facility failures, or to take advantage of concurrent construction such as street paving projects or adjacent infrastructure work. Some of the projects recommended are small and it may not be feasible to implement them as a single project. Therefore, several projects should be combined and bid as a package. Some of the projects may be broken down into smaller components to fit the City's budgetary and other obligations.

The total Wastewater Capital Improvement Program is shown in Table 10-5 of the Wastewater Master Plan. The total CIP costs are estimated at \$40,259,640.

The City's WCIP is funded by revenues generated through collection of fees for wastewater services. The waste water rate scale is determined as 80% of the volume of potable water used times the prevailing wastewater sewer rate. WCIP funding is augmented through the issuance of revenue bonds.

(d) Schedule: The Enrollee shall develop a schedule of completion dates for all portions of the capital improvement program developed in (a)-(c) above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section D.

The City's rolling Five-Year Capital Improvement Program is reviewed and updated annually and lists all capital improvement projects scheduled for implementation during the following 5 years. Inclusion in the CIP is determined by a risk-based prioritization system. Capital improvement projects for the City's Sanitary Sewer System are listed in a section entitled "Collection System (CS)."

**City of Manhattan Beach
Sewer System Management Plan**

References

- City of Manhattan Beach Wastewater Master Plan – *SECTION 6, Existing Pump Stations; Section 7, Hydraulic Model and Collection System Capacity Analysis; Section 8, Condition Assessment; and Section 10, Capital Improvement*
- City of Manhattan Beach Five-Year Capital Improvement Program

**City of Manhattan Beach
Sewer System Management Plan**

IX. Monitoring, Measurement, and Program Modifications

The Enrollee shall:

(a) Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;

The City has multiple ongoing programs that support the collection and management of data and information essential to successful implementation of its Sewer System Management Plan (SSMP). Major SSMP activities are established and prioritized as follows:

Information Management Systems

The City's information management system is an integral and essential element of the operation and maintenance program. All attributes of each sewer segment are included in a comprehensive inventory database. Information regarding all maintenance activities, sewer condition, overflows, and odor complaints is entered into the database. This information is routinely evaluated to document maintenance needs, identify problem locations, and assist in analysis of overflow events and odor complaints. This data is available to quickly identify and visualize problem areas, communicate actual condition and maintenance needs to operation and maintenance staff, prioritizes cleaning and root removal activities, and provide for corrective measures. CCTV records housed in the GIS data base are a primary tool used to prioritize and schedule sewer assessments and maintenance activities in their preventive maintenance program.

Sewer Condition Assessment

To assess the condition of CCTV inspected sewers, the City uses the National Association of Sewer Service Company (NASSCO) Pipeline Assessment and Certification Program (PACP) coding procedures, which utilized a five-category rating system based on the types and severity of defects. They range from 1 (excellent) to 5 (Immediate Attention) condition. The condition ratings trigger follow-up actions that could include increased monitoring and maintenance to keep a problem sewer fully operational while a capital improvement project is being developed and implemented to provide long-term solution. Rehabilitation or replacement projects are developed and scheduled for implementation on a prioritized basis with other identified needs. Category 1 and 2 sewers are in excellent to good condition and are scheduled for continued inspections and monitoring on 10-year cycles. Category 3 condition sewers are considered to be in fair condition and are scheduled for follow-up inspections once every five years. Category 4 condition sewers are considered in poor condition are closely monitored and are included in the Wastewater Capital Improvement Program (WCIP) for replacement or rehabilitation within five years. Increased preventive measures are taken for Category D condition sewers, as appropriate, to avoid emergency situations and follow-up inspections are conducted annually. Category 5 condition sewers are considered to be in need of immediate action. These are sewers where a pipe failure has already occurred or there is a full flow obstruction. Condition E sewers are immediately repaired and restored to condition A or B sewers.

City of Manhattan Beach Sewer System Management Plan

Operation and Maintenance Program

The City has an extensive proactive and preventive maintenance program for its collection system. Maintenance is performed by five Wastewater Division staff. Preventive maintenance is focused on critical and problematic areas. The critical sewers are identified, prioritized and scheduled for maintenance based on a comprehensive review of maintenance history and system characteristics of all sewers in the City including overflows, blockages, excessive maintenance, age, pipe material, and condition assessment records.

In an effort to prevent overflows, flow monitoring and CCTV records are reviewed to identify potential weaknesses in the system. Sewers that are in poor condition are identified through this process. These assessment activities may trigger further reviews to determine cause and/or may trigger immediate or accelerated corrective actions. Maintenance priorities are set based on the relative severity of the problem.

The City has implemented a proactive maintenance program where all eighty six miles of sewer lines are jetted twice per year and “Hot Spots” are jetted once per month. The City’s six lift stations are inspected and wet wells are cleaned twice a week.

Overflow Emergency Response

The Utilities Manager and staff meet monthly to review emergency response actions and collaborate on methods and procedures that will improve performance. Aggressive performance standards for timely response to sewer overflows are established and communicated to the overflow response team. Response protocol is reviewed periodically and updated as needed based on a review of established and actual response times.

(b) Monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP;

The City’s SSMP is a well-integrated plan with each element designed to complement and support the other elements. Each year as a part of the City’s rolling Five-Year Capital Improvement Program, the SSMP goals are set, the deliverables required to meet goals are defined and prioritized, lead and support staff and resources are assigned, and progress is measured and reported to ensure the City is meeting or exceeding goals and achieving full compliance with the SSMP requirements. Overall SSMP performance is evaluated and reported to management quarterly, and annually following the end of each fiscal year. Any plan updates necessary to enhance the SSMP performance are identified and become a part of the following year’s rolling Five-Year Capital Improvement Program as a part of this process.

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(c) Assess the success of the preventative maintenance program;

The City assesses the success of its programs by analyzing the condition assessment results and keeping track of the quantities and trends of various types of sewer blockages and overflows as well as odor problems and complaints. Successful practices are continued and program adjustments are made when appropriate.

Examples of these assessments include: weekly condition assessment review meetings, monthly Sanitary Sewer Overflow (SSO) reviews, annual capacity assurance review, and a comprehensive annual review of the preventive maintenance program.

The City's preventive measures also include community outreach and education programs on the workings of the sewer system and steps the public can take to help reduce blockages and overflows.

(d) Update program elements, as appropriate, based on monitoring or performance evaluations;

This section lists some examples of ongoing monitoring and review processes that are part of the City's system performance evaluation and continual improvement.

- **Annual review of preventive maintenance**

On an annual basis a comprehensive review of the maintenance program is conducted. The critical sewers are identified, prioritized and scheduled for maintenance based on a comprehensive review of maintenance history and system characteristics of all sewers in the City including overflows, blockages, excessive maintenance, age, pipe material and condition assessment records.

In an effort to prevent overflows, CCTV records are reviewed to identify potential weaknesses in the system. Sewer locations that are in poor condition are identified through this process. These assessment activities may trigger further reviews to determine cause and/or may trigger immediate or accelerated corrective actions. Maintenance priorities are set based on the relative severity of the problem.

- **Fats, Oils, and Grease (FOG) Control Program**

The City is implementing a robust program that includes annual Fats, Oils and Grease restaurant inspections, and ongoing user education and involvement. As a result, amendments and improvements are made to the program with active support of the FSEs. The program goal is to eliminate all preventable sewer overflows caused by grease.

- **Root Control Program**

The City performs routine mechanical root removal in areas of known root intrusion.

- **Construction**

To avoid construction related sewer overflows to comply with the City's "zero [construction] spill" policy requires that a spill prevention and response plan be developed and implemented for all sewer construction projects. The City's zero spill policy is documented in the "Standard Specifications for Public Works Construction (Green Book)".

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(e) Identify and illustrate SSO trends, including: frequency, location, and volume.

SSO trends are identified and tracked through a state-of-the art GIS tracking system. When complaints are called in, they are uploaded to a master database and plotted on a City-wide map. The City's information management system is an integral part of the operation and maintenance program. All attributes of each sewer pipe gravity and pressure segment are included in a comprehensive inventory database. Information regarding each new overflow and odor complaint is entered into a maintenance management database. This information is evaluated to document locations, causes, and frequency of overflows and odors. This data is overlain on a GIS base map of the sewer system to quickly identify and visualize problem areas; communicate conditions and needs to City policy makers and management; and prioritize maintenance activities, urgent and emergency repairs, and mid- and long-term solutions.

References

- City of Manhattan Beach, Wastewater Master Plan – *Section 8, Condition Assessment; Section 9, Operations and Maintenance*
- City of Manhattan Beach Municipal Code, Title 5, Sanitation and Health – Chapter 5.38 - FATS, OILS AND GREASE MANAGEMENT AND DISCHARGE CONTROL.
- City of Manhattan Beach FOG Source Control Manual
- Standard Specifications for Public Works Construction (Green Book), the 2006 Edition

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X. SSMP Program Audits

SSMP Program Audits: As part of the SSMP, the Enrollee shall conduct periodic internal audits, appropriate to the size of the system and the number of SSOs. At a minimum, these audits must occur every two years and a report must be prepared and kept on file. This audit shall focus on evaluating the effectiveness of the SSMP and the Enrollee's compliance with the SSMP requirements identified in this subsection (D.13), including identification of any deficiencies in the SSMP and steps to correct them.

Audit and benchmarking programs are among primary City strategies in accomplishing its mission to protect public health and the environment and meeting goals. As a part of the City's continuing performance measurement, the City's SSMP undergoes ongoing reviews at all levels of the organization having authorities and responsibilities in the SSMP implementation shown in Organization Section of this SSMP. These reviews culminate in internal (self) audits of the SSMP that result in biennial audit reports. As a part of these audits, all parts and sub-parts of the SSMP are reviewed critically with regards to their ability to effectively and efficiently meet the State General Waste Discharge Requirements (GWDR), and comply with City policies.

Each year as a part of City's Wastewater Division Five-Year Capital Improvement Plan:

- SSMP goals are set
- Deliverables that are required to meet goals defined and prioritized
- Lead and support staff and resources necessary to complete deliverables assigned
- Progress measured and reported on an ongoing basis to ensure full and timely completion of deliverables.

Any gaps between targeted results and actual progress are identified or anticipated and mitigation measures developed and implemented to close or avoid any performance gaps. The overall SSMP performance is evaluated and reported to management annually following the end of each fiscal year. Any plan updates necessary to enhance the SSMP performance are identified and included as a part of the following year's City's Five-Year Capital Improvement Plan.

Performance measures and benchmarks are established through ongoing performance review. Experienced personnel audit the SSMP at least once every two years by evaluating the effectiveness of each SSMP element and making recommendations for improvements and updates as appropriate. The SSMP is updated by incorporating adopted recommendations. Audit reports and related materials are maintained in a comprehensive hard copy and electronic document tracking and management system. The following are examples of ongoing self-monitoring and plan modification:

**City of Manhattan Beach
Sewer System Management Plan**

▪ **Overflow Emergency Response**

The Utilities Manager and Wastewater Division Staff meet quarterly to review emergency response actions and collaborate on methods and procedures that will improve performance. Performance standards are developed, published and communicated to relevant staff. Actual response times are compared to standards; changes are made and documented and staff retrained as appropriate.

▪ **Hydraulic Models**

The City of Manhattan Beach Wastewater Master Plan included hydraulic modeling and collection system capacity analysis to model and assess the hydraulic performance of its network of pipes, flow splits, and pumping plants, and to predict future flow based on growth projections.

▪ **Structural Condition Assessment**

Fifty percent of the City's sewer lines and manholes have been inspected by closed circuit television; the remaining fifty percent will be inspected over the next five years. Based on these inspections, the condition of each sewer line and manhole have been assessed and rated in a five-category condition ranking. The ranking system is used to prioritize and schedule future inspections and rehabilitation or replacement planning studies. Changes are made to work priorities and project delivery schedules based on the findings of field investigations and criticality of system needs.

▪ **Maintenance Management Approaches**

Priority is given to sewers within sewer sheds that return the most benefit for the maintenance effort. Data are accumulated on maintenance hot spots and displayed on GIS maps to display locations requiring additional attention. This information forms the basis for prioritizing cleaning, inspection, and rehabilitation. All maintenance holes are physically inspected biennially, all sewers cleaned bi-annually, and operationally challenged sewers are cleaned more often as needed. This ongoing monitoring and adjustment process will work to optimize staff efficiency and system performance. Effectiveness of root control is also monitored and changes to cleaning schedules made as needed.

▪ **Sewer Design Criteria and Standard Plans and Specifications**

The City's Public Works Department, Engineering Division, is in charge of design, construction, start-up and optimization of public works sewer system projects. Design standards, specifications and standard details are continuously monitored for currency and effectiveness. Staff input based on field experience is provided and reviewed systematically. Appropriate changes are incorporated into the City's standards and work in progress as needed.

▪ **Construction Activities**

In another effort to avoid SSO's, the City developed and implemented a requirement that a spill prevention and response plan has to be developed and implemented for all wastewater construction projects.

City of Manhattan Beach Sewer System Management Plan

References

- City of Manhattan Beach Sanitary Sewer Overflow Response Plan
- City of Manhattan Beach Wastewater Master Plan – Section 4, Criteria; *Section 6, Existing Pump Stations; Section 7, Hydraulic Model and Collection System Capacity Analysis; Section 8, Condition Assessment; Section 9, Operations and Maintenance; and Section 10, Capital Improvement*
- Standard Specifications for Public Works Construction (Green Book), the 2006 Edition

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XI. Communication Program

Communication Program: The Enrollee shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented. The Enrollee shall also create a plan of communication with systems that are tributary and/or satellite to the Enrollee's sanitary sewer system.

The City performs community outreach which includes mailing of pamphlets to Food Service Establishments; website SSMP information; handing out materials at community fairs; advisories and press releases; and toll-free help lines. Outreach events are held for the general public and Food Service Establishments to familiarize them with the Fats, Oils, and Grease (FOG) Control Program. Electronic versions of the FOG Ordinance and FOG Source Control Manual are also made available on the City's website.

The following are examples of the community outreach activities within the City's SSMP:

FOG Control Program

The FOG Ordinance and FOG Source Control Manual outreach is geared towards FSEs and residents.

Private Lateral Sewer Maintenance and Root Control Outreach

This outreach is focused in the areas of City designated as "root hot spots where SSOs may occur due to blockages caused by roots. Properties in the "root hot spot" areas are sent pamphlets which contain information regarding causes of root growth in private laterals, prevention methods and proper operation and maintenance for private laterals.

Capital Improvement Projects (CIPs)

Capital Improvement Projects (CIPs) are listed in the Wastewater Master Plan and are advertised in the community through updates to the City website. Outreach is also conducted by meeting with local businesses and community. These activities ensure that the communities are informed about projects in their neighborhoods.

Martha Alvarez

From: Lolly Doyle <lollydoyle@cs.com>
Sent: Tuesday, February 2, 2021 4:46 PM
To: City Clerk
Cc: Lolly Doyle; lolly.doyle@dsh.ca.gov
Subject: [EXTERNAL] 600 S. Sepulveda Proposed Development

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Good Afternoon,

Please see the letter below pertaining to the meeting scheduled for February 2, 2021. It is intended for the city council members and is regarding the proposed development of a hotel at 600 S. Sepulveda Blvd.

Thank you,
Lolly Doyle
1190 Shelley Street

February 2, 2021

Dear City Council Members,

I believe it is imperative that an environmental impact review be completed regarding the proposed development at 600 S Sepulveda. My family moved to the Poets Section 24 years ago, being drawn to it specifically because it was, and has continued to be, a peaceful, quiet and safe neighborhood. But, after hearing about the proposed hotel project as it currently stands, it is clear there would be a huge impact on our wonderful neighborhood, and it makes no sense that an environment impact review has not been required.

Vehicular traffic is certain to be impacted. In addition to the others who have spoken about the impact of traffic, I would like to point out that there have been two accidents in just the last two weeks by neighbors in my immediate neighborhood, at the intersection of Artesia Blvd and Prospect Ave. Both neighbors were victims of drivers who ran the red light on Artesia. Most residents in the Poets Section are well aware of the significant dangerousness of this intersection and we use extreme caution getting through it. That will not be so though, with drivers unfamiliar with the neighborhood. It seems fairly certain that traffic at this intersection will increase, as drivers destined for the hotel will end up driving east on Artesia after either missing the hotel's entrance off of Sepulveda or intentionally bypassing that entrance due to traffic backing up waiting to enter the hotel's parking lot. That intersection does not handle current traffic flow well and it will only get worse with increased traffic and drivers unfamiliar with the neighborhood.

Other areas certain to be impacted are the noise level, pedestrian traffic, neighborhood parking and the less objectively measurable but very important aspect of the neighborhood's character. The bulk of a four-story building just a few feet away from our small residential area is not something that adds to the charm of our beach town at all. Please note that I am not opposed to the development of that site. I know it is to be expected. However, I don't feel that due diligence has been done with regard to the impact on the neighborhood in the areas of noise, traffic and parking, in the least. Certainly, there would be an impact to the area surrounding the hotel and it is inconceivable that the environmental review required by the state of California was exempted for this project. It is also clear that there is conflicting information in the various expert assessments and reports that have been provided regarding this project. It is imperative that the city follow the protocol when a project of this magnitude is proposed and require that an environment impact review be completed.

Additionally, if they haven't already, I encourage city council members to visit our neighborhood and envision a four-story hotel at 600 S Sepulveda and honestly ask themselves whether the neighborhood would be impacted by it.

Martha Alvarez

From: rmcquillin@mcqcorp.com
Sent: Tuesday, February 2, 2021 4:45 PM
To: City Clerk
Subject: [EXTERNAL] Rick McQuillin's Public Comments for 2/2/2021 MB City Council meeting re hotel at 600 S. Sepulveda

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Hello everyone,

I'm Rick McQuillin. I live in The Poets at 1281 Tennyson Street. My main concerns are traffic, parking, noise, safety, and home values.

Did you know the Skechers headquarters, two blocks away, isn't operating properly today? Their loading dock has never been used. It's always blocked with pallets, crates, and junk, probably on purpose. Go see it now. So trucks park in every red zone on Longfellow and Kuhn. They block the right-turn lane in clear violation of posted signs. Look at the pictures I provided. Drivers just turn their flashers on, leave their trucks, and pay the fines. They have no choice. When will Skechers unblock their loading dock and use it for its intended and required use, to respect and benefit their community? This shows the difference between plans and reality.

So how do we know that this high-density hotel will operate in the lovely optimistic and tight scenarios being presented today? How will service and deliver trucks navigate this congested, confusing property? They won't. They'll do what's fast, safe, and convenient, just paying the fines, like they do now for Skechers. We'll have trucks parking, unloading, and ruining our peace on Chabela. The truck and guest traffic will ruin our streets. It doesn't take an expert to see some of the problems. Go observe that left turn from southbound Sepulveda onto Tennyson Street. Watch the opposing northbound cars speeding down that hill from behind that hidden curve on that six-lane highway. Imagine new arrivals to this densely-packed hotel, unfamiliar with our city and its traffic, in unfamiliar vehicles, trying to make that left turn (or maybe trying the U-turn into the new entrance lane if they're feeling lucky), day after day and night after night. This project obviously needs a traffic analysis. Fatal consequences are foreseeable.

Thank you.

Richard McQuillin
1281 Tennyson Street
90266
310-947-1759

THE SKECHERS LOADING DOCK IS ALWAYS BLOCKED:



LOOKS LIKE DUPLICATES BUT THESE ARE DIFFERENT DAYS AND TIMES OF DAY:



Martha Alvarez

From: Duncan Plexico <dugahu@me.com>
Sent: Tuesday, February 2, 2021 3:49 PM
To: City Clerk
Subject: [EXTERNAL] Fwd: Plans for Hotel Project at 600 S. Sepulveda Blvd

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Subject: Plans for Hotel Project at 600 S. Sepulveda Blvd

Greetings Honorable Mayor Hadley and esteemed City Council members.....

As we celebrated long standing businesses the past meeting some upwards of 30 years.... which was impressive... we will hopefully celebrate and protect residents in the poet section... some of whom have been here paying taxes for almost 70 years...

We are hoping that we are heard from the almost 3 hours of letters read in each prior meeting to the council in regards to this issue... pls do not leave this at potentially planting some more trees in the 6 ft of space they have given from the hotel to the street.... And about 20 feet to the homes on the other side.... Homes that have been here since 1953... and some residents that have been here that long as well. We cannot go talk to some of our elderly citizens and get the letters and signatures written to the council as we are in a pandemic and their health comes first.... they are not even technologically equipped to be included in these meetings. While the applicant had almost 3 years and over 40 minutes to speak at each of the earlier council meetings... while the actual group of people being affected had about 8 days and 3 minutes each to try and appeal to the council to not change our way of live.... This hotel requires massive revisions or to be removed ... as the extra floor with a roof top social deck is apparently not needed as shown by the lower amount of parking spaces and continual reassurance from the applicant that the parking will not ever be full.

As seen with the Marriott only a mile or so north of this property... the residents are severely affected (even with only 2 stories)... with over 107 calls in 6 months and they have a wall and cannot be viewed by whatever type of clientele frequents this proposed establishment. ... which our residences will be able to be seen from all levels of this structure. The applicant has not taken into consideration, the potential threat to our families and especially our children as mine walk our dog in the evening and walk to school. Never mind the light pollution, Noise, and the lack of light or breeze once you try to put in a 4 story building that somehow got

approved for this project with the applicant being on that task force...??? He shows no proof of how we will be affected besides a study done early in Covid.. which explained no impact... which if you say it out loud... ... What once was a restaurant and parking lot... you would like to change to 20,000 ft of retail space.... A 4 story hotel of over 81,000 ft... and underground parking... SOUNDS RIDICULOUS that there would be no impact....when Commissioner Tai is on record regarding the Marriott situation. Why would we think backing up a hotel to residents in a small beach hometown and raising the height would ever be a thought... and all under the guise of modernization.... When he has show no thought to being green or forward thinking besides making it bigger... What happens when the property across the street from this site is built and all this work goes into 4 stories... and now that view is blocked... Do you then approve 5 stories... ? Please take the time to reevaluate the properties we currently have in this city serving as hotels/motels... which is upwards of 10 or 11 just in the 4 mile drive down Sepulveda... (not including the ones off of Sepulveda) what makes this hotel special to be raising the height or to even be added... besides the then added noise pollution and potential drunks leaving the roof top deck into our neighborhood with poor traffic visibility.... He does not speak to the environmental implications due to the size of the property...

We feel unsafe... we feel bullied.... And our situation will change and we are asking city council to protect us and our families.

And to speak to Ted's comment on El Torito's permit until 12m... they may have had that, but the restaurant closed at 10pm every night.... And these 2 appellant groups asked for screening on every floor.... "unique in its impacts due to people sleeping overnight" looking into our back yards.... And as far as parking... where does the staff park for a 162 room hotel and retail?

We are not convinced Jan Holtz has had any thought to protect the residents of the community he would like to build in... which to be honest he has not addressed at all ... only noting that in a few years we would all be in 2 story homes anyway????..... He also clearly omitted the truth about Mr. Thompsons reservations for this project when asked at the last council meeting... as Mr. Thompson in the final planning commission meeting voiced his concern repeatedly regarding this project the height and placement of the hotel.... Asking for more screening and to remove the hotel rooms on the 4th floor facing east. He also asked and wanted to confirm that his comments and concerns would be placed into the notes going over to the City Council. Jan's only concern was the light going into the open parking garage which is now what the residents will get to look at..... We also lost one commissioner as he has a home that he will inherit behind this proposed hotel... so his vested interest removed him from the vote????? What about the fact of the so clearly apparent friendship between the voluntary Commissioner and the applicant???Shouldn't that make him removed from the vote as well?

What about moving this proposed hotel to the Parkview and Village site... or did they not want it either ???? Your applicant had years to try and reach out to this part of the community... and yet chose to send his postcard about this proposed hotel just 8 days prior to the first council meeting... AND shows that he has a total understanding of how this would affect this neighborhood.... But is more concerned about his own pockets not this community.

AND FINALLY WHY ARE WE BUILDING ANOTHER HOTEL IN A PANDEMIC.... WHEN WE GET TO THE OTHERSIDE OF THIS... THE REVENUE TO THIS CITY WILL BE MINISCULE COMPARED TO THE OUTPUT and EXPENDITURE... and you will be left with a non-profitable hotel If we are comparing to the Redondo Beach new properties... they are on the water and not in the middle of residents. Please think about the real outcome of this venture.... Things will not be the same... and we are already seeing a different way of life that will change for good.... As vacationers choose other more individualized locations such a private homes to vacation in..... and businesses move to Zoom meetings as opposed to sending their people on market trips for their own staffs safety.....

Pls take the time to view the findings from the Poets lawyers.

Thank you again for your time.

MB Citizen,

Victoria Plexico

Martha Alvarez

From: Nancy Best <coastalseabird@gmail.com>
Sent: Tuesday, February 2, 2021 1:48 PM
To: Hildy Stern; Steve Napolitano; Richard Montgomery; Suzanne Hadley; City Clerk
Cc: jrfranklin@citymb.com
Subject: [EXTERNAL] Late incoming petitions, 600 s Sepulveda
Attachments: 20210112_150250.jpeg; ATT00001.htm; 20210114_160456_resized.jpeg; ATT00002.htm; 20210117_114841.jpeg; ATT00003.htm; 600 S Sepulveda Hotel Project 2021-0114.pdf; ATT00004.htm; Resized_20210114_145224.jpeg; ATT00005.htm; Christopher IDE IMG_2830..eml; ATT00006.htm; 600 S Sepulveda Hotel Project 2021-0114-1 (dragged).pdf; ATT00007.htm; IMG_0050.jpeg; ATT00008.htm; IMG_2834.jpeg; ATT00009.htm; IMG_2830.jpeg; ATT00010.htm; IMG_1026.jpeg; ATT00011.htm; IMG_2830.jpeg; ATT00012.htm; 20210119_101649.jpeg; ATT00013.htm; IMG_0179.jpeg; ATT00014.htm; 600 S Sepulveda Hotel Project 2021-0114-1 (dragged) 2.pdf; ATT00015.htm

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POETS SECTION DOESN'T WANT TO BE A FISHBOWL

On Tuesday, January 19 at 6pm, City Council is set to approve a behemoth hotel project on the site of El Torito at 600 S Sepulveda, Manhattan Beach.

This historic 45' height development, with 162 rooms (same as Viceroy in Santa Monica) will have a 180' long wall of windows - that open - facing the Poets' Section neighborhood. It will be the tallest building on Sepulveda. City is setting a precedent.

Planning Commissioners passed an ordinance with ridiculously reduced parking. El Torito had 142 spaces. Hotel plus retail plus office to have 152, including underground garage.

This location makes access difficult from any direction. Combined with still under construction Skechers, it will have unprecedented and cumulative parking and traffic issues. Underground parking to have open air ventilation. Sun and ocean breezes become shade and exhaust. Developer plans a 200' rooftop bar open 7a - 1a, 365 days/year. City says no impact.

Municipal code was changed to fit the project. For now, only a hotel can be 45' high. Residents got almost no notice. This will double the population of the neighborhood. Developer will remove current boundary of mature, beautiful trees and replace with bamboo. This hotel will ruin the poets section.

Residential zoning changes require a citywide vote. Commercial zoning changes require 3 people out of 5.

We need your help.



Please fill in/sign the back, and return. Contact for more info. Thank you

coastwithclouds@gmail.com

310.963.9344

Re: 600 S Sepulveda Blvd.
Manhattan Beach, CA 90266
(El Torito lot)

In lieu of a petition,

If you have any objections to this project for any reason,
Please sign and print your name below, including email address.

We also encourage you to write a letter to city council, and attend the city
council meeting via zoom.

Thank you

take a photo and email or text to below.

coastwithclouds@gmail.com
310.963.9344

Name

Signature



Address

Email

Jon F. Rager
207 S Dianthus St
Manhattan Beach, CA 90266

JRAGER@RBDMCPA.COM

Re: 600 S Sepulveda Blvd.
Manhattan Beach, CA 90266
(El Torito lot)

In lieu of a petition,

If you have any objections to this project for any reason,
Please sign and print your name below, including email address.

We also encourage you to write a letter to city council, and attend the city
council meeting via zoom.

Thank you

take a photo and email or text to below.

coastwithclouds@gmail.com
310.963.9344

Name

Signature



Address

Email

Jon F. Rager
207 S Dianthus St
Manhattan Beach, CA 90266

JRAGER@RBDMCPA.COM

Re: 600 S Sepulveda Blvd.
Manhattan Beach, CA 90266
(E) Torito lot

In lieu of a petition,

If you have any objections to this project for any reason,
Please sign and print your name below, including email address.

We also encourage you to write a letter to city council, and attend the city
council meeting via zoom.

Thank you

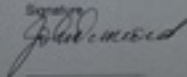
take a photo and email or text to below.

coastalclouds@gmail.com
310.963.9344

Name

John Damico

Signature



Address

1133 22nd St
Manhattan Beach
CA 90266

Email

coastaldamico@verizon.net

Box 600 S Sepulveda Blvd.
Marathon Beach, CA 90364
(714) 763-3344

In lieu of a petition,

if you have any objections to this project for any reason,
Please sign and print your name below, including email address.

We also encourage you to write a letter to city council, and attend the city
council meeting via zoom.

Thank you

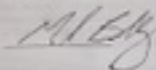
Leave a photo and email or text to below.

coastwithclouds@gmail.com
310 963-3344

Name

Signature

Michael Bling



Address

Email

751 30th St.
Marathon Beach
90364

mtbling87@gmail.com

Re: 600 S Sepulveda Blvd.
Manhattan Beach, CA 90266
(E) TorHo lot

In lieu of a petition,

if you have any objections to this project for any reason,
Please sign and print your name below, including email address.

We also encourage you to write a letter to city council, and attend the city
council meeting via zoom.

Thank you

take a photo and email or text to below

coastwithclouds@gmail.com
310.963.9344

Name

Signature

Eric Brown [Signature]

Address

Email

1034 2nd St. _____

File: 600 S Sepulveda Blvd.
Manhattan Beach, CA 90265
(E) Torito lot

In lieu of a petition,

If you have any objections to this project for any reason,
Please sign and print your name below, including email address.

We also encourage you to write a letter to city council, and attend the city
council meeting via zoom.

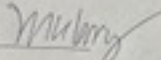
Thank you

Take a photo and email or text to below

coastwithclouds@gmail.com
310 963 9344

Name

Signature

Melinda Garvey 

Address

Email

1147 20th St
MB, CA
90240

mindygarvey@gmail.com

Re: 600 S Sepulveda Blvd.
Manhattan Beach, CA 90266
(E) Torito lot)

In lieu of a petition,

If you have any objections to this project for any reason,
Please sign and print your name below, including email address.

We also encourage you to write a letter to city council, and attend the city
council meeting via zoom.

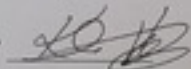
Thank you

take a photo and email or text to below.

coastwithclouds@gmail.com
310.963.9344

Name

Signature

KEN HARTLEY 

Address

Email

723 30th St HB kenhartley@verizon.net

Martha Alvarez

From: nancy best <coastwithclouds@yahoo.com>
Sent: Tuesday, February 2, 2021 1:20 PM
To: Hildy Stern; Steve Napolitano; Richard Montgomery; Suzanne Hadley; Joe Franklin; City Clerk
Subject: [EXTERNAL] Objecton Letter
Attachments: 11921 MBCC Mtg Letter.pages

Martha Alvarez

From: Quinn M. Barrow <QBarrow@rwglaw.com>
Sent: Tuesday, February 2, 2021 1:25 PM
To: Martha Alvarez
Subject: [EXTERNAL] Proposed hotel and mixed use project at 600 S. Sepulveda Blvd.

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From: **Ben Burkhalter** <blbarchitect@gmail.com>
Date: Sun, Jan 31, 2021 at 4:00 PM
Subject: Proposed hotel and mixed use project at 600 S. Sepulveda Blvd.
To: <shadley@citymb.info>, <rmontgomery@citymb.info>, Steve Napolitano <snapolitano@citymb.info>, <hstern@citymb.info>, <jfranklin@citymb.info>
Cc: <ctai@citymb.info>

Honorable Mayor and Council Members-

Since writing to you on January 18, 2021 to share my concerns with the proposed hotel and mixed use project at 600 S. Sepulveda Blvd. and particularly its relationship with the residential properties to the east, the Applicant has reached out to me to get a first-hand understanding of those concerns and to discuss possible solutions. That initial conversation led to several more and an exchange of ideas.

I have just received a set of drawings that reflect a number of nuanced revisions that vastly improve and/or entirely eliminate the initial concerns that had for the project's interface with its neighbors to the east. The eastern wing of the hotel has been pulled to the west and away from Chabela to substantially increase physical separation and create a much more effective landscape buffer. The visual massing is now articulated and permanent architectural screening elements have been incorporated at all fenestration on the upper floors to enhance visual privacy from Day One.

I applaud the Applicant's willingness to revisit and improve the project and I enthusiastically support the net results.

Respectfully-

Ben Burkhalter

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QUINN BARROW (EXTERNAL)



qbarrow@rwglaw.com

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DATE: February 2, 2021

TO: Carrie Tai, Community Development Director
Talyn Mirzakhonian, Planning Manager
Ted Faturos, Associate Planner

FROM: Jan Holtze, Agent for Applicant
MB Hotel Partners, LLC

RE: Request for Continuance of Hearing
600 S. Sepulveda Blvd.

In considering public comments and queries from the Council at the January 19, 2021 appeal hearing, Applicant, MB Hotel Partners, LLC, has considered moving a portion of the hotel structure facing Chabela 10 feet further west from the property line on Chabela, together with adding further architectural articulation to the elevation facing Chabela by mixing room configurations. With the location adjustment of the hotel structure, there will be a slight reduction in the square footage of the retail and office building, with all other elements, features and uses of the project remaining the same. No other adjustments to size, scope, components or uses within the project would be included. A preliminary design of these adjustments to the location of the hotel building, together with an articulated east elevation will be shared with the City in the next day or two. All other elements of the project remain unchanged. Given these adjustments we wish to allow City staff and consultants to confirm that this building realignment and eastern façade adjustment do not alter, invalidate or in any way diminish the extensive studies and analyses performed for this project before proceeding before the Council. Again, all other elements and contemplated uses of the project remain the same. Accordingly, Applicant is requesting a brief continuance of the 2/2/21 continued hearing to a date in the near future to be selected by Council. If there are questions or comments concerning the foregoing, please contact me at your convenience.



MASTER APPLICATION FORM

CITY OF MANHATTAN BEACH
COMMUNITY DEVELOPMENT DEPARTMENT

Office Use Only

Date Submitted:
Received By:
F&G Check Submitted:

600 S. Sepulveda Blvd.
Project Address

Legal Description

General Plan Designation Zoning Designation Area District

For projects requiring a Coastal Development Permit, select one of the following determinations¹:

- | | | | |
|--|---|---|---|
| Project located in Appeal Jurisdiction | | Project <u>not</u> located in Appeal Jurisdiction | |
| <input type="checkbox"/> Major Development (Public Hearing required) | <input type="checkbox"/> Public Hearing Required (due to UP, Var, ME, etc.) | <input type="checkbox"/> Minor Development (Public Hearing, if requested) | <input type="checkbox"/> No Public Hearing Required |

Submitted Application (check all that apply)

- | | | | |
|---|------|---|------|
| <input type="checkbox"/> Appeal to PC/PPIC/BBA/CC | 4225 | <input type="checkbox"/> Use Permit (Residential) | 4330 |
| <input type="checkbox"/> Coastal Development Permit | 4341 | <input type="checkbox"/> Use Permit (Commercial) | 4330 |
| <input checked="" type="checkbox"/> Continuance <i>(cancel)</i> | 4343 | <input type="checkbox"/> Use Permit Amendment | 4332 |
| <input type="checkbox"/> Cultural Landmark | 4336 | <input type="checkbox"/> Variance | 4331 |
| <input type="checkbox"/> Environmental Assessment | 4225 | <input type="checkbox"/> Park/Rec Quimby Fee | 4425 |
| <input type="checkbox"/> Minor Exception | 4333 | <input type="checkbox"/> Pre-application meeting | 4425 |
| <input type="checkbox"/> Subdivision (Map Deposit) | 4300 | <input type="checkbox"/> Public Hearing Notice | 4339 |
| <input type="checkbox"/> Subdivision (Tentative Map) | 4334 | <input type="checkbox"/> Lot Merger/Adjust./\$15 rec. | 4225 |
| <input type="checkbox"/> Subdivision (Final) | 4334 | <input type="checkbox"/> Zoning Business Review | 4337 |
| <input type="checkbox"/> Subdivision (Lot Line Adjust.) | 4335 | <input type="checkbox"/> Zoning Report | 4340 |
| <input type="checkbox"/> Telecom (New or Renewed) | 4338 | <input type="checkbox"/> Other | |

Fee Summary: (See fees on reverse side)

Total Amount: \$ 1,482.00 (less Pre-Application Fee if applied within past 3 months)
Receipt Number: _____ Date Paid: _____ Cashier: _____

Applicant(s)/Appellant(s) Information

M.B. Hotel Partners, LLC
Name

P.O. Box 2018 Manhattan Beach, CA 90266
Mailing Address

Development Sponsor
Applicant(s)/Appellant(s) Relationship to Property

Jan A. Holtze Jan@LiveOak-Properties.com
Contact Person (include relation to applicant/appellant) Phone number / email

1219 Morningside Dr Ste 201, Manhattan Beach
Address CA 90266

[Signature] (see above)
Applicant(s)/Appellant(s) Signature Phone number / email

Complete Project Description- including any demolition (attach additional pages as necessary)

request for continuance of City Council
hearing for new hotel and office/retil

¹ An Application for a Coastal Development Permit shall be made prior to, or concurrent with, an application for any other permit or approvals required for the project by the City of Manhattan Beach Municipal Code. (Continued on reverse) ◆

Martha Alvarez

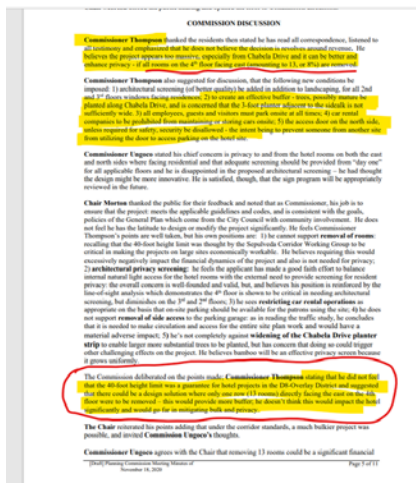
From: ROBERT CLARKE <clarkebobccc@yahoo.com>
Sent: Monday, February 1, 2021 5:26 PM
To: List - City Council; Richard Montgomery; Steve Napolitano; Suzanne Hadley; Ted Faturous; Carrie Tai, AICP
Subject: [EXTERNAL] Proposed Hotel at 600 Sepulveda Blvd.- Copy of letter sent to City day of the hearing Jan 18 & 5:11 from commissioner Ben Burkhalter
Attachments: PC4 1.18 Burkhalter letter dated 1-18-21.pdf; Planning Commission Draft Minutes (November 18 2020) (3).pdf
Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Major Hadley and City Council Members ,

The attached letter emailed by former **Manhattan Beach Planning Commissioner Ben Burkhalter** the day of the hearing was sent in at **5:11pm** so I am guessing that not many of you had the time to read it . I think he makes some very valid points (*I have attached it*) his points along with **Commissioner Thomson should be taken in to account** . At the hearing Commissioner Thomson's comments about the development in relation to the residents were not properly depicted by the developer (*see the minutes attached for his exact words*). Thank you .

Bob Clarke (lifetime resident)
[1141 Tennyson Street](#)
[Manhattan Beach, Ca90266](#)
[\(310\) 505-7391](#)
clarkebobccc@yahoo.com



Commissioner Thompson acknowledged that the applicant's point about not wanting to create a single loaded corridor is important - he agrees, however he inquired as to whether the architect can still create a double-loaded hallway by re-orienting the rooms which could be both a benefit for privacy as well as creating articulation along Chabela Drive.

Jon Holtz complimented the suggestion but he hesitated to affirm that it would work - as this change could raise new challenges to the overall building design. The 20-foot setback on Chabela Drive is intended to provide a buffer where the code allowed a zero setback above ground and below ground opens up the garage parking levels which provides a visual and visceral enhanced quality. If the main focus is the screening, they can provide other options.

Commissioner Thompson pointed out that while there is a 20-foot setback within that area, a sidewalk will be built but this is a common burden of a developer, and the planter width is very narrow.

Discussion focused back to bamboo, **Mr. Holtz** arguing that it is a perfect solution, **Commissioner Thompson** pointing out its possible shortcomings such as being a high water-consuming plant and the lack of more substantial street trees in the landscaping plan and **Mr. Holtz** rebutting he believes there are no trees that would be allowed in the 6-foot wide sidewalk space.

Responding to the **Chair**, as to whether he would support the project subject to such a condition, e.g., horizontal screening such that the first row of bushes across from the project are not visible from the 4th floor, **Commissioner Thompson** indicated that he will not be supporting the project because of the narrow planter width and the lack of building articulation on the main elevation as these are important concerns of the neighbors and he feels this may set a precedent for other projects. Upon further question, **Commissioner Thompson** stated he would want to see at least a 10-foot additional setback for the 4th floor, emphasizing that the 20-foot setback being described by the applicant is effectively not a setback but more of a 15-foot setback as some public improvements such as the sidewalk are actually on private property and, assuming the "sidewalk" will be 8-feet in width and this includes a three-foot planter, he does not see that as effective to mitigate building bulk. He will not be supporting the project without an additional 10-foot setback at the 4th floor.

Martha Alvarez

From: Quinn M. Barrow <QBarrow@rwglaw.com>
Sent: Monday, January 18, 2021 6:19 PM
To: Martha Alvarez
Cc: Carrie Tai, AICP
Subject: FW: [EXTERNAL] De Novo Hearing for Master Use Permit for Hotel and Mixed Use project at 600 S. Sepulveda Blvd.
Attachments: 3rd4th Floor Plan.pdf; Section A.pdf



QUINN BARROW (EXTERNAL)

qbarrow@rwglaw.com

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Office Hours: M-Th 7:30 AM-5:30 PM | Fridays 7:30 AM-4:30 PM | Not Applicable to Public Safety
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Download the mobile app now



From: Carrie Tai, AICP <ctai@citymb.info>
Sent: Monday, January 18, 2021 6:14 PM
To: Quinn Barrow <qbarrow@citymb.info>; Talyn Mirzakhian <tmirzakhian@citymb.info>; Ted Faturros <tfaturros@citymb.info>
Subject: Fwd: [EXTERNAL] De Novo Hearing for Master Use Permit for Hotel and Mixed Use project at 600 S. Sepulveda Blvd.

Sent from my iPhone

Begin forwarded message:

From: Ben Burkhalter <blbarchitect@gmail.com>
Date: January 18, 2021 at 5:11:26 PM PST
To: Richard Montgomery <rmontgomery@citymb.info>, Hildy Stern <hstern@citymb.info>, Suzanne Hadley <shadley@citymb.info>, Steve Napolitano <snapolitano@citymb.info>, Joe Franklin <jfranklin@citymb.info>
Cc: "Carrie Tai, AICP" <ctai@citymb.info>, Bruce Moe <bmoeb@citymb.info>
Subject: [EXTERNAL] De Novo Hearing for Master Use Permit for Hotel and Mixed Use project at 600 S. Sepulveda Blvd.

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Honorable Mayor and Council Members-

I realize that your hearing of the proposed hotel and mixed use project at 600 S. Sepulveda is a de novo hearing. That said, I offer the following comments for what they may be worth as a former planning commissioner, 25 year resident and architect.

As you may or may not recall, I was seated on the Planning Commission for the first hearing of the 600 Sepulveda project on 10/14/20. Unfortunately, I was obliged to resign my seat a few days before the second hearing on 11/18/20 due to the fact that I was no longer an MB resident as of 11/13/20. At that point, the Commission numbered a bare quorum of three due to the recusal of another commissioner. The project was approved by a vote of two to one.

During the first hearing, several issues were pointed out to Applicant that needed improvement, including the parking count and space allocations (compact versus standard), vehicular access point(s), massing of the detached mixed use building and the hotel building's general relationship to the residential properties to the East, particularly in terms of massing, visual privacy and light pollution. It was also pointed out that outreach to the neighboring residents was virtually non-existent and that this was contrary to the recommendations of the Sepulveda Initiative studies and findings, which the Applicants had actually participated in. The Commission continued the project to allow the applicant an opportunity to address and, hopefully, mitigate these concerns.

Having reviewed the resubmitted project packet for the continued 11/18/20 hearing and having watched the hearing itself, I am of the opinion that many of the concerns noted during the 10/14/20 were inadequately addressed or addressed at all to the extent that I would have been unable to approve the project had I remained on the Planning Commission.

This is particularly the case in terms of the interface between the hotel and the residential properties to the east. Much more could have and should have been done. And, had the Applicant more thoroughly addressed the massing, visual [privacy and light pollution issues, I believe that the neighboring residents might have adopted an entirely different posture as regards the project.

For instance, the Applicant could have reduced the massing of the third and fourth floors of the hotel building along Chabella Drive (see attached sketches) which would allow those upper floors to visually step back from the residential properties. Admittedly, this might reduce the total hotel room count by 14 rooms. But, if so, that amounts to a bit more than 8% and it would have gone a long way towards addressing a number of concerns from both the neighbors and at least two planning commissioners. In addition to reducing visual massing, perceived privacy issues and light pollution, it would mitigate several other areas of concern such as total parking demand, traffic, etc.

At the very least, the Applicant could (and should) apply the architectural screening elements to *all* of the east-facing hotel room windows rather than just the fourth floor as currently proposed. Per their own timetable, the timber bamboo won't screen the third floor until year six. Architectural screening elements would be effective from day one.

In conclusion, there is no argument that this particular property is in sore need of redevelopment. And, a mixed use hotel seems to be a very suitable use. Perhaps even ideal. But, as currently configured, it needs work, particularly in terms of its relationship with

the neighboring residential properties. I have a hunch that improvements along those lines could also have residual benefits to the project as a whole and how it is perceived by the community.

Respectfully and with best regards-

Ben Burkhalter



CARRIE TAI, AICP

DIRECTOR OF COMMUNITY DEVELOPMENT

310-802-5502
ctai@citymb.info

The City of Manhattan Beach cares about your health and safety. During state and local COVID-19 restrictions, most Community Development services are available online and various divisions can be reached at (310) 802-5500 or Email during normal City business hours. The Citizen Self Service (CSS) Online Portal is now available for City permit and planning applications and inspections.

CITY OF MANHATTAN BEACH 1400 Highland Avenue Manhattan Beach, CA 90266
Office Hours: M-Th 7:30 AM-5:30 PM | Fridays 7:30 AM-4:30 PM | Not Applicable to Public Safety
Reach Manhattan Beach Here for you 24/7, use our click and fix it app
Download the mobile app now

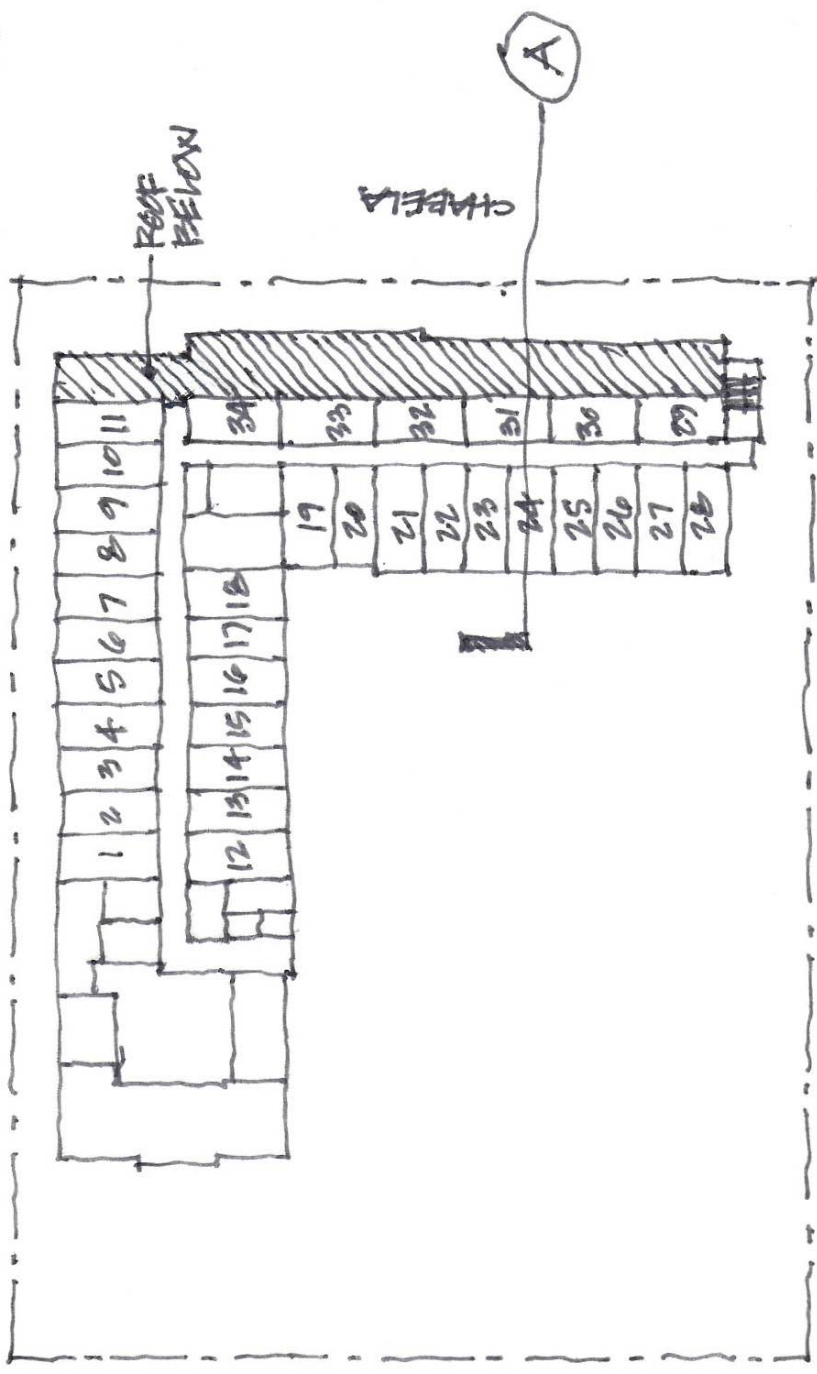


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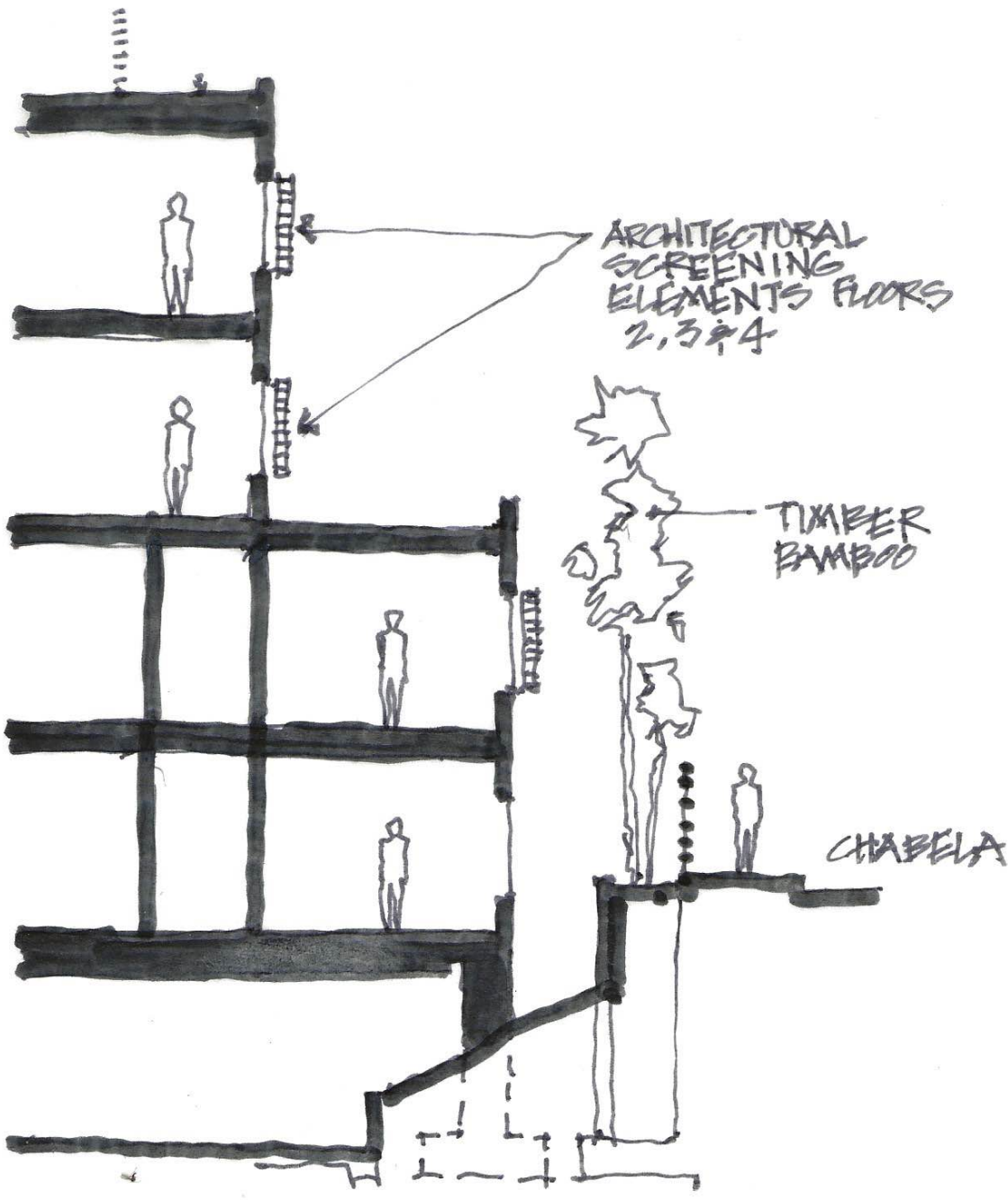
HOTEL ROOM COUNT EXISTING = 41
PROPOSED = 34

-7 PER FLOOR
-14 TOTAL



TENNYSON

4TH FLOOR (3RD FLOOR SIM.)



ARCHITECTURAL
SCREENING
ELEMENTS FLOORS
2, 3 & 4

TIMBER
BAMBOO

CHABELA

SECTION A

**MANHATTAN BEACH
PLANNING COMMISSION
MINUTES OF REGULAR MEETING
NOVEMBER 18, 2020
(DRAFT)**

A. CALL MEETING TO ORDER

A Regular meeting of the Planning Commission of the City of Manhattan Beach, California was held virtually via Zoom on the 18th day of November, 2020, at the hour of 3:14 p.m. Chair Morton called the meeting to order and announced the protocol for participating in the meeting.

B. PLEDGE TO FLAG

C. ROLL CALL

Present: Thompson, Ungoco, Vice Chair Fournier, Chairperson Morton
Absent: None
Others Present: Carrie Tai, AICP, Director of Community Development
Talyn Mirzakhonian, Planning Manager
Brendan Kearns, Assistant City Attorney
Ted Faturos, Assistant Planner
Nhung Huynh, Agenda Host
Rosemary Lackow, Recording Secretary

Director Tai announced that Commissioner Burkhalter, as he has moved out of the City, has submitted his resignation from the Commission; until his seat is filled, there will four Commissioners to deliberate.

D. APPROVAL OF AGENDA

It was moved and seconded (Thompson/Fournier) that the agenda be unchanged.

Roll Call:

Ayes: Vice Chair Fournier, Thompson, Ungoco, Chairperson Morton
Noes: None
Absent: None
Abstain: None

Director Tai announced: motion passed 4-0

E. AUDUENCE PARTICIPATION - None

F. APPROVAL OF THE MINUTES

11//18/20-1 Adopt revisions to October 14, 2020

It was moved and seconded (Thompson/Ungoco) to approve as presented.

Roll Call:

Ayes: Thompson, Ungoco, Vice Chair Fournier, Chairperson Morton
Noes: None
Absent: None
Abstain: None

Director Tai announced: motion passed 4-0.

11/18/20-2. Regular Meeting – October 28, 2020

It was moved and seconded (Thompson/Ungoco) to approve as presented.

Roll Call:

Ayes: Thompson, Ungoco, Vice Chair Fournier (except portion for 600 S. Sepulveda portion, for which he was recused); Chairperson Morton
Noes: None
Absent: None
Abstain: None

Director Tai announced: motion passed 4-0

G. PUBLIC HEARING

11/18/20-3. Proposed Master Use Permit for A New 162-room, 81,755 Square-Foot Hotel with Full Alcohol Service for Hotel Patrons and a New 16,348 Square-Foot Retail and Office Building; and Reduced Parking with 152 Parking Spaces at 600 South Sepulveda Boulevard; and Make an Environmental Determination in Accordance with the California Environmental Quality Act (MB Hotel Partners, LLC)

Chair Morton opened the public hearing and invited staff to make a presentation.

Vice Chair Fournier announced that he would be recusing himself from participating, making the following two points: 1) the basis for recusal is that he is a beneficiary of a trust at 448 Chabela Drive which lies within the 1,000-foot potential conflict of interest radius; and 2) as a point of order, he would like to reserve the ability and requested at which time he could, to comment, not on the merit of the project, but on some comments made in the October hearing portraying the legislative history behind the new Sepulveda overlay regulations – which he feels may be inaccurate.

Assistant City Attorney Kearns advised that such comments should appropriately be made in the “Commission Business” portion of the agenda. Vice Chair Fournier then recused himself.

Community Development **Director Tai** announced that project planner, Ted Fatuross will give the staff report, adding that the newly hired Planning Manager is present and available to participate.

Associate Planner Ted Fatuross summarized the staff report with the aid of a PowerPoint slide presentation covering: recap of October 14 hearing including a summary of the MUP request; modifications requested by the Commission, and then in more detail, issues including: parking ramp design (modified), architectural screening and neighborhood privacy, shade analysis, draft Resolution, proposed findings for approval (in Resolution); CEQA (environmental determination); public comments (both with packet/staff report and received late); and the Staff Recommendation to conduct the public hearing, adopt the proposed Environmental Determination, and adopt the draft Resolution, approving the subject MUP subject to conditions.

Planner Fatuross also noted public comments received including a 1118-signature petition opposing the project; and those present to address any questions are both from the City (including Traffic Engineer Zandvliet and environmental consultant Michael Baker International, and the Applicant and his team (including representatives from consultant Kimley-Horn).

Chair Morton opened the floor to the Commission.

Staff responded to Commission questions as follows: 1) Staff is satisfied with modifications addressing traffic circulation which include: ramp redesign (re-sloped to 12% on outbound side ramp) which eliminates visibility issue of car-to-pedestrian traffic; relocation of a pedestrian walkway to the south and design for a raised median that can be constructed on Sepulveda (subject to Caltrans) between in and out-bound driveways which ensures sufficient car queueing space for cars going to the surface lots. 2) A door providing access to the parking garage adjacent on the north side (on another private property) as shown on plan sheet 10, has been provided as a convenience to the commercial property to the north and the Applicant can address further if needed. The concern is that this type of building access may be something the Commission may want to restrict with a condition in the Resolution. 3) the Applicant has not yet submitted a site Master Sign Program but this would come later and would be a staff level approval unless they request more signage than allowed in which case, they would need to secure a “Sign Exception”.

Chair Morton invited the Applicant to address the Commission.

Jan Holtze, the applicant, stated that the project is strongly supported by both residents and businesses **and will:** 1) **be a better design** with proposed changes; 2) **fulfill the mission** of the Sepulveda Working Group and City Council's vision; 3) **help meet City goals** of the general plan and zoning code - for a balanced mix of special (e.g. a hotel) and non-commercial residential land uses that will meet the needs of residents and businesses, by providing goods and services for the regional market; 4) **bring significant benefit**, economically locally both indirectly - to other businesses - but also, substantial City revenues including transient occupancy and property taxes, development fees, and the school district will also receive a substantial development fee; 5) **not have a significant traffic impact**, as the traffic impact analysis (TIA) shows a net downward change of traffic trips even while not taking credit from the prior El Torito restaurant trips nor taking advantage of additional offsets due to ride-sharing, employee use of public mass transit, bicycling, and the like; 6) **have sufficient on-site parking** in that the shared parking analysis shows that the proposed parking will be sufficient - for example, on weekends, when the use of the hotel will be highest, the office parking demand is low.

Senior Project Manager Jason Melchor, Kimley-Horn, provided a rebuttal to a written public comment – stating that there are two inaccuracies in the commenter’s cited parking analysis – first, he believes a use code applied in that analysis, because it applies to a 300-room range hotel, is not representative of the proposed hotel which will have only 162 rooms, and therefore the claim that the hotel parking is inadequate is false and the Applicant stands by its submitted parking demand analysis. Secondly, he believes that a weekend rate of 1.55 spaces per room cited in the commenter’s arguments is also not appropriate in that it factors only occupied rooms, where the applicant analysis factored in the total number of rooms. Mr. Holtze also clarified that the exit door and stairway on the adjacent property is believed to be required for exiting the garage.

Architect Gene Fong, AIA, Axis Architecture, explained the Applicant’s conclusion that the east side proposed planting will sufficiently protect privacy of the neighbors and also be an effective buffer softening the building’s mass. When the building and landscape architects collaborated, they determined that “timber bamboo” would fan out and cover a lot of the 3rd floor within a short period of time. It was felt then, that the bamboo plus an architectural treatment would be “overkill” on the first three floors but the architectural screening would be justifiable on the 4th level. This they concluded would be a good compromise, on one hand this would reduce vision through window and natural light for the hotel guests, while on the other hand providing sufficient privacy to neighbors. With assistance from landscape architect Todd Bennitt who referred to Sheet 4 of the Landscaping Plan, Mr. Fong further explained that although the specs state that the bamboo will take nine years to grow to 39 feet, that full growth would not be needed, because, given the steep natural northerly upslope, a good portion of the building along Chabela Drive will be sunk into the ground. This gives the timber bamboo about six feet more of effective height that will be useful fairly early on for screening.

With no further questions, **Chair Morton** opened the floor to the public, advising of the applicable 3-minute time limit per speaker.

The following persons addressed the Commission in opposition to Commission taking action to approve the project for various reasons. (*) = submitted written comment. Bases for opposition include but are not limited to: disagreement with environmental determination, decreased property value, decreased quality of life impacts such as noise, traffic, visual, parking intrusion, etc.; public safety including increase in crime, inconsistent with existing neighborhood scale, insufficient time to review, construction impacts including cumulative with other active large projects.

Darryl Franklin, Tennyson Street, representing MB Poets (*)

Don McPherson, First Street (*)

Diane Wiseman, Tennyson Street (*)

Boryana Zamanoff, Tennyson Street(*)

Christine Mercer, Tennyson Street (*)

Jim Mercer, Tennyson Street (*)

Craig Neustaedter, Traffic engineering consultant representing Don McPherson

Doug Carstens, Attorney for MB Poets (*)

Emily White, Tennyson Street (*)

James Williams, Shelley Street (*)

Kathy Clarke, Tennyson Street (*)
Kim Herrera
Lolly Doyle, Shelley Street (*)
Robert Clarke, Tennyson Street (*)
Steve Rogers, acoustic consultant representing Don McPherson
Robin Charin, resident near Keats/Altura (*)
Mark Ferris, husband of Robin (*)
Suzanne Best, Shelly Street (*)
Victoria Plexico (*)
Julie Sanchez, Chabela/Shelley
Robert Goepp, Prospect
Nancy Best, Shelley St. (*)
Rick McQuillin, Tennyson Street (*)

The following persons addressed the Commission in favor of the Commission approving the project:
Bases for support include but are not limited to: a desirable addition to the community, attractive design, and income that will be generated to the City. (*) = submitted written comment

Audrey Judson (*)
Meg Lenihan (*)
Tim Kidder (*)

The following person addressed the Commission with questions:
Jonah Breslau, representing hospitality/hotel workers.

With no more persons in the queue to speak, the **Chair** opened the floor to questions from the Commissioners.

Commissioner Ungoco asked whether the Applicant would like an opportunity to respond to a couple technical challenges made by commenter Don McPherson and his technical consultants for acoustics and traffic/parking.

At **Director Tai's** suggestion, representatives of Michael Baker International (MBI) and Kimley-Horn, responded; both stood by their analyses as adequately evaluating potential noise and parking impacts.

Regarding noise (issues that excessive noise will be generated from roof HVAC and outdoor gatherings) the MBI consultant John Bellas asserted that there is expected to be 11, not 25 HVAC units as assumed by McPherson, and these will not be concentrated along the roof edge, creating an accumulated noise effect; further mitigating factors are: the units will be spread out across the entire roof; parapet walls will screen mechanical sound; improvements in technology have resulted in less noisy fans in the units (and there are far less nuisance complaints from residential/commercial interface) and, lastly the units will be at a much higher elevation than adjacent property living areas. Addressing concern for noise from outdoor uses, particularly the patio on the 3rd and 4th level - the Mr. Bellas opined that their study was conservative in its analysis in that they did not factor in noise attenuation that will be built in from the building itself – portions of the building by design that will block noise from emanating to the residential community. When that is factored in, noise levels from people speaking on the patio will actually be anticipated to be reduced to about 8-decibels, which is very quiet.

Chair Morton redirected to **Commissioner Ungoco's** question about the calculation of parking demand for the restaurant use.

Associate Planner Faturos clarified that the common term “restaurant” is open to the general public who could order and consume food and beverages on the premises; but this is not the case here, because the “restaurant” is an ancillary hotel use not open to the general public (see condition of approval in the resolution requiring that alcohol cannot be ordered or consumed by anyone other than a hotel patron). So, the restaurant, because it is not open to the public, and does not create any additional vehicle trips, is not calculated in the parking analysis. Should

the applicant in the future want to add a public accessed restaurant, on the 4th or ground floor, an amendment to the Master Use Permit, with a public hearing and amended/new parking/traffic analysis, would be required.

Chair Morton closed the public hearing and opened the floor to Commission discussion.

COMMISSION DISCUSSION

Commissioner Thompson thanked the residents then stated he has read all correspondence, listened to all testimony and emphasized that he does not believe the decision is revolves around revenue. He believes the project appears too massive, especially from Chabela Drive and it can be better and enhance privacy - if all rooms on the 4th floor facing east (amounting to 13, or 8%) are removed.

Commissioner Thompson also suggested for discussion, that the following new conditions be imposed: 1) architectural screening (of better quality) be added in addition to landscaping, for all 2nd and 3rd floors windows facing residences; 2) to create an effective buffer - trees, possibly mature be planted along Chabela Drive, and is concerned that the 3-foot planter adjacent to the sidewalk is not sufficiently wide. 3) all employees, guests and visitors must park onsite at all times; 4) car rental companies to be prohibited from maintaining or storing cars onsite; 5) the access door on the north side, unless required for safety, security be disallowed - the intent being to prevent someone from another site from utilizing the door to access parking on the hotel site.

Commissioner Ungoco stated his chief concern is privacy to and from the hotel rooms on both the east and north sides where facing residential and that adequate screening should be provided from “day one” for all applicable floors and he is disappointed in the proposed architectural screening – he had thought the design might be more innovative. He is satisfied, though, that the sign program will be appropriately reviewed in the future.

Chair Morton thanked the public for their feedback and noted that as Commissioner, his job is to ensure that the project: meets the applicable guidelines and codes, and is consistent with the goals, policies of the General Plan which come from the City Council with community involvement. He does not feel he has the latitude to design or modify the project significantly. He feels Commissioner Thompson’s points are well taken, but his own positions are: 1) he cannot support **removal of rooms**: recalling that the 40-foot height limit was thought by the Sepulveda Corridor Working Group to be critical in making the projects on large sites economically workable. He believes requiring this would excessively negatively impact the financial dynamics of the project and also is not needed for privacy; 2) **architectural privacy screening**: he feels the applicant has made a good faith effort to balance internal natural light access for the hotel rooms with the external need to provide screening for resident privacy: the overall concern is well-founded and valid, but, and believes his position is reinforced by the line-of-sight analysis which demonstrates the 4th floor is shown to be critical in needing architectural screening, but diminishes on the 3rd and 2nd floors; 3) he sees **restricting car rental operations** as appropriate on the basis that on-site parking should be available for the patrons using the site; 4) he does not support **removal of side access** to the parking garage: as in reading the traffic study, he concludes that it is needed to make circulation and access for the entire site plan work and would have a material adverse impact; 5) he’s not completely against **widening of the Chabela Drive planter strip** to enable larger more substantial trees to be planted, but has concern that doing so could trigger other challenging effects on the project. He believes bamboo will be an effective privacy screen because it grows uniformly.

The Commission deliberated on the points made; **Commissioner Thompson** stating that he did not feel that the 40-foot height limit was a guarantee for hotel projects in the D8-Overlay District and suggested that there could be a design solution where only one row (13 rooms) directly facing the east on the 4th floor were to be removed – this would provide more buffer; he doesn’t think this would impact the hotel significantly and would go far in mitigating bulk and privacy.

The Chair reiterated his points adding that under the corridor standards, a much bulkier project was possible, and invited **Commission Ungoco’s** thoughts.

Commissioner Ungoco agrees with the Chair that removing 13 rooms could be a significant financial

impact, but thinks the “bottom line” relates to the overlay regulations which he acknowledges were developed by other groups and the City Council; therefore, his job is more to look at how the regulations are being **applied**. He advocates focusing on the screening; he believes that the 4th floor is still a problem.

Chair Morton expressed his agreement with **Commissioner Ungoco**. **Commissioner Thompson** reiterated that: 1) removal of the rooms mitigates bulk as well as privacy; 2) having the 4th floor rooms as proposed puts a burden on the residents to build up a 2nd story in order to maintain privacy; 3) the City is not obligated to approve the 40-foot height; and, 4) he does not believe he can make the finding of a use permit unless the east elevation of the building is mitigated for bulk and privacy.

Commissioner Ungoco noted he feels analysis is missing that would demonstrate the sight lines **with** architectural screening in place - this might show to what degree this would impact natural light coming in to the rooms and then to what degree resident privacy would be improved.

Jan Holtze, applicant, addressed the suggested room removal, stating this would be an extreme and unnecessary, in that the combined width of the building setback from property line provides an adequate buffer, which, with the setback on the opposing properties, totals 15-20 feet and there are other options including planting larger plant; also removing the rooms would leave them with an undesirable single loaded hotel corridor. There are many ways to obscure the view for the residents, deferring to the architect who noted the density of the proposed louvers is created by 2x6's spaced a foot apart; this could be increased or changed to 2 x 2's, six or four inches on center. However, there is still concern that doing such would overly darken a room, and he feels that the bamboo is a better solution.

Kevin Sund, Axis Architecture, stated that it is very challenging to create a diagram that would singly demonstrate the effectiveness of the screening, but they felt that the 2x6's would be generous, but this can be studied further as the more you extend the louvers in size the more the sight lines it obscures. Further the louvers can be applied strategically at each level so that the angles are not as favorable to looking down into other areas. He suggested that the Commission also look at the long-term growth and development trends and in five or ten years it is possible that neighbors single story homes will be replaced with two-story homes and possibly trees can be planted on the opposite side of Chabela Drive.

Commissioner Thompson acknowledged that the applicant's point about not wanting to create a single loaded corridor is important – he agrees, however he inquired as to whether the architect can still create a double-loaded hallway by re-orienting the rooms which could be both a benefit for privacy as well as creating articulation along Chabela Drive.

Jan Holtze, complimented the suggestion but he hesitated to affirm that it would work – as this change could raise new challenges to the overall building design. The 20-foot setback on Chabela Drive is intended to provide a buffer where the code allowed a zero setback above ground and below ground opens up the garage parking levels which provides a visual and visceral enhanced quality. If the main focus is the screening, they can provide other options.

Commissioner Thompson pointed out that while there is a 20-foot setback within that area, a sidewalk will be built but this is a common burden of a developer, and the planter width is very narrow.

Discussion focused back to bamboo, **Mr. Holtze** arguing that it is a perfect solution; **Commissioner Thompson** pointing out its possible shortcomings such as being a high water- consuming plant and the lack of more substantial street trees in the landscaping plan and **Mr. Holtze** rebutting he believes there are no trees that would be allowed in the 6-foot wide sidewalk space.

Commissioner Ungoco stated his confidence that the applicant can come up with a solution for screening on the 4th floor.

Director Tai, through the Chair, suggested that the Commission could agree on a specifically worded condition of approval, whether to increase the size of the screening or louver length, or angles, basically establishing objective criteria which staff will apply in working with the applicant – then if devised tonight, this would preclude the need to continue the hearing.

Responding to the **Chair**, as to whether he would support the project subject to such a condition, e.g., bolstering screening such that the first row of homes across from the project are not visible from the 4th floor – **Commissioner Thompson** indicated that he will not be supporting the project because of the narrow planter width and the lack of building articulation on the east elevation as these are important concerns of the neighbors and he feels this may set a precedent for other projects. Upon further questions, **Commissioner Thompson** stated he would want to see at least a 10-foot additional setback for the 4th floor, emphasizing that the 20-foot setback being described by the applicant is effectively not a setback but more of a 15-foot setback as some public improvements such as the sidewalk are actually on private property and, assuming the “sidewalk” will be 8-feet in width and this includes a three-foot planter, he does not see that as effective to mitigate building bulk. He will not be supporting the project without an additional 10-foot setback at the 4th floor.

The Chair discussed with Commissioner Ungoco where he (Ungoco) would like the discussion to go to address his concerns regarding screening. Focus on design and line-of-sight and best bang for the buck in terms of privacy mitigation towards the east and north and residential interior as well as yards.

Director Tai, as requested by the Chair, clarified her understanding of Chair Morton’s intent in defining the “first row” or specific properties/lots that the applicant would be required to screen for privacy, and, assuming that a hotel room patron could not see beyond the first home, which would adjoin Chabela Drive at the “end cap” of the block, these would be the only properties that should need screening for privacy. Upon further discussion **Director Tai** acknowledged that although there are variations in the locations of homes on their lots, and height, the condition metric would be based on what existing currently - the first row would be the anchor for determining the baseline of effectiveness of privacy.

Commissioner Ungoco stated, with the **Director**’s suggestions his privacy concerns would be addressed.

Chair Morton proposed and confirmed with **Commissioner Ungoco** that he would support a motion approving the resolution with a modification requiring that the sight lines from the 4th story hotel rooms be blocked from the view of the first row of houses on Chabela Drive through additional architectural screening as determined by the applicant.

Chair Morton **MOVED TO** approve the resolution as written with a modification as stated that the screening be bolstered to ensure a lack of any visibility of the first story of the first row of houses on Chabela Drive, clarifying that in case there is a second story house you don't want to have to block all the way up to that level.

Commissioner Ungoco questioned whether the Commission should address whether the applicant should be required to plant more mature plants (bamboo potentially) so the landscape screening is higher at project start-up.

Director Tai explained that this could be an added condition and incorporated into the motion by the maker, Chair Morton, or as a “friendly amendment” by Commissioner Ungoco.

Commissioner Ungoco stated he offers such as a “friendly amendment”.

Director Tai suggested procedurally that the Commission complete its discussion on the architectural screening for the 4th floor and then address the landscape screening and specify a growth target. The Director suggested condition wording that “the screening on the 4th floor to be bolstered to ensure privacy for the first story of the first row of homes starting on Chabela Drive of that block” with added wording that “the screening would be subject to review and the satisfaction of the Community Development Director”. **Commissioner Ungoco** stated this language is acceptable.

Turning to the landscaping condition, **Director Tai** noted that bamboo has a growth rate and, as confirmed by Ungoco, the goal is to shorten the period of time it would reach a desired height.

Commissioner Ungoco noted, from the plans, that if you go up 30 feet from the lowest point at Chabela Drive/Tennyson Street, one gets to the 3rd floor, and so he thinks, (however unaware of

increments of height that bamboo is purchased) the goal is to achieve privacy coverage at the 3rd floor in six years.

Chair Morton suggested synching with the first modification and specify that the bamboo coverage by the Certificate of Occupancy be required to grow up to at least to a level where it provides **some** obscuring of the first row of houses for the first 10 feet of building elevation. He argued that you would get screening from the 4th floor completely and at the 3rd floor you'd have to have enough growth so that the bottom of that floor is blocked to the same degree as the 4th floor.

Commissioner Ungoco and **Director Tai** stated this is acceptable; the Director restated that the Landscape Plan would be amended to provide for bamboo planted along the east elevation that achieves a height up to the 3rd floor plate height.

Chair Morton and **Commissioner Ungoco** were in agreement with the restated condition.

Director Tai clarified that the condition would be enforced when the building is ready to be occupied and this would be accomplished by the Building Official who would not issue a Certificate of Occupancy (C of O) until the compliance is demonstrated.

This being acceptable to both the **Chair** and **Commissioner Ungoco**, Chair Morton made a new motion seconded by Commissioner Ungoco to adopt the draft resolution approving the subject Master Use Permit for A New 162-room, 81,755 Square-Foot Hotel with Full Alcohol Service for Hotel Patrons and a New 16,348 Square-Foot Retail and Office Building; and Reduced Parking with 152 Parking Spaces at 600 South Sepulveda Boulevard; and Make an Environmental Determination in Accordance with the California Environmental Quality Act (MB Hotel Partners, LLC), with two added conditions:

- 1) Screening on the fourth floor of the hotel building's eastern façade shall be bolstered to ensure privacy for the first floor of the first row of homes along Chabela Drive to the satisfaction of the Community Development Director; and,
- 2) Applicant shall revise landscaping plan to increase the size of the proposed plant material (upon installation) along the property's eastern perimeter such that the plant material achieves a height up to the third floor plate height upon issuance of Certificate of Occupancy.

Roll Call:

Ayes: Ungoco, Chairperson Morton
Noes: Thompson
Absent: None
Abstain: Vice Chair Fournier (recused)

Director Tai announced the motion passes 2-1; the appeal period is 15 days after the Commission decision; the decision is appealable to the City Council. Director Tai thanked all parties.

H. GENERAL BUSINESS

11/18/20-4 Discussion of Work Plan Items for Joint City Council/Planning Commission Meeting

Chair Morton announced the item and yielded the floor to **Community Development Director Tai**, who provided an overview and background. She noted that annually the Council holds a meeting with joint participation between it, the Planning Commission and the Parking and Public Improvements Commission. The meetings are an opportunity for the City Council to get together with all its advisory bodies and discuss joint goals. The Planning Commission's work plan is largely dictated by private applications and review of policy documents like the Housing Element or drafting ordinances like the one this year on Accessory Dwelling Units (ADU's) and training.

At approximately 6:33 p.m. Vice Chair Fournier was confirmed to be present now and he rejoined the meeting.

Chair Morton welcomed Vice Chair Fournier back and Director Tai continued, stating that tonight the

Commission has the chance to talk about what they will be discussing at the joint meeting.

Director Tai reviewed the status of 5 current (2020/21) Work Plan items: **1) Updated State Housing Laws and Housing Element:** status: a \$150k grant has been awarded the City to help pay for updating the Element for the 2021 – 2029 planning cycle, the Commission has received a training session on housing laws, and conducted three study sessions and a Commission hearing on permanent replacement Accessory Dwelling Unit ordinances; those ordinances (Muni Code and LCP versions) will be heard by the City Council at its January 5th meeting. **2) Sepulveda Corridor Planning Effort** – Initiative to modernize parking standards for the Sepulveda corridor: will be resuming progress. **3) Manhattan Village Mall construction:** no new use permits are pending that would be heard by the Commission. **4) Wireless Telecommunications Program:** the staff effort and scope of this item has evolved to focus more on public education and outreach on the authority of the city's discretion to permit these facilities. Staff expects its effort in the upcoming year to be on informing the Commission possibly with a study session. **5) Client Resiliency Program:** a joint effort coming from the Sustainability group in Community Development and planning division; will involve updates to the Coastal program and the Commission will have a role.

As to new topics, two have already been raised in Planning Commission meetings: 1) Holding public forums to provide info and respond to concerns about state level housing regulations such as SB 330; and 2) Review of the City's notification protocol for land use applications.

Chair Morton assumed the floor and invited the Commission to raise and additional topics.

Vice Chair Fournier asked if there would be any work on the General Plan other than the Housing Element and he feels that the staff needs some time to catch up - **Director Tai** expressed appreciation and noted that the Housing Element will be the main effort and beyond that the Climate Resiliency Program which will involve updating portions of the LCP, the General Plan, and the Safety Element in dealing with sea level rise (sometimes the updating of one policy document can trigger a requirement to update another). Another ongoing effort is the implementation of the Mobility Element. **Director Tai** expressed appreciation for concerns expressed by Commissioner Fournier as to the effect of vacancies in the Division and the pandemic, and alleviated concern by stating that the new Planning Manager who has joined staff very recently, will be introduced shortly, and a new Assistant Planner will be on board soon and Staff is managing work well.

Commissioner Fournier, speaking about the new discussion items, stated he greatly supports the concept of a "round table" for community discussion on planning issues, and he would like to see every part of the community have a chance to participate.

Director Tai understood the intent for participation, and believes it will be more of a listening and education forum as it appears that the market dynamics are such that solutions are not being found through the existing zoning ordinance. Staff intends to listen and provide information to help the public understand the bigger picture/issues.

Commissioner Ungoco asked if staff could educate the Commission with a brief overview of "affordable housing". Director Tai responded that staff can give a brief overview in a study session without designating this as a workplan item, adding that this could be raised as a part of the discussion regarding the Housing Element Update.

Chair Morton noted that the issue of notification has to do with whether the radius should be 1,000 feet or something else; Commissioner Fournier stated he feels that 1,000 feet should be the minimum radius as it is consistent with the distance for determining potential conflict of interest but in some cases, he feels the radius should be 5,000 feet.

Chair Morton assured that this topic would be added to the list of discussion issues for the joint meeting. **Director Tai** will internally assess the level of staff resources that would be needed and then develop a schedule and delivery date. The cost of doing the radius list of property owners is the responsibility of the applicants and staff would fold any change and effect on staff time into the Citywide annual fee study.

There were no members of the public present, wishing to comment.

I. DIRECTOR'S ITEMS

Director Tai made two announcements regarding staffing:

1. She introduced Talyn Mirzakhian, who joined staff last week as Planning Manager and who most recently worked for the City of Pasadena as Planning Manager; has a degree from USC and 15 years of experience. **Chair Morton** welcomed Talyn who stated she is honored and happy to work for Manhattan Beach, and looks forward to working alongside the Commission to realize the City's goals.
2. She announced that **Assistant Planner Ted Fatuos** has been reclassified to be an Associate Planner. This promotion is well deserved especially as Ted stepped up during the vacancies and picked up a number of difficult projects and has done a phenomenal job. This is especially meaningful as Ted started out as an intern and Director Tai has seen how much he has grown and given back to the staff and community. **Chair Morton, Vice Chair Fournier** and **Commissioner Thompson** all heartily congratulated Associate Planner Fatuos who returned his thanks.

Director Tai reported:

1. The City Council will be considering the permanent ADU Ordinance that was approved by the Commission at its January 5th 2021 meeting, however, in order to keep the interim ordinances (Nos. 20-0004-U, 20-0005-U) in effect while the permanent ones are being processed, staff has processed extensions which will be heard by the City Council on December 1st. The extensions will keep the urgency ordinances alive from December 15 to the end of the 2nd reading - likely the end of February.
2. The Kinecta Credit Union project approved by the Commission at the south east corner of Sepulveda/MBB is progressing; existing structures have been demolished and grading and building permits are expected to be issued soon.
3. The small office with roof deck approved by the Planning Commission (and appealed to Council) in 2019 at 1419 Highland is going to city council for a one-year use permit review that was imposed by the Council in the appeal hearing. There are no significant outstanding issues.
4. Staff is getting word from the County that much stronger regulations on outdoor dining are expected due to the number of cases of COVID going up. Staff is working with the business owners as much as possible to help them survive economically.
5. Director Tai wished everyone a safe and happy Thanksgiving.

J. PLANNING COMMISSION ITEMS

Vice Chair Fournier requested clarification on the guidelines for recusal on the basis of potential conflict of interest - to what degree can a Commissioner, in recusing speak on matters tangentially relating to the project that is the subject of recusal? Assistant City Attorney Kearns responded that when a Commissioner, a Councilmember, any other official recuses themselves, typically it's under the Political Reform Act or another statute that governs conflicts of interest that uses very broad language. Upon further discussion it was determined that since additional information was needed by the City Attorney, Vice Chair Fournier should contact the City Attorney directly to continue the discussion.

Commissioner Thompson raised two issues: 1) he acknowledged the contribution that Former Commissioner Ben Burkhalter made to the Commission, especially given his background as an architect; he will be greatly missed. Vice Chair Fournier joined in that acknowledgment. 2) Regarding the project heard tonight - he requested that when the project goes to the City Council, if the staff will identify his concerns as he voted against the approval. Director Tai noted that typically the reasoning behind a specific Commissioner's vote will be included in the minutes which are part of the background record of the project given with the staff report to the City Council. Commissioner Thompson requested that the staff report list some of the issues that the Commission or he had such that this can be read before the Council makes a decision on the project. Director Tai acknowledged this request.

K. TENTATIVE AGENDA – November 25, 2020

Chair Morton noted that the meeting will be cancelled due to the Thanksgiving holiday.

L. ADJOURNMENT TO – It was moved and seconded (Thompson/Ungoco) that the meeting be adjourned at 7:10 p.m. to Wednesday, December 9, 2020 at 3:00 p.m. via Zoom/virtual format. The motion passed unanimously 4-0 with a roll call vote.

ROSEMARY LACKOW
Recording Secretary

GERRY MORTON
Chairperson

ATTEST:

Carrie Tai, AICP
Community Development Director

Martha Alvarez

From: Darryl Franklin <600sepulvedacomunity@gmail.com>
Sent: Monday, February 1, 2021 10:38 AM
To: List - City Council; City Clerk; Ted Faturos; Liza Tamura; Martha Alvarez; Carrie Tai, AICP
Subject: [EXTERNAL] MB Poets - updated filing for 600 S Sepulveda Hotel hearing at Council Meeting 2.2.21
Attachments: 210202-CC-Appeal-MBPoetsReport-600PCH-Final.pdf
Follow Up Flag: Follow up
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To the Mayor and City Council (and others):

Please find attached MB Poets addendum to our appeal filing report dated January 19, 2021. It addresses various issues raised at the hearing on the 19th and in further submitted materials from the applicant and his experts.

Please acknowledge receipt.

Many thanks

Yours truly

Darryl Franklin

(1) 818 231 1182 (-8hrs GMT)

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ADDENDUM TO MB POETS APPEAL REPORT DATED 19 JANUARY 2021

This document augments the MB Poets appeal report, dated 19 January 2021, for the project at 600 S. Sepulveda Blvd. It comprises the following items:

- Rebuttal by Steve Rogers Acoustics [“SRA”] [Attachment 1], of the noise report by the city acoustic consultant Michael Baker International [“MBI”]¹, dated 19 January 2021;
- Comments on the rebuttal by the city traffic engineer [“City”], dated 26 January 2021, of analyses conducted by Transportation Engineering and Planning [“TEP”] for MB Poets; and,
- Comments on the parking and traffic rebuttal by Kimley Horn Associates [KMA”], dated 18 January 2021.

SRA Rebuttal of MBI Report, Attachment 1.

Condition 16 in Resolution No. PC 20-10 [“Use Permit”] states,

“Noise shall not be audible beyond the premises.”

Based on nighttime ambient noise measurements, SRA proves that crowd noise from 200 patrons on the 4th-floor open terrace and the 25 air-conditioning units on the roof will create noise audible at residences to the west across PCH and on Chabela Dr. to the east.

The municipal code requires the following finding for project approval,

*“The proposed use will comply with the provisions of this title, **including any specific condition** required for the proposed use in the district in which it would be located;”* [MBMC § 10.84.060 (A)(3), Emphasis added]

Consequently, the city council may not approve the project, because substantial evidence exists that the 25 roof-top air-conditioners and the 4th-floor outdoor nightclub will create noise beyond the east and west property lines, respectively.

Regarding the valid legal standing of Condition 16, MBI dismisses it, as follows,

“Since this is a condition of approval for the Project and not a threshold for consideration in a CEQA analysis, it is outside of MBI’s scope to demonstrate compliance.”

The SRA Attachment 1 rebuttal debunks the pitiful MBI claim above, as well as all others. For example, MBI did not conduct ambient nighttime noise levels. As result, they have no means to determine whether the project complies with the noise standards in nearby residential areas east and west.

Comments on Parking and Traffic Rebuttal by City.

Regarding Item 3 in the City rebuttal, Condition 13 in the Use Permit states,

“Operation of the hotel’s eating and drinking areas shall be in substantial compliance with all restrictions imposed by the California Department of Alcohol Beverage Control...”

Condition 14 in the Use Permit states,

“The hotel’s eating and drinking options are for the use of hotel patrons only.”

Condition 14 violates Condition 13, because the Department of Alcohol Beverage Control [“ABC”] requires a **public bona fide eating place** for the Type 47 license service-areas, per former ABC sworn officer Lauren Tyson.²

Consequently, per MBMC § 10.84.060 (A)(3), the city council may not approve the project, because substantial evidence exists that the project does not comply with ABC regulations.

¹ Response to Steve Rogers Associates Rebuttal, Michael Baker International, 19 January 2021.

² Proposed Type 47 License Applicant: MB Hotel Partners, LLC, Lauren C Tyson, 14 December 2020.

The City rebuttal³ erroneously states at Item 3,

“Staff has determined that the areas where food or alcohol will be served are not public in nature, and are therefore not separate land uses.”

This false claim lacks expert opinion on ABC regulations, thus unsubstantiated and deficient.

ABC regulations require public access to the hotel alcohol-service areas, thereby creating an additional parking demand estimated at 70 spaces⁴, excluded by the project application.

Regarding Item 1 in the City parking and traffic rebuttal³, MBMC §10.64.040 states,

“The maximum allowable reduction in the number of spaces to be provided shall not exceed fifteen percent (15%) of the sum of the number required for each use served.”

No exceptions or exemptions to this provision exist.

The City erroneously claims they can ignore the above provision, using MBMC §10.64.050 in its stead. The latter simply provides the findings necessary to make the 15% reduction in required parking, per MBMC §10.64.040. The City has failed to provide a single fact to support their invalid interpretation of these two parking provisions in the zoning code.

Regarding Items 2 & 4 in the City parking and traffic rebuttal³, MB Poets transportation engineer TEP previously disposed of these unsubstantiated claims in their report⁵.

Comments on Parking and Traffic Rebuttal by KMA⁶.

Regarding Items 1, 2, 3 and 4 in the KMA parking and traffic rebuttal, MB Poets transportation engineer TEP previously disposed of these unsubstantiated claims in their report⁵.

Item 5 addresses the erroneous hotel models for parking and traffic analyses used by KMA, chosen because they minimize impacts on the adjoining residential neighborhoods. To accomplish this shell game, KMA uses the ITE⁷ Code 311 All-Suites Hotel for traffic and the Code 312 Business Hotel for parking. [Footnote 6, p.3]

In their report⁵, based on facts, MB Poets TEP correctly asserts that the hotel, ranked in the top-five bracket for Manhattan Beach, constitutes an ITE Code 310 Hotel, with much higher peak-parking demands and traffic intensity than the KMA minimized choices.

For example, on weekends, the Code 310 Hotel has a parking demand of 1.55 spaces per room, versus 0.64 spaces a room for KMA, an erroneous 59% reduction in required parking demand.

Attachment 2⁸ provides traffic analysis by Tom Brohard and Associates, which also concludes that the ITE Code 310 Hotel constitutes the appropriate model for the project hotel.

Consequently, independent analyses by two licensed professionals have established the ITE Code 310 Hotel as the correct model. KMA, however, cherry-picked the Code 311 and 312 models for traffic and parking, respectively, to improperly minimize impacts on nearby residential neighborhoods.

³ *City Traffic Engineer Responses to MB Poets Rebuttal Documents*, Erik Zandvliet, 26 January 2021.

⁴ *Project Parking, Traffic and Noise Require Environmental Review*, p. 4, MB Poets, 19 January 2021.

⁵ *Rebuttal Comments on 600 PCH Project City of Manhattan Beach Traffic and Shared Parking Analysis*, Craig S. Neustaedter, 17 January 2021.

⁶ *Response to Traffic and Parking Comments*, Kimley Horn Associates, 18 January 2021.

⁷ *Trip Generation Manual*, ed. 10 and *Parking Generation Manual*, ed. 5, Institute of Transportation Engineers

⁸ *Transportation and Traffic Issues*, pp. 2-3, Tom Brohard and Associates, 15 January 2021 [United Here Local 11]



Steve Rogers Acoustics

ATTACHMENT 1. REBUTTAL OF MBI REPORT, 19 JANUARY 2021

January 30, 2021

Don McPherson
Coastal Defender
1014 1st Street
Manhattan Beach, CA 90266
dmcphersonla@gmail.com

Subject: **Manhattan Beach Hotel Project – Noise Impacts
Rebuttal of MBI dated January 19, 2021**

Dear Don:

We have received a copy of a memorandum from Michael Baker International (MBI), dated January 19, 2021. Our responses to this memo (which supplement our previous rebuttal comments dated January 16, 2021) are summarized as follows:

ROOFTOP HVAC EQUIPMENT

- MBI's January 19, 2021 memo presents an analysis of HVAC equipment noise based on 16 small exhaust fans and 9 small condensing units on the roof of the hotel – as shown on the current project drawings – and assumes that these 25 pieces of equipment could operate simultaneously. MBI's conclusion is that, with 16 exhaust fans and 9 condensing units operating at once, the received noise level on Chabela Drive would be 50 dBA – thereby complying with the nighttime noise limit in the MBMC, albeit just barely.
- The measured nighttime ambient noise level on Chabela Drive, directly behind the location of the proposed hotel, is 40.6 dBA – more than 9 dBA lower than MBI's predicted HVAC noise level. So, assuming that MBI's latest HVAC noise calculation is accurate, noise of the fans and condensing units would be quite clearly audible on Chabela drive, violating MBPC Condition of Approval #16, which requires that noise emanating from the hotel "shall not be audible beyond the premises".

CROWD NOISE FROM THE OUTDOOR ROOFTOP TERRACE & ADJACENT BAR

- MBI's January 19, 2021 memo clarifies the basis of their analysis of crowd noise from the outdoor rooftop terrace and adjacent open-sided bar. According to the memo, their calculation assumes a crowd of 150 people total, including people on the roof terrace and patio as well as the adjacent open-sided bar.
- However, the current project drawings show the combined area of the rooftop terrace, patio and bar as 3,000 ft² – which would accommodate a total occupancy of 200, assuming an occupant load factor of 15 for an assembly area without fixed seats and with an unconcentrated arrangement of tables and chairs (per Table 1004.5 in the California Building Code). And, according to the crowd noise research cited by MBI in their memos (Hayne et al, 2011), a crowd of 200 is 1.9 dBA noisier than a crowd of 150.



- MBI’s crowd noise calculation assumes that the homes on El Oeste Drive are “partially shielded by commercial buildings along Sepulveda Boulevard” and subtracts 3 dBA from the net level of crowd noise to reflect such shielding. This shielding factor is unrealistic because many of the homes on El Oeste Drive will have a clear and unobstructed view of the hotel’s rooftop deck and the open sides of the roof level bar – in other words, zero shielding.
- Adding 1.9 dBA for a crowd of 200 people and removing the unrealistic 3 dBA shielding factor from MBI’s calculation, the resulting received crowd noise level on El Oeste Drive becomes 54.9 dBA, which exceeds the nighttime noise limit in the MBMC.
- We measured a daytime (1:11 PM) ambient noise level of 51.9 dBA on El Oeste Drive – which is 3 dBA lower than MBI’s predicted crowd noise level (adjusted for maximum crowd size of 200 and without the erroneous shielding factor). It follows that crowd noise would be clearly audible at the homes on El Oeste Drive during the daytime, violating MBPC Condition of Approval #16, which requires that noise emanating from the hotel “shall not be audible beyond the premises”.
- We measured a nighttime (11:46PM) ambient noise level of 38 dBA on El Oeste Drive – which is almost 17 dBA lower than the expected level of crowd noise. It follows that crowd noise would be quite clearly audible at the homes on El Oeste Drive at night, violating MBPC Condition of Approval #16, which requires that noise emanating from the hotel “shall not be audible beyond the premises”.

AMPLIFIED MUSIC

- In their January 19, 2021 memo, MBI argues that amplified music does not include “impulsive” noises or “pure tones” as defined by the MBMC and should not, therefore, be subject to the more restrictive noise limits for impulsive or tonal sounds. MBI’s logic is that, because amplified music is not among the specific examples of impulsive/tonal noise listed in MBMC 5.48.160, “amplified music was not intended to be categorized as an impulsive noise or pure tone source”.
- We strongly disagree with MBI’s very narrow interpretation of MBMC 5.48.160. Among qualified and experienced acoustical consulting professionals, amplified music is universally recognized as an impulsive/tonal noise. This widely-accepted fact is further supported by MBMC 5.48.020 – Definitions, which reads (in part):

"Impulsive noise" means a noise of short duration usually of high intensity with an abrupt onset and rapid decay. Impulsive noise sources include but are not limited to impact wrenches, pneumatic hammers, hammering devices, explosions, fire arms and other similar noise sources.

"Pure tone" means any noise which is judged as audible as a single pitch or a set of single pitches. Pure tones include, but are not limited to, noise from whistles, bells, fans and other mechanical devices that emit audible tones.

- The key to understanding the intent of these definitions is that the various examples of impulsive/tonal noise in the MBMC are qualified by the words “include but are not limited



to”. This very deliberate language means that the list of examples is not complete or exhaustive. In other words, if a noise is of short duration with an abrupt onset and rapid decay it is categorized as impulsive – whether or not it is included in the list of examples. Similarly, if a noise contains a single pitch or a set of single pitches, it is characterized as a pure tone – whether or not it is included in the list of examples.

- Amplified music has an impulsive component (drum beat, percussive instrument sounds) and also contains single pitches and sets of single pitches (musical notes, chords) and is therefore subject to the provisions of paragraph MBMC 5.48.160. Which means that the Exterior Noise Standards for amplified music sounds received on residential property are 50 dBA during the daytime and 45 dBA at night.
- MBI’s January 19, 2021 memo reiterates their previous comment that “...amplified live music (e.g., live bands, disc jockeys, etc.) would be required to conclude no later than 9:00 p.m.”. While it is true that a 9 PM cutoff for live entertainment is a condition of approval, live entertainment is not the only potential source of amplified sound in this project. Almost all modern hotels have an amplified music system, with a distribution of loudspeakers throughout the common areas – including the outdoor gathering areas. It is therefore almost certain that the hotel operators intend to play amplified music on the rooftop terrace and open-sided bar area past 9 PM and all the way to 1 AM, in which case amplified music would need to comply with the MBMC daytime noise limit (7 AM -10 PM) of 50 dBA and MBMC nighttime noise limit (10 PM - 7 AM) of 45 dBA at the surrounding residential uses.
- According to MBI’s own calculations (presented in their memo dated January 12, 2021) expected levels of amplified sound on El Oeste Drive would be around 55 dBA, which exceeds the daytime and nighttime noise limits in the MBMC.
- We measured a daytime (1:11 PM) ambient noise level of 51.9 dBA on El Oeste Drive – which 3 dBA lower than MBI’s predicted amplified music noise level. It follows that amplified music would be clearly audible at the homes on El Oeste Drive during the daytime, violating MBPC Condition of Approval #16, which requires that noise emanating from the hotel “shall not be audible beyond the premises”.
- We measured a nighttime (11:46PM) ambient noise level of 38 dBA on El Oeste Drive – which is 17 dBA lower than MBI’s predicted amplified music noise level. It follows that amplified music would be quite clearly audible at the homes on El Oeste Drive at night, violating MBPC Condition of Approval #16, which requires that noise emanating from the hotel “shall not be audible beyond the premises”.

CONDITION OF APPROVAL #16

- MBPC Condition of Approval #16 requires that noise emanating from the hotel “shall not be audible beyond the premises”. And MBI’s own analysis shows that HVAC noise from the hotel rooftop, crowds in the outdoor gathering spaces and amplified music would all be audible on the surrounding streets – particularly during the late evening and at night.
- MBI’s January 19, 2021 memo argues that a condition of approval is not a valid consideration in CEQA analysis and this is why their noise studies to date have not



considered audibility or the low ambient noise levels on the neighboring residential streets at night. The memo also states that: “...it is not necessary or appropriate to demonstrate compliance with a condition of approval prior to project entitlement, as this condition is an enforcement mechanism intended for future activity.”

- We disagree. For the purposes of a CEQA evaluation, conditions of approval mandated by the City carry the same weight as regulations in the Municipal Code. For this project, it follows that Condition of Approval #16 must be considered in establishing thresholds of significance – consistent with current CEQA Guidelines, specifically Appendix G, XIII, which defines the threshold of significance for noise as follows:

“Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.”

SUMMARY & CONCLUSIONS

- Steve Rogers Acoustics (SRA) has previously identified various anomalies, omissions and errors in the noise analysis prepared by MBI for the Manhattan Beach Hotel project. [SRA reports dated November 15, 2020, December 14, 2020 and January 16, 2021 refer.]
- A memorandum from MBI dated January 19, 2021 is intended to address and rebut our previous findings. This memo does correct an anomaly in MBI’s previous HVAC noise calculations; however, this one correction does little to alter our overarching conclusion that the noise analyses presented by MBI significantly understates and downplays the potentially serious noise impacts of the project. Specifically, we find that:
 - MBI’s analysis fails to demonstrate that crowd noise and amplified music from the project will comply with the noise regulations in the City of Manhattan Beach Municipal Code.
 - MBI’s analysis fails to demonstrate that the project will comply with MBPC Condition of Approval #16, which requires that noise emanating from the hotel “shall not be audible beyond the premises”.
 - MBI’s assertion that Condition of Approval #16 is not relevant to CEQA evaluation of noise impacts is incorrect. Conditions of approval carry the same weight as regulations in the Municipal Code and are therefore a valid consideration in establishing significance thresholds according to CEQA Guidelines.

Yours sincerely,

Steve Rogers Acoustics, LLC

Steve Rogers
Principal

Tom Brohard and Associates

January 15, 2021

Mr. Jordan Sisson, Attorney at Law
Law Offices of Gideon Kracov
801 South Grand Avenue, 11th Floor
Los Angeles, California 90017

SUBJECT: Proposed Hotel at 600 South Sepulveda Boulevard in the City of Manhattan Beach - Transportation and Traffic Issues

Dear Mr. Sisson:

Tom Brohard, P.E., has reviewed the transportation and traffic aspects of the November 18, 2020 Report (Staff Report) to the Planning Commission to construct a new 162 room hotel and a new 16,348 square foot retail/office building at 600 South Sepulveda Boulevard in the City of Manhattan Beach. I have also reviewed comments prepared by Craig S. Neustaedter of Transportation Engineering and Planning, Inc., regarding deficiencies and errors contained within testimony and traffic reports prepared by Kimley Horn Associates for the Proposed Project. So too, I have reviewed the City's recently released staff report printed on January 14, 2021 (January Staff Report).

As concluded by Mr. Neustaedter, I also believe the Kimley Horn Traffic Study for the Project is fatally flawed. The Proposed Project will generate significantly more daily and peak hour trips as well as vehicle miles traveled (VMT) than identified in the Traffic Study, and mitigation measures must be developed, adopted, and implemented. This letter points out deficiencies, errors, and inconsistencies that must be addressed before the City of Manhattan Beach considers the Proposed Project further.

Education and Experience

Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained over 50 years of professional traffic engineering and transportation planning experience. I am licensed as a Professional Civil Engineer both in California and Hawaii and as a Professional Traffic Engineer in California. I formed Tom Brohard and Associates in 2000 and have served many diverse communities as the City Traffic Engineer and/or the Transportation Planner. During my career in both the public and private sectors, I have reviewed numerous environmental documents and traffic studies for various projects as shown in a short summary of my experience in the enclosed resume.

Mr. Jordan R. Sisson, Attorney at Law
Proposed Hotel at 600 South Sepulveda Boulevard in the City of Manhattan
Beach – Transportation and Traffic Issues
January 15, 2021

Transportation and Traffic Issues

Based on the information in the various documents, each of the following traffic and transportation issues must be fully addressed and evaluated:

- 1) Trip Generation for the Proposed Project Is Incorrect – The Institute of Transportation Engineers, ITE, regularly collects data from traffic studies across the United States, and most recently published the Trip Generation Manual, 10th Edition in September 2017. This data is used by engineers to forecast daily and peak hour trips from many different land uses. These same land use definitions are also consistently used in ITE's Parking Generation. Using this data, I found several errors in the calculation of trip generation for the Proposed Project as follows:
 - a) Incorrect Land Use Trip Rates Used for the Hotel - To forecast trips for the Proposed Project in their August 2020 Traffic Study, Kimley Horn incorrectly used trip generation data for ITE Land Use 311 for the hotel. As shown on the enclosed description of an All-Suites Hotel, ITE defines this as "a place of lodging that provides sleeping accommodations, a small restaurant and lounge, and small amounts of meeting space. **Each suite includes a sitting room and separate bedroom; limited kitchen facilities are provided within the suite.**" (emphasis added)

From my review of Pages 50 - 53 in the Staff Report showing detailed plans of each of the four hotel floors, **none** of the 162 guest rooms have both a sitting room and a separate bedroom as required by the ITE definition of an All-Suites Hotel. Therefore, the Traffic Study used incorrect trip generation rates to calculate daily and peak hour trips for the Proposed Project. From Table A on Page 37 of the Staff Report, an All-Suites Hotel with 162 rooms was forecast by Kimley Horn to generate only 723 daily trips with 55 in the morning peak hour and 58 in the afternoon peak hour. The trip rates used are significantly less than those for Land Use 310, Hotel.

Earlier in their March 8, 2020 Memo (attached) regarding right turn access for the Proposed Project, Kimley Horn forecast trips to and from the Proposed Project using Trip Generation Manual, 9th Edition. Table 1 on Page 3 indicates the Proposed Project would generate 2,200 daily trips including 121 in the morning peak hour and 178 in the afternoon peak hour.

From my review of this memo, Kimley Horn used ITE trip generation data for a Business Hotel, Land Use 312. Only very limited data is provided by ITE for this use. As shown on the attached definition from

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ITE, business hotels "...are places of lodging aimed toward the business traveler. These hotels provide sleeping accommodations and other limited facilities, such as a breakfast buffet bar and afternoon beverage bar (no lunch or dinner is served, and no meeting facilities are provided)." Other errors in Table 1 involving the fitted curve equations for the retail and office components led to an overstatement of trips to and from the Proposed Project.

Trip rates for business hotels (Land Use 312) are based on very limited data and are significantly less than the other hotel categories. Trip rates for All-Suites Hotels (Land Use 311) should not be used as the definition of the All-Suite Hotel does not fit the Proposed Project. From my review of the different ITE hotel categories, the Traffic Study must use trip rates for Hotel, Land Use 310, from Trip Generation Manual, 10th Edition.

- b) Corrected Land Use Trip Rates for the Hotel - The Proposed Project fits the description of a Hotel, Land Use 310. ITE defines a Hotel as "...a place of lodging that provides sleeping accommodations and supporting facilities such as restaurants, cocktail lounges, meeting and banquet rooms or convention facilities, limited recreational facilities (pool, fitness room), and/or other retail and service shops." (emphasis added).

As is typical in ITE Trip Generation and Parking Generation Manuals, the language "such as" merely provides examples of supporting facilities and in no way circumscribes the use of ITE Land Use 310 trip rates to only hotel projects that include all the referenced supporting facilities. Here, the Project includes a variety of supporting facilities that fit within the definition of ITE Land Use 310 (e.g., fitness center, business center, meeting room, breakfast, alcohol and beverage and food services, proposed retail on site, and indications of further dining services open to the public in future applications).

Using the corresponding data from ITE for Land Use 310, the 162-room hotel will generate 1,402 daily trips with 76 in the morning peak hour and 95 in the afternoon peak hour. These corrected trip rates indicate that only the Hotel portion of the Proposed Project will generate 670 more daily trip including 21 more trips in the morning peak hour and 37 more trips in the afternoon peak hour.

- c) Morning Peak Hour Restaurant Trips Are Grossly Overstated - From Yelp (<https://www.yelp.com/biz/el-torito-manhattan-beach-3>), the El Torito Restaurant opened at 11 AM on weekdays. As a result, it would not have served breakfast and would have generated only a very few, if any, trips in the morning peak hour. The Traffic Study incorrectly

Mr. Jordan R. Sisson, Attorney at Law
Proposed Hotel at 600 South Sepulveda Boulevard in the City of Manhattan
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assumed that the former restaurant was open for breakfast, significantly overstating the number of morning peak hour trips. By doing this and comparing to the Proposed Project, the potential traffic impacts of new morning peak hour trips on the area street system were totally missed.

- d) Restaurant Trips Cannot Be Used to Offset Project Trips – The article from Yelp cited above indicates El Torito closed in December 2018. Based on this, trips to and from the former restaurant should not be used to offset trips to and from the Proposed Project. Los Angeles and other cities require that trips to and from facilities closed for more than two years cannot be used to offset trips from proposed projects on the same site. For a proper analysis, the City should not take trip credits for the closed El Torito Restaurant against the Proposed Project.
 - e) Trips for Proposed Project Are Significantly Understated - In combination with the retail and general office components, the Proposed Project will generate 1,754 daily trips including 129 in the morning peak hour and 117 in the afternoon peak hour. Therefore, the Proposed Project is expected to generate 813 more daily trips including 129 more trips in the morning peak hour and 34 more trips in the afternoon peak hour than reported in the Traffic Study. With these errors, the Level of Service analysis in the Traffic Study has been incorrectly calculated and potentially significant traffic impacts have not been properly identified, analyzed, or mitigated.
 - f) Net Trip Difference Results in Failure to Disclose Significant Impacts – The Kimley Horn Traffic Study utilized the wrong trip rates for the proposed hotel and incorrectly added morning peak hour trips when the El Torito Restaurant was not open for business. These errors in the calculation of daily and peak hour trips could also result in the failure to disclose, analyze, and mitigate potentially significant impacts in the areas of air quality and noise.
- 2) Vehicle Miles Traveled (VMT) Must Be Properly Analyzed and Mitigated - Senate Bill 743 (SB-743) amended the California Environmental Quality Act (CEQA) to require calculation and estimates of vehicle miles traveled (VMT) for all development projects approved in California after July 1, 2020. As a result, the traffic impact analysis (TIA) must now include estimates of VMT created by the Proposed Project. My review indicates the TIA does not include a proper analysis of VMT for the Proposed Project.

Page 154 of the Staff Report, the Introduction to the August 2020 Traffic Impact Analysis for the Proposed Project prepared by Kimley Horn, states "This report has been prepared in accordance with the traffic impact study requirements of

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the current Los Angeles County Congestion Management Program (LA County CMP) for Traffic Impact Analyses.” This statement is incorrect as Los Angeles County opted out of the Congestion Management Program by action of their Board of Supervisors on July 16, 2019 (see enclosed). As a result, there are no LA County CMP Guidelines for Traffic Impact Analyses.

Historically, the City of Manhattan Beach has followed the “Transportation Impact Analysis Guidelines” adopted by Los Angeles County Public Works. The most recent edition published July 23, 2020 contains procedures to calculate VMT and comply with the provisions of SB-743. Instead of following County Public Works Guidelines, the August 2020 Traffic Impact Study prepared by Kimley Horn attempted to comply with the State Office of Planning Research (OPR) Technical Advisory but failed to do so as follows:

- a) Screening Threshold for Land Use Projects Is Significantly Exceeded – OPR suggested that projects which generate 110 or fewer daily trips could be considered to not lead to a significant impact.

As indicated in 1e) above, the Proposed Project will generate 1,754 daily trips. From Table A of the TIA on Page 37 of the Staff Report, the restaurant generated 941 daily trips. The difference in daily trips generated by the site is 1,754 minus 941, or 803 daily trips.

The forecast of 803 additional daily trips is significantly more than 130 daily trips identified on Page 183 of the Staff Report. These additional daily trips that will be created by the Proposed Project over the former restaurant use leads to potentially significant VMT impacts that require further study and adoption of mitigation measures to reduce vehicle trips.

- b) Project VMT Discussion Is Inadequate and Unsupported – Pages 183 and 184 of the Staff Report from the Kimley Horn TIA discuss trip types to and from the Proposed Project but provide no supporting documentation:
- i) Employee Commute Trips – The discussion states “Most often an important strategy for reducing VMT in a community like this is to improve the local jobs/housing balance by increasing the number of employment opportunities. As such, it is reasonable to expect that increasing local employment opportunities will reduce the average commuter trip lengths of residents, resulting in a net decrease to regional net VMT.” **No data is provided supporting this opinion.**
- ii) Guest Trips Related to the Hotel Use – The discussion states “It is reasonable to assume that hotel would not generate new demand but meets existing demand that guests would otherwise travel in the region

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for the service. Further, proximity to transit and potential use of shuttle services would also likely reduce the single occupancy vehicle trips." **Again, no data is provided here.** While there is some transit service within ½ mile of the site, no existing or proposed shuttle services have been discussed or described in relation to reducing single occupant vehicle trips.

- iii) Other Trips – The discussion acknowledges that these trips likely have a minimal impact on VMT, and these are not likely to impact the local transportation system compared to employee commute trips and guest trips related to the hotel use. **The discussion fails to discuss or analyze trips associated with the retail and office portions of the Proposed Project, with these trips being different from the hotel trips.**
- iv) VMT Discussion Conclusion – The discussion of VMT concludes on Page 184 of the Staff Report stating that "...if this site were not developed, a similar site will be developed elsewhere to meet this demand and as such the alternative to this development would not likely eliminate any related VMT. In consideration of this, it is anticipated that this redevelopment project would not result in a significant finding under SB-743." This conclusion also lacks supporting evidence.
- c) VMT Analysis Must Follow Los Angeles County Guidelines – The VMT discussion in the August 2020 Traffic Impact Analysis is inadequate and fails to support the conclusion that the Proposed Project will not have significant VMT. To properly assess VMT, the Los Angeles County Public Works Transportation Impact Analysis Guidelines must be followed in detail from Section 3.1.4.2, Project Impact Determination, through Section 3.1.5.1, Development Project Mitigations (Pages 12 through 16).

Based on the Los Angeles County Public Works Transportation Impact Analysis Guidelines, I believe the Proposed Project will have significant VMT impacts based upon the additional 803 daily trips, almost double the number of daily trips generated by the El Torito Restaurant. Measures to mitigate the significant VMT impacts must be adopted as conditions of approval for the Proposed Project.

In summary, the Proposed Project must fully evaluate and disclose the potential traffic impacts. Contrary to what is suggested by staff on Page 12 of the January Staff Report, further study must be undertaken, particularly regarding VMT, and more detailed information must be provided to properly identify and address the traffic impacts that will be created by the Proposed Project.

**Mr. Jordan R. Sisson, Attorney at Law
Proposed Hotel at 600 South Sepulveda Boulevard in the City of Manhattan
Beach – Transportation and Traffic Issues
January 15, 2021**

If you have questions regarding these comments, please contact me at your convenience.

Respectfully submitted,

Tom Brohard and Associates

Tom Brohard

Tom Brohard, PE
Principal



Enclosures

- Institute of Transportation Engineers, Trip Generation Manual, 10th Edition
- County of Los Angeles, Department of Public Works, Congestion Management Program Opt-Out, July 16, 2019
- Los Angeles County Public Works, "Transportation Impact Analysis Guidelines", July 23, 2020
- Resume

Martha Alvarez

From: jordan@gideonlaw.net
Sent: Monday, February 1, 2021 11:43 AM
To: Ted Faturus; City Clerk
Subject: [EXTERNAL] Item 2, Council Hearing 2/2/21 (MB Hotel De Novo Hearing)
Attachments: Manhattan Beach Hotel Traffic Comments 01 31 2021.pdf

Follow Up Flag: Follow up
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CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Mr. Faturus—First, please see attached expert traffic report regarding the above-referenced item. *Please confirm receipt of expert letter.*

Second, *please clarify the presentation/speaking process for tomorrow's hearing*, such as:

- What will be the order of speaking/comments?
- Will appellants have speaking opportunity to respond to the staff report and new documents submitted since the January meeting?
- When and how long will public have to comment during the public comment period?

Many thanks for your attention on this matter.

-JRS

Jordan R. Sisson, Attorney
Law Office of Gideon Kracov
801 S. Grand Ave., 11th Floor
Los Angeles, CA 90017
Cell: 818-324-9752
Office: 213-629-2071 ext. 1102
Fax: 213-623-7755
jordan@gideonlaw.net
www.gideonlaw.net

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Tom Brohard and Associates

January 31, 2021

Mr. Jordan Sisson, Attorney at Law
Law Offices of Gideon Kracov
801 South Grand Avenue, 11th Floor
Los Angeles, California 90017

SUBJECT: Proposed Hotel at 600 South Sepulveda Boulevard in the City of Manhattan Beach - Transportation and Traffic Issues

Dear Mr. Sisson:

Tom Brohard, P.E., previously reviewed the transportation and traffic aspects of various documents regarding the proposed 162-room hotel and a new 16,348 square foot retail/office building at 600 South Sepulveda Boulevard in the City of Manhattan Beach. My enclosed January 15, 2021 letter pointed out numerous deficiencies, errors, and inconsistencies that should be addressed before the City of Manhattan Beach considers the Proposed Project further.

I have now reviewed the January 25, 2021 responses to my prior comments prepared by Kimley Horn as well as the January 26, 2021 responses prepared by the City's Traffic Engineer. These responses do not counter or negate the significant issues and concerns that I have expressed. In sum, I believe the Proposed Project will generate significantly more daily and peak hour trips as well as vehicle miles traveled (VMT) than identified in the Traffic Study, and mitigation measures must be developed, adopted, and implemented.

My continuing transportation, traffic, and vehicle miles traveled issues are:

- 1) Inconsistent Land Uses for the Hotel - For trips, Kimley Horn incorrectly used trip generation data for ITE Land Use 311 for an All-Suites Hotel. ITE defines this as "Each suite includes a sitting room and separate bedroom; limited kitchen facilities are provided within the suite." None of the 162 guest rooms have both a sitting room and a separate bedroom as required by the ITE definition of an All-Suites Hotel. To forecast parking needs, Kimley Horn defined the hotel as a Business Hotel, ITE Land Use 312, because "...it is more in line with the project's intended use..." It is either one or the other and cannot be analyzed differently for traffic and parking.

Kimley Horn cherry-picked the data to reduce trips and parking forecasts. Traffic and parking data need to be consistent in the choice of land use for the Project, and data from different land uses cannot be mixed to evaluate trips and parking. Hotel, ITE Land Use 310, provides more data than the other land uses chosen, and is the correct application based upon my 50+ years of professional experience.

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- 2) Morning Peak Hour Restaurant Trips Are Grossly Overstated – According to the responses to my prior comments, the Traffic Study and other reports just show a significant number of morning peak hour trips “for comparison” to the Project. This misleading comparison was put forth even though the El Torito Restaurant opened at 11 AM on weekdays and generated few if any morning peak trips. Comparing morning peak hour trips for a different restaurant open for breakfast to the Proposed Project is not valid and only confuses decision makers and the public. Further, this flawed approach disguises the potential traffic impacts of new morning peak hour trips on the area street system.
- 3) Trips for Proposed Project Are Significantly Understated - In combination with the retail and general office components, the Proposed Project will generate 813 more daily trips including 129 more trips in the morning peak hour and 34 more trips in the afternoon peak hour than reported in the Traffic Study. With these errors, the Level of Service analysis in the Traffic Study has been incorrectly computed and potentially significant traffic impacts have not been properly identified, analyzed, or mitigated. These errors in the calculation of daily and peak hour trips could also result in the failure to disclose, analyze, and mitigate potentially significant impacts in the areas of air quality and noise.
- 4) Vehicle Miles Traveled (VMT) Must Be Properly Analyzed and Mitigated - Historically, the City of Manhattan Beach has followed the “Transportation Impact Analysis Guidelines” adopted by Los Angeles County Public Works. The most recent edition published July 23, 2020 contains procedures to calculate VMT and to comply with the provisions of SB-743. Now, the responses indicate “... it would be inappropriate to use a different jurisdiction’s VMT guidelines...”

There is no explanation, much less substantial evidence, to justify this sudden departure from the City’s prior practice of utilizing Los Angeles County Public Works guidance. So too, it is inconsistent to for the response to say that the County’s VMT guidance is not appropriate because it is a different jurisdiction (on the one hand), and then proceeds to rely on South Coast AQMD’s GHG threshold (on the other hand)—which is not only a different jurisdiction but also not specific to traffic/VMT.

Based on the County’s guidelines, the Proposed Project will have significant VMT impacts based upon the additional 803 daily trips, almost double the number of daily trips generated by the El Torito Restaurant. Measures to mitigate significant VMT impacts must be adopted as conditions of approval.

Additionally, the Project would have a significant impact under the Governor’s Office of Planning and Research (OPR) guidelines, which the City only partially

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applies. The TIA admits the Proposed Project exceeds OPR’s screening threshold of 110 additional daily trips and calculates an increase of 130 additional daily trips. The TIA then calls this “nominal”, concluding that the Project “...is not likely to result in a significant VMT impact.” Because the Project is primarily a non-residential/office development (i.e., 81,000+ SF hotel), it would be considered a retail project under OPR’s guidance, which provides a “net increase in total VMT” that may indicate a significant impact.¹ This threshold applies even to a redevelopment project.² Here, the hotel component alone is reported to generate over 5.2 million annual VMTs (see figure below), which will far exceed the VMTs generated by the prior restaurant. The City fails to explain why it deems OPR’s guidance relevant but ignores that the Project would exceed OPR’s screening and numeric thresholds.

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated Annual VMT	Mitigated Annual VMT
	Weekday	Saturday	Sunday		
Enclosed Parking Structure	0.00	0.00	0.00		
General Office Building	0.00	0.00	0.00		
Hotel	2,199.96	2,199.96	2,199.96	5,249,481	5,249,481
Parking Lot	0.00	0.00	0.00		
Regional Shopping Center	0.00	0.00	0.00		
Total	2,199.96	2,199.96	2,199.96	5,249,481	5,249,481

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Enclosed Parking Structure	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	35	4
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LD11	LD12	MDV	LD11	LD12	MHD	HRD	OBUS	DBUS	MCY	CBUS	MH
Enclosed Parking Structure	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000667	0.000876
General Office Building	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000667	0.000876
Hotel	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000667	0.000876
Parking Lot	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000667	0.000876
Regional Shopping Center	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000667	0.000876

5.0 Energy Detail

Furthermore, evidence is in the record that the Project would be far less efficient on a VMT per capita basis for light duty vehicles under both SCAG’s RTP/SCS and CARB’s 2017 Scoping Plan.³ This further supports the conclusion that substantial evidence shows that the Project’s hotel component—alone—will have significant VMT impacts that warrant analysis and mitigation, such as those described by other experts.

¹ OPR (Dec. 2018) Technical Advisory, p. 16, http://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

² Ibid., p. 17.

³ See SWAPE (1/19/21) Comments on the Manhattan Beach Hotel Project, pp. 19-23 (previously provided to the City).

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- 5) Project VMT Discussion Is Inadequate and Unsupported – The Kimley Horn TIA discusses trip types to and from the Proposed Project but provides no supporting documentation or data.⁴ Generalities such as improving the jobs/housing balance cannot be relied upon to reduce VMT. The hotel should not be expected to significantly increase employment opportunities or to decrease average commuter trip lengths. While there is nominal transit service within ½ mile of the site, no existing or proposed shuttle services have been discussed or described in relation to reducing single occupant vehicle trips. **Further, trips associated with the retail and office portions of the Proposed Project, different from the hotel trips, have not been analyzed.**

The conclusion that “...if this site were not developed, a similar site will be developed elsewhere to meet this demand and as such the alternative to this development would not likely eliminate any related VMT. In consideration of this, it is anticipated that this redevelopment project would not result in a significant finding under SB-743.” This conclusion lacks supporting evidence.

The responses to my January 15, 2021 letter by Kimley Horn and by the City’s Traffic Engineer do not alter the facts that I have presented. The Proposed Project must properly evaluate and disclose potential traffic impacts which has not been done. Further study must be undertaken, particularly regarding VMT, and more detailed information must be provided to properly identify and address the traffic impacts that will be created by the Proposed Project. Many agencies have developed reasonable numeric/qualitative thresholds, consistent with evolving scientific evidence and data. The analysis provided by the City here, however, is predicated entirely on unfounded assumptions, speculation, and inconsistent with guidance from other expert agencies.

If you have questions regarding these comments, please contact me at your convenience.

Respectfully submitted,

Tom Brohard and Associates



Tom Brohard, PE
Principal



Enclosure

January 15, 2021 Letter Regarding Transportation and Traffic Issues

⁴ For example, no data is provided about City hotel vacancy/occupancy rates as compared to surrounding cities, or what occupancy levels would indicate unmet demand.

Tom Brohard and Associates

January 15, 2021

Mr. Jordan Sisson, Attorney at Law
Law Offices of Gideon Kracov
801 South Grand Avenue, 11th Floor
Los Angeles, California 90017

SUBJECT: Proposed Hotel at 600 South Sepulveda Boulevard in the City of Manhattan Beach - Transportation and Traffic Issues

Dear Mr. Sisson:

Tom Brohard, P.E., has reviewed the transportation and traffic aspects of the November 18, 2020 Report (Staff Report) to the Planning Commission to construct a new 162 room hotel and a new 16,348 square foot retail/office building at 600 South Sepulveda Boulevard in the City of Manhattan Beach. I have also reviewed comments prepared by Craig S. Neustaedter of Transportation Engineering and Planning, Inc., regarding deficiencies and errors contained within testimony and traffic reports prepared by Kimley Horn Associates for the Proposed Project. So too, I have reviewed the City's recently released staff report printed on January 14, 2021 (January Staff Report).

As concluded by Mr. Neustaedter, I also believe the Kimley Horn Traffic Study for the Project is fatally flawed. The Proposed Project will generate significantly more daily and peak hour trips as well as vehicle miles traveled (VMT) than identified in the Traffic Study, and mitigation measures must be developed, adopted, and implemented. This letter points out deficiencies, errors, and inconsistencies that must be addressed before the City of Manhattan Beach considers the Proposed Project further.

Education and Experience

Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained over 50 years of professional traffic engineering and transportation planning experience. I am licensed as a Professional Civil Engineer both in California and Hawaii and as a Professional Traffic Engineer in California. I formed Tom Brohard and Associates in 2000 and have served many diverse communities as the City Traffic Engineer and/or the Transportation Planner. During my career in both the public and private sectors, I have reviewed numerous environmental documents and traffic studies for various projects as shown in a short summary of my experience in the enclosed resume.

81905 Mountain View Lane, La Quinta, California 92253-7611

Phone (760) 398-8885

Email tbrohard@earthlink.net

Mr. Jordan R. Sisson, Attorney at Law
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Transportation and Traffic Issues

Based on the information in the various documents, each of the following traffic and transportation issues must be fully addressed and evaluated:

1) Trip Generation for the Proposed Project Is Incorrect – The Institute of Transportation Engineers, ITE, regularly collects data from traffic studies across the United States, and most recently published the Trip Generation Manual, 10th Edition in September 2017. This data is used by engineers to forecast daily and peak hour trips from many different land uses. These same land use definitions are also consistently used in ITE’s Parking Generation. Using this data, I found several errors in the calculation of trip generation for the Proposed Project as follows:

a) Incorrect Land Use Trip Rates Used for the Hotel - To forecast trips for the Proposed Project in their August 2020 Traffic Study, Kimley Horn incorrectly used trip generation data for ITE Land Use 311 for the hotel. As shown on the enclosed description of an All-Suites Hotel, ITE defines this as “a place of lodging that provides sleeping accommodations, a small restaurant and lounge, and small amounts of meeting space. **Each suite includes a sitting room and separate bedroom; limited kitchen facilities are provided within the suite.**” (emphasis added)

From my review of Pages 50 - 53 in the Staff Report showing detailed plans of each of the four hotel floors, **none** of the 162 guest rooms have both a sitting room and a separate bedroom as required by the ITE definition of an All-Suites Hotel. Therefore, the Traffic Study used incorrect trip generation rates to calculate daily and peak hour trips for the Proposed Project. From Table A on Page 37 of the Staff Report, an All-Suites Hotel with 162 rooms was forecast by Kimley Horn to generate only 723 daily trips with 55 in the morning peak hour and 58 in the afternoon peak hour. The trip rates used are significantly less than those for Land Use 310, Hotel.

Earlier in their March 8, 2020 Memo (attached) regarding right turn access for the Proposed Project, Kimley Horn forecast trips to and from the Proposed Project using Trip Generation Manual, 9th Edition. Table 1 on Page 3 indicates the Proposed Project would generate 2,200 daily trips including 121 in the morning peak hour and 178 in the afternoon peak hour.

From my review of this memo, Kimley Horn used ITE trip generation data for a Business Hotel, Land Use 312. Only very limited data is provided by ITE for this use. As shown on the attached definition from

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ITE, business hotels “...are places of lodging aimed toward the business traveler. These hotels provide sleeping accommodations and other limited facilities, such as a breakfast buffet bar and afternoon beverage bar (no lunch or dinner is served, and no meeting facilities are provided).” Other errors in Table 1 involving the fitted curve equations for the retail and office components led to an overstatement of trips to and from the Proposed Project.

Trip rates for business hotels (Land Use 312) are based on very limited data and are significantly less than the other hotel categories. Trip rates for All-Suites Hotels (Land Use 311) should not be used as the definition of the All-Suite Hotel does not fit the Proposed Project. From my review of the different ITE hotel categories, the Traffic Study must use trip rates for Hotel, Land Use 310, from Trip Generation Manual, 10th Edition.

- b) Corrected Land Use Trip Rates for the Hotel - The Proposed Project fits the description of a Hotel, Land Use 310. ITE defines a Hotel as “...a place of lodging that provides sleeping accommodations and supporting facilities **such as** restaurants, cocktail lounges, meeting and banquet rooms or convention facilities, limited recreational facilities (pool, fitness room), and/or other retail and service shops.” (emphasis added).

As is typical in ITE Trip Generation and Parking Generation Manuals, the language “such as” merely provides examples of supporting facilities and in no way circumscribes the use of ITE Land Use 310 trip rates to only hotel projects that include **all** the referenced supporting facilities. Here, the Project includes a variety of supporting facilities that fit within the definition of ITE Land Use 310 (e.g., fitness center, business center, meeting room, breakfast, alcohol and beverage and food services, proposed retail on site, and indications of further dining services open to the public in future applications).

Using the corresponding data from ITE for Land Use 310, the 162-room hotel will generate 1,402 daily trips with 76 in the morning peak hour and 95 in the afternoon peak hour. These corrected trip rates indicate that only the Hotel portion of the Proposed Project will generate 670 more daily trip including 21 more trips in the morning peak hour and 37 more trips in the afternoon peak hour.

- c) Morning Peak Hour Restaurant Trips Are Grossly Overstated - From Yelp (<https://www.yelp.com/biz/el-torito-manhattan-beach-3>), the El Torito Restaurant opened at 11 AM on weekdays. As a result, it would not have served breakfast and would have generated only a very few, if any, trips in the morning peak hour. The Traffic Study incorrectly

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- assumed that the former restaurant was open for breakfast, significantly overstating the number of morning peak hour trips. By doing this and comparing to the Proposed Project, the potential traffic impacts of new morning peak hour trips on the area street system were totally missed.
- d) Restaurant Trips Cannot Be Used to Offset Project Trips – The article from Yelp cited above indicates El Torito closed in December 2018. Based on this, trips to and from the former restaurant should not be used to offset trips to and from the Proposed Project. Los Angeles and other cities require that trips to and from facilities closed for more than two years cannot be used to offset trips from proposed projects on the same site. For a proper analysis, the City should not take trip credits for the closed El Torito Restaurant against the Proposed Project.
- e) Trips for Proposed Project Are Significantly Understated - In combination with the retail and general office components, the Proposed Project will generate 1,754 daily trips including 129 in the morning peak hour and 117 in the afternoon peak hour. Therefore, the Proposed Project is expected to generate 813 more daily trips including 129 more trips in the morning peak hour and 34 more trips in the afternoon peak hour than reported in the Traffic Study. With these errors, the Level of Service analysis in the Traffic Study has been incorrectly calculated and potentially significant traffic impacts have not been properly identified, analyzed, or mitigated.
- f) Net Trip Difference Results in Failure to Disclose Significant Impacts – The Kimley Horn Traffic Study utilized the wrong trip rates for the proposed hotel and incorrectly added morning peak hour trips when the El Torito Restaurant was not open for business. These errors in the calculation of daily and peak hour trips could also result in the failure to disclose, analyze, and mitigate potentially significant impacts in the areas of air quality and noise.
- 2) Vehicle Miles Traveled (VMT) Must Be Properly Analyzed and Mitigated - Senate Bill 743 (SB-743) amended the California Environmental Quality Act (CEQA) to require calculation and estimates of vehicle miles traveled (VMT) for all development projects approved in California after July 1, 2020. As a result, the traffic impact analysis (TIA) must now include estimates of VMT created by the Proposed Project. My review indicates the TIA does not include a proper analysis of VMT for the Proposed Project.

Page 154 of the Staff Report, the Introduction to the August 2020 Traffic Impact Analysis for the Proposed Project prepared by Kimley Horn, states “This report has been prepared in accordance with the traffic impact study requirements of

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the current Los Angeles County Congestion Management Program (LA County CMP) for Traffic Impact Analyses.” This statement is incorrect as Los Angeles County opted out of the Congestion Management Program by action of their Board of Supervisors on July 16, 2019 (see enclosed). As a result, there are no LA County CMP Guidelines for Traffic Impact Analyses.

Historically, the City of Manhattan Beach has followed the “Transportation Impact Analysis Guidelines” adopted by Los Angeles County Public Works. The most recent edition published July 23, 2020 contains procedures to calculate VMT and comply with the provisions of SB-743. Instead of following County Public Works Guidelines, the August 2020 Traffic Impact Study prepared by Kimley Horn attempted to comply with the State Office of Planning Research (OPR) Technical Advisory but failed to do so as follows:

- a) Screening Threshold for Land Use Projects Is Significantly Exceeded – OPR suggested that projects which generate 110 or fewer daily trips could be considered to not lead to a significant impact.

As indicated in 1e) above, the Proposed Project will generate 1,754 daily trips. From Table A of the TIA on Page 37 of the Staff Report, the restaurant generated 941 daily trips. The difference in daily trips generated by the site is 1,754 minus 941, or 803 daily trips.

The forecast of 803 additional daily trips is significantly more than 130 daily trips identified on Page 183 of the Staff Report. These additional daily trips that will be created by the Proposed Project over the former restaurant use leads to potentially significant VMT impacts that require further study and adoption of mitigation measures to reduce vehicle trips.

- b) Project VMT Discussion Is Inadequate and Unsupported – Pages 183 and 184 of the Staff Report from the Kimley Horn TIA discuss trip types to and from the Proposed Project but provide no supporting documentation:
- i) Employee Commute Trips – The discussion states “Most often an important strategy for reducing VMT in a community like this is to improve the local jobs/housing balance by increasing the number of employment opportunities. As such, it is reasonable to expect that increasing local employment opportunities will reduce the average commuter trip lengths of residents, resulting in a net decrease to regional net VMT.” **No data is provided supporting this opinion.**
- ii) Guest Trips Related to the Hotel Use – The discussion states “It is reasonable to assume that hotel would not generate new demand but meets existing demand that guests would otherwise travel in the region

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for the service. Further, proximity to transit and potential use of shuttle services would also likely reduce the single occupancy vehicle trips.” **Again, no data is provided here.** While there is some transit service within ½ mile of the site, no existing or proposed shuttle services have been discussed or described in relation to reducing single occupant vehicle trips.

- iii) Other Trips – The discussion acknowledges that these trips likely have a minimal impact on VMT, and these are not likely to impact the local transportation system compared to employee commute trips and guest trips related to the hotel use. **The discussion fails to discuss or analyze trips associated with the retail and office portions of the Proposed Project, with these trips being different from the hotel trips.**
- iv) VMT Discussion Conclusion – The discussion of VMT concludes on Page 184 of the Staff Report stating that “...if this site were not developed, a similar site will be developed elsewhere to meet this demand and as such the alternative to this development would not likely eliminate any related VMT. In consideration of this, it is anticipated that this redevelopment project would not result in a significant finding under SB-743.” This conclusion also lacks supporting evidence.
- c) VMT Analysis Must Follow Los Angeles County Guidelines – The VMT discussion in the August 2020 Traffic Impact Analysis is inadequate and fails to support the conclusion that the Proposed Project will not have significant VMT. To properly assess VMT, the Los Angeles County Public Works Transportation Impact Analysis Guidelines must be followed in detail from Section 3.1.4.2, Project Impact Determination, through Section 3.1.5.1, Development Project Mitigations (Pages 12 through 16).

Based on the Los Angeles County Public Works Transportation Impact Analysis Guidelines, I believe the Proposed Project will have significant VMT impacts based upon the additional 803 daily trips, almost double the number of daily trips generated by the El Torito Restaurant. Measures to mitigate the significant VMT impacts must be adopted as conditions of approval for the Proposed Project.

In summary, the Proposed Project must fully evaluate and disclose the potential traffic impacts. Contrary to what is suggested by staff on Page 12 of the January Staff Report, further study must be undertaken, particularly regarding VMT, and more detailed information must be provided to properly identify and address the traffic impacts that will be created by the Proposed Project.

Mr. Jordan R. Sisson, Attorney at Law
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If you have questions regarding these comments, please contact me at your convenience.

Respectfully submitted,

Tom Brohard and Associates



Tom Brohard, PE
Principal



Enclosures

- Institute of Transportation Engineers, Trip Generation Manual, 10th Edition
- County of Los Angeles, Department of Public Works, Congestion Management Program Opt-Out, July 16, 2019
- Los Angeles County Public Works, "Transportation Impact Analysis Guidelines", July 23, 2020
- Resume

Land Use: 311 All Suites Hotel

Description

An all suites hotel is a place of lodging that provides sleeping accommodations, a small restaurant and lounge, and small amounts of meeting space. Each suite includes a sitting room and separate bedroom; limited kitchen facilities are provided within the suite. Hotel (Land Use 310), business hotel (Land Use 312), motel (Land Use 320), and resort hotel (Land Use 330) are related uses.

Additional Data

Six studies provided information on occupancy rates at the time the studies were conducted. The average occupancy rate for these studies was approximately 74 percent.

Time-of-day distribution data for this land use are presented in Appendix A. For the three general urban/suburban sites with data, the overall highest vehicle volumes during the AM and PM on a weekday were counted between 11:45 a.m. and 12:45 p.m. and 6:30 and 7:30 p.m., respectively.

The sites were surveyed in the 1980s, the 1990s, and the 2010s in Florida, Georgia, Minnesota, Virginia, and Washington.

For all lodging uses, it is important to collect data on occupied rooms as well as total rooms in order to accurately predict trip generation characteristics for the site.

Source Numbers

216, 436, 818, 870, 872

Land Use: 310 Hotel

Description

A hotel is a place of lodging that provides sleeping accommodations and supporting facilities such as restaurants, cocktail lounges, meeting and banquet rooms or convention facilities, limited recreational facilities (pool, fitness room), and/or other retail and service shops. All suites hotel (Land Use 311), business hotel (Land Use 312), motel (Land Use 320), and resort hotel (Land Use 330) are related uses.

Additional Data

Studies of hotel employment density indicate that, on the average, a hotel will employ 0.9 employees per room.¹

Twenty-five studies provided information on occupancy rates at the time the studies were conducted. The average occupancy rate for these studies was approximately 82 percent.

Some properties contained in this land use provide guest transportation services such as airport shuttles, limousine service, or golf course shuttle service, which may have an impact on the overall trip generation rates.

Time-of-day distribution data for this land use are presented in Appendix A. For the one center city core site with data, the overall highest vehicle volumes during the AM and PM on a weekday were counted between 8:30 and 9:30 a.m. and 3:15 and 4:15 p.m., respectively. On Saturday and Sunday, the peak hours were between 5:00 and 6:00 p.m. and 10:15 and 11:15 a.m., respectively.

The sites were surveyed in the 1980s, the 1990s, the 2000s, and the 2010s in California, District of Columbia, Florida, Georgia, Indiana, Minnesota, New York, Pennsylvania, South Dakota, Texas, Vermont, Virginia, and Washington.

For all lodging uses, it is important to collect data on occupied rooms as well as total rooms in order to accurately predict trip generation characteristics for the site.

Trip generation at a hotel may be related to the presence of supporting facilities such as convention facilities, restaurants, meeting/banquet space, and retail facilities. Future data submissions should specify the presence of these amenities. Reporting the level of activity at the supporting facilities such as full, empty, partially active, number of people attending a meeting/banquet during observation may also be useful in further analysis of this land use.

Source Numbers

170, 260, 262, 277, 280, 301, 306, 357, 422, 507, 577, 728, 867, 872, 925, 951

¹ Buttk, Carl H. Unpublished studies of building employment densities, Portland, Oregon.

Hotel (310)

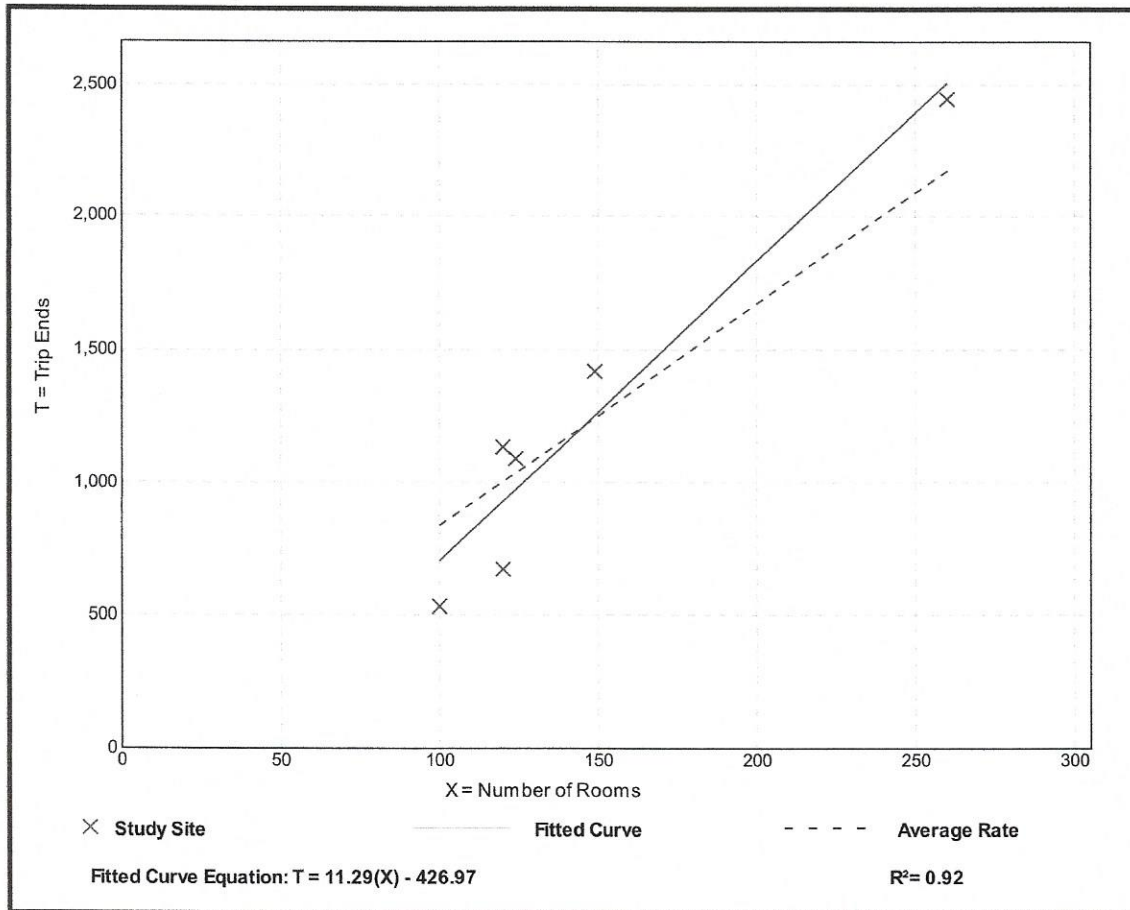
Vehicle Trip Ends vs: Rooms
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 6
Avg. Num. of Rooms: 146
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per Room

Average Rate	Range of Rates	Standard Deviation
8.36	5.31 - 9.53	1.86

Data Plot and Equation



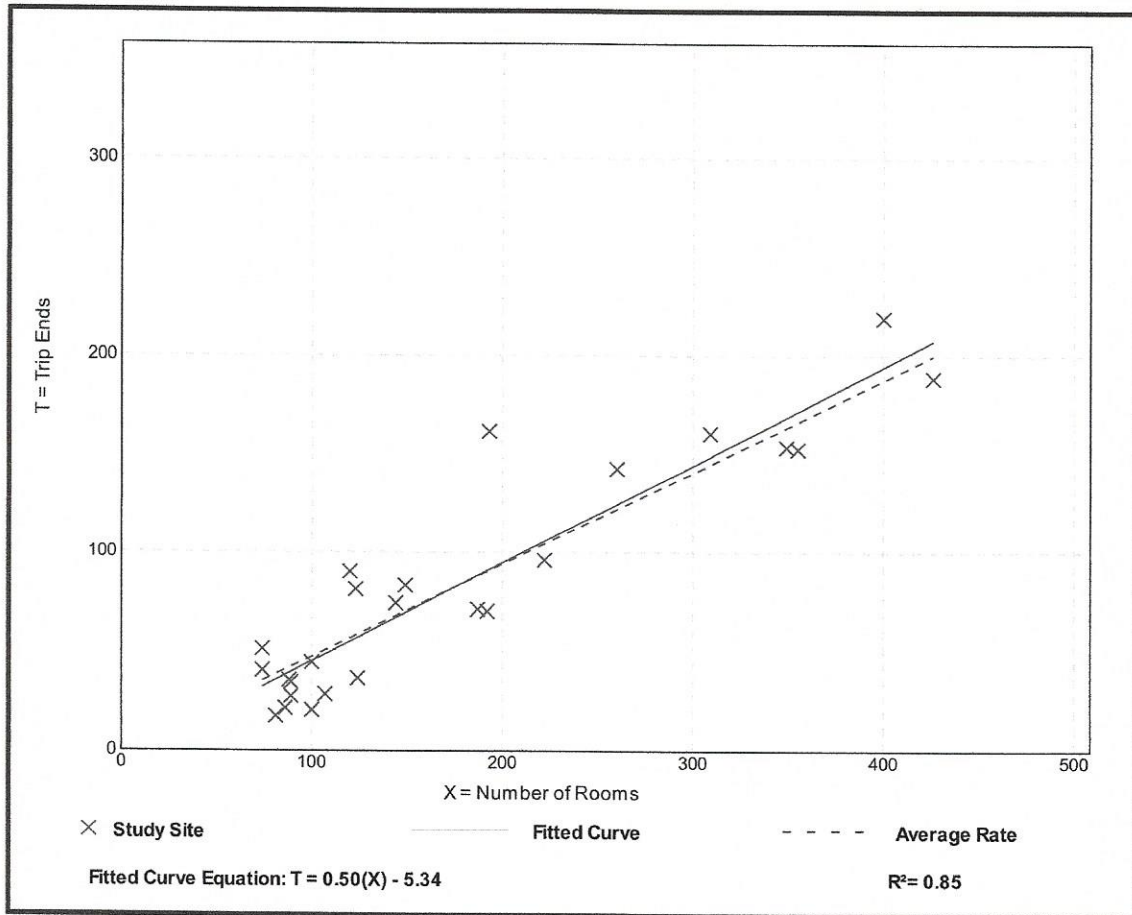
Hotel (310)

Vehicle Trip Ends vs: Rooms
On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.
Setting/Location: General Urban/Suburban
 Number of Studies: 25
 Avg. Num. of Rooms: 178
 Directional Distribution: 59% entering, 41% exiting

Vehicle Trip Generation per Room

Average Rate	Range of Rates	Standard Deviation
0.47	0.20 - 0.84	0.14

Data Plot and Equation



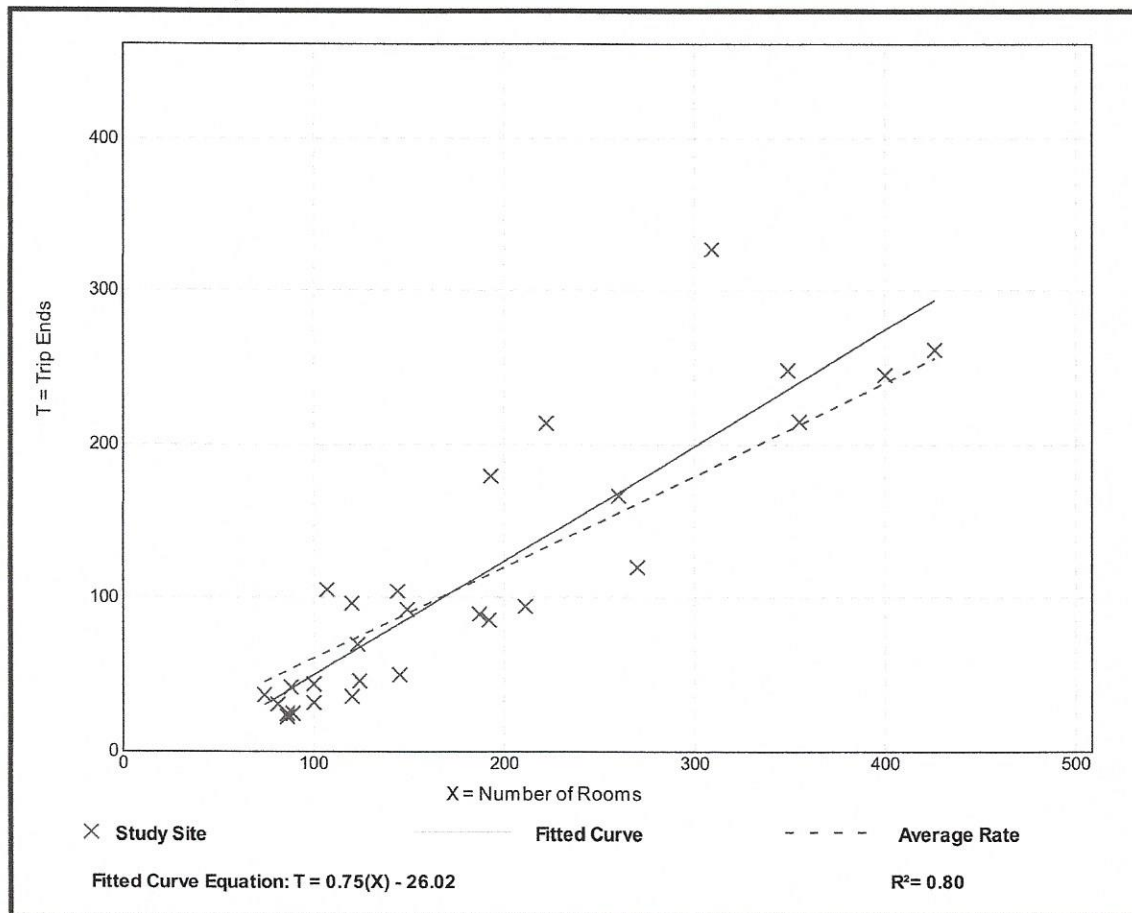
Hotel (310)

Vehicle Trip Ends vs: Rooms
On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.
Setting/Location: General Urban/Suburban
 Number of Studies: 28
 Avg. Num. of Rooms: 183
 Directional Distribution: 51% entering, 49% exiting

Vehicle Trip Generation per Room

Average Rate	Range of Rates	Standard Deviation
0.60	0.26 - 1.06	0.22

Data Plot and Equation





MEMORANDUM

To: Mr. Jan Holtze

From: Serine Ciandella

Date: March 8, 2020

Re: *Manhattan Beach Hotel Mixed-Use Project Access Evaluation*

INTRODUCTION

This memorandum has been prepared to provide an evaluation of the access provisions for the proposed Manhattan Beach Hotel Mixed-use Project in the City of Manhattan Beach. The site access discussion will focus on a right-turn warrant analysis for the site driveways.

PROJECT DESCRIPTION

The project site is located on the northeast corner of the intersection of Sepulveda Boulevard and Tennyson Street in the City of Manhattan Beach. The proposed development would consist of a 162-room hotel, 6,845 square feet of retail space, and 9,264 square feet of office space. Site parking would be provided in a combination of surface level and underground parking. Access to the site would consist of one right-in/right-out only driveway on Sepulveda Boulevard and one full-movement driveway on Tennyson Street.

SITE ACCESS – RIGHT-TURN LANE EVALUATION

This right-turn warrant evaluation has been prepared to determine whether or not a dedicated right-turn deceleration lane would be warranted at the driveways for the Manhattan Beach Hotel Mixed-use project. Our assumptions, analysis, and findings are summarized below.

As described above, the project access provisions would consist of one right-in/right-out only driveway on Sepulveda Boulevard and one full-movement driveway on Tennyson Street.

Tennyson Street is currently closed to through traffic just east of the project site; therefore, it is assumed that no project traffic will approach the site from the east on Tennyson Street. Since there will be no vehicles turning right into the Tennyson Street driveway, a dedicated right-turn lane will not be needed on Tennyson Street. The remainder of this analysis will focus on the project driveway on Sepulveda Boulevard.

Right-Turn Deceleration Lane Criteria

Based on the County of Los Angeles Department of Public Works *Access Management for Private Development Guidelines Manual*, the determination of whether or not a dedicated right-turn lane is warranted at an unsignalized driveway is based on the following factors:

- sight distance constraints,
- the design speed of the fronting roadway (Sepulveda Boulevard), and,
- the percentage of right-turning vehicles in the advancing traffic volume (the through plus turning volume) on northbound Sepulveda Boulevard during the peak hours.

Given that there are no sight distance constraints for northbound traffic on Sepulveda Boulevard at the project driveway, the determining factors for this project will be:

- design speed and
- right-turning volume percentage of the advancing volume at the project driveway.

Design Speed

The posted speed limit on Sepulveda Boulevard is 35 miles per hour (mph). For a conservative analysis, the design speed used for this analysis will be 55 mph.

Existing Traffic Volumes on Sepulveda Boulevard

Existing peak hour traffic volumes on Sepulveda Boulevard were obtained from the *Traffic Impact Study for the Skechers Design Center and Office Project* (Linscott Law and Greenspan, August 25, 2016). Traffic counts for that study were collected in March, 2016.

The 2016 peak hour through volumes on northbound Sepulveda Boulevard along the project frontage were:

- 2,943 trips in the morning peak hour and
- 1,297 trips in the evening peak hour.

The 2016 counts were grown to develop forecasts for the analysis year of 2021 at a growth rate of 0.026% per year, in accordance with the Los Angeles County Congestion Management Program (CMP).

With the annual growth rate applied, the peak hour through volumes on northbound Sepulveda Boulevard for analysis year 2020 would be:

- 2,982 trips in the morning peak hour and
- 1,314 trips in the evening peak hour.

Project Trip Generation

A summary of the daily, morning and evening peak hour trip generation estimates for the project is provided on **Table 1**. The project is estimated to generate 78 inbound trips in the morning peak hour and 79 inbound trips in the evening peak hour. These trips will enter the project site via one of the two site project driveways, depending on the direction of approach.

TABLE 1 SUMMARY OF PROJECT TRIP GENERATION Manhattan Beach Hotel Mixed-Use Project										
Land Use	ITE Code	Unit	Trip Generation Rates ¹							
			Daily	AM Peak Hour			PM Peak Hour			
				In	Out	Total	In	Out	Total	
Business Hotel	312	Occ. Room	4.901	0.210	0.173	0.38	0.179	0.222	0.40	
Shopping Center	820	KSF	Fitted Curve Equation							
General Office Building	710	KSF	Fitted Curve Equation				0.253	1.237	1.49	
Trip Generation Estimates										
Land Use	Quantity	Unit	Daily	AM Peak Hour			PM Peak Hour			
				In	Out	Total	In	Out	Total	
Business Hotel	162	Occ. Room	794	34	28	62	29	36	65	
Shopping Center	6,845	KSF	1,190	19	12	31	48	52	100	
General Office Building	9,264	KSF	216	25	3	28	2	11	13	
Total Project Trips			2,200	78	43	121	79	99	178	
¹ Source: Institute of Transportation Engineers (ITE) <u>Trip Generation Manual</u> , 9 th Edition										

Project Trip Assignment at Site Driveways

It is assumed that the project traffic will approach the site via Sepulveda Boulevard – 60% from the north and 40% from the south. Project traffic approaching from the north on Sepulveda Boulevard will turn left onto Tennyson Street and enter the site via a left turn into the Tennyson Street driveway. For project traffic approaching from the south on Sepulveda Boulevard, roughly half will enter the site via the Tennyson Street driveway and half via the Sepulveda Boulevard driveway.

Based on these project trip assignment assumptions, the volume of project traffic entering the Sepulveda Boulevard driveway via a right turn is estimated to be 16 morning peak hour trips and 16 evening peak hour trips. These volumes represent 0.5% and 1.2% of the northbound advancing volume (the through plus turning volume) on Sepulveda Boulevard in the morning and evening peak hours, respectively.

This percentage of turning vehicles compared to the advancing volume on Sepulveda Boulevard would not warrant the requirement of a dedicated right-turn lane for the project driveway in either the morning or the evening peak hour.

SUMMARY AND CONCLUSIONS

- The project applicant proposes a mixed-use site with a combination of hotel, office, and retail uses.
- Access to the site will be provided via one right-in/right-out only driveway on Sepulveda Boulevard and one full-movement driveway on Tennyson Street.
- It is estimated that 80% of the project traffic will enter the site at the Tennyson Street driveway via an eastbound left turn, and that 20% will enter the Sepulveda Boulevard driveway via a northbound right turn.
- The percentage of vehicles turning into the Sepulveda Boulevard driveway compared to the northbound advancing volume (the through plus turning volume) on Sepulveda Boulevard would be 0.5% in the morning peak hour and 1.1% in the evening peak hour. This comparative percentage would not warrant the requirement of a dedicated right-turn lane for the project driveway in either the morning or the evening peak hour.



MARK PESTRELLA, Director

**COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS**

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone (828) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE

July 16, 2019

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

ADOPTED

BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

28 July 16, 2019

CELIA ZAVALA
EXECUTIVE OFFICER

Dear Supervisors:

**TRANSPORTATION CORE SERVICE AREA
CONGESTION MANAGEMENT PROGRAM OPT-OUT
(ALL SUPERVISORIAL DISTRICTS)
(3 VOTES)**

SUBJECT

This action is to approve a resolution exempting the Los Angeles County from the State-mandated Congestion Management Program in conjunction with Metro's effort to achieve Countywide exemption once a majority of the Los Angeles County's local governments have adopted similar resolutions.

IT IS RECOMMENDED THAT THE BOARD:

1. Find that the proposed action is exempt from the California Environmental Quality Act for the reasons stated in this Board letter.
2. Approve the resolution, as authorized by the California Government Code Section 65088.3, electing for the Los Angeles County to be exempt from the Congestion Management Program as described in the California Government Code Section 65088 et seq.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

Approval of recommended actions will find that the project is exempt from the California Environmental Quality Act (CEQA) and withdraw the County from the requirement of the adopted Congestion Management Program (CMP).

Background

The CMP for the County region was first established in 1992 by the County Transportation Commission, predecessor of Metro, following the passage of Proposition 111 in 1990. The purpose of the CMP was to address the impacts of local growth on the regional transportation system. The CMP was created to link local land use decisions with their impacts on regional transportation and air quality as well as to develop a partnership among transportation decision makers on devising appropriate transportation solutions that include all modes of travel.

Under the CMP, the 88 incorporated cities plus the County share various statutory responsibilities, including monitoring traffic count locations on select arterials, implementing transportation improvements, adoption of travel demand management and land use ordinance, and mitigating congestion impacts.

The framework for the CMP is linked to the idea that congestion can be mitigated by continuing to add capacity to roadways since the primary metric that drives the program is level of service (LOS). LOS is a qualitative metric that is used to define operational conditions of a roadway in terms of vehicular service measures, such as speed and travel time, freedom to maneuver, traffic interruptions, and comfort and convenience. Recent State laws and rulemaking, namely Assembly Bill 32 (California Global Warming Solutions Act of 2006), Senate Bill (SB) 375 (Sustainable Communities and Climate Protection Act of 2008), SB 743 (Environmental quality: transit-oriented infill projects, judicial review streamlining for environmental leadership development projects) and SB 32 (California Global Warming Solutions Act of 2006), all move away from LOS directly or indirectly. Therefore, the CMP contradicts these key State policies. Several counties have elected to opt-out of the CMP over the years, including Fresno, San Diego, San Luis Obispo, and Santa Cruz. The reasons for doing so are varied but generally include redundant administrative processes that come with great expense with little to no congestion management benefit along with the continued mandate of using LOS to determine roadway deficiencies.

Over the last several years, the CMP has become increasingly outdated in relation to the direction of regional, State, and Federal transportation planning requirements. Additional reasons to opt-out of the CMP include:

Opting out of the CMP relieves the County from:

- Having to use a single measure LOS to determine roadway deficiencies.
- Losing State gas tax funds or being ineligible to receive State and Federal Transportation Improvement Program funds, as a result of not being in compliance with CMP requirements or performance standards.
- Administrative and financial burden associated with the preparation of documents to demonstrate conformance with the CMP.

While the CMP requirement was one of the pioneering efforts to conduct performance-based planning, the approach has become antiquated and expensive.

Metro has been designated as the Congestion Management Agency responsible for administering the County's region CMP. On June 28, 2018, the Metro Board of Directors acted to initiate the process to opt-out of the State-mandated program and directed Metro to consult with local jurisdictions to consider and prepare the necessary resolutions for jurisdictions to exempt themselves from the program. The California Government Code Section 65088.3 states that jurisdictions within a county may opt-out of the CMP requirement without penalty, if a majority of local jurisdictions

representing a majority of the County's population formally adopt resolutions requesting to opt-out of the program. If Metro is successful in opting out of the CMP, it will allow the region to use different performance measures consistent with State-mandates to determine roadway deficiencies and ensure adequate planning.

Implementation of Strategic Plan Goals

The County Strategic Plan directs the provision of Strategy III.3, Pursue Operational Effectiveness, Fiscal Responsibility, and Accountability. The recommended actions will maximize the use of County assets by exercising fiscal responsibility of County funds.

FISCAL IMPACT/FINANCING

There will be no impact to the County's General Fund.

Opting out of this program will alleviate the County obligation on the CMP costs.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

The resolution has been reviewed and approved by County Counsel.

ENVIRONMENTAL DOCUMENTATION

The proposed project is exempt from CEQA. It can be seen with certainty that there is no possibility that the project may have a significant effect on the environment pursuant to State CEQA Guidelines Section 15061(b)(3). The proposed project is covered by the general rule that CEQA applies only to projects that have the potential for causing a significant effect on the environment. The adoption of the resolution exempting the County from the CMP is exempt under this common-sense exemption because the CMP is an obsolete performance-based planning program that is not consistent with current transportation metrics used for CEQA analysis. Furthermore, other similar, applicable regional, State, and Federal transportation planning processes and requirements have weakened and supplanted the CMP. Thus, exemption from the CMP can have no potential significant impact on the environment. Upon the Board's approval of the recommended actions, Public Works will file a Notice of Exemption with the County Clerk in accordance with Section 21152 of the California Public Resources Code.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

There are no negative impacts anticipated from opting out of this program and the enclosed resolution will continue to enable the County to preserve gasoline tax subvention funds.

The Honorable Board of Supervisors

7/16/2019

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CONCLUSION

Please return two adopted copies of the letter and resolution to Public Works, Transportation Planning and Programs Division.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark Pestrella". The signature is fluid and cursive, with the first name "Mark" written in a larger, more prominent script than the last name "Pestrella".

MARK PESTRELLA

Director

MP:DBM:pr

Enclosures

c: Chief Executive Office (Chia-Ann Yen)
County Counsel (Laura Jacobson)
Executive Office

**A RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF
LOS ANGELES, CALIFORNIA, ELECTING TO BE EXEMPT FROM THE
CONGESTION MANAGEMENT PROGRAM**

WHEREAS, California voters passed Proposition 111 in June of 1990 requiring urbanized counties to develop and implement a Congestion Management Program (CMP); and

WHEREAS, Metro is the Congestion Management Agency responsible for the County's CMP; and

WHEREAS, California Government Code Section 65088.3 states that the CMP requirements do not apply in the County in that the majority of local governments comprised of City councils and the Board, and representing a majority of the population within the county, each adopt resolutions electing to be exempt from the CMP; and

WHEREAS, over time the CMP has become increasingly out of step with current regional, State, and Federal planning processes and requirements, including new State requirements for transportation performance measures related to greenhouse gas reduction; and

WHEREAS, on June 28, 2018, the Metro Board of Directors directed Metro staff to work with the various local governments within the County to gauge the level of interest in pursuing exemption from the CMP, and assisting with preparing the resolutions required under Government Code Section 65088.3.

NOW, THEREFORE BE IT RESOLVED by the Board that:

1. The Board, pursuant to the California Government Code Section 65088.3 does hereby elect to be exempt from the CMP as described in the California Government Code Sections 65088 to 65089.10.

On the 16th day July, 2019, the foregoing resolution was adopted by the Board of Supervisors of the Los Angeles County.



CELIA ZAVALA
Executive Officer of the
Board of Supervisors of the
Los Angeles County

By *Danilo Ruiz*
Deputy

APPROVED AS TO FORM:

MARY C. WICKHAM
County Counsel

By *[Signature]*
Deputy



Public Works
LOS ANGELES COUNTY

**Los Angeles County
Public Works**

**Transportation Impact Analysis
Guidelines**

July 23, 2020
Prepared by Public Works

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Section 1. - Introduction

Public Works generally will require the preparation and submission of a Transportation Impact Analysis for projects that meet the following criteria:

- Development Projects:
 - Estimated to generate a net increase of 110 or more daily vehicle¹ trips.
- Transportation Projects:
 - Likely to induce additional vehicle¹ miles traveled (VMT) by increasing vehicle capacity.
- Projects for which a Transportation Impact Analysis is required by County ordinance; regulation; resolution; court order; or directive from the Board of Supervisors, Regional Planning Commission.

A Transportation Impact Analysis requires analyses and forecasting of impacts or deficiencies to the circulation system generated by the project. The Transportation Impact Analysis identifies feasible measures or corrective conditions to offset any impacts or deficiencies.

The Transportation Impact Analysis shall be prepared under the direction of, and be signed by, a Professional Engineer, registered in the State of California to practice either Traffic or Civil Engineering.

¹ The term vehicle refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty trucks should only be included in a traffic impacts analysis for modeling convenience and ease of calculation (e.g., where models or data provide combine auto and heavy-freight VMT) but should not contribute to a finding of significant traffic impact under any circumstances.

Section 2. - Overall Steps

The project applicant shall follow the general steps summarized below when preparing a transportation impact analysis for a discretionary development project or transportation project.

Step 1. Project Memo

The project applicant shall inform Public Works that a new Transportation Impact Analysis is being prepared. In this initial communication, the following information shall be provided:

- A. Project Description – Provide a general description of the project, including size (defined by square footage per use and/or number of dwelling units) and use(s). The project description should include information on any phased construction and any unusual conditions. The project description shall specify a building address, Assessor’s parcel number, and project title.
- B. Project Site Plan – Submit the proposed project site plan, which shall clearly identify driveway or access location(s), loading/unloading areas, and parking design and circulation to help define the distribution of project trips. Considerations for traffic flow and movement should be designed and incorporated early in building and parking layout plans. To minimize and prevent last minute building design changes, project applicants should contact the Public Works Land Development Division and Public Works Traffic Safety and Mobility Division to determine the requirements for driveway width and internal circulation before finalizing the building and parking layout design.

Step 2. Other Agency Contacts

The project applicant shall consult with other agencies or adjacent jurisdictions (e.g., Caltrans, other cities, transit agencies, etc.) that may be affected by site access and travel demands generated by the project to ensure those agencies’ transportation-related concerns and issues are properly addressed in the Transportation Impact Analysis. If, as part of site access and circulation evaluation (see Section 4), a Transportation Impact Analysis includes the evaluation of an intersection or intersections in an adjacent local jurisdiction, then any corrective actions deemed necessary to address circulation concerns should be reviewed by and confirmed in writing by that jurisdiction. Written confirmation of consultation with all affected agencies is required.

Step 3. Scoping Document

The project applicant shall prepare and submit a Scoping Document to Public Works through the EPIC-LA portal. The Scoping Document describes the

assumptions and parameters that shall be included in the Transportation Impact Analysis including any analysis requirements from other affected jurisdictions identified in Step 2.

Step 4. Data Collection

The project applicant shall gather qualitative and quantitative data needed to support the required analyses and components of the Transportation Impact Analysis. Traffic count data shall be collected in accordance with standards and methods established in the Transportation Impact Analysis Guidelines.

Step 5. Transportation Impact Analysis Submittal

The project applicant shall submit the completed Transportation Impact Analysis to Public Works through the EPIC-LA portal and ensure that all subsequent submittals of the Transportation Impact Analysis are dated and timestamped.

Step 6. Transportation Impact Analysis Confirmation of Findings Letter

Public Works will prepare and distribute a Transportation Impact Analysis Confirmation of Findings Letter after the fees have been submitted and the Transportation Impact Analysis has been reviewed and approved.

The Transportation Impact Analysis Confirmation of Findings Letter will be limited to summarizing the findings and requirements for the proposed project. Additional fees/deposits may be required should the project applicant request findings and requirements for additional project alternatives.

Step 7. Mitigation and Monitoring

The project applicant may be responsible for ongoing reporting, depending on the nature of the mitigation measures and corrective actions to be implemented by the project. Reporting and monitoring of Transportation Demand Management (TDM) measures implemented by the project to improve mobility options at and around a project site may also be required and will be described in the Transportation Impact Analysis Confirmation of Findings Letter.

Section 3. - California Environmental Quality Act (CEQA) Transportation Impact Analysis Process

Section 3.1. - Development Projects

Section 3.1.1. - Introduction

The updated CEQA Guidelines certified and adopted by the California Natural Resources Agency in December 2018 are now in effect. Accordingly, Public Works recognizes the need to provide information based on guidance from the Office of Planning and Research and the California Air Resources Board on the assessment of vehicle miles traveled (VMT), thresholds of significance, and mitigation measures for development projects and land use plans in accordance with the amended Appendix G question below:

- For a development project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?

For development projects, the intent of this question is to assess whether a proposed project or plan adequately reduces total VMT. Public Works provides the following guidance regarding screening and impact criteria to address this question. The following screening criteria and impact criteria are only meant to serve as guidance for projects to determine whether a Transportation Impact Analysis should be performed, and the criteria to determine if a project generates a significant transportation impact. The criteria shall be determined on a project-by-project basis as approved by Public Works.

Section 3.1.2. - Screening Criteria

Section 3.1.2.1. - Non-Retail Project Trip Generation Screening Criteria

If the answer is no to the question below, further analysis is not required, and a less than significant determination can be made.

- Does the development project generate a net increase of 110 or more daily vehicle¹ trips²?

A project's daily vehicle trip generation should be estimated using the most recent edition of the Institute of Transportation Engineers (ITE) Trip Generation Manual. If the project proposed land use is not listed in the ITE Trip Generation Manual, please submit a trip generation study to Public Works for review and approval.

Section 3.1.2.2. - Retail Project Site Plan Screening Criteria

A project that contains a local serving retail use is assumed to have less than significant VMT impacts for the retail portion of the project. If the answer to the following question

² As referenced in the Governor's Office of Planning and Research (OPR), *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018.

is no, a less than significant determination can be made for the portion of the project that contains retail uses.

- Does the project contain retail uses that exceed 50,000 square feet of gross floor area²?

However, if the retail project is part of a mixed-use project, then the remaining portion of the project may be subject to further analysis in accordance with other screening criteria in Section 3.1. Projects that include retail uses in excess of the Retail Project Site Plan Screening Criteria need to evaluate the entirety of the project's VMT.

Section 3.1.2.3. – Proximity to Transit Based Screening Criteria

If a project is located near a major transit stop or high-quality transit corridor, the following question should be considered:

- Is the project located within a one-half mile radius of a major transit stop or an existing stop along a high-quality transit corridor²?

If the answer to the question above is yes, then the following subsequent questions should be considered:

- Does the project have a Floor Area Ratio² less than 0.75?
- Does the project provide more parking than required by the County Code²?
- Is the project inconsistent with the SCAG RTP/SCS²?
- Does the project replace residential units set aside for lower income households with a smaller number of market-rate residential units²?

If the answer to all four questions is no, further analysis is not required, and a less than significant determination can be made.

To determine the proposed change in residential units, the total number of lower income housing units that exist on the project site should be counted and compared to the total number of lower income and market-rate residential units proposed by the project. If there is a net decrease in residential units, the Proximity to Transit Based Screening Criteria cannot be utilized.

Section 3.1.2.4. – Residential Land Use Based Screening Criteria

Independent of the screening criteria for non-retail and retail projects, certain projects that further the State's affordable housing goals are presumed to have less than significant impact on VMT. If the project requires a discretionary action and the answer is yes to the question below, further analysis is not required, and a less than significant determination can be made.

- Are 100% of the units, excluding manager's units, set aside for lower income households²?

Section 3.1.3. - Impact Criteria

The project has a potentially significant VMT impact if it meets one or more of the criteria listed below. The impact criteria below are considered as potential options that may be selected as thresholds for determining significance. These impact criteria below are based on guidance published by OPR² and CARB³ but their applicability to a specific project shall be justified with substantial evidence and is not presumed to be appropriate.

- Residential Projects The project's residential VMT⁴ per capita would not be 16.8%³ below the existing residential VMT⁴ per capita for the Baseline Area in which the project is located (Table 3.1.3.-1),
- Office Projects. The project's employment VMT⁵ per employee exceeding would not be 16.8%³ below the existing employment VMT⁵ per employee for the Baseline Area in which the project is located (see Table 3.1.3.-1),
- Regional Serving Retail Projects. The project would result in a net increase² in existing total VMT (see Table 3.1.3.-1),
- Land Use Plans. The plan total VMT per service population⁶ (residents and employees) would not be 16.8%³ below the existing VMT per service population⁶ for the Baseline Area in which the plan is located (see Table 3.1.3.-1),
- For other land use types, please contact Public Works to determine which of the above are an appropriate threshold of significance to be utilized (see Table 3.1.3.-1).

Table 3.1.3-1 provides the Baseline VMT for the North and South areas of the County at the time these guidelines were prepared. The Baseline VMT applied in the Transportation Impact Analysis should be consistent with the year that the transportation study begins as defined in the Scoping Document.

³ As referenced by the VMT reduction goals discussed in the California Air Resources Board, 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Goals, January 2019, Figure 3.

⁴ Residential VMT is the VMT generated by Home-Based Work and Home-Based Other trip productions.

⁵ Employment VMT is the VMT generated by Home-Based Work trip attractions.

⁶ Service population is the sum of the number residents and the number of employees

Table 3.1.3.-1 – Baseline VMT for North and South County

Baseline Area	Residential VMT per Capita	Employment VMT per Employee	Total VMT per Service Population
North County	22.3	19.0	43.1
South County	12.7	18.4	31.1

The geographic boundaries for the North County and South County Baseline Areas are shown in Figure 3.1.3-1.

Figure 3.1.3.-1 North and South County Baseline VMT Boundaries

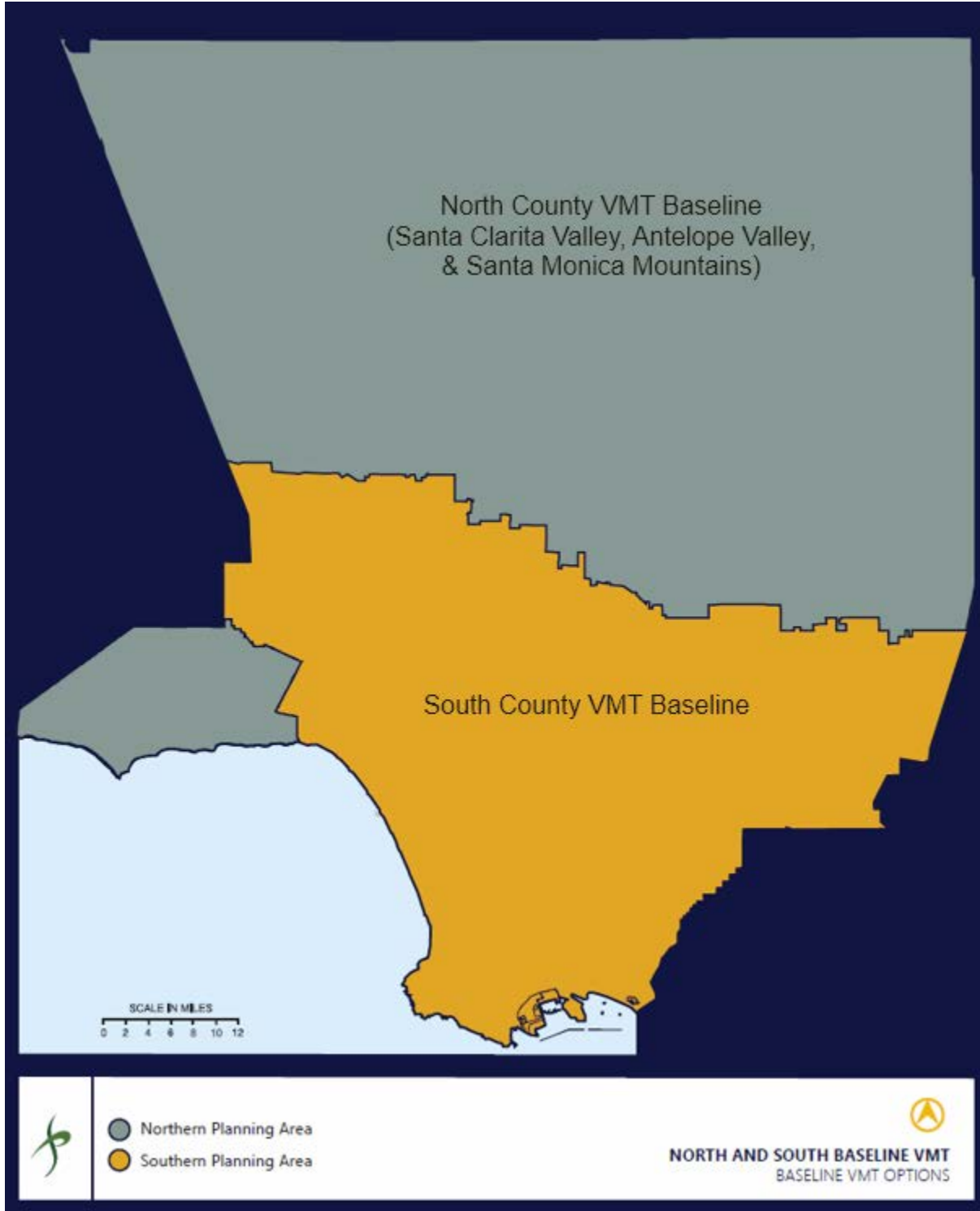


Table 3.1.3.-2 – VMT Impact Criteria (16.8% Below Area Baseline)

Baseline Area	Residential VMT per Capita	Employment VMT per Employee	Total VMT per Service Population (residents and employees)
North County	18.6	15.8	35.9
South County	10.6	15.3	25.9

Section 3.1.4. - Methodology

Section 3.1.4.1 - Evaluation

Screening and impact evaluation should be conducted for the following types of development projects:

- Non-Retail Land Uses:
 - Residential Land Uses:
 - Single-family housing,
 - Multi-family housing,
 - Affordable housing (for lower income households).
 - Office, Manufacturing, or Institutional Land Uses:
 - General office,
 - Medical office,
 - Light industrial,
 - Manufacturing,
 - Warehousing/self-storage,
 - K-12 schools,
 - College/university,
 - Hotel/motel.
- Retail Land Uses:
 - General retail,
 - Furniture store,
 - Pharmacy/drugstore,
 - Supermarket,
 - Bank,
 - Health club,
 - Restaurant,
 - Auto repair,
 - Home improvement superstore,
 - Discount store,
 - Movie theater.

The land uses described above are not intended to be inclusive of every project-type reviewed by Public Works and subject to CEQA. For these and all other land uses, the appropriate screening criteria and impact evaluation shall be determined on a project-by-project basis.

Section 3.1.4.2. - Project Impact Determination

- Residential Projects: Daily vehicle¹ trips, daily VMT, and daily residential VMT⁴ per capita for residential projects should be estimated using the SCAG RTP/SCS Travel Demand Forecast Model (as described in the Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷). Transportation demand management strategies to be included as project design features should be considered in the estimation of a project's daily vehicle trips and VMT (see Section 3.1.5 regarding TDM strategies),
- Office Projects: Daily vehicle¹ trips, daily VMT, and daily employment VMT⁵ per employee for office projects should be estimated using the SCAG RTP/SCS Travel Demand Forecast Model (as described Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷). Transportation demand management strategies to be included as project design features should be considered in the estimation of a project's daily vehicle trips and VMT,
- Regional Serving Retail Projects: The Scoping Document prepared by the project applicant and Public Works will outline one of the following methods for impact determination:
 - Preparation of a market-study-based transportation analysis submitted by the project applicant that demonstrates the project area is underserved for the proposed retail use and that the project will shorten existing shopping trips by creating an intervening location between trip origins and current retail destinations.
 - Run the SCAG RTP/SCS Travel Demand Forecasting Model (as described in the Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷) with and without the project. Since the overall number of trips in the model is based on home-based trips and is balanced to home-trip productions, the total number of trips will not be influenced materially by the introduction of the additional retail space. Rather, the model will redistribute home-shopping trips from other retail destinations to the proposed retail destination,
 - If the project is entirely retail, the following steps apply:
 - Determine the traffic analysis zone (TAZ) in which the project is located,

⁷ Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report, Fehr & Peers, June 2020

- Convert the project retail land uses into the appropriate employment categories utilized in the model and adjust the socioeconomic parameters in the TAZ appropriately to reflect removal of existing land uses and addition of the project,
 - Run the four-step model process for the model existing base year for the four-time periods in the model (AM peak period, midday period, PM peak period, nighttime period) for the base (“no project”) scenario and for the “plus project” scenario,
 - Calculate total VMT on the model network for each time period and sum to determine daily VMT for each scenario. The total VMT should capture both employee and home-shopping trips. Subtract the daily VMT for the base scenario from the daily VMT for the “plus project” scenario to determine the net change in daily VMT.
- If the proposed project is a mixed-use development including more than 50,000 square feet of retail, conduct steps similar to those described above. However, first create a “without retail” model scenario that includes the rest of the project’s proposed land uses and then create and run the four-step model for this “with retail” scenario. Subtract the daily VMT for the “without retail” scenario from the daily VMT for the “with retail” scenario to determine the net change in daily VMT.
- Land Use Plans: Daily vehicle¹ trips, daily VMT, and daily total VMT per service population⁶ for land use plans should be estimated using the SCAG RTP/SCS Travel Demand Forecast Model (as described Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷). Transportation demand management strategies to be included as project design features should be considered in the estimation of a project’s daily vehicle trips and VMT,
 - Unique Land Uses: Some projects will not fit into one of the above categories. In such cases, a customized approach may be required to estimate daily trips and VMT. The methodology and thresholds to be used in such cases should be developed in consultation with and approved by Public Works staff at the outset of the study,
 - Mixed-Use Projects: The project VMT impact should be considered significant if any (one or all) of the project land uses exceed the impact criteria for that particular land use, taking credit for internal capture. In such cases, mitigation options that reduce the VMT generated by any or all of the land uses could be considered.

Section 3.1.4.3. - Cumulative Impacts Determination

Land use projects should consider both short- and long-term project effects on VMT. Short-term effects will be evaluated in the detailed project-level VMT analysis. Long-term, or cumulative effects is determined through consistency with the SCAG RTP/SCS. The

RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. As such, projects that are consistent with this plan in terms of development location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. Development in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation. However, if a project does not demonstrate a significant impact in the project impact analysis, a less than significant impact in the cumulative impact analysis can also be determined. Projects that fall under the RTP/SCS's efficiency-based impact thresholds are already shown to align with the long-term VMT and greenhouse gas reduction goals of SCAG's RTP/SCS.

Land use projects that: (1) demonstrate a project impact after applying an efficiency based VMT threshold and (2) are not deemed to be consistent with the SCAG RTP/SCS could have a significant cumulative impact on VMT. Further evaluation would be necessary to determine whether the project's cumulative impact on VMT is significant. This analysis could be conducted by running the SCAG RTP/SCS Travel Demand Forecasting Model (as described in the Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷) with the cumulative "no project" scenario representing the RTP/SCS cumulative year conditions and the cumulative "plus project" scenario representing the reallocation of the population and/or employment growth based on the land supply changes associated with the proposed project. Baseline Area VMT, residential VMT per capita, or employment VMT per employee (depending on project type) would be calculated for both scenarios, and any increase in VMT, residential VMT per capita, or employment VMT per employee (depending on project type) above that which was forecasted in the RTP/SCS would constitute a significant impact.

When specifically evaluating the VMT impacts of regional-serving retail, the cumulative analysis would include additional steps under the project impact methodology to compare a cumulative "plus project" scenario with the cumulative "no project" scenario. The cumulative "no project" scenarios represents the adopted RTP/SCS cumulative year conditions (as incorporated into the SCAG RTP/SCS model). This would involve the following additional steps:

- Determine the traffic analysis zone (TAZ) in which the project is located,
- Convert the project land uses into the appropriate employment categories utilized in the RTP/SCS horizon year model. Adjust the socioeconomic parameters in the TAZ appropriately to reflect removal of the existing land uses and addition of the project,
- Run the four-step model process for the model's cumulative "no project" scenario for the four-time periods in the model (AM peak period, midday period, PM peak period, nighttime period). Then do the same for the base cumulative "no project" scenario and for the cumulative "plus project" scenario,
- Calculate total VMT on the model's network for each time period as well as the sum total to determine daily VMT for each scenario. Subtract the daily VMT for the

base cumulative “no project” scenario from the daily VMT for the cumulative “plus project” scenario to determine the net change in daily VMT.

Land use plans that: (1) demonstrate a project impact after applying an efficiency based VMT threshold and (2) are not deemed to be consistent with the SCAG RTP/SCS could have a significant cumulative impact on VMT. Further evaluation would be necessary to determine whether the Plan’s cumulative impact on VMT is significant. This analysis could be conducted by running the SCAG RTP/SCS Travel Demand Forecasting Model (as described in the Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷) with the cumulative “no project” scenario representing the RTP/SCS cumulative year conditions and the cumulative “plus project” scenario representing the reallocation of the population and/or employment growth based on the land supply changes associated with the proposed plan. Total VMT and VMT per service population would be calculated for both scenarios, and any increase in VMT above that which was forecasted in the RTP/SCS would constitute a significant impact.

Section 3.1.5. - Mitigation

Section 3.1.5.1. - Development Project Mitigations

Potential mitigation measures for a development project’s VMT impacts can include the following:

- Transportation demand management (TDM) strategies beyond those that will be included as project design features. These strategies shall be demonstrated to be effective in reducing VMT. Some of these may include, but are not limited to, the following described in Table 3.1.5-1 below. Substantial evidence should be provided to the Public Works to support the claimed effectiveness of the measure(s),

Table 3.1.5-1: TDM Strategies

Category	Measure
Commuter Trip Reduction	<ul style="list-style-type: none"> • Commute Trip Reduction Programs with Required Monitoring • Ride Sharing Programs • Subsidized or Discounted Transit Programs • Telecommuting • Alternative Work Schedules
Land Use/Location	<ul style="list-style-type: none"> • Increase Transit Accessibility
Parking Policy/Parking	<ul style="list-style-type: none"> • Unbundle parking
Neighborhood/Site Enhancement	<ul style="list-style-type: none"> • Pedestrian Network Improvements • Traffic Calming Measures • Car Sharing Programs

- Additional TDM measures beyond those listed above may be considered, if such measure is used to quantitatively reduce a project’s VMT estimate. Substantial evidence should be provided to Public Works to support the effectiveness of the measure,
- For a single-use project, introducing compatible additional land uses to allow for internalization of trips,
- For a mixed-use project, modifying the project’s land use mix to increase internalization of trips, reduce external trip generation, and serve the local community.

Section 3.1.5.2. - Land Use Plans Mitigations

Potential mitigation measures for land use plan VMT impacts can include:

- Reallocation of future land use development to increase land use variety and density in transportation-efficient locations (e.g., proximity to jobs and housing, proximity to transit, proximity to services),
- Measures to enhance the public transit system and/or connections to the system including active transportation mode improvements, such as infrastructure improvements, programs, or education and marketing,
- Measures to encourage reduced reliance on automobile trips and encourage transit and active transportation modes.

Section 3.2. - Transportation Projects

Section 3.2.1. - Introduction

Transportation projects that increase vehicular capacity can lead to additional travel on the roadway network, which can include induced vehicle travel due to factors such as increased speeds and induced growth. To provide consistency across transportation projects and achieve the County's sustainability goals, the screening criteria for transportation impacts is based on the question below:

- For a transportation project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(2)?

For transportation projects, the intent is to assess whether a transportation project induces substantial additional VMT. The following screening criteria and impact criteria are meant to serve as guidance for projects to determine whether a Transportation Impact Analysis should be performed, and whether a project generates a significant transportation impact. The criteria will be considered on a project-by-project basis as approved by Public Works.

Section 3.2.2. - Screening Criteria

If the answer is no to the following question, further analysis will not be required, and a less than significant impact determination can be made for that threshold:

- Would the project include the addition of through traffic lanes on existing or new highways, including general purpose lanes, high-occupancy vehicle (HOV) lanes, peak period lanes, auxiliary lanes, and lanes through grade-separated interchanges (except managed lanes, transit lanes, and auxiliary lanes of less than one mile in length designed to improve roadway safety)²?

Transit and active transportation projects and projects that reduce roadway capacity generally reduce VMT and, therefore, are presumed to cause a less-than-significant impact. Transportation projects that are not likely to lead to a substantial or measurable increase in vehicle travel and would, therefore, not be required to prepare an induced travel analysis supported by the OPR technical advisory², are listed below:

- Rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets (e.g., highways; roadways; bridges; culverts; Transportation Management System field elements such as cameras, message signs, detection, or signals; tunnels; transit systems; and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle capacity,
- Roadside safety devices or hardware installation such as median barriers and guardrails,

- Roadway shoulder enhancements to provide "breakdown space" - dedicated space for use only by transit vehicles, to provide bicycle access, or to otherwise improve safety, but which will not be used as automobile vehicle travel lanes,
- Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety,
- Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, two-way left turn lanes, or emergency breakdown lanes that are not utilized as through lanes,
- Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit,
- Conversion of existing general-purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially increase vehicle travel,
- Addition of a new lane that is permanently restricted to use only by transit vehicles,
- Reduction in number of through lanes,
- Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane to separate preferential vehicles (e.g., high-occupancy vehicles [HOV], high-occupancy toll [HOT], or trucks) from general vehicles,
- Installation, removal, or reconfiguration of traffic control devices,
- Installation of traffic metering systems, detection systems, cameras, changeable message signs and other electronics designed to optimize vehicle, bicycle, or pedestrian flow,
- Timing of signals to optimize vehicle, bicycle or pedestrian flow,
- Installation of roundabouts or traffic circles,
- Installation or reconfiguration of traffic calming devices,
- Adoption of, or increase, in tolls,
- Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase.
- Initiation of new transit service,
- Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes,
- Removal or relocation of off-street or on-street parking spaces,
- Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs),
- Addition of traffic wayfinding signage,
- Rehabilitation and maintenance projects that do not add motor vehicle capacity,

- Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way,
- Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel,
- Installation of publicly available alternative fuel/charging infrastructure,
- Adding of passing lanes, truck climbing lanes, or truck brake-check lanes in rural areas that do not increase overall vehicle capacity along the corridor.

Section 3.2.3. – Impact Criteria

The project has a potentially significant VMT impact if it meets the criteria listed below. The impact criteria below are considered as a potential option that may be selected as thresholds for determining significance. The impact criteria below is based on guidance published by OPR², but their applicability to a specific project shall be justified with substantial evidence and is not presumed to be appropriate.

- The project will increase the project area VMT, as measurable by the SCAG RTP/SCS base year Travel Demand Forecasting Model plus an induced travel elasticity factor per lane mile².

Section 3.2.4. - Methodology

Section 3.2.4.1. - Project Impacts Determination

The County utilizes the SCAG RTP/SCS Travel Demand Forecasting Model (as described in the Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷) that is suitable for assessing change in VMT due to a given roadway project in its land use/transportation context. This model should be used to calculate the change in VMT from transportation projects that, by definition, are considered to have the potential for inducing VMT.

For the direct measurement of project impacts, the SCAG RTP/SCS model's base year network should be modified to reflect the vehicle capacity-enhancements that would result from the proposed transportation project. The base year model should be run with and without the proposed transportation project, without adjusting the model's land use inputs, to isolate the potential change in network VMT with the project as compared to the baseline. The assessment should cover the full area in which driving patterns are expected to change and include supporting evidence for why such area was selected.

The SCAG RTP/SCS model is capable of adjusting trip lengths, mode split, and route choice in response to network changes. However, the model does not include the ability to modify land use in response to changes to the transportation system and will not increase trips to reflect latent demand. Therefore, such induced travel should be estimated by applying an induced demand elasticity factor available from appropriate academic literature.

Accordingly, the VMT impact of a transportation project shall be calculated as the direct change in VMT as estimated by the SCAG RTP/SCS model (as described in the Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷) with and without the project plus a factor for induced demand calculated as follows:

- Run the SCAG RTP/SCS model with and without the transportation project to isolate the potential direct change in network VMT due to changes in trip length, mode split, and route choice,
- Using the SCAG RTP/SCS model, determine the total modeled lane-miles over the project area that fully captures travel behavior changes resulting from the project,
- Determine the percent change in total lane miles that will result from the project,
- Using the SCAG RTP/SCS model, determine the total existing VMT over that same area,
- Multiply the percent increase in lane miles by the existing VMT and then multiply that by the elasticity factor from the latest induced travel literature to determine the induced VMT,
- Add the induced VMT to the modeled change in network VMT due to trip length, mode split, and route choice.

Section 3.2.4.2. - Cumulative Impacts Determination

Analyses should consider both short- and long-term project effects on VMT. Short-term effects will be evaluated in the project-level VMT analysis described above. Long-term, or cumulative, effects will be determined through consistency with the SCAG RTP/SCS. The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) reduction targets. As such, transportation projects that are included in this plan are part of the regional solution for meeting air pollution and GHG reduction goals. Transportation projects that are deemed to be consistent would have a less than significant cumulative impact on VMT.

Transportation projects that are not deemed to be consistent could have a significant cumulative impact on VMT. Further evaluation would be necessary to determine whether such a project's cumulative impact on VMT is significant. This analysis would be conducted by running the RTP/SCS cumulative year conditions and the cumulative "plus project" scenario (as described in the Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷) incorporating the network changes due to the proposed transportation project. An induced demand elasticity factor should be applied to any increase in VMT thus determined, and any increase in VMT would constitute a significant impact because it could jeopardize regional air quality conformity or GHG reduction findings.

Section 3.2.5. – Mitigation

Mitigation measures that could reduce the amount of increased vehicle travel induced by capacity increases could include, but not be limited to, the following measures:

- Converting existing general-purpose lanes to HOV lanes, high occupancy toll (HOT) lanes, toll lanes, or bus lanes to encourage carpools and fund transit improvements,
- Implementing or funding off-site mobility improvements, including the initiation of transportation management organizations (TMOs),
- Implementing intelligent transportation systems (ITS) strategies to improve passenger throughput on existing lanes,
- Additional measures beyond those listed above, may be considered, if such measures are used to quantitatively reduce a project's VMT estimate, substantial evidence should be provided to support the claimed effectiveness of the measure(s).

Section 4. – Site Access Studies

Section 4.1. – Operational Analysis

Section 4.1.1. - Introduction

The site access and circulation constraints related to the provision of access to and from the project site may be analyzed as part of the project's environmental review. The analysis should address the site access and circulation needs of vehicles, bicycles and pedestrians. If the operation analysis is determined to be necessary in consultation with Public Works, operational performance may be quantified for primary site access points, unsignalized intersections integral to the project's site access, and signalized intersections in the vicinity of the project site.

Section 4.1.2. - Screening Criteria

Section 4.1.2.1. - Development Projects

For development projects, if the answer is yes to the following questions, further analysis may be required to assess whether the project would negatively affect project access and circulation:

- Is the project required to submit a Transportation Impact Analysis?
- Does the development project involve a discretionary action that would be reviewed by the Department of Regional Planning?

Section 4.1.3. - Evaluation Criteria

Section 4.1.3.1. - Operational Deficiencies

The Transportation Impact Analysis should include a quantitative evaluation of the project's expected access and circulation operations. Project access is considered constrained if the project's traffic would contribute to unacceptable queuing at nearby signalized intersections. Unacceptable or extended queuing may be defined as follows:

- Spill over from turn pockets into through lanes,
- Spill over into intersections.

Section 4.1.4. - Methodology

Section 4.1.4.1. - Level of Service and Queueing Methodology

Intersection level of service (LOS) and queueing methodologies from the latest edition of the Transportation Research Board Highway Capacity Manual (HCM) should be used to evaluate the operation of the project driveways and nearby intersections. For individual

isolated intersection analysis, the use of software packages such as Synchro, Vistro, or HCS that implement the HCM methodologies is acceptable.

Where oversaturated conditions currently exist, the operational analysis should be conducted using Synchro/SimTraffic or VISSIM simulation models to more accurately reflect the effect of downstream congestion on intersection operations. VISSIM should be used in areas with transit lanes or with high levels of pedestrians conflicting with vehicle turning movements

Section 4.1.4.2. - Study Area

Study locations should be determined in consultation with Public Works and should include:

- All primary project driveway(s),
- Unsignalized and/signalized intersections that are adjacent to the project or that are expected to be integral to the project's site access and circulation plan,
- Additional intersections may be necessary as determined by Public Works.

For most projects, analyze traffic for both the a.m. and p.m. weekday peak hours as determined by 24-hour traffic counts. For some projects, expanding the analysis to include midday or weekend periods may be appropriate if these are expected to be the prime periods of trip generation for the project.

Section 4.1.4.3. - Traffic Counts

Traffic counts should generally be conducted per the following guidance and by Section 4.1.4.2., unless otherwise directed by Public Works:

- Turning movement data at the study intersections:
 - Should be collected in 15-minute intervals,
 - Must include vehicle classifications, pedestrian volume counts, and bicycle counts,
 - Must include a minimum of 2 hours of traffic counts for each of the peak hours,
 - Must be taken on Tuesdays, Wednesdays or Thursdays,
 - Must exclude holidays, and the first weekdays before and after the holiday,
 - Must be taken on days when local schools or colleges are in session,
 - Must be taken on days of good weather, and avoid atypical conditions (e.g., road construction, detours, or major traffic incidents),
- Traffic counts used from other traffic studies in the area may be use if they are reviewed and approved by Public Works.

When simulation analyses are to be conducted, obtain traffic speed and/or travel time data during peak periods to aid in calibration of the simulation model.

Section 4.1.4.4. - Project Trip Distribution

Distribution patterns for project trips should be determined considering a number of factors including, but not limited to, the following:

- Characteristics of the street system serving the project site,
- Level of accessibility of routes to and from the proposed project site,
- Locations of employment and commercial centers,
- Locations of residential areas.

The Transportation Impact Analysis shall include map(s) showing project trip distribution percentages (inbound and outbound) at the study intersections, and project driveway(s). This map shall be pre-approved by Public Works and included in the Transportation Impact Analysis Scoping Document.

Section 4.1.4.5. - Traffic Forecasts

The Transportation Impact Analysis shall estimate traffic conditions for the study horizon year selected during the scoping phase and recorded in the executed Scoping Document. The study shall clearly identify the horizon year and annual ambient growth rate used for the study. For development projects constructed in phases over several years, the Transportation Impact Analysis should analyze intermediary milestones before the buildout and completion of the project. The annual ambient growth rate shall be determined by Public Works staff during the scoping process and can be based on the most recent SCAG Regional Transportation Model or other empirical information approved by Public Works.

The Transportation Impact Analysis shall consider trip generation for known development projects within one-half mile (2,640 foot) radius of the farthest outlying study intersections. Consultation with the Department of Regional Planning or other planning agencies will be required to compile a related projects list.

The traffic forecasts for the project access and circulation constraints are determined by adding project-generated trips to future base traffic volumes, including ambient growth and related projects and conducting the operational analysis.

Any programmed and funded transportation system improvements that are expected to be implemented on or before the project buildout year should be identified in the study, in consultation with Public Works. If programmed improvements include a modification to the existing lane configuration at any of the study intersections, then the study should identify these changes and include the revised lane configuration in the LOS calculations for all future scenarios.

Section 4.1.5. – Recommended Action

Potential corrective actions for project access and circulation constraints can include, but are not limited to:

- Installation of a traffic signal or stop signs or electronic warning devices at site access points,
- Redesign and/or relocation of project access points,
- Redesign of the internal access and circulation system,
- Installation of stop-signs and pavement markings internal to the site,
- Restriction or prohibition of turns at site access points,
- Installation of new traffic signal, left-turn signal phasing, or other vehicle flow enhancements at nearby intersections,
- Reconfiguration of study intersections that reduces gridlock and unsafe conflict points.

Any of the above-mentioned actions shall be recommended in accordance with California Manual on Uniform Traffic Control Devices (CA MUTCD) warrants and criteria, or other criteria deemed appropriate by Public Works.

Section 4.2 – Construction Phase Analysis

Section 4.2.1. - Introduction

This category addresses activities associated with project construction and major in-street construction of infrastructure projects.

Section 4.2.2. - Screening Criteria

If the answer is yes to any of the following questions, further analysis will be required to assess if the project could negatively affect existing pedestrian, bicycle, transit, or vehicle circulation:

- For projects that require construction activities to take place within the right-of-way of a highway, would it be necessary to close any temporary lanes, alleys, or streets for more than one day (including day and evening hours, and overnight closures if on a residential street)?
- For projects that require construction activities to take place within the right-of-way of a Local Street, would it be necessary to temporarily close any lanes, alleys, or streets for more than seven days (including day and evening hours, and including overnight closures if on a residential street)?
- Would in-street construction activities result in the loss of any vehicle, bicycle, or pedestrian access, including loss of existing bicycle parking to an existing land use for more than one day, including day and evening hours and overnight closures if access is lost to residential units?
- Would in-street construction activities result in the loss of any ADA access to an existing transit station, stop, or facility (e.g., layover zone)?

- Would in-street construction activities restrict access to any bus stops for more than one day, or necessitate any rerouting of a bus route?
- Would construction of a project interfere with pedestrian, bicycle, transit, or vehicle circulation and accessibility to adjoining areas?

Please note, that further analysis may determine that a project construction analysis may be required as determined by Public Works.

Section 4.2.3. - Evaluation Criteria

Factors to be considered as part of the construction phase analysis are: location of the project site, functional classification of the adjacent street, availability of alternate routes or additional capacity, temporary loss of bicycle parking, temporary loss of bus stops or rerouting of transit lines, duration of temporary loss of access, affected land uses, and magnitude of the temporary construction activities.

- Temporary transportation constraints:
 - Length of time of temporary street closures or closures of one or more travel lanes,
 - Classification of the street (major arterial, state highway) affected,
 - Existing congestion levels on the affected street segments and intersections,
 - Direct access to freeway on- or off-ramp or other state highway,
 - Presence of emergency services (fire, hospital, etc.) located nearby that regularly use the affected street,
- Temporary loss of access:
 - Length of time of any loss of pedestrian or bicycle circulation outside the construction zone,
 - Length of time of any loss of vehicular, bicycle, or pedestrian access to a parcel within the construction zone,
 - Length of time of any loss of ADA pedestrian access to a transit station, stop, or facility,
 - Availability of nearby vehicular or pedestrian access within 1/2 mile of the lost access,
- Temporary Loss of Bus Stops or Rerouting of Bus Lines:
 - Days and times during which an existing bus stop would be unavailable or existing service would be interrupted,
 - Availability of a nearby location (within 1/2 mile) to which the bus stop or route can be temporarily relocated,
 - Existence of other bus stops or routes with similar routes/destinations within a 1/2- mile radius of the affected stops or routes,
 - Time of interruption on a weekday, weekend or holiday, and whether the existing bus route typically provides service on those day(s).

Section 4.2.4. – Methodology

Describe the physical setting, including the classification of adjacent streets, on-street parking conditions, including bicycle parking, in the immediate vicinity of the construction project, a description of the land uses potentially affected by construction, and an inventory of existing transit lines, bus stops, transit stations, and transit facilities within a 1/2-mile radius of the construction site. Review proposed construction procedures/plans to determine whether construction activity within the street right-of-way would require any of the following:

- Closure of street, sidewalk, or lanes,
- Blocking existing vehicle, bicycle, or pedestrian access along a street or to parcels fronting the street,
- Modification of access to transit stations, stops, or facilities during service hours,
- Closure or movement of an existing bus stop or rerouting of an existing bus line.
- Creation of transportation hazards.

Compare the results to the evaluation criteria to determine the level of deficiency.

Section 4.2.5. - Recommended Action

Potential corrective conditions for project construction constraints can include but are not limited to:

- Implement traffic management plan, including traffic control plans,
 - Consult with Public Works if temporary closure of a travel lane may be necessary to stage equipment in the public right-of-way,
- Modify construction procedures,
- Limit major road obstructions to off-peak hours,
- Coordinate with emergency service and public transit providers,
- Provide alternative vehicular, bicycle, and/or pedestrian access to affected parcels. Consult with Public Works if temporary closure of a travel lane may be necessary to maintain adequate pedestrian and bicycle access as part of the traffic management plan,
- Coordinate access with adjacent property owners and tenants,
- Coordinate with transit agency regarding maintenance of ADA access to transit stations, stops, and transit facilities (e.g., layover zones),
- Coordinate with transit providers regarding need to temporarily close or relocate bus stops or reroute service.

Section 4.3. – Local Residential Street Cut-Through Analysis

Section 4.3.1. - Introduction

Development and transportation projects may be required to conduct a Local Residential Street Cut-Through Analysis (LRSTM). The objective of this analysis is to determine

potential increases in average daily traffic (ADT) volumes on designated Local Streets near a project that can be classified as cut-through trips generated by the project, and that can adversely affect the character and function of those streets. Cut-through trips are defined as trips along a street classified as a Local Street in the County's General Plan, with residential land-use frontage, as an alternative to trips along a highway defined as Limited Secondary, Secondary, Major, Parkway, or Expressway as designated in the County's General Plan for purposes of accessing a destination that is not within the neighborhood within which the Local Street is located.

Cut-through traffic may result from development projects that add vehicle trips to congested arterial street segments, or by transportation projects that reduce vehicular capacity on highway street segments. To mitigate potential adverse impacts from cut-through traffic (e.g., congestion, access issues, and speeding on Local Streets), traffic calming and diverting features should be considered and, if deemed appropriate by Public Works, implemented to offset any anticipated cut-through traffic.

Section 4.3.2. - Screening Criteria

Section 4.3.2.1. - Development Projects

If the answer is yes to the following questions, further analysis may be required to assess whether the project would negatively affect residential streets:

- Is the project required to submit a Transportation Impact Analysis?
- Does the development project involve a discretionary action that would be reviewed by the Department of Regional Planning?

In addition, for development projects to which all of the following circumstances apply, select local residential street segments for analyses during the transportation assessment scoping process:

- The project is located along a current Limited Secondary, Secondary, Major, Parkway, Expressway per the County's General Plan and the study intersections under project build-out conditions (as determined in Section 4.1) operate at a peak hour LOS E or LOS F.
- The project has a potential, based on connectivity to the roadway network, to add automobile traffic to the alternative local residential street route(s) during peak hours,
- An alternative local residential street route (defined as local streets as designated in the County's General Plan passing through a residential neighborhood) provide motorists with a viable alternative route. A viable alternative local residential street route is defined as one which is parallel and reasonably adjacent to the primary route as to make it attractive as an alternative to the primary route. The project applicant in consultation with Public Works shall define which routes are viable

alternative routes, based on, but not limited to, features such as geography and presence of existing traffic control devices, and other criteria as determined by Public Works.

For the purpose of screening for daily vehicle trips, a proposed project's daily vehicle trips should be estimated using the most recent edition of the ITE Trip Generation Manual. If the project proposed land use is not listed in the ITE Trip Generation Manual, please submit a trip generation study to Public Works for review and approval.

Section 4.3.3. - Methodology

Section 4.3.3.1. - Development Projects

Future peak hour "without project" traffic conditions for the study intersections in the vicinity of the project identified in Section 4.1 should be developed using the intersection analysis methodologies, including an ambient growth rate to the study horizon year and adding traffic generated by related projects. Future "without project" daily traffic volumes for the local residential streets included in the analysis should be developed by collecting daily traffic counts for the subject streets, adding an ambient growth rate to the study horizon year, and adding traffic generated by related projects, also using methodologies described in Section 4.1.

The methodologies described in Section 4.1 should be applied to estimate the daily and peak hour trip generation of the project and distribute the project trips to the street system to forecast the amount of project traffic that may be added to nearby congested highways. If the nearby study intersections are projected to operate at LOS E or F, the analysis shall include the following:

- Estimate the amount of peak hour project traffic that may instead shift away from the congested facilities to local residential streets,
- Estimate the amount of daily project traffic that may shift to local residential streets, considering that the street system is less congested during non-peak hours than during peak hours,

Section 4.3.4. - Recommended Action

If the analysis indicated the project may result in substantial diversion, the project applicant shall conduct public outreach and develop a Local Residential Street Cut-Through (LRSTM) Plan. The project applicant shall consult with Public Works, and neighborhood stakeholders, and any other stakeholders to collaboratively prepare the LRSTM Plan. Coordination with the appropriate Supervisorial District office may be necessary to designate the stakeholders that should facilitate the public outreach.

The project applicant shall submit a separate scoping document for the LRSTM Plan to Public Works for review and approval as part of the Transportation Impact Analysis which shall include the following items:

- Identify key milestones,
- Summarize the proposed process in developing a LRSTM plan for the local residential street segments of concern,
- Define a public outreach and consensus- building process,
- Propose selection and approval criteria for any evaluated traffic calming measures,
- Provide a funding plan which will include potential sources of funding.

The project applicant shall submit the LRSTM Plan with a cost estimate for the improvements, and a funding plan to Public Works for review and approval, prior to issuance of building permit. The LRSTM Plan shall be prepared in conformance with the guidelines established by Public Works and should contain, at a minimum, the following elements:

- Description of existing facilities and neighborhood traffic conditions,
- Description of proposed neighborhood traffic controls, including sketches of specific street modifications,
- Analysis of any change in existing or future traffic patterns as a result of implementation of the plan,
- Implementation and monitoring program.

The project applicant shall lead public outreach in consultation with Public Works and the affected Supervisorial District office.

The development of the LRSTM plan shall include the analysis of any relevant traffic data, roadway characteristics, and conditions of the local residential street segments of concern.

The LRSTM Plan should prioritize implementing effective traffic calming subject to Public Works guidelines and appropriate warrants, which may include, but is not limited to:

- Traffic circles,
- Speed humps,
- Roadway narrowing effects (raised medians, traffic chokers, etc.),
- Landscaping features,
- Roadway striping changes,
- Traffic control devices,
- Restrictive measures such as turn restrictions, physical barriers, diverters, signal metering, etc.,
 - Restrictive measures should be carefully evaluated to ensure that they do not lead to the diversion of a significant amount of traffic from one local residential street to another local residential street.

For these above-mentioned items, the project applicant shall also be responsible for conducting the engineering evaluation of the potential measures to determine the feasibility regarding drainage, constructability, street design and other pertinent elements.

Section 4.4 - Additional Site Access Analysis

Section 4.4.1 - Introduction

Project access and circulation constraints related to the site plan, and access to and from the project site may be analyzed separately from the Transportation Impact Analysis.

Section 4.4.2. - Screening Criteria

If the answer is yes to any of the following question, additional site access studies may be required to assess the projects site access requirements:

- Would the project provide a driveway on a rural cross section two-lane highway per the County's General Plan?
- Does the project's land use require vehicles to queue on-site?
- Does the project's land use include intermittent events which may exceed the supply of on-site parking?

Section 4.4.3. - Evaluation and Methodology

The project applicant shall prepare and submit a Scoping Document to Public Works through the EPIC-LA portal. The Scoping Document describes the assumptions and parameters that shall be included in the Additional Site Access Studies including any analysis requirements. The additional site access studies required based on the screening criteria from Section 4.4.2. are listed below

- Public Works may evaluate the site access requirements for a driveway on a rural two-lane highway by requesting a Traffic Access Management Study to be conducted,
- Public Works may evaluate the site access requirements for vehicular queuing by requesting a Traffic Queueing Analysis to be conducted,
- Public Works may evaluate the site access requirements for land use with intermittent events that will exceed the supply of on-site parking by requesting a Traffic Event Management Study to be conducted.

Section 4.4.4. - Recommended Actions

Potential corrective actions for project access and circulation will be addressed in the additional site access studies and documented in a Traffic Study Confirmation of Findings Letter from Public Works.

Section 5. - Study Format and Required Content

Each Transportation Impact Analysis should follow a consistent format and organization and include all of the figures, maps, and information presented in this section. The level of detail required for each project's Transportation Impact Analysis should be determined during the scoping process and identified in the Scoping Document.

Section 5.1. - Project Description

A Transportation Impact Analysis shall include a detailed project description at the beginning of the document. The project description should include the following information:

- Project case number, as assigned by the Department of Regional Planning (if applicable Tract Map, Parcel Map, Conditional Use Permit, RPPL),
- Location of the project site, address, Assessor's Block and Lot number(s), cross streets, and Supervisorial District, and Unincorporated Community,
- Existing and proposed total square footage for each type of land use and/or the number of residential units, including the net changes for each type of use,
- Transportation demand management measures proposed as part of the project.

This section shall also include the following maps and figures:

- Project site plan showing driveway locations, loading/unloading area,
- Site map showing study intersections and distance of the project driveway(s) from the adjacent intersections. Include location and identification of all major buildings, driveways, parking areas, and loading docks of the project.

Section 5.2. - Site Conditions

The information on the location and surroundings of the project shall be discussed following the project description, as a different section of the Transportation Impact Analysis. This section will provide a brief, but comprehensive description of the existing transportation infrastructure and conditions in the vicinity of the project. The specific boundaries of the Transportation Impact Analysis area, for both the location and surroundings of the project, should be confirmed during the initial discussion and scoping process with Public Works.

The project context section should include the following information, with the level of detail to be directed by Public Works during the scoping process:

- Street designations, classifications, pedestrian and bicycle facilities existing and planned,

- Description of the study area streets, including the number and width of lanes, direction of flow, on-street parking information, and other significant street information,
- Location of, distance from, and routings to and from on-ramps and off-ramps of regional highways and freeways,
- Description of public transit routes operating on the streets within the Transportation Impact Analysis area, including hours of service, peak period headways, type of vehicle (bus, light rail vehicle, etc.), and service provider.

This section of a Transportation Impact Analysis will also include the following maps and figures:

- Area map showing location of the project and related projects,
- Street maps of the study area indicating street names, classifications, and traffic control,
- Map or diagram of potential pedestrian destinations within 1,320 feet of the edge of a project site,
- Table indicating location, size, name, description, and trip generation of each related project.

Section 5.3. - Analysis, Discussion, and Results

Following the descriptions of the project and its surroundings, the Transportation Impact Analysis shall contain sections that detail the analyses conducted, summarize the results, and identify any significant transportation impacts and mitigation measures for each of the CEQA issue areas identified in Section 3, and any operational deficiencies and corrective actions for the additional areas of analysis identified in Section 4.

The Transportation Impact Analysis should include calculations, data, and descriptions of any transportation analyses conducted to determine project impacts on the transportation system. The Transportation Impact Analysis should describe the results of all project scenarios and describe all project impacts that have been identified.

Section 5.4. – Mitigation Measures and Recommended Actions

Section 5.4.1. - Introduction

When a project is expected to result in significant transportation impacts, as defined in Section 3, or transportation deficiencies, as defined in Section 4, the project's consultant should meet with Public Works to discuss potential transportation mitigation options and corrective actions before submitting a Transportation Impact Analysis. A variety of transportation mitigation measures should be considered to mitigate a project's significant transportation impact to a level of insignificance.

All proposed mitigation measures shall be described in the Transportation Impact Analysis and to the satisfaction of Public Works.

Section 5.4.2. - Transportation Demand Management Measures

Mitigation measures shall minimize vehicle miles traveled through Transportation Demand Management (TDM) strategies. A preliminary draft performance based TDM Program shall be included in the Transportation Impact Analysis for any project seeking trip generation amendments supported by TDM, to the satisfaction of Public Works. The applicant may be allowed to reduce the total project trips and VMT by an amount determined to be commensurate with the measures proposed in the TDM Program.

Section 5.4.3. - Physical Infrastructure Improvements

Construction of physical infrastructure improvements shall encourage walking and biking and the use of transit. Conceptual Traffic Signal Plans and Conceptual Signing and Striping Plans should be prepared for any proposed physical infrastructure improvements and should be submitted to Public Works for review and approval as part of the Transportation Impact Analysis.

Section 5.4.4. - Mitigation Monitoring and Reporting Program in CEQA Documents

Each mitigation measure in the project's mitigation monitoring program should be described separately in the CEQA Document. The following details are required for each measure:

- Identification of the agency responsible for monitoring the measure and coordinating all participants,
- Qualifications, if any, of the necessary monitor(s),
- Monitoring schedule (i.e., the phase of the project, frequency, and completion/termination) – this should be stated for physical mitigation measures required during construction as well as those that are for the operation/life of the project (e.g., TDM program),
- Funding required and sources of funding for monitoring activities by both project and County personnel (especially for long-term monitoring activities).

Tom Brohard, PE

Licenses: 1975 / Professional Engineer / California – Civil, No. 24577
1977 / Professional Engineer / California – Traffic, No. 724
2006 / Professional Engineer / Hawaii – Civil, No. 12321

Education: 1969 / BSE / Civil Engineering / Duke University

Experience: 50 Years

Memberships: 1977 / Institute of Transportation Engineers – Fellow, Life
1978 / Orange County Traffic Engineers Council - Chair 1982-1983
1981 / American Public Works Association – Life Member

Tom is a recognized expert in the field of traffic engineering and transportation planning. His background also includes responsibility for leading and managing the delivery of various contract services to numerous cities in Southern California.

Tom has extensive experience in providing transportation planning and traffic engineering services to public agencies. In addition to conducting traffic engineering investigations for Los Angeles County from 1972 to 1978, he has previously served as City Traffic Engineer in the following communities:

- Bellflower 1997 - 1998
- Bell Gardens 1982 - 1995
- Big Bear Lake.....2006 - 2015
- Indio.....2005 - 2019
- Huntington Beach 1998 - 2004
- Lawndale..... 1973 - 1978
- Los Alamitos 1981 - 1982
- Oceanside..... 1981 - 1982
- Paramount 1982 - 1988
- Rancho Palos Verdes 1973 - 1978
- Rolling Hills 1973 - 1978, 1985 - 1993
- Rolling Hills Estates 1973 - 1978, 1984 - 1991
- San Fernando.....2004 - 2019
- San Marcos..... 1981
- Santa Ana 1978 - 1981
- Westlake Village 1983 - 1994

During these assignments, Tom has supervised City staff and directed other consultants including traffic engineers and transportation planners, traffic signal and street lighting personnel, and signing, striping, and marking crews. He has secured over \$10 million in grant funding for various improvements. He has managed and directed many traffic and transportation studies and projects. While serving these communities, he has personally conducted investigations of hundreds of citizen requests for various traffic control devices. Tom has also successfully presented numerous engineering reports at City Council, Planning Commission, and Traffic Commission meetings in these and other municipalities.

Tom Brohard and Associates

In his 14 years of service to the City of Indio, Tom accomplished the following:

- ❖ Oversaw preparation and adoption of the 2008 Circulation Element Update of the General Plan including development of Year 2035 buildout traffic volumes, revised and simplified arterial roadway cross sections, and reduction in acceptable Level of Service criteria under certain conditions.
- ❖ Oversaw preparation of fact sheets/design exceptions to reduce shoulder widths on Jackson Street and on Monroe Street over I-10 as well as justifications for protected-permissive left turn phasing at I-10 on-ramps, the first such installations in Caltrans District 8 in Riverside County; reviewed plans and provided assistance during construction of both \$2 million projects to install traffic signals and widen three of four ramps at these two interchanges under Caltrans encroachment permits.
- ❖ Reviewed traffic signal, signing, striping, and work area traffic control plans for the County's \$45 million I-10 Interchange Improvement Project at Jefferson Street.
- ❖ Reviewed traffic impact analyses for Project Study Reports evaluating different alternatives for buildout improvements of the I-10 Interchanges at Jefferson Street, Monroe Street, Jackson Street and Golf Center Parkway.
- ❖ Oversaw preparation of plans, specifications, and contract documents and provided construction assistance for over 70 traffic signal installations and modifications.
- ❖ Reviewed and approved over 2,000 work area traffic control plans as well as signing and striping plans for all City and developer funded roadway improvement projects.
- ❖ Oversaw preparation of a City-wide traffic safety study of conditions at all schools.
- ❖ Obtained \$47,000 grant from the California Office of Traffic Safety and implemented the City's Traffic Collision Database System. Annually reviews "Top 25" collision locations and provides traffic engineering recommendations to reduce collisions.
- ❖ Prepared over 1,500 work orders directing City forces to install, modify, and/or remove traffic signs, pavement and curb markings, and roadway striping.
- ❖ Oversaw preparation of engineering and traffic surveys to establish enforceable speed limits on over 500 street segments.
- ❖ Reviewed and approved traffic impact studies for more than 35 major projects and special events including the annual Coachella and Stagecoach Music Festivals.
- ❖ Developed and implemented the City's Golf Cart Transportation Program.

Since forming Tom Brohard and Associates in 2000, Tom has reviewed many traffic impact reports and environmental documents for various development projects. He has provided expert witness services and also prepared traffic studies for public agencies and private sector clients.

Martha Alvarez

From: Darryl Franklin <600sepulvedacomunity@gmail.com>
Sent: Monday, February 1, 2021 4:28 PM
To: List - City Council; Liza Tamura; Ted Faturos; Carrie Tai, AICP; Martha Alvarez
Cc: Doug CARSTENS
Subject: [EXTERNAL] 600 S Sepulveda Hotel Application - Items for the record re traffic accidents
Attachments: Hermosa traffic info.pdf; Manhattan Beach collisions 18-20.pdf; SW.LSTREFNWrev2020.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Dear Mayor, City Councilors and others

As has been raised by numerous persons throughout the various hearings on the hotel application there are very real traffic accident concerns that have to be looked at that through an EIR with the involvement of CalTrans who have jurisdiction over Sepulveda and the City of Hermosa who are on the other side of the road.

As you are aware the proposed granting of the Sec 32 exemption would sidestep that important examination with likely and foreseeable fatal results.

As the reports of MB Poets traffic expert and the other appellant's traffic expert report shows the applicant's traffic expert has significantly understated trips generated and failed to analyze the impact of the development's traffic on the residential roads where much of the traffic will be carried (and which traffic will in turn enter and exit on the major arterial routes from those side streets).

I am attaching for the record information obtained by me today from CHP on accidents in the last 3 years on Sepulveda from Artesia to Keats. Please bear in mind 2020 had very reduced traffic due to COVID. Ther Hermosa PD email also raises the issue that this data may not be complete. You will see reports of 14 accidents on Sepulveda between Artesia and Keats, many with injuries and one fatality. These do NOT include the cyclist and motorcyclist fatalities at Tennyson and Keats that were more than 3 years ago (but are still very recent). This information was obtained by me today from Janelle Fallan Dunham, Information Officer – Office of Community Outreach and Media Relations, California Highway Patrol.

Also attached is information from Hermosa PD on accidents in the last 12 months on their portion of PCH approaching the Artesia junction. Obviously the information in this email is not as detailed as that provided above by CHP but both attachments highlight that there are many serious accidents on this road on a regular basis and adding to the traffic in a significant way cannot and morally should not just be glossed over.

The City should already be well familiar with the detailed accidents analysis contained in the traffic reports done as part of the EIR for the Skechers developments (37 accidents in a 5 year period at the Artesia/Sepulveda junctions).

In closing and unfortunately making my point all the more personal, last week my nanny and 3 year old were hit in her car at 10.30am crossing over Artesia on Prospect heading South. Her car was written off by a pickup truck driver who went through a very red light at full speed. The attending police officer told me if the driver had hit the doors instead of the front of the car over the wheel well, they would both likely be dead. The difference between two funerals and an interesting story?...about 36 inches.

Please for the sake of the community you represent do not exempt this project from an EIR to make sure that what is developed here does not create a bunch of entirely foreseeable adverse impacts.

Yours truly

Darryl Franklin

(1) 818 231 1182 (-8hrs GMT)

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Found in coastwithclouds@gmail.com Inbox

→ Starla Smith

1/14/21



PRR-21-00006-Best,Nancy-01-11-21

Details

To: coastwithclouds@gmail.com Cc: Victoria, Records

Dear Ms. Best,

The City of Hermosa Beach is in receipt of your Public Records Act request received on January 11, 2021. The responsive records for 01/01/2020-12/31/2019 are available on The Statewide Integrated Traffic Records System(SWITRS) maintained by the California Highway Patrol (<https://www.chp.ca.gov/programs-services/services-information/switrs-internet-statewide-integrated-traffic-records-system>) (<https://iswitrs.chp.ca.gov/Reports/sp/index.jsp>). The SWITRS website is currently behind in updating the most current records so we are providing the responsive records for 2020-2021; there were 14 traffic accidents from 01/01/2020-01/07/2021 on Sepulveda Blvd./Pacific Coast Highway from Boundry Pl to 21st St. 4 of which resulted in injury, 0 accidents had fatalities. Please let me know if I can be of further assistance.

PSO Supervisor Starla Smith

Court Liaison and Property & Evidence
Hermosa Beach Police Dept.
540 Pier Ave
Hermosa Beach, CA 90254
Tel: 310-318-0344
Fax: 310-798-8926
ssmith@hermosabeach.gov

COVID-19 updates: hermosabeach.gov/coronavirus

As of Monday March 16, 2020, the City of Hermosa Beach has significantly altered City operations to slow the spread of the novel coronavirus (COVID-19). City staff and services will be transitioning to make services available by phone, email or online. A list of City services and department contact information is available on the [City Directory](#) page of the website. Hermosa Beach police and other City staff that provide essential services outside City Hall – such as street repairs and other public works functions – will continue their work in the community, while taking additional precautions to reduce the risk of spread.

See More



Primary Rd SEPULVEDA BL Distance (ft) 111 Direction S Secondary Rd ARTESIA BL NCIC 1944 State Hwy? Y Route 1 Postmile Prefix - Postmile 21.940 Side of Hwy S
 City MANHATTAN BEA County LOS ANGELES Population 4 Rpt Dist Beat 002 Type CalTrans Dist 7 Badge 329 Collision Date 20180121 Time 1940 Day SUN
 Primary Collision Factor UNSAFE SPEED Violation 22350 Collision Type REAR END Severity INJURY # Killed 0 # Injured 2 Tow Away? Y Process Date 20180810
 Weather1 CLEAR Weather2 Rdw Surface DRY Rdw Cond1 NO UNUSL CND Rdw Cond2 Spec Cond 0
 Hit and Run Motor Veh Involved With OTHER MV Lighting DARK - ST LTS Ped Action Cntrl Dev FNCTNG Loc Type H Ramp/Int -

PARTY INFO

VICTIM INFO

Party	Type	Age	Sex	Race	Sobriety1	Sobriety2	Move	Pre Coll	Dir	SW	Veh	CHP	Veh Make	Year	Sp	Info	OAF1 Viol	OAF2	Safety Equip	Role	Ext of Inj	Age	Sex	Seat Pos	Safety Equip	Ejected	
1F	DRVR	42	F	A	HNBD		PROC	ST	S	A	0700	LEXUS	2005	-	3	N	-	L	G	PASS		8	M	3	M	G	0
																				PASS		6	F	6	M	Q	0
2	DRVR	29	F	W	HNBD		STOPPED		S	A	0100	TOYOT	2010	-	3	N	-	L	G	DRVR COMP PN		29	F	1	L	G	0
																				PASS	OTH VIS	29	M	3	L	G	0
3	DRVR	58	F	W	HNBD		STOPPED		S	A	0100	HONDA	2006	-	3	N	-			M	G						
4	DRVR	37	F	W	HNBD		STOPPED		S	A	0800	CHRY	2017	-	3	N	-			M	G						
5	DRVR	33	F	B	HNBD		STOPPED		S	A	0100	HYUND	2018	-	3	N	-			M	G						

Primary Rd SEPULVEDA BL Distance (ft) 22 Direction N Secondary Rd KEATS ST NCIC 1944 State Hwy? Y Route 1 Postmile Prefix - Postmile 22.091 Side of Hwy N
 City MANHATTAN BEA County LOS ANGELES Population 4 Rpt Dist SOUTH Beat 001 Type CalTrans Dist 7 Badge 345 Collision Date 20180216 Time 0945 Day FRI
 Primary Collision Factor R-O-W AUTO Violation 21801A Collision Type SIDESWIPE Severity PDO # Killed 0 # Injured 0 Tow Away? N Process Date 20180810
 Weather1 CLEAR Weather2 Rdw Surface DRY Rdw Cond1 NO UNUSL CND Rdw Cond2 Spec Cond 0
 Hit and Run Motor Veh Involved With OTHER MV Lighting DAYLIGHT Ped Action Cntrl Dev NT PRS/FCTR Loc Type I Ramp/Int 5

PARTY INFO

VICTIM INFO

Party	Type	Age	Sex	Race	Sobriety1	Sobriety2	Move	Pre Coll	Dir	SW	Veh	CHP	Veh Make	Year	Sp	Info	OAF1 Viol	OAF2	Safety Equip	Role	Ext of Inj	Age	Sex	Seat Pos	Safety Equip	Ejected			
1F	DRVR	68	M	W	HNBD		LFT	TURN	S	A	0700	JEEP	2007	-	3	N	-			M	G	PASS		68	F	3	M	G	0
2	DRVR	26	M	O	HNBD		PROC	ST	N	A	0700	HONDA	2007	-	3	N	-			M	G								

Primary Rd SEPULVEDA BL Distance (ft) 0 Direction Secondary Rd ARTESIA BL NCIC 1944 State Hwy? Y Route 1 Postmile Prefix - Postmile 21.930 Side of Hwy N
 City MANHATTAN BEA County LOS ANGELES Population 4 Rpt Dist Beat Type CalTrans Dist 7 Badge 176 Collision Date 20180224 Time 0130 Day SAT
 Primary Collision Factor LANE CHANGE Violation 21658A Collision Type SIDESWIPE Severity PDO # Killed 0 # Injured 0 Tow Away? N Process Date 20180810
 Weather1 CLEAR Weather2 Rdw Surface DRY Rdw Cond1 NO UNUSL CND Rdw Cond2 Spec Cond 0
 Hit and Run MSDMNR Motor Veh Involved With OTHER MV Lighting DARK - ST LTS Ped Action Cntrl Dev NT PRS/FCTR Loc Type H Ramp/Int -

PARTY INFO

VICTIM INFO

Party	Type	Age	Sex	Race	Sobriety1	Sobriety2	Move	Pre Coll	Dir	SW	Veh	CHP	Veh Make	Year	Sp	Info	OAF1 Viol	OAF2	Safety Equip	Role	Ext of Inj	Age	Sex	Seat Pos	Safety Equip	Ejected	
1F	DRVR	998					UNS	TURN	N	A	0000	-	-	-	-	-	A	20002	-	-	-						
2	DRVR	35	M	O	HNBD		PROC	ST	S	A	0000	TOYOT	2016	-	-	-	-	-	-								

Primary Rd SEPULVEDA BL Distance (ft) 1 Direction Secondary Rd KEATS ST NCIC 1944 State Hwy? Y Route 1 Postmile Prefix - Postmile 22.091 Side of Hwy N
 City MANHATTAN BEA County LOS ANGELES Population 4 Rpt Dist 2L1D Beat 001 Type CalTrans Dist 7 Badge 224 Collision Date 20180705 Time 0937 Day THU
 Primary Collision Factor R-O-W AUTO Violation 21801A Collision Type BROADSIDE Severity INJURY # Killed 0 # Injured 2 Tow Away? Y Process Date 20181113
 Weather1 CLEAR Weather2 Rdw Surface DRY Rdw Cond1 NO UNUSL CND Rdw Cond2 Spec Cond 0
 Hit and Run Motor Veh Involved With OTHER MV Lighting DAYLIGHT Ped Action Cntrl Dev NT PRS/FCTR Loc Type I Ramp/Int 5

PARTY INFO

VICTIM INFO

Party	Type	Age	Sex	Race	Sobriety1	Sobriety2	Move	Pre Coll	Dir	SW	Veh	CHP	Veh Make	Year	Sp	Info	OAF1 Viol	OAF2	Safety Equip	Role	Ext of Inj	Age	Sex	Seat Pos	Safety Equip	Ejected			
1F	DRVR	29	F	O	HNBD		LFT	TURN	S	A	0700	JEEP	2015	-	3	N	-			M	G	DRVR COMP PN		29	F	1	M	G	0
2	DRVR	22	M	O	HNBD		PROC	ST	N	A	0100	BMW	2017	-	3	N	-			L	G	DRVR COMP PN		22	M	1	L	G	0

Primary Rd ARTESIA BL Distance (ft) 1 Direction Secondary Rd RT 1 NCIC 1972 State Hwy? N Route Postmile Prefix Postmile Side of Hwy
 City TORRANCE County LOS ANGELES Population 6 Rpt Dist Beat Type CalTrans Dist Badge 16610 Collision Date 20181013 Time 1552 Day SAT
 Primary Collision Factor NOT STATED Violation Collision Type SIDESWIPE Severity PDO # Killed 0 # Injured 0 Tow Away? N Process Date 20190114
 Weather1 CLEAR Weather2 Rdw Surface DRY Rdw Cond1 NO UNUSL CND Rdw Cond2 Spec Cond 0
 Hit and Run Motor Veh Involved With OTHER MV Lighting DAYLIGHT Ped Action Cntrl Dev FNCTNG Loc Type Ramp/Int

PARTY INFO

VICTIM INFO

Party	Type	Age	Sex	Race	Sobriety1	Sobriety2	Move	Pre Coll	Dir	SW	Veh	CHP	Veh Make	Year	Sp	Info	OAF1 Viol	OAF2	Safety Equip	Role	Ext of Inj	Age	Sex	Seat Pos	Safety Equip	Ejected	
1F	DRVR	58	F	W	HNBD		PROC	ST	W	-	0000	TOYOT	2006	-	-	N	-			G	-						
2	DRVR	58	F	W	HNBD		RGT	TURN	W	-	0000	BMW	2011	-	-	N	-			G	-						

Primary Rd ARTESIA BL Distance (ft) 50 Direction E Secondary Rd RT 1 NCIC 1929 State Hwy? Y Route 1 Postmile Prefix - Postmile 21.919 Side of Hwy N
 City HERMOSA BEACH County LOS ANGELES Population 3 Rpt Dist 3 Beat Type CalTrans Dist 7 Badge 173 Collision Date 20181026 Time 1218 Day FRI
 Primary Collision Factor IMPROP PASS Violation 21750A Collision Type SIDESWIPE Severity PDO # Killed 0 # Injured 0 Tow Away? N Process Date 20190117
 Weather1 CLEAR Weather2 Rdwy Surface DRY Rdwy Cond1 NO UNUSL CND Rdwy Cond2 Spec Cond 0
 Hit and Run Motor Veh Involved With OTHER MV Lighting DAYLIGHT Ped Action Cntrl Dev FNCTNG Loc Type I Ramp/Int 6

PARTY INFO

VICTIM INFO

Party	Type	Age	Sex	Race	Sobriety1	Sobriety2	Move	Pre Coll	Dir	SW	Veh	CHP	Veh Make	Year	Sp Info	OAF1 Viol	OAF2 Safety Equip	Role	Ext of Inj	Age	Sex	Seat Pos	Safety Equip	Ejected	
1F	DRVR	65	M	B	HNBD		PROC ST	W	-		0000	OTHER	2000	-	-	N	-	M	G						
2	DRVR	46	M	W	HNBD		STOPPED	W	-		0000	GMC	2017	-	3	N	-	M	G						

Primary Rd S SEPULVEDA BL Distance (ft) 156 Direction N Secondary Rd TENNYSON ST NCIC 1944 State Hwy? Y Route 1 Postmile Prefix - Postmile 22.050 Side of Hwy S
 City MANHATTAN BEA County LOS ANGELES Population 4 Rpt Dist SOUTH Beat 004 Type CalTrans Dist 7 Badge 366 Collision Date 20190215 Time 0004 Day FRI
 Primary Collision Factor DRVR ALC|DRG Violation 23152A Collision Type REAR END Severity PDO # Killed 0 # Injured 0 Tow Away? N Process Date 20190821
 Weather1 CLOUDY Weather2 Rdwy Surface WET Rdwy Cond1 NO UNUSL CND Rdwy Cond2 Spec Cond 0
 Hit and Run Motor Veh Involved With OTHER MV Lighting DARK - ST LTS Ped Action Cntrl Dev FNCTNG Loc Type H Ramp/Int -

PARTY INFO

VICTIM INFO

Party	Type	Age	Sex	Race	Sobriety1	Sobriety2	Move	Pre Coll	Dir	SW	Veh	CHP	Veh Make	Year	Sp Info	OAF1 Viol	OAF2 Safety Equip	Role	Ext of Inj	Age	Sex	Seat Pos	Safety Equip	Ejected	
1F	DRVR	40	F	W	HBD-UI		PROC ST	S	A		0100	FORD	2013	-	3	A	22350	M	M	G					
2	DRVR	34	F	W	HNBD		PROC ST	S	A		0100	CHRY	2007	-	3	N	-	M	G						

Primary Rd SEPULVEDA BL Distance (ft) 21 Direction N Secondary Rd KEATS ST NCIC 1944 State Hwy? Y Route 1 Postmile Prefix - Postmile 22.091 Side of Hwy N
 City MANHATTAN BEA County LOS ANGELES Population 4 Rpt Dist SOUTH Beat 001 Type CalTrans Dist 7 Badge 345 Collision Date 20190828 Time 1141 Day WED
 Primary Collision Factor R-O-W AUTO Violation 21801A Collision Type BROADSIDE Severity INJURY # Killed 0 # Injured 2 Tow Away? Y Process Date 20200127
 Weather1 CLEAR Weather2 Rdwy Surface DRY Rdwy Cond1 NO UNUSL CND Rdwy Cond2 Spec Cond 0
 Hit and Run Motor Veh Involved With OTHER MV Lighting DAYLIGHT Ped Action Cntrl Dev NT PRS/FCTR Loc Type I Ramp/Int 5

PARTY INFO

VICTIM INFO

Party	Type	Age	Sex	Race	Sobriety1	Sobriety2	Move	Pre Coll	Dir	SW	Veh	CHP	Veh Make	Year	Sp Info	OAF1 Viol	OAF2 Safety Equip	Role	Ext of Inj	Age	Sex	Seat Pos	Safety Equip	Ejected			
1F	DRVR	48	F	W	HNBD		LFT TURN	E	A		0700	ROVER	2016	-	3	N	-	L	G	DRVR	COMP PN	48	F	1	L	G	0
2	DRVR	46	M	H	HNBD		PROC ST	N	A		0700	BMW	2008	-	3	N	-	L	G	PASS	COMP PN	80	F	3	L	G	0
3	DRVR	72	F	W	HNBD		STOPPED	W	A		0700	FORD	2015	-	3	N	-	M	G	PASS		6	F	6	L	Q	0

Primary Rd SEPULVEDA BL Distance (ft) 258 Direction S Secondary Rd TENNYSON ST NCIC 1944 State Hwy? N Route Postmile Prefix Postmile Side of Hwy
 City MANHATTAN BEA County LOS ANGELES Population 4 Rpt Dist 2B5 Beat 001 Type CalTrans Dist Badge 368 Collision Date 20190830 Time 0132 Day FRI
 Primary Collision Factor DRVR ALC|DRG Violation 23152A Collision Type HEAD-ON Severity PDO # Killed 0 # Injured 0 Tow Away? Y Process Date 20191116
 Weather1 CLEAR Weather2 Rdwy Surface DRY Rdwy Cond1 NO UNUSL CND Rdwy Cond2 Spec Cond 0
 Hit and Run MSDMNR Motor Veh Involved With OTHER OBJ Lighting DARK - ST LTS Ped Action Cntrl Dev FNCTNG Loc Type Ramp/Int

PARTY INFO

VICTIM INFO

Party	Type	Age	Sex	Race	Sobriety1	Sobriety2	Move	Pre Coll	Dir	SW	Veh	CHP	Veh Make	Year	Sp Info	OAF1 Viol	OAF2 Safety Equip	Role	Ext of Inj	Age	Sex	Seat Pos	Safety Equip	Ejected	
1F	DRVR	28	M	H	HBD-UI		PROC ST	N	A		0100	HONDA	2015	-	3	A	22107	-	L	C					

Primary Rd KEATS ST Distance (ft) 92 Direction E Secondary Rd SEPULVEDA BL NCIC 1944 State Hwy? Y Route 1 Postmile Prefix - Postmile 22.091 Side of Hwy N
 City MANHATTAN BEA County LOS ANGELES Population 4 Rpt Dist SOUTH Beat 001 Type CalTrans Dist 7 Badge 369 Collision Date 20191011 Time 0036 Day FRI
 Primary Collision Factor UNKNOWN Violation 21315B Collision Type Severity INJURY # Killed 0 # Injured 1 Tow Away? Y Process Date 20200309
 Weather1 CLEAR Weather2 Rdwy Surface DRY Rdwy Cond1 NO UNUSL CND Rdwy Cond2 Spec Cond 0
 Hit and Run Motor Veh Involved With FIXED OBJ Lighting DARK - ST LTS Ped Action Cntrl Dev NT PRS/FCTR Loc Type I Ramp/Int 6

PARTY INFO

VICTIM INFO

Party	Type	Age	Sex	Race	Sobriety1	Sobriety2	Move	Pre Coll	Dir	SW	Veh	CHP	Veh Make	Year	Sp Info	OAF1 Viol	OAF2 Safety Equip	Role	Ext of Inj	Age	Sex	Seat Pos	Safety Equip	Ejected				
1	DRVR	21	M	HBD-UI			LFT TURN	E	A		0100	INFIN	2013	-	3	A	22350	-	L	G	PASS	OTH VIS	998	M	3	L	H	0

Primary Rd SEPULVEDA BL Distance (ft) 1 Direction Secondary Rd KEATS ST NCIC 1944 State Hwy? Y Route 1 Postmile Prefix - Postmile 22.091 Side of Hwy N
 City MANHATTAN BEA County LOS ANGELES Population 4 Rpt Dist SOUTH Beat 001 Type CalTrans Dist 7 Badge 329 Collision Date 20191021 Time 1233 Day MON
 Primary Collision Factor R-O-W AUTO Violation 21801A Collision Type BROADSIDE Severity INJURY # Killed 0 # Injured 1 Tow Away? Y Process Date 20200310
 Weather1 CLEAR Weather2 Rdwy Surface DRY Rdwy Cond1 NO UNUSL CND Rdwy Cond2 Spec Cond 0
 Hit and Run Motor Veh Involved With OTHER MV Lighting DAYLIGHT Ped Action Cntrl Dev NT PRS/FCTR Loc Type I Ramp/Int 5

PARTY INFO

VICTIM INFO

Party	Type	Age	Sex	Race	Sobriety1	Sobriety2	Move	Pre Coll	Dir	SW	Veh	CHP	Veh Make	Year	Sp Info	OAF1 Viol	OAF2 Safety Equip	Role	Ext of Inj	Age	Sex	Seat Pos	Safety Equip	Ejected			
1F	DRVR	26	F	H	HNBD		LFT TURN	E	A		0100	HONDA	2014	-	3	N	-	L	G	DRVR	COMP PN	26	F	1	L	G	0
2	DRVR	22	F	A	HNBD		PROC ST	N	A		0700	LEXUS	2015	-	3	N	-	L	G	PASS		1	F	4	M	Q	0

Primary Rd RT 1 Distance (ft) 66 Direction S Secondary Rd ARTESIA BL NCIC 1929 State Hwy? Y Route 1 Postmile Prefix - Postmile 21.90 Side of Hwy N
 City HERMOSA BEACH County LOS ANGELES Population 3 Rpt Dist Beat Type CalTrans Dist 7 Badge 924 Collision Date 20191023 Time 0142 Day WED
 Primary Collision Factor DRVR ALC|DRG Violation 23152G Collision Type BROADSIDE Severity FATAL # Killed 1 # Injured 0 Tow Away? Y Process Date 20200515
 Weather1 CLEAR Weather2 Rdry Surface DRY Rdry Cond1 NO UNUSL CND Rdry Cond2 Spec Cond 0
 Hit and Run Motor Veh Involved With OTHER MV Lighting DARK - ST LTS Ped Action Cntrl Dev FNCTNG Loc Type H Ramp/Int -

PARTY INFO

VICTIM INFO

Party	Type	Age	Sex	Race	Sobriety1	Sobriety2	Move	Pre Coll	Dir	SW	Veh	CHP	Veh Make	Year	Sp Info	OAF1 Viol	OAF2 Safety Equip	Role	Ext of Inj	Age	Sex	Seat Pos	Safety Equip	Ejected	
1F	DRVR	21	F	H	HBD-UI	DRUG	PROC ST	N	A		0100		HONDA	2015	- 3	A 22350	- L G								
2	DRVR	24	F	H	HNBD		STOPPED	W	A		0100		NISSA	2019	- 3	N	- L G	DRVR KILLED		24	F	1	L G	0	

Primary Rd SEPULVEDA BL Distance (ft) 1 Direction Secondary Rd KEATS ST NCIC 1944 State Hwy? Y Route 1 Postmile Prefix - Postmile 22.091 Side of Hwy N
 City MANHATTAN BEACH County LOS ANGELES Population 4 Rpt Dist SOUTH Beat 001 Type CalTrans Dist 7 Badge 316 Collision Date 20200124 Time 1116 Day FRI
 Primary Collision Factor R-O-W AUTO Violation 21801A Collision Type BROADSIDE Severity PDO # Killed 0 # Injured 0 Tow Away? Y Process Date 20201013
 Weather1 CLEAR Weather2 Rdry Surface DRY Rdry Cond1 NO UNUSL CND Rdry Cond2 Spec Cond 0
 Hit and Run Motor Veh Involved With OTHER MV Lighting DAYLIGHT Ped Action Cntrl Dev NT PRS/FCTR Loc Type I Ramp/Int 5

PARTY INFO

VICTIM INFO

Party	Type	Age	Sex	Race	Sobriety1	Sobriety2	Move	Pre Coll	Dir	SW	Veh	CHP	Veh Make	Year	Sp Info	OAF1 Viol	OAF2 Safety Equip	Role	Ext of Inj	Age	Sex	Seat Pos	Safety Equip	Ejected	
1F	DRVR	85	F	W	HNBD		LFT TURN	S	A		0100		LEXUS	2003	- 3	N	- M G								
2	DRVR	39	F	O	HNBD		PROC ST	N	A		0700		MAZDA	2017	- 3	N	- L G	PASS		2	M	4	L Q	0	
3	DRVR	37	M	W	HNBD		STOPPED	N	A		0100		TOYOT	1990	- 3	N	- M G								

Primary Rd GOULD AV Distance (ft) 132 Direction W Secondary Rd RT 1 NCIC 1929 State Hwy? Y Route 1 Postmile Prefix - Postmile 21.919 Side of Hwy S
 City HERMOSA BEACH County LOS ANGELES Population 3 Rpt Dist 2 Beat Type CalTrans Dist 7 Badge 211 Collision Date 20200816 Time 0907 Day SUN
 Primary Collision Factor STRTNG|BCKNG Violation 22106 Collision Type HIT OBJECT Severity PDO # Killed 0 # Injured 0 Tow Away? Y Process Date 20201203
 Weather1 CLEAR Weather2 Rdry Surface DRY Rdry Cond1 NO UNUSL CND Rdry Cond2 Spec Cond 0
 Hit and Run Motor Veh Involved With FIXED OBJ Lighting DAYLIGHT Ped Action Cntrl Dev FNCTNG Loc Type I Ramp/Int 6

PARTY INFO

VICTIM INFO

Party	Type	Age	Sex	Race	Sobriety1	Sobriety2	Move	Pre Coll	Dir	SW	Veh	CHP	Veh Make	Year	Sp Info	OAF1 Viol	OAF2 Safety Equip	Role	Ext of Inj	Age	Sex	Seat Pos	Safety Equip	Ejected
1F	OTHR	998	F		HNBD		BACKING	E	A		0000	-		2004	- C	O	- - -							

STATEWIDE INTEGRATED TRAFFIC RECORDS SYSTEM (SWITRS)

EXTRACT OF HISTORY FILES GENERATED ON LIST

'HP.SW.LSTREF'
(I:042/ISU/SW.LSTREFNWrev2020.DOC
AUGUST 26, 2020

DESCRIPTION OF SWITRS COLLISION LISTING

LINE 1 * * * * *

PRIMARY ROAD - PRIMARY ROAD NAME AS APPEARS UNDER HEADING "COLLISION OCCURRED ON"

DISTANCE (FT) - DISTANCE, IN FEET, FROM SECONDARY ROAD OR "I", MEANING COLLISION OCCURRED AT INTERSECTION WITH SECONDARY ROAD

DIRECTION - DIRECTION FROM SECONDARY ROAD. IF AT INTERSECTION, DIRECTION IS BLANK.

SECONDARY RD - SECONDARY ROAD NAME AS APPEARS IN "LOCATION" BOX OF PAGE 1 OF COLLISION REPORT. NEAREST CROSS STREET OR LANDMARK TO POINT OF IMPACT.

NCIC - NATIONAL CRIME INFORMATION CENTER NUMBER FOR JURISDICTION

STATE HWY? - Y OR N

ROUTE - - ROUTE NUMBER OF STATE HIGHWAY (OR INTERSTATE OR U S)
(RARELY WITH SUFFIX TO INDICATE TRANSITIONAL STATUS)

POSTMILE PREFIX - NEW POSTMILE VALUES ARE ASSIGNED WHENEVER A LENGTH OF HIGHWAY IS CHANGED DUE TO CONSTRUCTION OR REALIGNMENT. TO DIFFERENTIATE THE NEW VALUES FROM THE OLD, AN ALPHA CODE IS ADDED PREFIXING THE POSTMILE FOR THE NEW VALUES.

- B-BLANK
- C-COMMERCIAL LANES
- D-DUPLICATE POSTMILE AT MEANDERING COUNTY LINE
- G-REPOSTING OF DUPLICATE POSTMILE AT THE END OF A ROUTE
- H-REALIGNMENT OF D MILEAGE
- L-OVERLAP POSTMILE
- M-REALIGNMENT OF R MILEAGE
- N-REALIGNMENT OF M MILEAGE
- R-FIRST REALIGNMENT
- S-SPUR
- T-TEMPORARY CONNECTION
- NO PREFIX

POSTMILE - HIGHWAY MARKER (MILEPOST MARKER [MPM])

SIDE OF HWY - SIDE OF HIGHWAY (N,S,E OR W)

LINE 2 * * * * *
*

CITY - NAME OF INCORPORATED CITY WHERE COLLISION OCCURRED OR UNINCORP FOR UNINCORPORATED AREAS OF THE COUNTY

COUNTY - NAME OF COUNTY WHERE COLLISION OCCURRED

POPULATION - POPULATION CODE FOR INCORPORATED CITY

- 1 - LESS THAN 2,500
- 2 - 2,500 - 10,000
- 3 - 10,000 - 25,000
- 4 - 25,000 - 50,000
- 5 - 50,000 - 100,000

- 6 - 100,000 - 250,000
- 7 - GREATER 250,000
- 9 - UNINCORPORATED

PAGE 2

LINE 2 (CONTINUED) * * * * *

0 - UNIVERSITY/STATE PARK, ETC.

RPT DIST - LOCAL REPORTING DISTRICT

BEAT - BEAT NUMBER

TYPE - BEAT TYPE (CHP)

- 1 - STATE HIGHWAY
- 2 - COUNTY ROAD LINE
- 3 - COUNTY ROAD AREA
- 4 - SCHOOLBUS ON CITY ROADWAY
- 5 - SCHOOLBUS NOT ON PUBLIC ROADWAY
- 6 - OFFROAD (UNIMPROVED)
- 7 - VISTA POINT OR REST AREA,
SCALES OR INSPECTION FACILITY
- 8 - OTHER PUBLIC ACCESS (IMPROVED)
- BLANK - NOT CHP

CALTRANS DIST - CALTRANS DISTRICT NUMBER (01-12)

BADGE - OFFICER IDENTIFICATION NUMBER

COLLISION DATE - DATE OF COLLISION (YEARMODY)

TIME - TIME OF COLLISION

- 0000 TO 2359
- 2500 (NOT STATED)

DAY - DAY OF WEEK

LINE 3 * * * * *

PRIMARY COLLISION FACTOR - CATEGORY DESCRIPTION OF PRIMARY COLLISION FACTOR (PCF)

ABBREVIATED CATEGORY	FULL CATEGORY
R-O-W AUTO	- Automobile Right-Of-Way
BRAKES	- Brakes
DRVR ALC DRG	- Driving or Bicycling Under Influence of Alcohol or Drug
FELL ASLEEP	- Fell Asleep (No longer a PCF Category beginning with the 7/2003 traffic collision form revision.)
TOO CLOSE	- Following Too Closely
HAZ PARKING	- Hazardous Parking
IMPED TRAFFIC	- Impeding Traffic
IMPROP PASS	- Improper Passing
IMPROP TURN	- Improper Turning
LIGHTS	- Lights
NOT STATED	- Not Stated
OTHER EQPMNT	- Other Equipment
OTHER HAZ	- Other Hazardous Violation
OTHER IMPROP DRV	- Other Improper Driving
NOT DRIVER	- Other Than Driver
PED ALC DRUG	- Pedestrian or "Other" Under Influence Of Alcohol Or Drug
R-O-W PED	- Pedestrian Right-Of-Way
PED VIOL	- Pedestrian Violation

STOP SGN|SIG - Traffic Signals and Signs
UNKNOWN - Unknown
LANE CHANGE - Unsafe Lane Change
UNSAFE SPEED - Unsafe Speed
STRNG|BCKNG - Unsafe Starting or Backing
WRONG SIDE - Wrong Side of Road

PAGE 3

LINE 3 (CONTINUED) * * * * *

VIOLATION - SPECIFIC SECTION OF CODE VIOLATION LISTED BY OFFICER AS PRIMARY COLLISION FACTOR

COLLISION TYPE - TYPE OF COLLISION INDICATED BY OFFICER ON PAGE 2 OF COLLISION REPORT

POSSIBLE ENTRIES
HEAD-ON
SIDESWIPE
REAR END
BROADSIDE
HIT OBJECT
OVERTURNED
AUTO/PED
OTHER

SEVERITY - SEVERITY OF COLLISION - HIGHEST DEGREE OF RESULTING INJURY
(FATAL, INJURY OR PDO [PROPERTY DAMAGE ONLY])

KILLED - COUNT OF VICTIMS KILLED

INJURED - COUNT OF VICTIMS INJURED (SEVERE, OTHER VISIBLE OR COMPLAINT OF PAIN)

TOW AWAY? - Y OR N AS INDICATED ON PAGE 1 OF COLLISION REPORT

PROCESS DATE - DATE COLLISION WAS PROCESSED INTO SWITRS (YEARMOYD)

LINE 4 * * * * *
*

WEATHER1 - FIRST OR ONLY INDICATION OF WEATHER

POSSIBLE ENTRIES
CLEAR
CLOUDY
RAINING
SNOWING
FOG
OTHER
WIND
BLANK

WEATHER2 - IF INDICATED, SECOND WEATHER CONDITION (SAME POSSIBLE ENTRIES AS WEATHER1 ABOVE)

RDWY SURFACE - ROADWAY SURFACE AS INDICATED BY OFFICER ON COLLISION REPORT

POSSIBLE ENTRIES
DRY
WET
SNOWY/ICY
SLIPPERY
BLANK

RDWY COND1 - FIRST OR ONLY INDICATION OF ROADWAY CONDITION

ABBRIEVATED ENTRIES	FULL ENTRIES
CONS ZONE	CONSTRUCTION ZONE
FLOODED	FLOODED
HOLES	HOLES , DEEP RUTS
LOOSE MATRL	LOOSE MATERIAL ON ROADWAY
NO UNUSL CND	NO UNUSUAL CONDITION
OBSTR ON RD	OBSTRUCTION ON ROADWAY
OTHER	OTHER

PAGE 4

LINE 4 (CONTINUED) * * * * *

REDUCED RD WPTH	REDUCED ROADWAY WIDTH
NOT STATED	BLANK

RDWY COND2 - IF INDICATED, SECOND ROADWAY CONDITION (SAME POSSIBLE ENTRIES AS RDWY COND1)

SPEC COND - SPECIAL CONDITION CODED AT TIME OF PROCESSING REPORT

- 1 - SCHOOLBUS, PUBLIC ROADWAY
- 2 - UNIVERSITY/STATE PARKS/AIRPORT
- 3 - SCHOOLBUS, NOT ON PUBLIC ROADWAY
- 4 - OFFROAD (UNIMPROVED)
- 5 - REST AREAS/SCALES
- 6 - OTHER PUBLIC ACCESS
- NO SPECIAL CONDITION
- 0 - NOT STATED

(STATISTICALLY, SPECIAL CONDITIONS GREATER THAN ONE ARE CONSIDERED PRIVATE PROPERTY)

LINE 5 * * * * *

HIT AND RUN - AS INDICATED ON COLLISION REPORT

- FELONY
- MISDEMEANOR

MOTOR VEHICLE INVOLVED WITH - AS INDICATED ON THE COLLISION REPORT. THIS CATEGORY IS THE FIRST EVENT THAT OCCURRED.

POSSIBLE ENTRIES	FULL ENTRIES
ANIMAL	ANIMAL
BICYCLE	BICYCLE
FIXED OBJ	FIXED OBJECT
MV ON OTHER RD	MOTOR VEHICLE ON OTHER ROADWAY
NON-CLSN	NON- COLLISION
BLANK	NOT STATED
OTHER MV	OTHER MOTOR VEHICLE
OTHER OBJ	OTHER OBJECT
PKD MV	PARKED MOTOR VEHICLE
PED	PEDESTRIAN
TRAIN	TRAIN

LIGHTING - LIGHT CONDITION AS INDICATED ON COLLISION REPORT

POSSIBLE ENTRIES	FULL ENTRIES
DAYLIGHT	- DAYLIGHT
DUSK/DAWN	- DUSK/DAWN
DARK - ST LTS	- DARK WITH STREET LIGHTS
DARK - NO ST LTS	- DARK NO STREET LIGHTS

DARK - ST LTS NON-OP - DARK STREET LIGHTS NOT FUNCTIONING

PED ACTION - PEDESTRIAN ACTION

POSSIBLE ENTRIES	FULL ENTRIES
X-WLK AT IS	- CROSSING IN CROSSWALK AT INTERSECTION
X-WLK NT IS	- CROSSING IN CROSSWALK NOT AT INTERSECTION
NOT IN X-WLK	- CROSSING NOT IN CROSSWALK
IN RD, SHLDR	- IN ROAD (INCLUDING SHOULDER)
NOT IN RD	- NOT IN ROAD
ON/OFF SCH BUS	- APPROACHING/LEAVING SCHOOL BUS

PAGE 5

LINE 4 (CONTINUED) * * * * *

BLANK - NO PEDESTRIAN INVOLVED

CNTRL DEV - TRAFFIC CONTROL DEVICES

FNCTNG	- CONTROLS FUNCTIONING
NT FNCT	- CONTROLS NOT FUNCTIONING
OBSCR	- CONTROLS OBSCURED
NT PRS/FCTR	- NO CONTROLS PRESENT/FACTOR
BLANK	- NOT STATED

LOC TYPE - CALTRANS CODING REFERRING TO TYPE OF LOCATION

H - HIGHWAY
 I - INTERSECTION
 R - RAMP

RAMP/INT - RAMP/INTERSECTION DESCRIPTION

1 - RAMP EXIT, LAST 50 FEET
 2 - MID-RAMP
 3 - RAMP ENTRY, FIRST 50 FEET
 4 - NON-STATE HIGHWAY, RAMP RELATED, WITHIN 100 FT
 5 - INTERSECTION
 6 - NON-STATE HIGHWAY, INTERSECTION RELATED, WITHIN 250 FT
 7 - HIGHWAY
 8 - NON STATE HIGHWAY

NOTE: THE FIRST FIVE LINES OF EACH COLLISION PRESENT DATA THAT DESCRIBES THE COLLISION. THE FOLLOWING DESCRIPTIONS ARE FOR EACH PARTY IN THE COLLISION AND THE VICTIMS ASSOCIATED WITH EACH PARTY. THE VICTIM DATA APPEARS TO THE RIGHT OF EACH PARTY.

DESCRIPTION OF PARTY DATA (ONE LINE PER PARTY)

PARTY - PARTY NUMBER

IF AN "F" APPEARS AFTER THE PARTY NUMBER, THIS IS THE PARTY INDICATED BY THE OFFICER AS AT FAULT.

TYPE - PARTY TYPE

DRVR - DRIVER
 PED - PEDESTRIAN
 PRKD - PARKED VEHICLE
 BICY - BICYCLIST
 OTHR - OTHER

AGE - AGE OF PARTY

998 - UNKNOWN

SEX - SEX OF PARTY

RACE - RACE OF PARTY (EFFECTIVE 1/1/2002)

- A - ASIAN
- B - BLACK
- H - HISPANIC
- O - OTHER
- W - WHITE
- BLANK - NOT STATED

SOBRIETY1 - REFERS TO THE ALCOHOL PORTION OF THE SOBRIETY-DRUG-PHYSICAL CATEGORY ON THE COLLISION REPORT.

- HNBD - HAD NOT BEEN DRINKING
- HBD-UI - HBD UNDER INFLUENCE
- HBD-NUI - HBD NOT UNDER INFLUENCE
- HBD-UNK - HBD IMPAIRMENT UNKNOWN

PAGE 6

DESCRIPTION OF PARTY DATA (CONTINUED) * * * * *

*

IMP UNK - IMPAIRMENT UNKNOWN

SOBRIETY2 - REFERS TO THE DRUG AND PHYSICAL IMPAIRMENT PORTION OF THE SOBRIETY-DRUG-PHYSICAL CATEGORY ON THE COLLISION REPORT.

- DRUG - UNDER DRUG INFLUENCE
- PHYS - PHYSICAL IMPAIRMENT
- FATG - SLEEPY/FATIGUED
- IMP UNK - IMPAIRMENT UNKNOWN

MOVE PRE COLL - PARTY'S MOVEMENT PRECEDING COLLISION

- STOPPED - STOPPED
- PROC ST - PROCEEDING STRAIGHT
- RAN OFF RD - RAN OFF ROAD
- RGT TURN - MAKING RIGHT TURN
- LFT TURN - MAKING LEFT TURN
- U-TURN - MAKING U TURN
- BACKING - BACKING
- SLOWING - SLOWING/STOPPING
- PASSING - PASSING OTHER VEHICLE
- CHANG LN - CHANGING LANES
- PARKING - PARKING MANEUVER
- ENT TRAF - ENTERING TRAFFIC
- UNS TURN - OTHER UNSAFE TURNING
- OPPOS LN - CROSSED INTO OPPOSING LANE
- PARKED - PARKED
- MERGING - MERGING
- WRONG WY - TRAVELING WRONG WAY
- OTHER - OTHER
- BLANK - NOT STATED/NOT APPLICABLE

DIR - PARTY'S DIRECTION OF TRAVEL (N,S,E OR W)

SW VEH - STATEWIDE VEHICLE TYPE OF PARTY'S VEHICLE

- A - PASSENGER CAR/STATION WAGON
- B - PASSENGER CAR WITH TRAILER
- C - MOTORCYCLE/SCOOTER
- D - PICKUP OR PANEL TRUCK
- E - PICKUP/PANEL TRUCK WITH TRAILER
- F - TRUCK OR TRUCK TRACTOR
- G - TRUCK/TRUCK TRACTOR WITH TRAILER
- H - SCHOOL BUS
- I - OTHER BUS
- J - EMERGENCY VEHICLE

- K - HIGHWAY CONSTRUCTION EQUIPMENT
- L - BICYCLE
- M - OTHER VEHICLE
- N - PEDESTRIAN
- O - MOPED

CHP VEH - CHP-REPORTED COLLISIONS ONLY, CHP VEHICLE TYPE. THE FIRST TWO DIGITS REFERENCE VEHICLE TYPE, NO TOW, OR TOWING VEHICLE TYPE; THIRD AND FOURTH DIGITS REFERENCE TOWED VEHICLE TYPE. (EFFECTIVE 7/2003 TRAFFIC COLLISION FORM REVISION ALL JURISDICTION ARE TO USE THIS VEHICLE TYPE)

- 00 - NO TOW
- 01 - PASSENGER CAR
- 02 - MOTORCYCLE
- 03 - MOTOR-DRIVEN CYCLE (UNDER 15 HP)
- 04 - BICYCLE
- 05 - MOTORIZED BICYCLE
- 06 - ALL TERRAIN VEHICLE (ATV), NO MOTORCYCLE

PAGE 7

DESCRIPTION OF PARTY DATA (CONTINUED) * * * * *

- 07 - SPORT UTILITY VEHICLE (EFF. 6/00)
- 08 - MINI-VAN (EFF. 6/00)
- 09 - PARATRANSIT BUS
- 10 - TOUR BUS
- 11 - OTHER COMMERCIAL BUS
- 12 - NON-COMMERCIAL BUS
- 13 - SCHOOLBUS WITHOUT PUPIL PASSENGERS (prior to 2002)
- 13 - SCHOOLBUS PUBLIC I (EFF. 2002)
- 14 - SCHOOLBUS, PUBLIC I (prior to 2002)
- 14 - SCHOOLBUS, PUBLIC II (EFF. 2002)
- 15 - SCHOOLBUS, PUBLIC II (prior to 2002)
- 15 - SCHOOLBUS, PRIVATE I (EFF. 2002)
- 16 - SCHOOLBUS, PRIVATE I (prior to 2002)
- 16 - SCHOOLBUS, PRIVATE II (EFF. 2002)
- 17 - SCHOOLBUS, PRIVATE II (prior to 2002)
- 17 - SCHOOLBUS, CONTRACTUAL I (EFF. 2002)
- 18 - SCHOOLBUS, CONTRACTUAL I (prior to 2002)
- 18 - SCHOOLBUS, CONTRACTUAL II (EFF. 2002)
- 19 - SCHOOLBUS, CONTRACTUAL II (prior to 2002)
- 19 - GENERAL PUBLIC PARATRANSIT VEHICLE
- 20 - PUBLIC TRANSIT AUTHORITY
- 21 - TWO AXLE TANK TRUCK
- 22 - PICKUP OR PANEL TRUCK
- 23 - PICKUP TRUCK WITH CAMPER
- 24 - THREE AXLE TANK TRUCK
- 25 - TRUCK TRACTOR
- 26 - TWO-AXLE TRUCK
- 27 - THREE-AXLE OR MORE AXLE TRUCK
- 28 - SEMI-TANK TRAILER
- 29 - PULL-TANK TRAILER
- 30 - TWO TANK TRAILER
- 31 - SEMI-TRAILER
- 32 - PULL TRAILER
- 33 - TWO TRAILERS
- 34 - BOAT TRAILER
- 35 - UTILITY TRAILER
- 36 - TRAILER COACH
- 37 - EXTRALEGAL PERMIT LOAD
- 38 - POLE, PIPE, OR LOGGING DOLLY
- 39 - THREE TRAILERS

- 40 - FEDERALLY LEGAL SEMI TRAILER
- 41 - AMBULANCE
- 42 - DUNE BUGGY
- 43 - FIRE TRUCK (NOT RESCUE)
- 44 - FORKLIFT
- 45 - HIGHWAY CONSTRUCTION EQUIPMENT
- 46 - IMPLEMENT OF HUSBANDRY
- 47 - MOTOR HOME 40 FEET IN LENGTH OR LESS (EFF. 01/02)
- 47 - MOTOR HOME (PRIOR TO 01/02)
- 48 - POLICE CAR
- 49 - POLICE MOTORCYCLE
- 50 - MOBILE EQUIPMENT
- 51 - FARM LABOR VEHICLE (PRIOR TO 6/00)
- 51 - FARM LABOR VEHICLE-CERTIFIED (EFF. 6/00)
- 52 - FEDERALLY LEGAL DBL CARGO COMBO (OVER 75 FEET)
- 53 - FIFTH WHEEL TRAVEL TRAILER
- 54 - CONTAINER CHASSIS
- 55 - TWO-AXLE TOW TRUCK
- 56 - THREE-AXLE TOW TRUCK
- 57 - FARM LABOR VEHICLE NON-CERTIFIED (EFF. 6/00)

PAGE 8

DESCRIPTION OF PARTY DATA (CONTINUED) * * * * *
*

- 58 - FARM LABOR VEHICLE TRANSPORTER (EFF. 6/00)
- 59 - MOTOR HOME OVER 40 FEET (EFF. 1/02)
- 61 - SCHOOL PUPIL ACTIVITY BUS I (prior to 2002)
- 62 - SCHOOL PUPIL ACTIVITY BUS II (prior to 2002)
- 63 - "YOUTH" BUS
- 64 - SCHOOL PUPIL ACTIVITY BUS I (EFF. 2002)
- 65 - SCHOOL PUPIL ACTIVITY BUS II (EFF. 2002)
- 66 - SCHOOLBUS WITHOUT PUPIL PASSENGERS (EFF. 2002)
- 71 - PASSENGER CAR-HAZARDOUS MATERIALS ONLY
- 72 - PICKUP OR PANEL-HAZARDOUS MATERIALS ONLY
- 73 - PICKUP AND CAMPER-HAZARDOUS MATERIALS ONLY
- 75 - TRUCK TRACTOR-HAZARDOUS MATERIALS ONLY
- 76 - TWO-AXLE TRUCK-HAZARDOUS MATERIALS ONLY
- 77 - THREE OR MORE AXLE TRUCK-HAZARDOUS MATERIALS ONLY
- 78 - TWO-AXLE TANK TRUCK-HAZARDOUS MATERIALS ONLY
- 79 - THREE-AXLE TANK TRUCK-HAZARDOUS MATERIALS ONLY
- 81 - PASSENGER CAR-HAZ WASTE OR COMBO HAZ WASTE & MATERIALS
- 82 - PICKUP OR PANEL-HAZ WASTE OR COMBO HAZ WASTE & MATERIALS
- 83 - PICKUP AND CAMPER-HAZ WASTE OR COMBO HAZ WASTE & MATERIALS
- 85 - TRUCK TRACTOR-HAZ WASTE OR COMBO HAZ WASTE & MATERIALS
- 86 - TWO-AXLE TRUCK-HAZ WASTE OR COMBO HAZ WASTE & MATERIALS
- 87 - THREE OR MORE AXLE TRUCK-HAZ WASTE OR COMBO HAZ WASTE & MAT.
- 88 - TWO-AXLE TANK TRUCK-HAZ WASTE OR COMBO HAZ WASTE & MATERIALS
- 89 - THREE-AXLE TANK TRUCK-HAZ WASTE OR COMBO HAZ WASTE & MAT.
- 94 - MOTORIZED TRANSPORTATION DEVICE (EFF. 6/00)
- 95 - MISC NON-MOTORIZED VEHICLE
- 96 - MISC MOTORIZED VEHICLE
- 97 - LOW SPEED VEHICLE (EFF. 6/00)
- 98 - EMERGENCY VEHICLE ON EMERGENCY RUN OR IN PURSUIT OF VIOLATOR
- 99 - HIT AND RUN, UNKNOWN

VEH MAKE - VEHICLE MAKE OF PARTY'S VEHICLE

YEAR - MODEL YEAR OF PARTY'S VEHICLE

SP INFO - FROM SPECIAL INFORMATION BOX ON COLLISION REPORT (TWO ITEMS MAY BE INDICATED)

- A - HAZARDOUS MATERIALS INVOLVED
- B - CELL PHONE IN USE (4/1/01)
- C - CELL PHONE NOT IN USE (4/1/01)
- D - CELL PHONE NONE/UNKNOWN (4/1/01)
- 1 - CELL PHONE HANDHELD IN USE (7/1/03)
- 2 - CELL PHONE HANDS FREE IN USE (7/1/03)
- 3 - CELL PHONE NOT IN USE (7/1/03)

OAF1 VIOL - FIRST OTHER ASSOCIATED FACTOR INDICATED FOR THE PARTY. IF "A", "B" OR "C" IS INDICATED, THE VIOLATION WILL ALSO APPEAR.

- A,B,C - VC SECTION VIOLATION
- E - VISION OBSCUREMENT
- F - INATTENTION (TYPE OF INATTENTION NOT STATED)
- G - STOP & GO TRAFFIC
- H - ENTERING/LEAVING RAMP
- I - PREVIOUS COLLISION
- J - UNFAMILIAR WITH ROAD
- K - DEFECTIVE EQUIPMENT
- L - UNINVOLVED VEHICLE
- M - OTHER
- N - NONE APPARENT
- O - RUNAWAY VEHICLE
- P - CELL PHONE
- Q - ELECTRONIC EQUIPMENT
- R - RADIO/CD
- S - SMOKING
- T - EATING

PAGE 9

DESCRIPTION OF PARTY DATA (CONTINUED) * * * * *
*

- U - CHILDREN
- V - ANIMALS
- W - PERSONAL HYGIENE
- X - READING
- Y - OTHER INATTENTION

(CATEGORIES P THROUGH Y WERE EFFECTIVE 1/1/01 THROUGH 12/1/2001 ONLY AND ARE CATEGORIES OF "F" INATTENTION.)

OAF2 - SECOND OTHER ASSOCIATED FACTOR INDICATED FOR THE PARTY. IF NOT BLANK, REFER TO SAME ALPHA CODES AS ABOVE IN OAF1.

SAFETY EQUIPMENT - TWO CATEGORIES MAY BE INDICATED BY OFFICER

- A - NONE IN VEHICLE
- B - UNKNOWN
- C - LAP BELT USED
- D - LAP BELT NOT USED
- E - SHOULDER HARNESS USED
- F - SHOULDER HARNESS NOT USED
- G - LAP/SHOULDER HARNESS USED
- H - LAP/SHOULDER HARNESS NOT USED
- J - PASSIVE RESTRAINT USED
- K - PASSIVE RESTRAINT NOT USED
- L - AIR BAG DEPLOYED
- M - AIR BAG NOT DEPLOYED
- N - OTHER
- P - NOT REQUIRED
- Q - CHILD RESTRAINT IN VEHICLE USED
- R - CHILD RESTRAINT IN VEHICLE NOT USED
- S - CHILD RESTRAINT IN VEHICLE USE UNKNOWN

- T - CHILD RESTRAINT IN VEHICLE IMPROPER USE
- U - CHILD RESTRAINT NONE IN VEHICLE
- V - DRIVER OF M/C OR BICYCLIST NOT USING HELMET
- W - DRIVER OF M/C OR BICYCLIST USING HELMET
- X - PASSENGER ON M/C OR BICYCLE NOT USING HELMET
- Y - PASSENGER NO M/C OR BICYCLE USING HELMET

DESCRIPTION OF VICTIM DATA * * * * *

EACH VICTIM IS LISTED ON A SEPARATE LINE TO THE RIGHT OF THE PARTY WITH WHICH THE VICTIM IS ASSOCIATED.

ROLE - VICTIM CLASSIFICATION

- DRVR - DRIVER
- PASS - PASSENGER
- PED - PEDESTRIAN
- BICY - BICYCLE RIDER (DOES NOT INCLUDE PASSENGER)
- OTHR - OTHER

EXT OF INJ - EXTENT OF INJURY FOR EACH VICTIM

- KILLED - KILLED
- SEVERE - SEVERE INJURY
- OTH VIS - OTHER VISIBLE INJURY
- COMP PN - COMPLAINT OF PAIN
- SERIOUS - SUSPECTED SERIOUS INJURY
- MINOR - SUSPECTED MINOR INJURY
- POSSIBLE - POSSIBLE INJURY
- BLANK - NOT INJURED

AGE - AGE OF VICTIM

- 998 - UNKNOWN
- 999 - FETUS (FATAL ONLY)

SEX - SEX OF VICTIM

PAGE 10

DESCRIPTION OF VICTIM DATA (CONTINUED) * * * * *

SEAT POS - SEATING POSITION OF VICTIM

- 1 - DRIVER
- 2 TO 6 - PASSENGERS
- 7 - STATION WAGON REAR
- 8 - REAR OCCUPANT OF TRUCK OR VAN
- 9 - POSITION UNKNOWN

SAFETY EQUIP - TWO CATEGORIES MAY BE INDICATED BY THE OFFICER. FOR A LIST OF THE CODES, SEE PARTY DESCRIPTION FOR SAFETY EQUIPMENT.

EJECTED - VICTIM EJECTED FROM VEHICLE CATEGORY

- 0 - NOT EJECTED
- 1 - FULLY EJECTED
- 2 - PARTIALLY EJECTED
- 3 - UNKNOWN

Martha Alvarez

From: Darryl Franklin <600sepulvedacomunity@gmail.com>
Sent: Monday, February 1, 2021 5:03 PM
To: List - City Council; City Clerk; Ted Faturos; Carrie Tai, AICP; Martha Alvarez; Liza Tamura
Subject: [EXTERNAL] MB Poets Appeal - supplemental report from MB Poets traffic expert.
Attachments: 210201-Neustaedter-McP-Comments 020121 lh.pdf

Follow Up Flag: Follow up
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Dear all

Sorry for the stream of emails today but please find attached a rebuttal from our traffic expert to the applicants traffic expert's further report following the last hearing. Please review, consider and add this to the record.

See you tomorrow evening.

Yours truly

Darryl Franklin

(1) 818 231 1182 (-8hrs GMT)

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sm

P.O. Box 18355
Irvine CA 92623
e-mail: tepirvine@sbcglobal.net

phone: 949 552 4357

mobile: 909 263 0383

February 1, 2021

To: Don McPherson
1014 1st Street Manhattan Beach, CA 90266
Cell 310 487 0383 dmcphersonla@gmail.com

From: Craig S. Neustaedter, Registered Traffic Engineer (TR1433)

Re.: Follow-up Comments on the 600 PCH Traffic and Parking Analysis

ITE Hotel Classification

Two independent reviews of the 600 PCH project have determined that the on-site hotel has been misclassified in the Kimley Horn traffic and parking studies. Both TEP and the Brohard reviews have determined that the project hotel is consistent with the ITE Classification 310, and not the ITE Classification 312 (Business Hotel) as identified in the Kimley Horn studies. This discrepancy is significant because the ITE Classification 310 has a significantly higher traffic and parking generation rates than the rates for ITE Classification 312 used in the Kimley Horn studies.

Example, parking generation (85th percentile):

	ITE 310	ITE 312
Weekday	.99	.83
Weekend	1.55	.75

85th Percentile - Standard for Shared Parking Analysis

The methodology for shared parking analysis was developed by the Urban land Institute (ULI) in the early 1980s. The ULI methodology is documented in the manual “Shared Parking” which details the standards and valid procedures for performing a site-specific shared parking analysis. The following quotes are cited from the ULI manual (pps 22-23) concerning the appropriateness of use of the 85th percentile, as opposed to the mean parking rate:

“After considerable debate, the (ULI) study team for this 2nd edition of Shared Parking adopted the 85th percentile of peak hour observations in developing recommended parking ratios.”

“The Shared Parking team believes that using the 85th percentile will provide an adequate supply cushion (in the analysis of) most locations.”

Expected Further Parking Demand Reductions

The Kimley Horn shared parking analysis makes the following claim, “the foregoing analysis is conservative inasmuch as the parking analysis does not account for expected further
Transportation Engineering and Planning, Inc.

reduction in actual parking demand attributable to the significant use of other modes of travel.(pg. 3)”

This is a speculative statement. There is a significant deficiency between the amount of on-site parking to be provided and on-site parking demand, even when accounting for demand reductions attributable to shared parking. To be reasonably conservative about on-site parking requirements, expected further parking demand reductions should not be considered.

Project Generated Traffic Impacts on Residential Streets

The project applicant contends that project generated traffic will not impact adjacent residential areas due to a barricade on Tennyson St., east of the project’s Tennyson driveway. The barricade is located east of the intersection with Chabela Dr. the barricade at this location fails to block infiltration of project generated traffic. Both inbound and outbound traffic can infiltrate the adjacent residential streets of Chabela, Keats, and Shelley. Users of these streets will include on-site employees, delivery vehicles, and others who will regularly access the project site.

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sm

P.O. Box 18355
Irvine CA 92623
e-mail: tepirvine@sbcglobal.net

phone: 949 552 4357

mobile: 909 263 0383

February 1, 2021

To: Don McPherson
1014 1st Street Manhattan Beach, CA 90266
Cell 310 487 0383 dmcphersonla@gmail.com

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Martha Alvarez

From: jordan@gideonlaw.net
Sent: Tuesday, February 2, 2021 12:16 PM
To: Ted Fatuoros; City Clerk
Subject: [EXTERNAL] RE: Item 2, Council Hearing 2/2/21 (MB Hotel De Novo Hearing)
Attachments: Cover & Expert Letter.pdf

Follow Up Flag: Follow up
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Dear City Clerk:

Please see attached regarding the above-referenced item. The expert letter attached thereto is exactly the same that was provided yesterday (see below email).

Please confirm receipt of this message—many thanks.

-JRS

From: jordan@gideonlaw.net <jordan@gideonlaw.net>
Sent: Monday, February 1, 2021 11:43 AM
To: 'tfatuoros@citymb.info' <tfatuoros@citymb.info>; 'cityclerk@citymb.info' <cityclerk@citymb.info>
Subject: Item 2, Council Hearing 2/2/21 (MB Hotel De Novo Hearing)

Mr. Fatuoros—First, please see attached expert traffic report regarding the above-referenced item. Please confirm receipt of expert letter.

Second, please clarify the presentation/speaking process for tomorrow's hearing, such as:

- What will be the order of speaking/comments?
- Will appellants have speaking opportunity to respond to the staff report and new documents submitted since the January meeting?
- When and how long will public have to comment during the public comment period?

Many thanks for your attention on this matter.

-JRS

Jordan R. Sisson, Attorney
Law Office of Gideon Kracov
801 S. Grand Ave., 11th Floor
Los Angeles, CA 90017
Cell: 818-324-9752
Office: 213-629-2071 ext. 1102
Fax: 213-623-7755
jordan@gideonlaw.net
www.gideonlaw.net

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GIDEON KRACOV

Attorney at Law

801 South Grand Avenue
11th Floor
Los Angeles, California 90017

(213) 629-2071
Fax: (213) 623-7755

gk@gideonlaw.net
www.gideonlaw.net

February 2, 2021

VIA EMAIL:

City Council
City of Manhattan Beach
1400 Highland Avenue
Manhattan Beach, CA 90266
cityclerk@citymb.info

**RE: Item 2, City Council Meeting Scheduled February 2, 2021;
Appeal – MB Hotel Partners, LLC Hotel Project (600 S. Sepulveda Blvd.)**

On behalf of appellant UNITE HERE Local 11 and its members (“**Local 11**” or “**Appellant**”), this Office respectfully submits the following comments to the City of Manhattan Beach (“**City**”) regarding the above-referenced hotel development (“**Project**”), which includes a request for a Master Use Permit (“**MUP**”) and Class 32 Categorical Exemption (“**Exemption**”) (collectively “**Project Approvals**”). As fully explained in Local’s appeal over the Planning Commission’s granting of the Project Approvals (the “**Appeal**”), the Project is not compliant with Manhattan Beach Municipal Code (“**MBMC**” or “**Code**”) and the California Environmental Quality Act (“**CEQA**”),¹ including but not limited to the Project being ineligible for the Class 32 Exemption.

Since the last public hearing for the Project (held January 19, 2021), the City released new documents that included City staff and applicant responses to the Appeal (“**Response**”) that, in short, maintains that the Project would not have a traffic or vehicle miles traveled (“**VMT**”) impact and qualifies for the Class 32 exemption. In response, Local 11 submitted expert traffic comments from Tom Brohard and Associates dated January 31, 2021 (attached hereto as Exhibit A for your convenience),² which is incorporated into Local 11’s Appeal in their entirety by this reference. While this expert letter speaks for itself, it is worth highlighting the following expert findings:

- The Project’s traffic impact assessment (“**TIA**”) only looked at the traffic generated by the hotel—completely ignoring traffic/VMT generated by the other retail/office components.
- The Response fails to explain why the City is departing from the prior practice of utilizing Los Angeles County Public Work (“**County**”) guidance, which shows the Project will nearly double daily trips and have a significant VMT impact.
- The Response is inconsistent because it claims using the County’s VMT guidance would be inappropriate because it is a different jurisdiction (on the one hand) but proceeds to use South Coast AQMD’s greenhouse gas interim thresholds (on the other hand).

¹ See Pub. Res. Code § 21000 *et seq.* and 14 Cal. Code Regs. § 15000 *et seq.* (“**CEQA Guidelines**”).

² Emailed to City Clerk and City Planner at or around 11:47 a.m. on February 1, 2021.




- While citing to the Governor’s Office of Planning and Research (“**OPR**”)’s VMT guidelines, the TIA fails to apply OPR’s guidelines, which show that the Project exceeds screening thresholds and that the hotel’s 5.2+ million annual VMTs are significant because it will far exceed the VMTs generated by the site’s prior use as a restaurant.
- The Response relies on unsupported, conclusory claims that the Project’s VMTs are less significant, despite substantial evidence that the Project’s hotel component alone would exceed relevant thresholds and benchmarks under applicable plans—as confirmed by other environmental experts.

Ultimately, the *traffic expert confirms that neither the TIA nor the City’s VMT threshold is consistent with industry practices, agency guidance methods, or evolving standards.*³ While the lead agencies have some discretion in selecting thresholds, the selection of a threshold must be supported by substantial evidence—which is utterly lacking here. Instead, there is substantial evidence—supported by expert evidence based on objective facts, evidence, and agency guidance—that the hotel component alone will have a significant traffic/VMT impact.⁴ As such, the Project does not fall within the Class 32 Exemption and the City must prepare an adequate CEQA review.

For the reasons discussed herein and elsewhere in the administrative record for this Project, Appellant Local 11 respectfully requests that the City Council reject the Project Approvals until a CEQA-compliant Mitigated Negative Declaration or Environmental Impact Report is prepared for the Project.

Finally, on behalf of Appellant, this Office requests, to the extent not already on the notice list, for all notices of CEQA actions, Appeal hearings and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them.⁵ Please send notice by electronic and regular mail to: Jordan R. Sisson, 801 S. Grand Avenue, 11th Fl., Los Angeles, CA 90017, jordan@gideonlaw.net.

Sincerely,



Jordan R. Sisson, Esq.
Attorney for Appellant

Attachments:

Exhibit A: Tom Brohard and Associates (1/31/21) Expert Traffic Comments

³ See *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 504.

⁴ See Pub. Res. Code §§ 21080(e), 21082.2(c); CEQA Guidelines §§ 15064(f)(5), 15384.

⁵ See Pub. Res. Code §§ 21092.2, 21167(f); Gov. Code § 65092; MBMC §§ 10.84.040.B, 10.84.050.B, 10.100.010.D, 10.100.020.B.

EXHIBIT A

Tom Brohard and Associates

January 31, 2021

Mr. Jordan Sisson, Attorney at Law
Law Offices of Gideon Kracov
801 South Grand Avenue, 11th Floor
Los Angeles, California 90017

SUBJECT: Proposed Hotel at 600 South Sepulveda Boulevard in the City of Manhattan Beach - Transportation and Traffic Issues

Dear Mr. Sisson:

Tom Brohard, P.E., previously reviewed the transportation and traffic aspects of various documents regarding the proposed 162-room hotel and a new 16,348 square foot retail/office building at 600 South Sepulveda Boulevard in the City of Manhattan Beach. My enclosed January 15, 2021 letter pointed out numerous deficiencies, errors, and inconsistencies that should be addressed before the City of Manhattan Beach considers the Proposed Project further.

I have now reviewed the January 25, 2021 responses to my prior comments prepared by Kimley Horn as well as the January 26, 2021 responses prepared by the City's Traffic Engineer. These responses do not counter or negate the significant issues and concerns that I have expressed. In sum, I believe the Proposed Project will generate significantly more daily and peak hour trips as well as vehicle miles traveled (VMT) than identified in the Traffic Study, and mitigation measures must be developed, adopted, and implemented.

My continuing transportation, traffic, and vehicle miles traveled issues are:

- 1) Inconsistent Land Uses for the Hotel - For trips, Kimley Horn incorrectly used trip generation data for ITE Land Use 311 for an All-Suites Hotel. ITE defines this as "Each suite includes a sitting room and separate bedroom; limited kitchen facilities are provided within the suite." None of the 162 guest rooms have both a sitting room and a separate bedroom as required by the ITE definition of an All-Suites Hotel. To forecast parking needs, Kimley Horn defined the hotel as a Business Hotel, ITE Land Use 312, because "...it is more in line with the project's intended use..." It is either one or the other and cannot be analyzed differently for traffic and parking.

Kimley Horn cherry-picked the data to reduce trips and parking forecasts. Traffic and parking data need to be consistent in the choice of land use for the Project, and data from different land uses cannot be mixed to evaluate trips and parking. Hotel, ITE Land Use 310, provides more data than the other land uses chosen, and is the correct application based upon my 50+ years of professional experience.

Mr. Jordan R. Sisson, Attorney at Law
Proposed Hotel at 600 South Sepulveda Boulevard in the City of Manhattan Beach – Transportation and Traffic Issues
January 31, 2021

- 2) Morning Peak Hour Restaurant Trips Are Grossly Overstated – According to the responses to my prior comments, the Traffic Study and other reports just show a significant number of morning peak hour trips “for comparison” to the Project. This misleading comparison was put forth even though the El Torito Restaurant opened at 11 AM on weekdays and generated few if any morning peak trips. Comparing morning peak hour trips for a different restaurant open for breakfast to the Proposed Project is not valid and only confuses decision makers and the public. Further, this flawed approach disguises the potential traffic impacts of new morning peak hour trips on the area street system.
- 3) Trips for Proposed Project Are Significantly Understated - In combination with the retail and general office components, the Proposed Project will generate 813 more daily trips including 129 more trips in the morning peak hour and 34 more trips in the afternoon peak hour than reported in the Traffic Study. With these errors, the Level of Service analysis in the Traffic Study has been incorrectly computed and potentially significant traffic impacts have not been properly identified, analyzed, or mitigated. These errors in the calculation of daily and peak hour trips could also result in the failure to disclose, analyze, and mitigate potentially significant impacts in the areas of air quality and noise.
- 4) Vehicle Miles Traveled (VMT) Must Be Properly Analyzed and Mitigated - Historically, the City of Manhattan Beach has followed the “Transportation Impact Analysis Guidelines” adopted by Los Angeles County Public Works. The most recent edition published July 23, 2020 contains procedures to calculate VMT and to comply with the provisions of SB-743. Now, the responses indicate “... it would be inappropriate to use a different jurisdiction’s VMT guidelines...”

There is no explanation, much less substantial evidence, to justify this sudden departure from the City’s prior practice of utilizing Los Angeles County Public Works guidance. So too, it is inconsistent to for the response to say that the County’s VMT guidance is not appropriate because it is a different jurisdiction (on the one hand), and then proceeds to rely on South Coast AQMD’s GHG threshold (on the other hand)—which is not only a different jurisdiction but also not specific to traffic/VMT.

Based on the County’s guidelines, the Proposed Project will have significant VMT impacts based upon the additional 803 daily trips, almost double the number of daily trips generated by the El Torito Restaurant. Measures to mitigate significant VMT impacts must be adopted as conditions of approval.

Additionally, the Project would have a significant impact under the Governor’s Office of Planning and Research (OPR) guidelines, which the City only partially

Mr. Jordan R. Sisson, Attorney at Law
Proposed Hotel at 600 South Sepulveda Boulevard in the City of Manhattan
Beach – Transportation and Traffic Issues
January 31, 2021

applies. The TIA admits the Proposed Project exceeds OPR’s screening threshold of 110 additional daily trips and calculates an increase of 130 additional daily trips. The TIA then calls this “nominal”, concluding that the Project “...is not likely to result in a significant VMT impact.” Because the Project is primarily a non-residential/office development (i.e., 81,000+ SF hotel), it would be considered a retail project under OPR’s guidance, which provides a “net increase in total VMT” that may indicate a significant impact.¹ This threshold applies even to a redevelopment project.² Here, the hotel component alone is reported to generate over 5.2 million annual VMTs (see figure below), which will far exceed the VMTs generated by the prior restaurant. The City fails to explain why it deems OPR’s guidance relevant but ignores that the Project would exceed OPR’s screening and numeric thresholds.

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated Annual VMT	Mitigated Annual VMT
	Weekday	Saturday	Sunday		
Enclosed Parking Structure	0.00	0.00	0.00		
General Office Building	0.00	0.00	0.00		
Hotel	2,199.96	2,199.96	2,199.96	5,249,481	5,249,481
Parking Lot	0.00	0.00	0.00		
Regional Shopping Center	0.00	0.00	0.00		
Total	2,199.96	2,199.96	2,199.96	5,249,481	5,249,481

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diversed	Pass-by
Enclosed Parking Structure	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	35	4
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LD11	LD12	MDV	LD11	LD12	MHD	HRD	OBUS	DBUS	MCV	CBUS	MH
Enclosed Parking Structure	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000667	0.000876
General Office Building	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000667	0.000876
Hotel	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000667	0.000876
Parking Lot	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000667	0.000876
Regional Shopping Center	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000667	0.000876

5.0 Energy Detail

Furthermore, evidence is in the record that the Project would be far less efficient on a VMT per capita basis for light duty vehicles under both SCAG’s RTP/SCS and CARB’s 2017 Scoping Plan.³ This further supports the conclusion that substantial evidence shows that the Project’s hotel component—alone—will have significant VMT impacts that warrant analysis and mitigation, such as those described by other experts.

¹ OPR (Dec. 2018) Technical Advisory, p. 16, http://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

² Ibid., p. 17.

³ See SWAPE (1/19/21) Comments on the Manhattan Beach Hotel Project, pp. 19-23 (previously provided to the City).

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- 5) Project VMT Discussion Is Inadequate and Unsupported – The Kimley Horn TIA discusses trip types to and from the Proposed Project but provides no supporting documentation or data.⁴ Generalities such as improving the jobs/housing balance cannot be relied upon to reduce VMT. The hotel should not be expected to significantly increase employment opportunities or to decrease average commuter trip lengths. While there is nominal transit service within ½ mile of the site, no existing or proposed shuttle services have been discussed or described in relation to reducing single occupant vehicle trips. **Further, trips associated with the retail and office portions of the Proposed Project, different from the hotel trips, have not been analyzed.**

The conclusion that “...if this site were not developed, a similar site will be developed elsewhere to meet this demand and as such the alternative to this development would not likely eliminate any related VMT. In consideration of this, it is anticipated that this redevelopment project would not result in a significant finding under SB-743.” This conclusion lacks supporting evidence.

The responses to my January 15, 2021 letter by Kimley Horn and by the City’s Traffic Engineer do not alter the facts that I have presented. The Proposed Project must properly evaluate and disclose potential traffic impacts which has not been done. Further study must be undertaken, particularly regarding VMT, and more detailed information must be provided to properly identify and address the traffic impacts that will be created by the Proposed Project. Many agencies have developed reasonable numeric/qualitative thresholds, consistent with evolving scientific evidence and data. The analysis provided by the City here, however, is predicated entirely on unfounded assumptions, speculation, and inconsistent with guidance from other expert agencies.

If you have questions regarding these comments, please contact me at your convenience.

Respectfully submitted,

Tom Brohard and Associates



Tom Brohard, PE
Principal



Enclosure

January 15, 2021 Letter Regarding Transportation and Traffic Issues

⁴ For example, no data is provided about City hotel vacancy/occupancy rates as compared to surrounding cities, or what occupancy levels would indicate unmet demand.

Tom Brohard and Associates

January 15, 2021

Mr. Jordan Sisson, Attorney at Law
Law Offices of Gideon Kracov
801 South Grand Avenue, 11th Floor
Los Angeles, California 90017

SUBJECT: Proposed Hotel at 600 South Sepulveda Boulevard in the City of Manhattan Beach - Transportation and Traffic Issues

Dear Mr. Sisson:

Tom Brohard, P.E., has reviewed the transportation and traffic aspects of the November 18, 2020 Report (Staff Report) to the Planning Commission to construct a new 162 room hotel and a new 16,348 square foot retail/office building at 600 South Sepulveda Boulevard in the City of Manhattan Beach. I have also reviewed comments prepared by Craig S. Neustaedter of Transportation Engineering and Planning, Inc., regarding deficiencies and errors contained within testimony and traffic reports prepared by Kimley Horn Associates for the Proposed Project. So too, I have reviewed the City's recently released staff report printed on January 14, 2021 (January Staff Report).

As concluded by Mr. Neustaedter, I also believe the Kimley Horn Traffic Study for the Project is fatally flawed. The Proposed Project will generate significantly more daily and peak hour trips as well as vehicle miles traveled (VMT) than identified in the Traffic Study, and mitigation measures must be developed, adopted, and implemented. This letter points out deficiencies, errors, and inconsistencies that must be addressed before the City of Manhattan Beach considers the Proposed Project further.

Education and Experience

Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained over 50 years of professional traffic engineering and transportation planning experience. I am licensed as a Professional Civil Engineer both in California and Hawaii and as a Professional Traffic Engineer in California. I formed Tom Brohard and Associates in 2000 and have served many diverse communities as the City Traffic Engineer and/or the Transportation Planner. During my career in both the public and private sectors, I have reviewed numerous environmental documents and traffic studies for various projects as shown in a short summary of my experience in the enclosed resume.

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Transportation and Traffic Issues

Based on the information in the various documents, each of the following traffic and transportation issues must be fully addressed and evaluated:

- 1) Trip Generation for the Proposed Project Is Incorrect – The Institute of Transportation Engineers, ITE, regularly collects data from traffic studies across the United States, and most recently published the Trip Generation Manual, 10th Edition in September 2017. This data is used by engineers to forecast daily and peak hour trips from many different land uses. These same land use definitions are also consistently used in ITE’s Parking Generation. Using this data, I found several errors in the calculation of trip generation for the Proposed Project as follows:
 - a) Incorrect Land Use Trip Rates Used for the Hotel - To forecast trips for the Proposed Project in their August 2020 Traffic Study, Kimley Horn incorrectly used trip generation data for ITE Land Use 311 for the hotel. As shown on the enclosed description of an All-Suites Hotel, ITE defines this as “a place of lodging that provides sleeping accommodations, a small restaurant and lounge, and small amounts of meeting space. **Each suite includes a sitting room and separate bedroom; limited kitchen facilities are provided within the suite.**” (emphasis added)

From my review of Pages 50 - 53 in the Staff Report showing detailed plans of each of the four hotel floors, **none** of the 162 guest rooms have both a sitting room and a separate bedroom as required by the ITE definition of an All-Suites Hotel. Therefore, the Traffic Study used incorrect trip generation rates to calculate daily and peak hour trips for the Proposed Project. From Table A on Page 37 of the Staff Report, an All-Suites Hotel with 162 rooms was forecast by Kimley Horn to generate only 723 daily trips with 55 in the morning peak hour and 58 in the afternoon peak hour. The trip rates used are significantly less than those for Land Use 310, Hotel.

Earlier in their March 8, 2020 Memo (attached) regarding right turn access for the Proposed Project, Kimley Horn forecast trips to and from the Proposed Project using Trip Generation Manual, 9th Edition. Table 1 on Page 3 indicates the Proposed Project would generate 2,200 daily trips including 121 in the morning peak hour and 178 in the afternoon peak hour.

From my review of this memo, Kimley Horn used ITE trip generation data for a Business Hotel, Land Use 312. Only very limited data is provided by ITE for this use. As shown on the attached definition from

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ITE, business hotels “...are places of lodging aimed toward the business traveler. These hotels provide sleeping accommodations and other limited facilities, such as a breakfast buffet bar and afternoon beverage bar (no lunch or dinner is served, and no meeting facilities are provided).” Other errors in Table 1 involving the fitted curve equations for the retail and office components led to an overstatement of trips to and from the Proposed Project.

Trip rates for business hotels (Land Use 312) are based on very limited data and are significantly less than the other hotel categories. Trip rates for All-Suites Hotels (Land Use 311) should not be used as the definition of the All-Suite Hotel does not fit the Proposed Project. From my review of the different ITE hotel categories, the Traffic Study must use trip rates for Hotel, Land Use 310, from Trip Generation Manual, 10th Edition.

- b) Corrected Land Use Trip Rates for the Hotel - The Proposed Project fits the description of a Hotel, Land Use 310. ITE defines a Hotel as “...a place of lodging that provides sleeping accommodations and supporting facilities **such as** restaurants, cocktail lounges, meeting and banquet rooms or convention facilities, limited recreational facilities (pool, fitness room), and/or other retail and service shops.” (emphasis added).

As is typical in ITE Trip Generation and Parking Generation Manuals, the language “such as” merely provides examples of supporting facilities and in no way circumscribes the use of ITE Land Use 310 trip rates to only hotel projects that include **all** the referenced supporting facilities. Here, the Project includes a variety of supporting facilities that fit within the definition of ITE Land Use 310 (e.g., fitness center, business center, meeting room, breakfast, alcohol and beverage and food services, proposed retail on site, and indications of further dining services open to the public in future applications).

Using the corresponding data from ITE for Land Use 310, the 162-room hotel will generate 1,402 daily trips with 76 in the morning peak hour and 95 in the afternoon peak hour. These corrected trip rates indicate that only the Hotel portion of the Proposed Project will generate 670 more daily trip including 21 more trips in the morning peak hour and 37 more trips in the afternoon peak hour.

- c) Morning Peak Hour Restaurant Trips Are Grossly Overstated - From Yelp (<https://www.yelp.com/biz/el-torito-manhattan-beach-3>), the El Torito Restaurant opened at 11 AM on weekdays. As a result, it would not have served breakfast and would have generated only a very few, if any, trips in the morning peak hour. The Traffic Study incorrectly

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- assumed that the former restaurant was open for breakfast, significantly overstating the number of morning peak hour trips. By doing this and comparing to the Proposed Project, the potential traffic impacts of new morning peak hour trips on the area street system were totally missed.
- d) Restaurant Trips Cannot Be Used to Offset Project Trips – The article from Yelp cited above indicates El Torito closed in December 2018. Based on this, trips to and from the former restaurant should not be used to offset trips to and from the Proposed Project. Los Angeles and other cities require that trips to and from facilities closed for more than two years cannot be used to offset trips from proposed projects on the same site. For a proper analysis, the City should not take trip credits for the closed El Torito Restaurant against the Proposed Project.
- e) Trips for Proposed Project Are Significantly Understated - In combination with the retail and general office components, the Proposed Project will generate 1,754 daily trips including 129 in the morning peak hour and 117 in the afternoon peak hour. Therefore, the Proposed Project is expected to generate 813 more daily trips including 129 more trips in the morning peak hour and 34 more trips in the afternoon peak hour than reported in the Traffic Study. With these errors, the Level of Service analysis in the Traffic Study has been incorrectly calculated and potentially significant traffic impacts have not been properly identified, analyzed, or mitigated.
- f) Net Trip Difference Results in Failure to Disclose Significant Impacts – The Kimley Horn Traffic Study utilized the wrong trip rates for the proposed hotel and incorrectly added morning peak hour trips when the El Torito Restaurant was not open for business. These errors in the calculation of daily and peak hour trips could also result in the failure to disclose, analyze, and mitigate potentially significant impacts in the areas of air quality and noise.
- 2) Vehicle Miles Traveled (VMT) Must Be Properly Analyzed and Mitigated - Senate Bill 743 (SB-743) amended the California Environmental Quality Act (CEQA) to require calculation and estimates of vehicle miles traveled (VMT) for all development projects approved in California after July 1, 2020. As a result, the traffic impact analysis (TIA) must now include estimates of VMT created by the Proposed Project. My review indicates the TIA does not include a proper analysis of VMT for the Proposed Project.

Page 154 of the Staff Report, the Introduction to the August 2020 Traffic Impact Analysis for the Proposed Project prepared by Kimley Horn, states “This report has been prepared in accordance with the traffic impact study requirements of

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the current Los Angeles County Congestion Management Program (LA County CMP) for Traffic Impact Analyses.” This statement is incorrect as Los Angeles County opted out of the Congestion Management Program by action of their Board of Supervisors on July 16, 2019 (see enclosed). As a result, there are no LA County CMP Guidelines for Traffic Impact Analyses.

Historically, the City of Manhattan Beach has followed the “Transportation Impact Analysis Guidelines” adopted by Los Angeles County Public Works. The most recent edition published July 23, 2020 contains procedures to calculate VMT and comply with the provisions of SB-743. Instead of following County Public Works Guidelines, the August 2020 Traffic Impact Study prepared by Kimley Horn attempted to comply with the State Office of Planning Research (OPR) Technical Advisory but failed to do so as follows:

- a) Screening Threshold for Land Use Projects Is Significantly Exceeded – OPR suggested that projects which generate 110 or fewer daily trips could be considered to not lead to a significant impact.

As indicated in 1e) above, the Proposed Project will generate 1,754 daily trips. From Table A of the TIA on Page 37 of the Staff Report, the restaurant generated 941 daily trips. The difference in daily trips generated by the site is 1,754 minus 941, or 803 daily trips.

The forecast of 803 additional daily trips is significantly more than 130 daily trips identified on Page 183 of the Staff Report. These additional daily trips that will be created by the Proposed Project over the former restaurant use leads to potentially significant VMT impacts that require further study and adoption of mitigation measures to reduce vehicle trips.

- b) Project VMT Discussion Is Inadequate and Unsupported – Pages 183 and 184 of the Staff Report from the Kimley Horn TIA discuss trip types to and from the Proposed Project but provide no supporting documentation:
- i) Employee Commute Trips – The discussion states “Most often an important strategy for reducing VMT in a community like this is to improve the local jobs/housing balance by increasing the number of employment opportunities. As such, it is reasonable to expect that increasing local employment opportunities will reduce the average commuter trip lengths of residents, resulting in a net decrease to regional net VMT.” **No data is provided supporting this opinion.**
- ii) Guest Trips Related to the Hotel Use – The discussion states “It is reasonable to assume that hotel would not generate new demand but meets existing demand that guests would otherwise travel in the region

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for the service. Further, proximity to transit and potential use of shuttle services would also likely reduce the single occupancy vehicle trips.” **Again, no data is provided here.** While there is some transit service within ½ mile of the site, no existing or proposed shuttle services have been discussed or described in relation to reducing single occupant vehicle trips.

- iii) Other Trips – The discussion acknowledges that these trips likely have a minimal impact on VMT, and these are not likely to impact the local transportation system compared to employee commute trips and guest trips related to the hotel use. **The discussion fails to discuss or analyze trips associated with the retail and office portions of the Proposed Project, with these trips being different from the hotel trips.**
- iv) VMT Discussion Conclusion – The discussion of VMT concludes on Page 184 of the Staff Report stating that “...if this site were not developed, a similar site will be developed elsewhere to meet this demand and as such the alternative to this development would not likely eliminate any related VMT. In consideration of this, it is anticipated that this redevelopment project would not result in a significant finding under SB-743.” This conclusion also lacks supporting evidence.
- c) VMT Analysis Must Follow Los Angeles County Guidelines – The VMT discussion in the August 2020 Traffic Impact Analysis is inadequate and fails to support the conclusion that the Proposed Project will not have significant VMT. To properly assess VMT, the Los Angeles County Public Works Transportation Impact Analysis Guidelines must be followed in detail from Section 3.1.4.2, Project Impact Determination, through Section 3.1.5.1, Development Project Mitigations (Pages 12 through 16).

Based on the Los Angeles County Public Works Transportation Impact Analysis Guidelines, I believe the Proposed Project will have significant VMT impacts based upon the additional 803 daily trips, almost double the number of daily trips generated by the El Torito Restaurant. Measures to mitigate the significant VMT impacts must be adopted as conditions of approval for the Proposed Project.

In summary, the Proposed Project must fully evaluate and disclose the potential traffic impacts. Contrary to what is suggested by staff on Page 12 of the January Staff Report, further study must be undertaken, particularly regarding VMT, and more detailed information must be provided to properly identify and address the traffic impacts that will be created by the Proposed Project.

Mr. Jordan R. Sisson, Attorney at Law
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If you have questions regarding these comments, please contact me at your convenience.

Respectfully submitted,

Tom Brohard and Associates



Tom Brohard, PE
Principal



Enclosures

- Institute of Transportation Engineers, Trip Generation Manual, 10th Edition
- County of Los Angeles, Department of Public Works, Congestion Management Program Opt-Out, July 16, 2019
- Los Angeles County Public Works, "Transportation Impact Analysis Guidelines", July 23, 2020
- Resume

Land Use: 311 All Suites Hotel

Description

An all suites hotel is a place of lodging that provides sleeping accommodations, a small restaurant and lounge, and small amounts of meeting space. Each suite includes a sitting room and separate bedroom; limited kitchen facilities are provided within the suite. Hotel (Land Use 310), business hotel (Land Use 312), motel (Land Use 320), and resort hotel (Land Use 330) are related uses.

Additional Data

Six studies provided information on occupancy rates at the time the studies were conducted. The average occupancy rate for these studies was approximately 74 percent.

Time-of-day distribution data for this land use are presented in Appendix A. For the three general urban/suburban sites with data, the overall highest vehicle volumes during the AM and PM on a weekday were counted between 11:45 a.m. and 12:45 p.m. and 6:30 and 7:30 p.m., respectively.

The sites were surveyed in the 1980s, the 1990s, and the 2010s in Florida, Georgia, Minnesota, Virginia, and Washington.

For all lodging uses, it is important to collect data on occupied rooms as well as total rooms in order to accurately predict trip generation characteristics for the site.

Source Numbers

216, 436, 818, 870, 872

Land Use: 310 Hotel

Description

A hotel is a place of lodging that provides sleeping accommodations and supporting facilities such as restaurants, cocktail lounges, meeting and banquet rooms or convention facilities, limited recreational facilities (pool, fitness room), and/or other retail and service shops. All suites hotel (Land Use 311), business hotel (Land Use 312), motel (Land Use 320), and resort hotel (Land Use 330) are related uses.

Additional Data

Studies of hotel employment density indicate that, on the average, a hotel will employ 0.9 employees per room.¹

Twenty-five studies provided information on occupancy rates at the time the studies were conducted. The average occupancy rate for these studies was approximately 82 percent.

Some properties contained in this land use provide guest transportation services such as airport shuttles, limousine service, or golf course shuttle service, which may have an impact on the overall trip generation rates.

Time-of-day distribution data for this land use are presented in Appendix A. For the one center city core site with data, the overall highest vehicle volumes during the AM and PM on a weekday were counted between 8:30 and 9:30 a.m. and 3:15 and 4:15 p.m., respectively. On Saturday and Sunday, the peak hours were between 5:00 and 6:00 p.m. and 10:15 and 11:15 a.m., respectively.

The sites were surveyed in the 1980s, the 1990s, the 2000s, and the 2010s in California, District of Columbia, Florida, Georgia, Indiana, Minnesota, New York, Pennsylvania, South Dakota, Texas, Vermont, Virginia, and Washington.

For all lodging uses, it is important to collect data on occupied rooms as well as total rooms in order to accurately predict trip generation characteristics for the site.

Trip generation at a hotel may be related to the presence of supporting facilities such as convention facilities, restaurants, meeting/banquet space, and retail facilities. Future data submissions should specify the presence of these amenities. Reporting the level of activity at the supporting facilities such as full, empty, partially active, number of people attending a meeting/banquet during observation may also be useful in further analysis of this land use.

Source Numbers

170, 260, 262, 277, 280, 301, 306, 357, 422, 507, 577, 728, 867, 872, 925, 951

¹ Buttk, Carl H. Unpublished studies of building employment densities, Portland, Oregon.

Hotel (310)

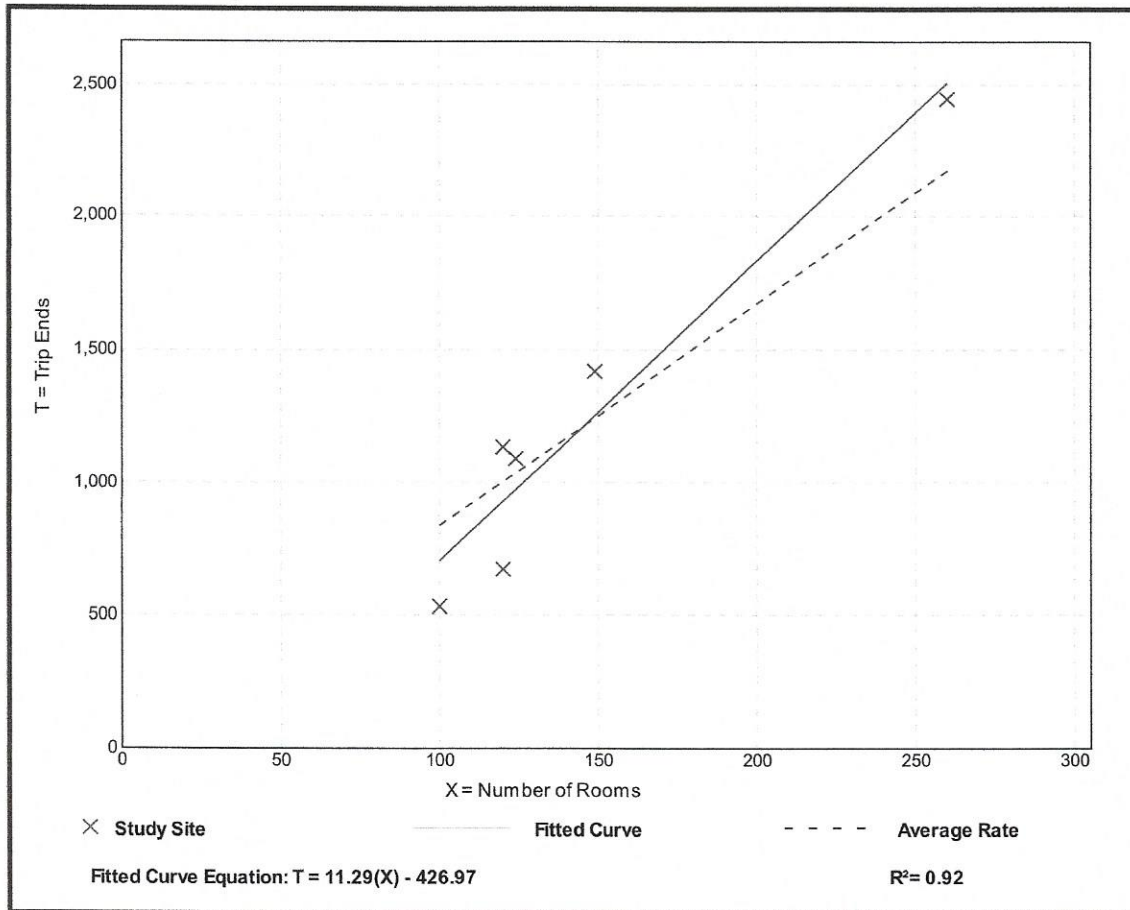
Vehicle Trip Ends vs: Rooms
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 6
Avg. Num. of Rooms: 146
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per Room

Average Rate	Range of Rates	Standard Deviation
8.36	5.31 - 9.53	1.86

Data Plot and Equation



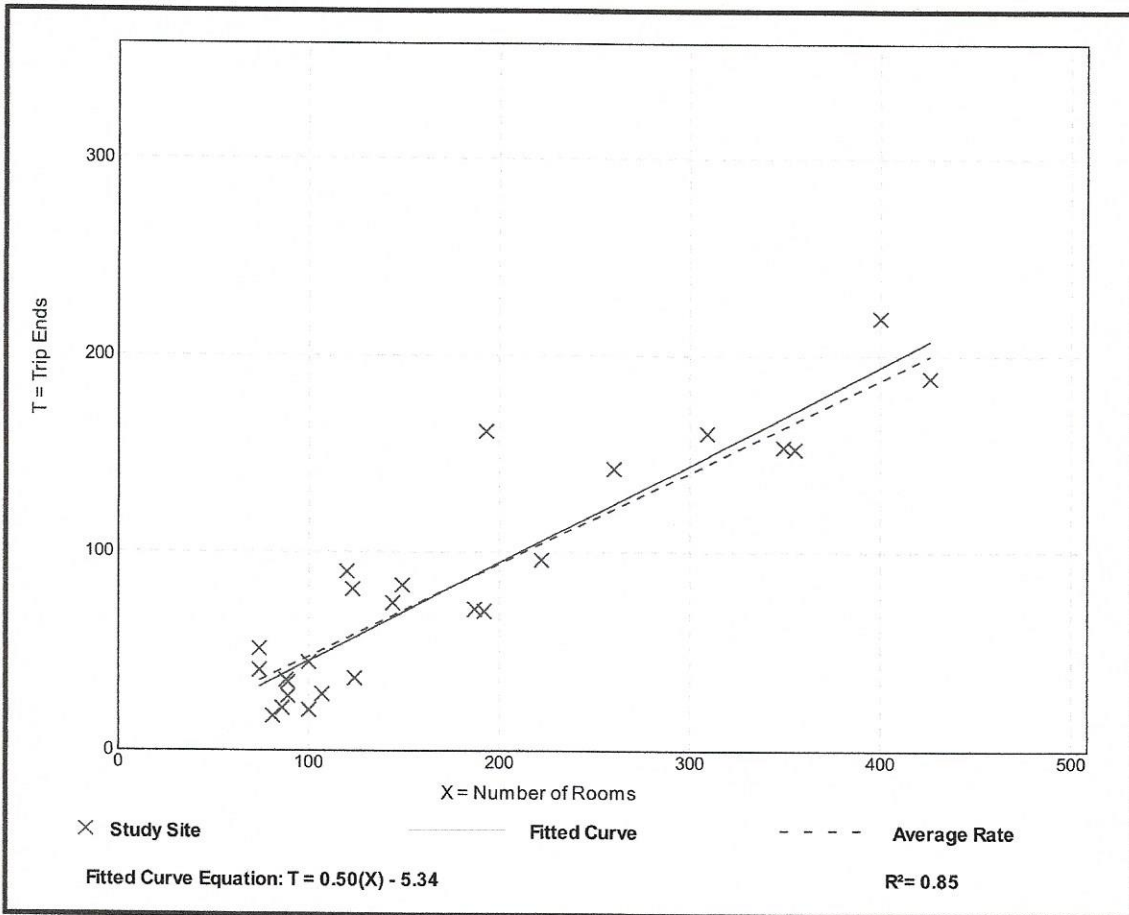
Hotel (310)

Vehicle Trip Ends vs: Rooms
On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.
Setting/Location: General Urban/Suburban
 Number of Studies: 25
 Avg. Num. of Rooms: 178
 Directional Distribution: 59% entering, 41% exiting

Vehicle Trip Generation per Room

Average Rate	Range of Rates	Standard Deviation
0.47	0.20 - 0.84	0.14

Data Plot and Equation



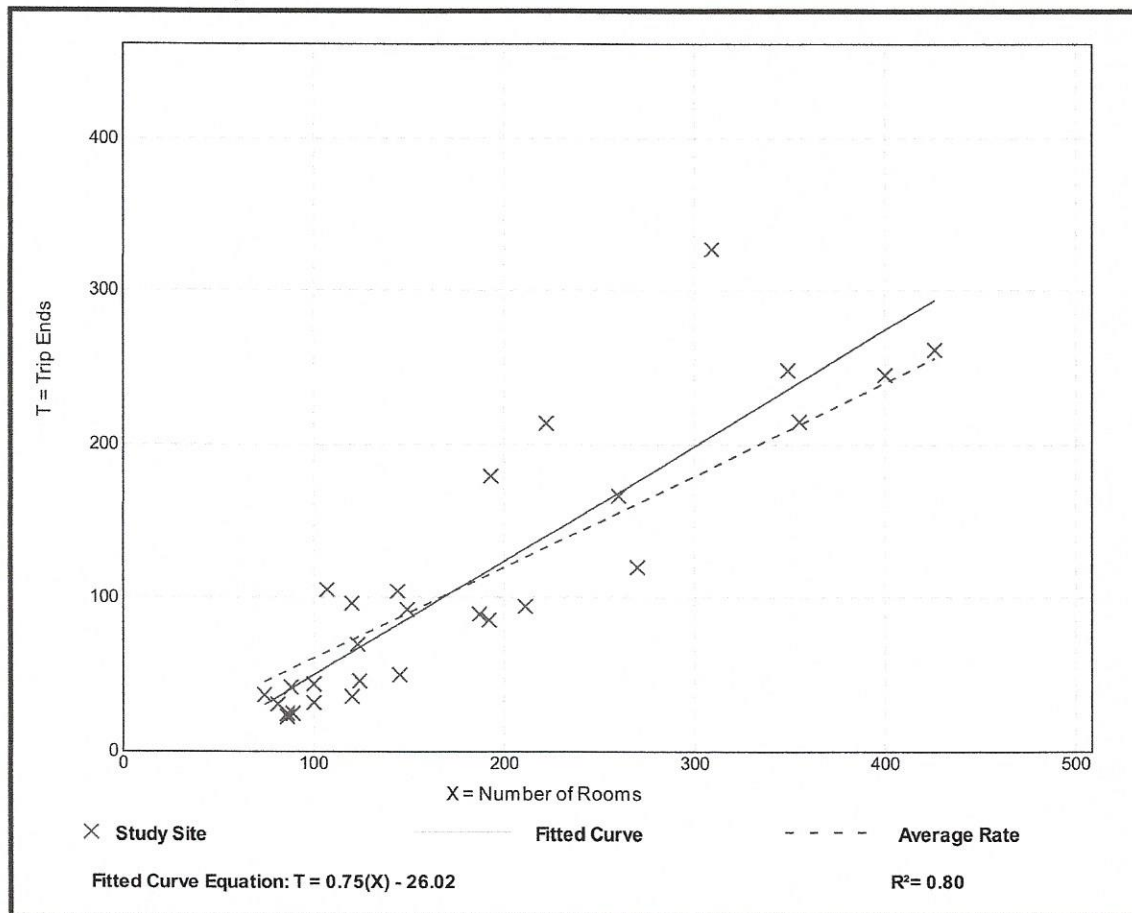
Hotel (310)

Vehicle Trip Ends vs: Rooms
On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.
Setting/Location: General Urban/Suburban
 Number of Studies: 28
 Avg. Num. of Rooms: 183
 Directional Distribution: 51% entering, 49% exiting

Vehicle Trip Generation per Room

Average Rate	Range of Rates	Standard Deviation
0.60	0.26 - 1.06	0.22

Data Plot and Equation





MEMORANDUM

To: Mr. Jan Holtze

From: Serine Ciandella

Date: March 8, 2020

Re: *Manhattan Beach Hotel Mixed-Use Project Access Evaluation*

INTRODUCTION

This memorandum has been prepared to provide an evaluation of the access provisions for the proposed Manhattan Beach Hotel Mixed-use Project in the City of Manhattan Beach. The site access discussion will focus on a right-turn warrant analysis for the site driveways.

PROJECT DESCRIPTION

The project site is located on the northeast corner of the intersection of Sepulveda Boulevard and Tennyson Street in the City of Manhattan Beach. The proposed development would consist of a 162-room hotel, 6,845 square feet of retail space, and 9,264 square feet of office space. Site parking would be provided in a combination of surface level and underground parking. Access to the site would consist of one right-in/right-out only driveway on Sepulveda Boulevard and one full-movement driveway on Tennyson Street.

SITE ACCESS – RIGHT-TURN LANE EVALUATION

This right-turn warrant evaluation has been prepared to determine whether or not a dedicated right-turn deceleration lane would be warranted at the driveways for the Manhattan Beach Hotel Mixed-use project. Our assumptions, analysis, and findings are summarized below.

As described above, the project access provisions would consist of one right-in/right-out only driveway on Sepulveda Boulevard and one full-movement driveway on Tennyson Street.

Tennyson Street is currently closed to through traffic just east of the project site; therefore, it is assumed that no project traffic will approach the site from the east on Tennyson Street. Since there will be no vehicles turning right into the Tennyson Street driveway, a dedicated right-turn lane will not be needed on Tennyson Street. The remainder of this analysis will focus on the project driveway on Sepulveda Boulevard.

Right-Turn Deceleration Lane Criteria

Based on the County of Los Angeles Department of Public Works *Access Management for Private Development Guidelines Manual*, the determination of whether or not a dedicated right-turn lane is warranted at an unsignalized driveway is based on the following factors:

- sight distance constraints,
- the design speed of the fronting roadway (Sepulveda Boulevard), and,
- the percentage of right-turning vehicles in the advancing traffic volume (the through plus turning volume) on northbound Sepulveda Boulevard during the peak hours.

Given that there are no sight distance constraints for northbound traffic on Sepulveda Boulevard at the project driveway, the determining factors for this project will be:

- design speed and
- right-turning volume percentage of the advancing volume at the project driveway.

Design Speed

The posted speed limit on Sepulveda Boulevard is 35 miles per hour (mph). For a conservative analysis, the design speed used for this analysis will be 55 mph.

Existing Traffic Volumes on Sepulveda Boulevard

Existing peak hour traffic volumes on Sepulveda Boulevard were obtained from the *Traffic Impact Study for the Skechers Design Center and Office Project* (Linscott Law and Greenspan, August 25, 2016). Traffic counts for that study were collected in March, 2016.

The 2016 peak hour through volumes on northbound Sepulveda Boulevard along the project frontage were:

- 2,943 trips in the morning peak hour and
- 1,297 trips in the evening peak hour.

The 2016 counts were grown to develop forecasts for the analysis year of 2021 at a growth rate of 0.026% per year, in accordance with the Los Angeles County Congestion Management Program (CMP).

With the annual growth rate applied, the peak hour through volumes on northbound Sepulveda Boulevard for analysis year 2020 would be:

- 2,982 trips in the morning peak hour and
- 1,314 trips in the evening peak hour.

Project Trip Generation

A summary of the daily, morning and evening peak hour trip generation estimates for the project is provided on **Table 1**. The project is estimated to generate 78 inbound trips in the morning peak hour and 79 inbound trips in the evening peak hour. These trips will enter the project site via one of the two site project driveways, depending on the direction of approach.

TABLE 1 SUMMARY OF PROJECT TRIP GENERATION Manhattan Beach Hotel Mixed-Use Project										
Land Use	ITE Code	Unit	Trip Generation Rates ¹							
			Daily	AM Peak Hour			PM Peak Hour			
				In	Out	Total	In	Out	Total	
Business Hotel	312	Occ. Room	4.901	0.210	0.173	0.38	0.179	0.222	0.40	
Shopping Center	820	KSF	Fitted Curve Equation							
General Office Building	710	KSF	Fitted Curve Equation				0.253	1.237	1.49	
Trip Generation Estimates										
Land Use	Quantity	Unit	Daily	AM Peak Hour			PM Peak Hour			
				In	Out	Total	In	Out	Total	
Business Hotel	162	Occ. Room	794	34	28	62	29	36	65	
Shopping Center	6,845	KSF	1,190	19	12	31	48	52	100	
General Office Building	9,264	KSF	216	25	3	28	2	11	13	
Total Project Trips			2,200	78	43	121	79	99	178	
¹ Source: Institute of Transportation Engineers (ITE) <u>Trip Generation Manual</u> , 9 th Edition										

Project Trip Assignment at Site Driveways

It is assumed that the project traffic will approach the site via Sepulveda Boulevard – 60% from the north and 40% from the south. Project traffic approaching from the north on Sepulveda Boulevard will turn left onto Tennyson Street and enter the site via a left turn into the Tennyson Street driveway. For project traffic approaching from the south on Sepulveda Boulevard, roughly half will enter the site via the Tennyson Street driveway and half via the Sepulveda Boulevard driveway.

Based on these project trip assignment assumptions, the volume of project traffic entering the Sepulveda Boulevard driveway via a right turn is estimated to be 16 morning peak hour trips and 16 evening peak hour trips. These volumes represent 0.5% and 1.2% of the northbound advancing volume (the through plus turning volume) on Sepulveda Boulevard in the morning and evening peak hours, respectively.

This percentage of turning vehicles compared to the advancing volume on Sepulveda Boulevard would not warrant the requirement of a dedicated right-turn lane for the project driveway in either the morning or the evening peak hour.

SUMMARY AND CONCLUSIONS

- The project applicant proposes a mixed-use site with a combination of hotel, office, and retail uses.
- Access to the site will be provided via one right-in/right-out only driveway on Sepulveda Boulevard and one full-movement driveway on Tennyson Street.
- It is estimated that 80% of the project traffic will enter the site at the Tennyson Street driveway via an eastbound left turn, and that 20% will enter the Sepulveda Boulevard driveway via a northbound right turn.
- The percentage of vehicles turning into the Sepulveda Boulevard driveway compared to the northbound advancing volume (the through plus turning volume) on Sepulveda Boulevard would be 0.5% in the morning peak hour and 1.1% in the evening peak hour. This comparative percentage would not warrant the requirement of a dedicated right-turn lane for the project driveway in either the morning or the evening peak hour.



MARK PESTRELLA, Director

**COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS**

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone (828) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE

July 16, 2019

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

ADOPTED

BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

28 July 16, 2019

CELIA ZAVALA
EXECUTIVE OFFICER

Dear Supervisors:

**TRANSPORTATION CORE SERVICE AREA
CONGESTION MANAGEMENT PROGRAM OPT-OUT
(ALL SUPERVISORIAL DISTRICTS)
(3 VOTES)**

SUBJECT

This action is to approve a resolution exempting the Los Angeles County from the State-mandated Congestion Management Program in conjunction with Metro's effort to achieve Countywide exemption once a majority of the Los Angeles County's local governments have adopted similar resolutions.

IT IS RECOMMENDED THAT THE BOARD:

1. Find that the proposed action is exempt from the California Environmental Quality Act for the reasons stated in this Board letter.
2. Approve the resolution, as authorized by the California Government Code Section 65088.3, electing for the Los Angeles County to be exempt from the Congestion Management Program as described in the California Government Code Section 65088 et seq.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

Approval of recommended actions will find that the project is exempt from the California Environmental Quality Act (CEQA) and withdraw the County from the requirement of the adopted Congestion Management Program (CMP).

Background

The CMP for the County region was first established in 1992 by the County Transportation Commission, predecessor of Metro, following the passage of Proposition 111 in 1990. The purpose of the CMP was to address the impacts of local growth on the regional transportation system. The CMP was created to link local land use decisions with their impacts on regional transportation and air quality as well as to develop a partnership among transportation decision makers on devising appropriate transportation solutions that include all modes of travel.

Under the CMP, the 88 incorporated cities plus the County share various statutory responsibilities, including monitoring traffic count locations on select arterials, implementing transportation improvements, adoption of travel demand management and land use ordinance, and mitigating congestion impacts.

The framework for the CMP is linked to the idea that congestion can be mitigated by continuing to add capacity to roadways since the primary metric that drives the program is level of service (LOS). LOS is a qualitative metric that is used to define operational conditions of a roadway in terms of vehicular service measures, such as speed and travel time, freedom to maneuver, traffic interruptions, and comfort and convenience. Recent State laws and rulemaking, namely Assembly Bill 32 (California Global Warming Solutions Act of 2006), Senate Bill (SB) 375 (Sustainable Communities and Climate Protection Act of 2008), SB 743 (Environmental quality: transit-oriented infill projects, judicial review streamlining for environmental leadership development projects) and SB 32 (California Global Warming Solutions Act of 2006), all move away from LOS directly or indirectly. Therefore, the CMP contradicts these key State policies. Several counties have elected to opt-out of the CMP over the years, including Fresno, San Diego, San Luis Obispo, and Santa Cruz. The reasons for doing so are varied but generally include redundant administrative processes that come with great expense with little to no congestion management benefit along with the continued mandate of using LOS to determine roadway deficiencies.

Over the last several years, the CMP has become increasingly outdated in relation to the direction of regional, State, and Federal transportation planning requirements. Additional reasons to opt-out of the CMP include:

Opting out of the CMP relieves the County from:

- Having to use a single measure LOS to determine roadway deficiencies.
- Losing State gas tax funds or being ineligible to receive State and Federal Transportation Improvement Program funds, as a result of not being in compliance with CMP requirements or performance standards.
- Administrative and financial burden associated with the preparation of documents to demonstrate conformance with the CMP.

While the CMP requirement was one of the pioneering efforts to conduct performance-based planning, the approach has become antiquated and expensive.

Metro has been designated as the Congestion Management Agency responsible for administering the County's region CMP. On June 28, 2018, the Metro Board of Directors acted to initiate the process to opt-out of the State-mandated program and directed Metro to consult with local jurisdictions to consider and prepare the necessary resolutions for jurisdictions to exempt themselves from the program. The California Government Code Section 65088.3 states that jurisdictions within a county may opt-out of the CMP requirement without penalty, if a majority of local jurisdictions

representing a majority of the County's population formally adopt resolutions requesting to opt-out of the program. If Metro is successful in opting out of the CMP, it will allow the region to use different performance measures consistent with State-mandates to determine roadway deficiencies and ensure adequate planning.

Implementation of Strategic Plan Goals

The County Strategic Plan directs the provision of Strategy III.3, Pursue Operational Effectiveness, Fiscal Responsibility, and Accountability. The recommended actions will maximize the use of County assets by exercising fiscal responsibility of County funds.

FISCAL IMPACT/FINANCING

There will be no impact to the County's General Fund.

Opting out of this program will alleviate the County obligation on the CMP costs.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

The resolution has been reviewed and approved by County Counsel.

ENVIRONMENTAL DOCUMENTATION

The proposed project is exempt from CEQA. It can be seen with certainty that there is no possibility that the project may have a significant effect on the environment pursuant to State CEQA Guidelines Section 15061(b)(3). The proposed project is covered by the general rule that CEQA applies only to projects that have the potential for causing a significant effect on the environment. The adoption of the resolution exempting the County from the CMP is exempt under this common-sense exemption because the CMP is an obsolete performance-based planning program that is not consistent with current transportation metrics used for CEQA analysis. Furthermore, other similar, applicable regional, State, and Federal transportation planning processes and requirements have weakened and supplanted the CMP. Thus, exemption from the CMP can have no potential significant impact on the environment. Upon the Board's approval of the recommended actions, Public Works will file a Notice of Exemption with the County Clerk in accordance with Section 21152 of the California Public Resources Code.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

There are no negative impacts anticipated from opting out of this program and the enclosed resolution will continue to enable the County to preserve gasoline tax subvention funds.

The Honorable Board of Supervisors

7/16/2019

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CONCLUSION

Please return two adopted copies of the letter and resolution to Public Works, Transportation Planning and Programs Division.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark Pestrella". The signature is fluid and cursive, with the first name "Mark" and last name "Pestrella" clearly distinguishable.

MARK PESTRELLA

Director

MP:DBM:pr

Enclosures

c: Chief Executive Office (Chia-Ann Yen)
County Counsel (Laura Jacobson)
Executive Office

**A RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF
LOS ANGELES, CALIFORNIA, ELECTING TO BE EXEMPT FROM THE
CONGESTION MANAGEMENT PROGRAM**

WHEREAS, California voters passed Proposition 111 in June of 1990 requiring urbanized counties to develop and implement a Congestion Management Program (CMP); and

WHEREAS, Metro is the Congestion Management Agency responsible for the County's CMP; and

WHEREAS, California Government Code Section 65088.3 states that the CMP requirements do not apply in the County in that the majority of local governments comprised of City councils and the Board, and representing a majority of the population within the county, each adopt resolutions electing to be exempt from the CMP; and

WHEREAS, over time the CMP has become increasingly out of step with current regional, State, and Federal planning processes and requirements, including new State requirements for transportation performance measures related to greenhouse gas reduction; and

WHEREAS, on June 28, 2018, the Metro Board of Directors directed Metro staff to work with the various local governments within the County to gauge the level of interest in pursuing exemption from the CMP, and assisting with preparing the resolutions required under Government Code Section 65088.3.

NOW, THEREFORE BE IT RESOLVED by the Board that:

1. The Board, pursuant to the California Government Code Section 65088.3 does hereby elect to be exempt from the CMP as described in the California Government Code Sections 65088 to 65089.10.

On the 16th day July, 2019, the foregoing resolution was adopted by the Board of Supervisors of the Los Angeles County.



CELIA ZAVALA
Executive Officer of the
Board of Supervisors of the
Los Angeles County

By *Danilo Ruiz*
Deputy

APPROVED AS TO FORM:

MARY C. WICKHAM
County Counsel

By *[Signature]*
Deputy



Public Works
LOS ANGELES COUNTY

**Los Angeles County
Public Works**

**Transportation Impact Analysis
Guidelines**

July 23, 2020
Prepared by Public Works

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Section 1. - Introduction

Public Works generally will require the preparation and submission of a Transportation Impact Analysis for projects that meet the following criteria:

- Development Projects:
 - Estimated to generate a net increase of 110 or more daily vehicle¹ trips.
- Transportation Projects:
 - Likely to induce additional vehicle¹ miles traveled (VMT) by increasing vehicle capacity.
- Projects for which a Transportation Impact Analysis is required by County ordinance; regulation; resolution; court order; or directive from the Board of Supervisors, Regional Planning Commission.

A Transportation Impact Analysis requires analyses and forecasting of impacts or deficiencies to the circulation system generated by the project. The Transportation Impact Analysis identifies feasible measures or corrective conditions to offset any impacts or deficiencies.

The Transportation Impact Analysis shall be prepared under the direction of, and be signed by, a Professional Engineer, registered in the State of California to practice either Traffic or Civil Engineering.

¹ The term vehicle refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty trucks should only be included in a traffic impacts analysis for modeling convenience and ease of calculation (e.g., where models or data provide combine auto and heavy-freight VMT) but should not contribute to a finding of significant traffic impact under any circumstances.

Section 2. - Overall Steps

The project applicant shall follow the general steps summarized below when preparing a transportation impact analysis for a discretionary development project or transportation project.

Step 1. Project Memo

The project applicant shall inform Public Works that a new Transportation Impact Analysis is being prepared. In this initial communication, the following information shall be provided:

- A. Project Description – Provide a general description of the project, including size (defined by square footage per use and/or number of dwelling units) and use(s). The project description should include information on any phased construction and any unusual conditions. The project description shall specify a building address, Assessor’s parcel number, and project title.
- B. Project Site Plan – Submit the proposed project site plan, which shall clearly identify driveway or access location(s), loading/unloading areas, and parking design and circulation to help define the distribution of project trips. Considerations for traffic flow and movement should be designed and incorporated early in building and parking layout plans. To minimize and prevent last minute building design changes, project applicants should contact the Public Works Land Development Division and Public Works Traffic Safety and Mobility Division to determine the requirements for driveway width and internal circulation before finalizing the building and parking layout design.

Step 2. Other Agency Contacts

The project applicant shall consult with other agencies or adjacent jurisdictions (e.g., Caltrans, other cities, transit agencies, etc.) that may be affected by site access and travel demands generated by the project to ensure those agencies’ transportation-related concerns and issues are properly addressed in the Transportation Impact Analysis. If, as part of site access and circulation evaluation (see Section 4), a Transportation Impact Analysis includes the evaluation of an intersection or intersections in an adjacent local jurisdiction, then any corrective actions deemed necessary to address circulation concerns should be reviewed by and confirmed in writing by that jurisdiction. Written confirmation of consultation with all affected agencies is required.

Step 3. Scoping Document

The project applicant shall prepare and submit a Scoping Document to Public Works through the EPIC-LA portal. The Scoping Document describes the

assumptions and parameters that shall be included in the Transportation Impact Analysis including any analysis requirements from other affected jurisdictions identified in Step 2.

Step 4. Data Collection

The project applicant shall gather qualitative and quantitative data needed to support the required analyses and components of the Transportation Impact Analysis. Traffic count data shall be collected in accordance with standards and methods established in the Transportation Impact Analysis Guidelines.

Step 5. Transportation Impact Analysis Submittal

The project applicant shall submit the completed Transportation Impact Analysis to Public Works through the EPIC-LA portal and ensure that all subsequent submittals of the Transportation Impact Analysis are dated and timestamped.

Step 6. Transportation Impact Analysis Confirmation of Findings Letter

Public Works will prepare and distribute a Transportation Impact Analysis Confirmation of Findings Letter after the fees have been submitted and the Transportation Impact Analysis has been reviewed and approved.

The Transportation Impact Analysis Confirmation of Findings Letter will be limited to summarizing the findings and requirements for the proposed project. Additional fees/deposits may be required should the project applicant request findings and requirements for additional project alternatives.

Step 7. Mitigation and Monitoring

The project applicant may be responsible for ongoing reporting, depending on the nature of the mitigation measures and corrective actions to be implemented by the project. Reporting and monitoring of Transportation Demand Management (TDM) measures implemented by the project to improve mobility options at and around a project site may also be required and will be described in the Transportation Impact Analysis Confirmation of Findings Letter.

Section 3. - California Environmental Quality Act (CEQA) Transportation Impact Analysis Process

Section 3.1. - Development Projects

Section 3.1.1. - Introduction

The updated CEQA Guidelines certified and adopted by the California Natural Resources Agency in December 2018 are now in effect. Accordingly, Public Works recognizes the need to provide information based on guidance from the Office of Planning and Research and the California Air Resources Board on the assessment of vehicle miles traveled (VMT), thresholds of significance, and mitigation measures for development projects and land use plans in accordance with the amended Appendix G question below:

- For a development project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?

For development projects, the intent of this question is to assess whether a proposed project or plan adequately reduces total VMT. Public Works provides the following guidance regarding screening and impact criteria to address this question. The following screening criteria and impact criteria are only meant to serve as guidance for projects to determine whether a Transportation Impact Analysis should be performed, and the criteria to determine if a project generates a significant transportation impact. The criteria shall be determined on a project-by-project basis as approved by Public Works.

Section 3.1.2. - Screening Criteria

Section 3.1.2.1. - Non-Retail Project Trip Generation Screening Criteria

If the answer is no to the question below, further analysis is not required, and a less than significant determination can be made.

- Does the development project generate a net increase of 110 or more daily vehicle¹ trips²?

A project's daily vehicle trip generation should be estimated using the most recent edition of the Institute of Transportation Engineers (ITE) Trip Generation Manual. If the project proposed land use is not listed in the ITE Trip Generation Manual, please submit a trip generation study to Public Works for review and approval.

Section 3.1.2.2. - Retail Project Site Plan Screening Criteria

A project that contains a local serving retail use is assumed to have less than significant VMT impacts for the retail portion of the project. If the answer to the following question

² As referenced in the Governor's Office of Planning and Research (OPR), *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018.

is no, a less than significant determination can be made for the portion of the project that contains retail uses.

- Does the project contain retail uses that exceed 50,000 square feet of gross floor area²?

However, if the retail project is part of a mixed-use project, then the remaining portion of the project may be subject to further analysis in accordance with other screening criteria in Section 3.1. Projects that include retail uses in excess of the Retail Project Site Plan Screening Criteria need to evaluate the entirety of the project's VMT.

Section 3.1.2.3. – Proximity to Transit Based Screening Criteria

If a project is located near a major transit stop or high-quality transit corridor, the following question should be considered:

- Is the project located within a one-half mile radius of a major transit stop or an existing stop along a high-quality transit corridor²?

If the answer to the question above is yes, then the following subsequent questions should be considered:

- Does the project have a Floor Area Ratio² less than 0.75?
- Does the project provide more parking than required by the County Code²?
- Is the project inconsistent with the SCAG RTP/SCS²?
- Does the project replace residential units set aside for lower income households with a smaller number of market-rate residential units²?

If the answer to all four questions is no, further analysis is not required, and a less than significant determination can be made.

To determine the proposed change in residential units, the total number of lower income housing units that exist on the project site should be counted and compared to the total number of lower income and market-rate residential units proposed by the project. If there is a net decrease in residential units, the Proximity to Transit Based Screening Criteria cannot be utilized.

Section 3.1.2.4. – Residential Land Use Based Screening Criteria

Independent of the screening criteria for non-retail and retail projects, certain projects that further the State's affordable housing goals are presumed to have less than significant impact on VMT. If the project requires a discretionary action and the answer is yes to the question below, further analysis is not required, and a less than significant determination can be made.

- Are 100% of the units, excluding manager's units, set aside for lower income households²?

Section 3.1.3. - Impact Criteria

The project has a potentially significant VMT impact if it meets one or more of the criteria listed below. The impact criteria below are considered as potential options that may be selected as thresholds for determining significance. These impact criteria below are based on guidance published by OPR² and CARB³ but their applicability to a specific project shall be justified with substantial evidence and is not presumed to be appropriate.

- Residential Projects The project's residential VMT⁴ per capita would not be 16.8%³ below the existing residential VMT⁴ per capita for the Baseline Area in which the project is located (Table 3.1.3.-1),
- Office Projects. The project's employment VMT⁵ per employee exceeding would not be 16.8%³ below the existing employment VMT⁵ per employee for the Baseline Area in which the project is located (see Table 3.1.3.-1),
- Regional Serving Retail Projects. The project would result in a net increase² in existing total VMT (see Table 3.1.3.-1),
- Land Use Plans. The plan total VMT per service population⁶ (residents and employees) would not be 16.8%³ below the existing VMT per service population⁶ for the Baseline Area in which the plan is located (see Table 3.1.3.-1),
- For other land use types, please contact Public Works to determine which of the above are an appropriate threshold of significance to be utilized (see Table 3.1.3.-1).

Table 3.1.3-1 provides the Baseline VMT for the North and South areas of the County at the time these guidelines were prepared. The Baseline VMT applied in the Transportation Impact Analysis should be consistent with the year that the transportation study begins as defined in the Scoping Document.

³ As referenced by the VMT reduction goals discussed in the California Air Resources Board, 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Goals, January 2019, Figure 3.

⁴ Residential VMT is the VMT generated by Home-Based Work and Home-Based Other trip productions.

⁵ Employment VMT is the VMT generated by Home-Based Work trip attractions.

⁶ Service population is the sum of the number residents and the number of employees

Table 3.1.3.-1 – Baseline VMT for North and South County

Baseline Area	Residential VMT per Capita	Employment VMT per Employee	Total VMT per Service Population
North County	22.3	19.0	43.1
South County	12.7	18.4	31.1

The geographic boundaries for the North County and South County Baseline Areas are shown in Figure 3.1.3-1.

Figure 3.1.3.-1 North and South County Baseline VMT Boundaries

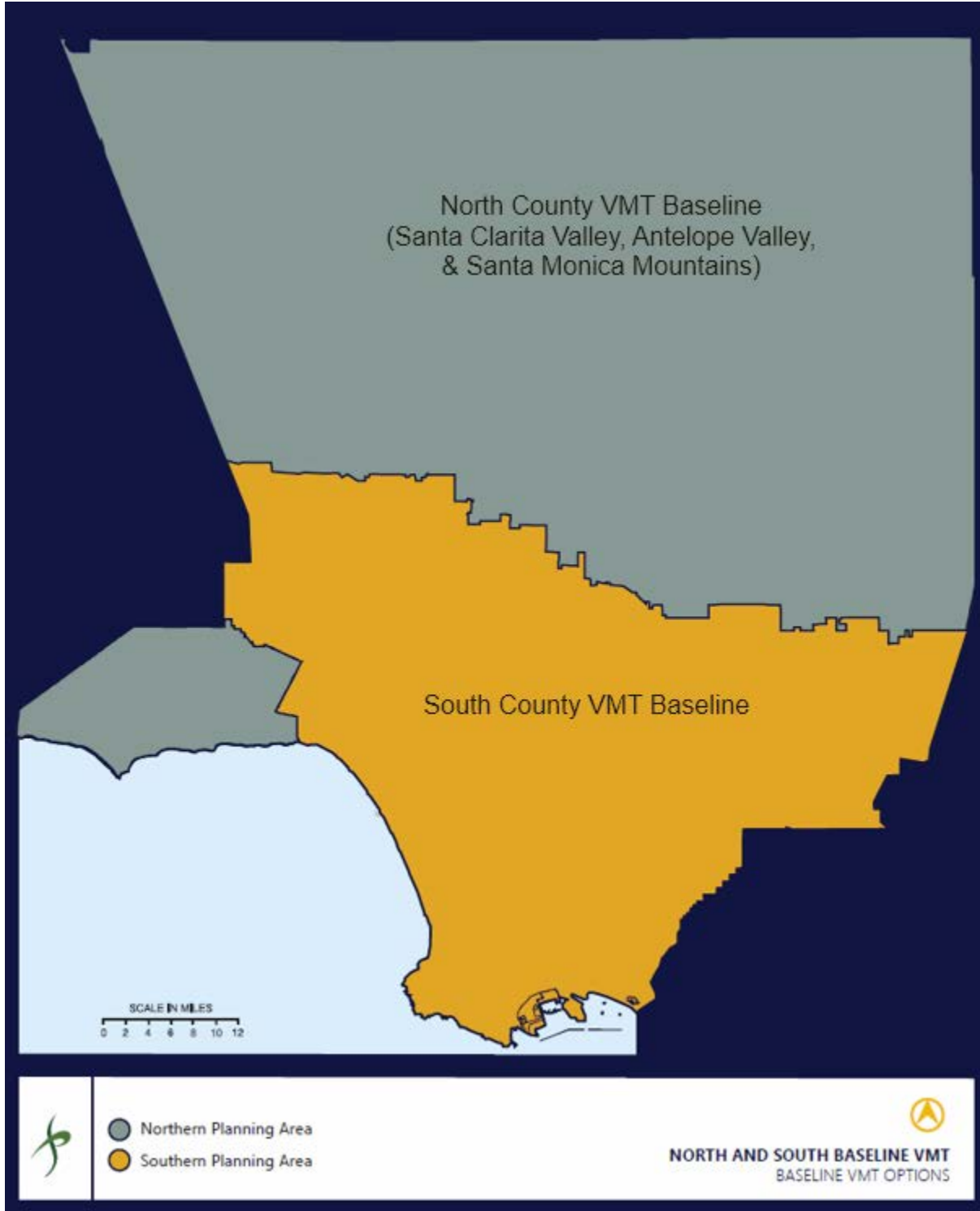


Table 3.1.3.-2 – VMT Impact Criteria (16.8% Below Area Baseline)

Baseline Area	Residential VMT per Capita	Employment VMT per Employee	Total VMT per Service Population (residents and employees)
North County	18.6	15.8	35.9
South County	10.6	15.3	25.9

Section 3.1.4. - Methodology

Section 3.1.4.1 - Evaluation

Screening and impact evaluation should be conducted for the following types of development projects:

- Non-Retail Land Uses:
 - Residential Land Uses:
 - Single-family housing,
 - Multi-family housing,
 - Affordable housing (for lower income households).
 - Office, Manufacturing, or Institutional Land Uses:
 - General office,
 - Medical office,
 - Light industrial,
 - Manufacturing,
 - Warehousing/self-storage,
 - K-12 schools,
 - College/university,
 - Hotel/motel.
- Retail Land Uses:
 - General retail,
 - Furniture store,
 - Pharmacy/drugstore,
 - Supermarket,
 - Bank,
 - Health club,
 - Restaurant,
 - Auto repair,
 - Home improvement superstore,
 - Discount store,
 - Movie theater.

The land uses described above are not intended to be inclusive of every project-type reviewed by Public Works and subject to CEQA. For these and all other land uses, the appropriate screening criteria and impact evaluation shall be determined on a project-by-project basis.

Section 3.1.4.2. - Project Impact Determination

- Residential Projects: Daily vehicle¹ trips, daily VMT, and daily residential VMT⁴ per capita for residential projects should be estimated using the SCAG RTP/SCS Travel Demand Forecast Model (as described in the Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷). Transportation demand management strategies to be included as project design features should be considered in the estimation of a project's daily vehicle trips and VMT (see Section 3.1.5 regarding TDM strategies),
- Office Projects: Daily vehicle¹ trips, daily VMT, and daily employment VMT⁵ per employee for office projects should be estimated using the SCAG RTP/SCS Travel Demand Forecast Model (as described Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷). Transportation demand management strategies to be included as project design features should be considered in the estimation of a project's daily vehicle trips and VMT,
- Regional Serving Retail Projects: The Scoping Document prepared by the project applicant and Public Works will outline one of the following methods for impact determination:
 - Preparation of a market-study-based transportation analysis submitted by the project applicant that demonstrates the project area is underserved for the proposed retail use and that the project will shorten existing shopping trips by creating an intervening location between trip origins and current retail destinations.
 - Run the SCAG RTP/SCS Travel Demand Forecasting Model (as described in the Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷) with and without the project. Since the overall number of trips in the model is based on home-based trips and is balanced to home-trip productions, the total number of trips will not be influenced materially by the introduction of the additional retail space. Rather, the model will redistribute home-shopping trips from other retail destinations to the proposed retail destination,
 - If the project is entirely retail, the following steps apply:
 - Determine the traffic analysis zone (TAZ) in which the project is located,

⁷ Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report, Fehr & Peers, June 2020

- Convert the project retail land uses into the appropriate employment categories utilized in the model and adjust the socioeconomic parameters in the TAZ appropriately to reflect removal of existing land uses and addition of the project,
 - Run the four-step model process for the model existing base year for the four-time periods in the model (AM peak period, midday period, PM peak period, nighttime period) for the base (“no project”) scenario and for the “plus project” scenario,
 - Calculate total VMT on the model network for each time period and sum to determine daily VMT for each scenario. The total VMT should capture both employee and home-shopping trips. Subtract the daily VMT for the base scenario from the daily VMT for the “plus project” scenario to determine the net change in daily VMT.
- If the proposed project is a mixed-use development including more than 50,000 square feet of retail, conduct steps similar to those described above. However, first create a “without retail” model scenario that includes the rest of the project’s proposed land uses and then create and run the four-step model for this “with retail” scenario. Subtract the daily VMT for the “without retail” scenario from the daily VMT for the “with retail” scenario to determine the net change in daily VMT.
- Land Use Plans: Daily vehicle¹ trips, daily VMT, and daily total VMT per service population⁶ for land use plans should be estimated using the SCAG RTP/SCS Travel Demand Forecast Model (as described Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷). Transportation demand management strategies to be included as project design features should be considered in the estimation of a project’s daily vehicle trips and VMT,
 - Unique Land Uses: Some projects will not fit into one of the above categories. In such cases, a customized approach may be required to estimate daily trips and VMT. The methodology and thresholds to be used in such cases should be developed in consultation with and approved by Public Works staff at the outset of the study,
 - Mixed-Use Projects: The project VMT impact should be considered significant if any (one or all) of the project land uses exceed the impact criteria for that particular land use, taking credit for internal capture. In such cases, mitigation options that reduce the VMT generated by any or all of the land uses could be considered.

Section 3.1.4.3. - Cumulative Impacts Determination

Land use projects should consider both short- and long-term project effects on VMT. Short-term effects will be evaluated in the detailed project-level VMT analysis. Long-term, or cumulative effects is determined through consistency with the SCAG RTP/SCS. The

RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. As such, projects that are consistent with this plan in terms of development location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. Development in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation. However, if a project does not demonstrate a significant impact in the project impact analysis, a less than significant impact in the cumulative impact analysis can also be determined. Projects that fall under the RTP/SCS's efficiency-based impact thresholds are already shown to align with the long-term VMT and greenhouse gas reduction goals of SCAG's RTP/SCS.

Land use projects that: (1) demonstrate a project impact after applying an efficiency based VMT threshold and (2) are not deemed to be consistent with the SCAG RTP/SCS could have a significant cumulative impact on VMT. Further evaluation would be necessary to determine whether the project's cumulative impact on VMT is significant. This analysis could be conducted by running the SCAG RTP/SCS Travel Demand Forecasting Model (as described in the Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷) with the cumulative "no project" scenario representing the RTP/SCS cumulative year conditions and the cumulative "plus project" scenario representing the reallocation of the population and/or employment growth based on the land supply changes associated with the proposed project. Baseline Area VMT, residential VMT per capita, or employment VMT per employee (depending on project type) would be calculated for both scenarios, and any increase in VMT, residential VMT per capita, or employment VMT per employee (depending on project type) above that which was forecasted in the RTP/SCS would constitute a significant impact.

When specifically evaluating the VMT impacts of regional-serving retail, the cumulative analysis would include additional steps under the project impact methodology to compare a cumulative "plus project" scenario with the cumulative "no project" scenario. The cumulative "no project" scenarios represents the adopted RTP/SCS cumulative year conditions (as incorporated into the SCAG RTP/SCS model). This would involve the following additional steps:

- Determine the traffic analysis zone (TAZ) in which the project is located,
- Convert the project land uses into the appropriate employment categories utilized in the RTP/SCS horizon year model. Adjust the socioeconomic parameters in the TAZ appropriately to reflect removal of the existing land uses and addition of the project,
- Run the four-step model process for the model's cumulative "no project" scenario for the four-time periods in the model (AM peak period, midday period, PM peak period, nighttime period). Then do the same for the base cumulative "no project" scenario and for the cumulative "plus project" scenario,
- Calculate total VMT on the model's network for each time period as well as the sum total to determine daily VMT for each scenario. Subtract the daily VMT for the

base cumulative “no project” scenario from the daily VMT for the cumulative “plus project” scenario to determine the net change in daily VMT.

Land use plans that: (1) demonstrate a project impact after applying an efficiency based VMT threshold and (2) are not deemed to be consistent with the SCAG RTP/SCS could have a significant cumulative impact on VMT. Further evaluation would be necessary to determine whether the Plan’s cumulative impact on VMT is significant. This analysis could be conducted by running the SCAG RTP/SCS Travel Demand Forecasting Model (as described in the Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷) with the cumulative “no project” scenario representing the RTP/SCS cumulative year conditions and the cumulative “plus project” scenario representing the reallocation of the population and/or employment growth based on the land supply changes associated with the proposed plan. Total VMT and VMT per service population would be calculated for both scenarios, and any increase in VMT above that which was forecasted in the RTP/SCS would constitute a significant impact.

Section 3.1.5. - Mitigation

Section 3.1.5.1. - Development Project Mitigations

Potential mitigation measures for a development project’s VMT impacts can include the following:

- Transportation demand management (TDM) strategies beyond those that will be included as project design features. These strategies shall be demonstrated to be effective in reducing VMT. Some of these may include, but are not limited to, the following described in Table 3.1.5-1 below. Substantial evidence should be provided to the Public Works to support the claimed effectiveness of the measure(s),

Table 3.1.5-1: TDM Strategies

Category	Measure
Commuter Trip Reduction	<ul style="list-style-type: none"> • Commute Trip Reduction Programs with Required Monitoring • Ride Sharing Programs • Subsidized or Discounted Transit Programs • Telecommuting • Alternative Work Schedules
Land Use/Location	<ul style="list-style-type: none"> • Increase Transit Accessibility
Parking Policy/Parking	<ul style="list-style-type: none"> • Unbundle parking
Neighborhood/Site Enhancement	<ul style="list-style-type: none"> • Pedestrian Network Improvements • Traffic Calming Measures • Car Sharing Programs

- Additional TDM measures beyond those listed above may be considered, if such measure is used to quantitatively reduce a project’s VMT estimate. Substantial evidence should be provided to Public Works to support the effectiveness of the measure,
- For a single-use project, introducing compatible additional land uses to allow for internalization of trips,
- For a mixed-use project, modifying the project’s land use mix to increase internalization of trips, reduce external trip generation, and serve the local community.

Section 3.1.5.2. - Land Use Plans Mitigations

Potential mitigation measures for land use plan VMT impacts can include:

- Reallocation of future land use development to increase land use variety and density in transportation-efficient locations (e.g., proximity to jobs and housing, proximity to transit, proximity to services),
- Measures to enhance the public transit system and/or connections to the system including active transportation mode improvements, such as infrastructure improvements, programs, or education and marketing,
- Measures to encourage reduced reliance on automobile trips and encourage transit and active transportation modes.

Section 3.2. - Transportation Projects

Section 3.2.1. - Introduction

Transportation projects that increase vehicular capacity can lead to additional travel on the roadway network, which can include induced vehicle travel due to factors such as increased speeds and induced growth. To provide consistency across transportation projects and achieve the County's sustainability goals, the screening criteria for transportation impacts is based on the question below:

- For a transportation project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(2)?

For transportation projects, the intent is to assess whether a transportation project induces substantial additional VMT. The following screening criteria and impact criteria are meant to serve as guidance for projects to determine whether a Transportation Impact Analysis should be performed, and whether a project generates a significant transportation impact. The criteria will be considered on a project-by-project basis as approved by Public Works.

Section 3.2.2. - Screening Criteria

If the answer is no to the following question, further analysis will not be required, and a less than significant impact determination can be made for that threshold:

- Would the project include the addition of through traffic lanes on existing or new highways, including general purpose lanes, high-occupancy vehicle (HOV) lanes, peak period lanes, auxiliary lanes, and lanes through grade-separated interchanges (except managed lanes, transit lanes, and auxiliary lanes of less than one mile in length designed to improve roadway safety)²?

Transit and active transportation projects and projects that reduce roadway capacity generally reduce VMT and, therefore, are presumed to cause a less-than-significant impact. Transportation projects that are not likely to lead to a substantial or measurable increase in vehicle travel and would, therefore, not be required to prepare an induced travel analysis supported by the OPR technical advisory², are listed below:

- Rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets (e.g., highways; roadways; bridges; culverts; Transportation Management System field elements such as cameras, message signs, detection, or signals; tunnels; transit systems; and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle capacity,
- Roadside safety devices or hardware installation such as median barriers and guardrails,

- Roadway shoulder enhancements to provide "breakdown space" - dedicated space for use only by transit vehicles, to provide bicycle access, or to otherwise improve safety, but which will not be used as automobile vehicle travel lanes,
- Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety,
- Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, two-way left turn lanes, or emergency breakdown lanes that are not utilized as through lanes,
- Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit,
- Conversion of existing general-purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially increase vehicle travel,
- Addition of a new lane that is permanently restricted to use only by transit vehicles,
- Reduction in number of through lanes,
- Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane to separate preferential vehicles (e.g., high-occupancy vehicles [HOV], high-occupancy toll [HOT], or trucks) from general vehicles,
- Installation, removal, or reconfiguration of traffic control devices,
- Installation of traffic metering systems, detection systems, cameras, changeable message signs and other electronics designed to optimize vehicle, bicycle, or pedestrian flow,
- Timing of signals to optimize vehicle, bicycle or pedestrian flow,
- Installation of roundabouts or traffic circles,
- Installation or reconfiguration of traffic calming devices,
- Adoption of, or increase, in tolls,
- Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase.
- Initiation of new transit service,
- Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes,
- Removal or relocation of off-street or on-street parking spaces,
- Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs),
- Addition of traffic wayfinding signage,
- Rehabilitation and maintenance projects that do not add motor vehicle capacity,

- Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way,
- Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel,
- Installation of publicly available alternative fuel/charging infrastructure,
- Adding of passing lanes, truck climbing lanes, or truck brake-check lanes in rural areas that do not increase overall vehicle capacity along the corridor.

Section 3.2.3. – Impact Criteria

The project has a potentially significant VMT impact if it meets the criteria listed below. The impact criteria below are considered as a potential option that may be selected as thresholds for determining significance. The impact criteria below is based on guidance published by OPR², but their applicability to a specific project shall be justified with substantial evidence and is not presumed to be appropriate.

- The project will increase the project area VMT, as measurable by the SCAG RTP/SCS base year Travel Demand Forecasting Model plus an induced travel elasticity factor per lane mile².

Section 3.2.4. - Methodology

Section 3.2.4.1. - Project Impacts Determination

The County utilizes the SCAG RTP/SCS Travel Demand Forecasting Model (as described in the Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷) that is suitable for assessing change in VMT due to a given roadway project in its land use/transportation context. This model should be used to calculate the change in VMT from transportation projects that, by definition, are considered to have the potential for inducing VMT.

For the direct measurement of project impacts, the SCAG RTP/SCS model's base year network should be modified to reflect the vehicle capacity-enhancements that would result from the proposed transportation project. The base year model should be run with and without the proposed transportation project, without adjusting the model's land use inputs, to isolate the potential change in network VMT with the project as compared to the baseline. The assessment should cover the full area in which driving patterns are expected to change and include supporting evidence for why such area was selected.

The SCAG RTP/SCS model is capable of adjusting trip lengths, mode split, and route choice in response to network changes. However, the model does not include the ability to modify land use in response to changes to the transportation system and will not increase trips to reflect latent demand. Therefore, such induced travel should be estimated by applying an induced demand elasticity factor available from appropriate academic literature.

Accordingly, the VMT impact of a transportation project shall be calculated as the direct change in VMT as estimated by the SCAG RTP/SCS model (as described in the Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷) with and without the project plus a factor for induced demand calculated as follows:

- Run the SCAG RTP/SCS model with and without the transportation project to isolate the potential direct change in network VMT due to changes in trip length, mode split, and route choice,
- Using the SCAG RTP/SCS model, determine the total modeled lane-miles over the project area that fully captures travel behavior changes resulting from the project,
- Determine the percent change in total lane miles that will result from the project,
- Using the SCAG RTP/SCS model, determine the total existing VMT over that same area,
- Multiply the percent increase in lane miles by the existing VMT and then multiply that by the elasticity factor from the latest induced travel literature to determine the induced VMT,
- Add the induced VMT to the modeled change in network VMT due to trip length, mode split, and route choice.

Section 3.2.4.2. - Cumulative Impacts Determination

Analyses should consider both short- and long-term project effects on VMT. Short-term effects will be evaluated in the project-level VMT analysis described above. Long-term, or cumulative, effects will be determined through consistency with the SCAG RTP/SCS. The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) reduction targets. As such, transportation projects that are included in this plan are part of the regional solution for meeting air pollution and GHG reduction goals. Transportation projects that are deemed to be consistent would have a less than significant cumulative impact on VMT.

Transportation projects that are not deemed to be consistent could have a significant cumulative impact on VMT. Further evaluation would be necessary to determine whether such a project's cumulative impact on VMT is significant. This analysis would be conducted by running the RTP/SCS cumulative year conditions and the cumulative "plus project" scenario (as described in the Los Angeles County Senate Bill (SB) 743 Implementation and CEQA Updates Report⁷) incorporating the network changes due to the proposed transportation project. An induced demand elasticity factor should be applied to any increase in VMT thus determined, and any increase in VMT would constitute a significant impact because it could jeopardize regional air quality conformity or GHG reduction findings.

Section 3.2.5. – Mitigation

Mitigation measures that could reduce the amount of increased vehicle travel induced by capacity increases could include, but not be limited to, the following measures:

- Converting existing general-purpose lanes to HOV lanes, high occupancy toll (HOT) lanes, toll lanes, or bus lanes to encourage carpools and fund transit improvements,
- Implementing or funding off-site mobility improvements, including the initiation of transportation management organizations (TMOs),
- Implementing intelligent transportation systems (ITS) strategies to improve passenger throughput on existing lanes,
- Additional measures beyond those listed above, may be considered, if such measures are used to quantitatively reduce a project's VMT estimate, substantial evidence should be provided to support the claimed effectiveness of the measure(s).

Section 4. – Site Access Studies

Section 4.1. – Operational Analysis

Section 4.1.1. - Introduction

The site access and circulation constraints related to the provision of access to and from the project site may be analyzed as part of the project's environmental review. The analysis should address the site access and circulation needs of vehicles, bicycles and pedestrians. If the operation analysis is determined to be necessary in consultation with Public Works, operational performance may be quantified for primary site access points, unsignalized intersections integral to the project's site access, and signalized intersections in the vicinity of the project site.

Section 4.1.2. - Screening Criteria

Section 4.1.2.1. - Development Projects

For development projects, if the answer is yes to the following questions, further analysis may be required to assess whether the project would negatively affect project access and circulation:

- Is the project required to submit a Transportation Impact Analysis?
- Does the development project involve a discretionary action that would be reviewed by the Department of Regional Planning?

Section 4.1.3. - Evaluation Criteria

Section 4.1.3.1. - Operational Deficiencies

The Transportation Impact Analysis should include a quantitative evaluation of the project's expected access and circulation operations. Project access is considered constrained if the project's traffic would contribute to unacceptable queuing at nearby signalized intersections. Unacceptable or extended queuing may be defined as follows:

- Spill over from turn pockets into through lanes,
- Spill over into intersections.

Section 4.1.4. - Methodology

Section 4.1.4.1. - Level of Service and Queueing Methodology

Intersection level of service (LOS) and queueing methodologies from the latest edition of the Transportation Research Board Highway Capacity Manual (HCM) should be used to evaluate the operation of the project driveways and nearby intersections. For individual

isolated intersection analysis, the use of software packages such as Synchro, Vistro, or HCS that implement the HCM methodologies is acceptable.

Where oversaturated conditions currently exist, the operational analysis should be conducted using Synchro/SimTraffic or VISSIM simulation models to more accurately reflect the effect of downstream congestion on intersection operations. VISSIM should be used in areas with transit lanes or with high levels of pedestrians conflicting with vehicle turning movements

Section 4.1.4.2. - Study Area

Study locations should be determined in consultation with Public Works and should include:

- All primary project driveway(s),
- Unsignalized and/signalized intersections that are adjacent to the project or that are expected to be integral to the project's site access and circulation plan,
- Additional intersections may be necessary as determined by Public Works.

For most projects, analyze traffic for both the a.m. and p.m. weekday peak hours as determined by 24-hour traffic counts. For some projects, expanding the analysis to include midday or weekend periods may be appropriate if these are expected to be the prime periods of trip generation for the project.

Section 4.1.4.3. - Traffic Counts

Traffic counts should generally be conducted per the following guidance and by Section 4.1.4.2., unless otherwise directed by Public Works:

- Turning movement data at the study intersections:
 - Should be collected in 15-minute intervals,
 - Must include vehicle classifications, pedestrian volume counts, and bicycle counts,
 - Must include a minimum of 2 hours of traffic counts for each of the peak hours,
 - Must be taken on Tuesdays, Wednesdays or Thursdays,
 - Must exclude holidays, and the first weekdays before and after the holiday,
 - Must be taken on days when local schools or colleges are in session,
 - Must be taken on days of good weather, and avoid atypical conditions (e.g., road construction, detours, or major traffic incidents),
- Traffic counts used from other traffic studies in the area may be use if they are reviewed and approved by Public Works.

When simulation analyses are to be conducted, obtain traffic speed and/or travel time data during peak periods to aid in calibration of the simulation model.

Section 4.1.4.4. - Project Trip Distribution

Distribution patterns for project trips should be determined considering a number of factors including, but not limited to, the following:

- Characteristics of the street system serving the project site,
- Level of accessibility of routes to and from the proposed project site,
- Locations of employment and commercial centers,
- Locations of residential areas.

The Transportation Impact Analysis shall include map(s) showing project trip distribution percentages (inbound and outbound) at the study intersections, and project driveway(s). This map shall be pre-approved by Public Works and included in the Transportation Impact Analysis Scoping Document.

Section 4.1.4.5. - Traffic Forecasts

The Transportation Impact Analysis shall estimate traffic conditions for the study horizon year selected during the scoping phase and recorded in the executed Scoping Document. The study shall clearly identify the horizon year and annual ambient growth rate used for the study. For development projects constructed in phases over several years, the Transportation Impact Analysis should analyze intermediary milestones before the buildout and completion of the project. The annual ambient growth rate shall be determined by Public Works staff during the scoping process and can be based on the most recent SCAG Regional Transportation Model or other empirical information approved by Public Works.

The Transportation Impact Analysis shall consider trip generation for known development projects within one-half mile (2,640 foot) radius of the farthest outlying study intersections. Consultation with the Department of Regional Planning or other planning agencies will be required to compile a related projects list.

The traffic forecasts for the project access and circulation constraints are determined by adding project-generated trips to future base traffic volumes, including ambient growth and related projects and conducting the operational analysis.

Any programmed and funded transportation system improvements that are expected to be implemented on or before the project buildout year should be identified in the study, in consultation with Public Works. If programmed improvements include a modification to the existing lane configuration at any of the study intersections, then the study should identify these changes and include the revised lane configuration in the LOS calculations for all future scenarios.

Section 4.1.5. – Recommended Action

Potential corrective actions for project access and circulation constraints can include, but are not limited to:

- Installation of a traffic signal or stop signs or electronic warning devices at site access points,
- Redesign and/or relocation of project access points,
- Redesign of the internal access and circulation system,
- Installation of stop-signs and pavement markings internal to the site,
- Restriction or prohibition of turns at site access points,
- Installation of new traffic signal, left-turn signal phasing, or other vehicle flow enhancements at nearby intersections,
- Reconfiguration of study intersections that reduces gridlock and unsafe conflict points.

Any of the above-mentioned actions shall be recommended in accordance with California Manual on Uniform Traffic Control Devices (CA MUTCD) warrants and criteria, or other criteria deemed appropriate by Public Works.

Section 4.2 – Construction Phase Analysis

Section 4.2.1. - Introduction

This category addresses activities associated with project construction and major in-street construction of infrastructure projects.

Section 4.2.2. - Screening Criteria

If the answer is yes to any of the following questions, further analysis will be required to assess if the project could negatively affect existing pedestrian, bicycle, transit, or vehicle circulation:

- For projects that require construction activities to take place within the right-of-way of a highway, would it be necessary to close any temporary lanes, alleys, or streets for more than one day (including day and evening hours, and overnight closures if on a residential street)?
- For projects that require construction activities to take place within the right-of-way of a Local Street, would it be necessary to temporarily close any lanes, alleys, or streets for more than seven days (including day and evening hours, and including overnight closures if on a residential street)?
- Would in-street construction activities result in the loss of any vehicle, bicycle, or pedestrian access, including loss of existing bicycle parking to an existing land use for more than one day, including day and evening hours and overnight closures if access is lost to residential units?
- Would in-street construction activities result in the loss of any ADA access to an existing transit station, stop, or facility (e.g., layover zone)?

- Would in-street construction activities restrict access to any bus stops for more than one day, or necessitate any rerouting of a bus route?
- Would construction of a project interfere with pedestrian, bicycle, transit, or vehicle circulation and accessibility to adjoining areas?

Please note, that further analysis may determine that a project construction analysis may be required as determined by Public Works.

Section 4.2.3. - Evaluation Criteria

Factors to be considered as part of the construction phase analysis are: location of the project site, functional classification of the adjacent street, availability of alternate routes or additional capacity, temporary loss of bicycle parking, temporary loss of bus stops or rerouting of transit lines, duration of temporary loss of access, affected land uses, and magnitude of the temporary construction activities.

- Temporary transportation constraints:
 - Length of time of temporary street closures or closures of one or more travel lanes,
 - Classification of the street (major arterial, state highway) affected,
 - Existing congestion levels on the affected street segments and intersections,
 - Direct access to freeway on- or off-ramp or other state highway,
 - Presence of emergency services (fire, hospital, etc.) located nearby that regularly use the affected street,
- Temporary loss of access:
 - Length of time of any loss of pedestrian or bicycle circulation outside the construction zone,
 - Length of time of any loss of vehicular, bicycle, or pedestrian access to a parcel within the construction zone,
 - Length of time of any loss of ADA pedestrian access to a transit station, stop, or facility,
 - Availability of nearby vehicular or pedestrian access within 1/2 mile of the lost access,
- Temporary Loss of Bus Stops or Rerouting of Bus Lines:
 - Days and times during which an existing bus stop would be unavailable or existing service would be interrupted,
 - Availability of a nearby location (within 1/2 mile) to which the bus stop or route can be temporarily relocated,
 - Existence of other bus stops or routes with similar routes/destinations within a 1/2- mile radius of the affected stops or routes,
 - Time of interruption on a weekday, weekend or holiday, and whether the existing bus route typically provides service on those day(s).

Section 4.2.4. – Methodology

Describe the physical setting, including the classification of adjacent streets, on-street parking conditions, including bicycle parking, in the immediate vicinity of the construction project, a description of the land uses potentially affected by construction, and an inventory of existing transit lines, bus stops, transit stations, and transit facilities within a 1/2-mile radius of the construction site. Review proposed construction procedures/plans to determine whether construction activity within the street right-of-way would require any of the following:

- Closure of street, sidewalk, or lanes,
- Blocking existing vehicle, bicycle, or pedestrian access along a street or to parcels fronting the street,
- Modification of access to transit stations, stops, or facilities during service hours,
- Closure or movement of an existing bus stop or rerouting of an existing bus line.
- Creation of transportation hazards.

Compare the results to the evaluation criteria to determine the level of deficiency.

Section 4.2.5. - Recommended Action

Potential corrective conditions for project construction constraints can include but are not limited to:

- Implement traffic management plan, including traffic control plans,
 - Consult with Public Works if temporary closure of a travel lane may be necessary to stage equipment in the public right-of-way,
- Modify construction procedures,
- Limit major road obstructions to off-peak hours,
- Coordinate with emergency service and public transit providers,
- Provide alternative vehicular, bicycle, and/or pedestrian access to affected parcels. Consult with Public Works if temporary closure of a travel lane may be necessary to maintain adequate pedestrian and bicycle access as part of the traffic management plan,
- Coordinate access with adjacent property owners and tenants,
- Coordinate with transit agency regarding maintenance of ADA access to transit stations, stops, and transit facilities (e.g., layover zones),
- Coordinate with transit providers regarding need to temporarily close or relocate bus stops or reroute service.

Section 4.3. – Local Residential Street Cut-Through Analysis

Section 4.3.1. - Introduction

Development and transportation projects may be required to conduct a Local Residential Street Cut-Through Analysis (LRSTM). The objective of this analysis is to determine

potential increases in average daily traffic (ADT) volumes on designated Local Streets near a project that can be classified as cut-through trips generated by the project, and that can adversely affect the character and function of those streets. Cut-through trips are defined as trips along a street classified as a Local Street in the County's General Plan, with residential land-use frontage, as an alternative to trips along a highway defined as Limited Secondary, Secondary, Major, Parkway, or Expressway as designated in the County's General Plan for purposes of accessing a destination that is not within the neighborhood within which the Local Street is located.

Cut-through traffic may result from development projects that add vehicle trips to congested arterial street segments, or by transportation projects that reduce vehicular capacity on highway street segments. To mitigate potential adverse impacts from cut-through traffic (e.g., congestion, access issues, and speeding on Local Streets), traffic calming and diverting features should be considered and, if deemed appropriate by Public Works, implemented to offset any anticipated cut-through traffic.

Section 4.3.2. - Screening Criteria

Section 4.3.2.1. - Development Projects

If the answer is yes to the following questions, further analysis may be required to assess whether the project would negatively affect residential streets:

- Is the project required to submit a Transportation Impact Analysis?
- Does the development project involve a discretionary action that would be reviewed by the Department of Regional Planning?

In addition, for development projects to which all of the following circumstances apply, select local residential street segments for analyses during the transportation assessment scoping process:

- The project is located along a current Limited Secondary, Secondary, Major, Parkway, Expressway per the County's General Plan and the study intersections under project build-out conditions (as determined in Section 4.1) operate at a peak hour LOS E or LOS F.
- The project has a potential, based on connectivity to the roadway network, to add automobile traffic to the alternative local residential street route(s) during peak hours,
- An alternative local residential street route (defined as local streets as designated in the County's General Plan passing through a residential neighborhood) provide motorists with a viable alternative route. A viable alternative local residential street route is defined as one which is parallel and reasonably adjacent to the primary route as to make it attractive as an alternative to the primary route. The project applicant in consultation with Public Works shall define which routes are viable

alternative routes, based on, but not limited to, features such as geography and presence of existing traffic control devices, and other criteria as determined by Public Works.

For the purpose of screening for daily vehicle trips, a proposed project's daily vehicle trips should be estimated using the most recent edition of the ITE Trip Generation Manual. If the project proposed land use is not listed in the ITE Trip Generation Manual, please submit a trip generation study to Public Works for review and approval.

Section 4.3.3. - Methodology

Section 4.3.3.1. - Development Projects

Future peak hour "without project" traffic conditions for the study intersections in the vicinity of the project identified in Section 4.1 should be developed using the intersection analysis methodologies, including an ambient growth rate to the study horizon year and adding traffic generated by related projects. Future "without project" daily traffic volumes for the local residential streets included in the analysis should be developed by collecting daily traffic counts for the subject streets, adding an ambient growth rate to the study horizon year, and adding traffic generated by related projects, also using methodologies described in Section 4.1.

The methodologies described in Section 4.1 should be applied to estimate the daily and peak hour trip generation of the project and distribute the project trips to the street system to forecast the amount of project traffic that may be added to nearby congested highways. If the nearby study intersections are projected to operate at LOS E or F, the analysis shall include the following:

- Estimate the amount of peak hour project traffic that may instead shift away from the congested facilities to local residential streets,
- Estimate the amount of daily project traffic that may shift to local residential streets, considering that the street system is less congested during non-peak hours than during peak hours,

Section 4.3.4. - Recommended Action

If the analysis indicated the project may result in substantial diversion, the project applicant shall conduct public outreach and develop a Local Residential Street Cut-Through (LRSTM) Plan. The project applicant shall consult with Public Works, and neighborhood stakeholders, and any other stakeholders to collaboratively prepare the LRSTM Plan. Coordination with the appropriate Supervisorial District office may be necessary to designate the stakeholders that should facilitate the public outreach.

The project applicant shall submit a separate scoping document for the LRSTM Plan to Public Works for review and approval as part of the Transportation Impact Analysis which shall include the following items:

- Identify key milestones,
- Summarize the proposed process in developing a LRSTM plan for the local residential street segments of concern,
- Define a public outreach and consensus- building process,
- Propose selection and approval criteria for any evaluated traffic calming measures,
- Provide a funding plan which will include potential sources of funding.

The project applicant shall submit the LRSTM Plan with a cost estimate for the improvements, and a funding plan to Public Works for review and approval, prior to issuance of building permit. The LRSTM Plan shall be prepared in conformance with the guidelines established by Public Works and should contain, at a minimum, the following elements:

- Description of existing facilities and neighborhood traffic conditions,
- Description of proposed neighborhood traffic controls, including sketches of specific street modifications,
- Analysis of any change in existing or future traffic patterns as a result of implementation of the plan,
- Implementation and monitoring program.

The project applicant shall lead public outreach in consultation with Public Works and the affected Supervisorial District office.

The development of the LRSTM plan shall include the analysis of any relevant traffic data, roadway characteristics, and conditions of the local residential street segments of concern.

The LRSTM Plan should prioritize implementing effective traffic calming subject to Public Works guidelines and appropriate warrants, which may include, but is not limited to:

- Traffic circles,
- Speed humps,
- Roadway narrowing effects (raised medians, traffic chokers, etc.),
- Landscaping features,
- Roadway striping changes,
- Traffic control devices,
- Restrictive measures such as turn restrictions, physical barriers, diverters, signal metering, etc.,
 - Restrictive measures should be carefully evaluated to ensure that they do not lead to the diversion of a significant amount of traffic from one local residential street to another local residential street.

For these above-mentioned items, the project applicant shall also be responsible for conducting the engineering evaluation of the potential measures to determine the feasibility regarding drainage, constructability, street design and other pertinent elements.

Section 4.4 - Additional Site Access Analysis

Section 4.4.1 - Introduction

Project access and circulation constraints related to the site plan, and access to and from the project site may be analyzed separately from the Transportation Impact Analysis.

Section 4.4.2. - Screening Criteria

If the answer is yes to any of the following question, additional site access studies may be required to assess the projects site access requirements:

- Would the project provide a driveway on a rural cross section two-lane highway per the County's General Plan?
- Does the project's land use require vehicles to queue on-site?
- Does the project's land use include intermittent events which may exceed the supply of on-site parking?

Section 4.4.3. - Evaluation and Methodology

The project applicant shall prepare and submit a Scoping Document to Public Works through the EPIC-LA portal. The Scoping Document describes the assumptions and parameters that shall be included in the Additional Site Access Studies including any analysis requirements. The additional site access studies required based on the screening criteria from Section 4.4.2. are listed below

- Public Works may evaluate the site access requirements for a driveway on a rural two-lane highway by requesting a Traffic Access Management Study to be conducted,
- Public Works may evaluate the site access requirements for vehicular queuing by requesting a Traffic Queueing Analysis to be conducted,
- Public Works may evaluate the site access requirements for land use with intermittent events that will exceed the supply of on-site parking by requesting a Traffic Event Management Study to be conducted.

Section 4.4.4. - Recommended Actions

Potential corrective actions for project access and circulation will be addressed in the additional site access studies and documented in a Traffic Study Confirmation of Findings Letter from Public Works.

Section 5. - Study Format and Required Content

Each Transportation Impact Analysis should follow a consistent format and organization and include all of the figures, maps, and information presented in this section. The level of detail required for each project's Transportation Impact Analysis should be determined during the scoping process and identified in the Scoping Document.

Section 5.1. - Project Description

A Transportation Impact Analysis shall include a detailed project description at the beginning of the document. The project description should include the following information:

- Project case number, as assigned by the Department of Regional Planning (if applicable Tract Map, Parcel Map, Conditional Use Permit, RPPL),
- Location of the project site, address, Assessor's Block and Lot number(s), cross streets, and Supervisorial District, and Unincorporated Community,
- Existing and proposed total square footage for each type of land use and/or the number of residential units, including the net changes for each type of use,
- Transportation demand management measures proposed as part of the project.

This section shall also include the following maps and figures:

- Project site plan showing driveway locations, loading/unloading area,
- Site map showing study intersections and distance of the project driveway(s) from the adjacent intersections. Include location and identification of all major buildings, driveways, parking areas, and loading docks of the project.

Section 5.2. - Site Conditions

The information on the location and surroundings of the project shall be discussed following the project description, as a different section of the Transportation Impact Analysis. This section will provide a brief, but comprehensive description of the existing transportation infrastructure and conditions in the vicinity of the project. The specific boundaries of the Transportation Impact Analysis area, for both the location and surroundings of the project, should be confirmed during the initial discussion and scoping process with Public Works.

The project context section should include the following information, with the level of detail to be directed by Public Works during the scoping process:

- Street designations, classifications, pedestrian and bicycle facilities existing and planned,

- Description of the study area streets, including the number and width of lanes, direction of flow, on-street parking information, and other significant street information,
- Location of, distance from, and routings to and from on-ramps and off-ramps of regional highways and freeways,
- Description of public transit routes operating on the streets within the Transportation Impact Analysis area, including hours of service, peak period headways, type of vehicle (bus, light rail vehicle, etc.), and service provider.

This section of a Transportation Impact Analysis will also include the following maps and figures:

- Area map showing location of the project and related projects,
- Street maps of the study area indicating street names, classifications, and traffic control,
- Map or diagram of potential pedestrian destinations within 1,320 feet of the edge of a project site,
- Table indicating location, size, name, description, and trip generation of each related project.

Section 5.3. - Analysis, Discussion, and Results

Following the descriptions of the project and its surroundings, the Transportation Impact Analysis shall contain sections that detail the analyses conducted, summarize the results, and identify any significant transportation impacts and mitigation measures for each of the CEQA issue areas identified in Section 3, and any operational deficiencies and corrective actions for the additional areas of analysis identified in Section 4.

The Transportation Impact Analysis should include calculations, data, and descriptions of any transportation analyses conducted to determine project impacts on the transportation system. The Transportation Impact Analysis should describe the results of all project scenarios and describe all project impacts that have been identified.

Section 5.4. – Mitigation Measures and Recommended Actions

Section 5.4.1. - Introduction

When a project is expected to result in significant transportation impacts, as defined in Section 3, or transportation deficiencies, as defined in Section 4, the project's consultant should meet with Public Works to discuss potential transportation mitigation options and corrective actions before submitting a Transportation Impact Analysis. A variety of transportation mitigation measures should be considered to mitigate a project's significant transportation impact to a level of insignificance.

All proposed mitigation measures shall be described in the Transportation Impact Analysis and to the satisfaction of Public Works.

Section 5.4.2. - Transportation Demand Management Measures

Mitigation measures shall minimize vehicle miles traveled through Transportation Demand Management (TDM) strategies. A preliminary draft performance based TDM Program shall be included in the Transportation Impact Analysis for any project seeking trip generation amendments supported by TDM, to the satisfaction of Public Works. The applicant may be allowed to reduce the total project trips and VMT by an amount determined to be commensurate with the measures proposed in the TDM Program.

Section 5.4.3. - Physical Infrastructure Improvements

Construction of physical infrastructure improvements shall encourage walking and biking and the use of transit. Conceptual Traffic Signal Plans and Conceptual Signing and Striping Plans should be prepared for any proposed physical infrastructure improvements and should be submitted to Public Works for review and approval as part of the Transportation Impact Analysis.

Section 5.4.4. - Mitigation Monitoring and Reporting Program in CEQA Documents

Each mitigation measure in the project's mitigation monitoring program should be described separately in the CEQA Document. The following details are required for each measure:

- Identification of the agency responsible for monitoring the measure and coordinating all participants,
- Qualifications, if any, of the necessary monitor(s),
- Monitoring schedule (i.e., the phase of the project, frequency, and completion/termination) – this should be stated for physical mitigation measures required during construction as well as those that are for the operation/life of the project (e.g., TDM program),
- Funding required and sources of funding for monitoring activities by both project and County personnel (especially for long-term monitoring activities).

Tom Brohard, PE

Licenses: 1975 / Professional Engineer / California – Civil, No. 24577
1977 / Professional Engineer / California – Traffic, No. 724
2006 / Professional Engineer / Hawaii – Civil, No. 12321

Education: 1969 / BSE / Civil Engineering / Duke University

Experience: 50 Years

Memberships: 1977 / Institute of Transportation Engineers – Fellow, Life
1978 / Orange County Traffic Engineers Council - Chair 1982-1983
1981 / American Public Works Association – Life Member

Tom is a recognized expert in the field of traffic engineering and transportation planning. His background also includes responsibility for leading and managing the delivery of various contract services to numerous cities in Southern California.

Tom has extensive experience in providing transportation planning and traffic engineering services to public agencies. In addition to conducting traffic engineering investigations for Los Angeles County from 1972 to 1978, he has previously served as City Traffic Engineer in the following communities:

- Bellflower 1997 - 1998
- Bell Gardens 1982 - 1995
- Big Bear Lake.....2006 - 2015
- Indio.....2005 - 2019
- Huntington Beach 1998 - 2004
- Lawndale..... 1973 - 1978
- Los Alamitos 1981 - 1982
- Oceanside..... 1981 - 1982
- Paramount 1982 - 1988
- Rancho Palos Verdes 1973 - 1978
- Rolling Hills 1973 - 1978, 1985 - 1993
- Rolling Hills Estates 1973 - 1978, 1984 - 1991
- San Fernando.....2004 - 2019
- San Marcos..... 1981
- Santa Ana 1978 - 1981
- Westlake Village 1983 - 1994

During these assignments, Tom has supervised City staff and directed other consultants including traffic engineers and transportation planners, traffic signal and street lighting personnel, and signing, striping, and marking crews. He has secured over \$10 million in grant funding for various improvements. He has managed and directed many traffic and transportation studies and projects. While serving these communities, he has personally conducted investigations of hundreds of citizen requests for various traffic control devices. Tom has also successfully presented numerous engineering reports at City Council, Planning Commission, and Traffic Commission meetings in these and other municipalities.

In his 14 years of service to the City of Indio, Tom accomplished the following:

- ❖ Oversaw preparation and adoption of the 2008 Circulation Element Update of the General Plan including development of Year 2035 buildout traffic volumes, revised and simplified arterial roadway cross sections, and reduction in acceptable Level of Service criteria under certain conditions.
- ❖ Oversaw preparation of fact sheets/design exceptions to reduce shoulder widths on Jackson Street and on Monroe Street over I-10 as well as justifications for protected-permissive left turn phasing at I-10 on-ramps, the first such installations in Caltrans District 8 in Riverside County; reviewed plans and provided assistance during construction of both \$2 million projects to install traffic signals and widen three of four ramps at these two interchanges under Caltrans encroachment permits.
- ❖ Reviewed traffic signal, signing, striping, and work area traffic control plans for the County's \$45 million I-10 Interchange Improvement Project at Jefferson Street.
- ❖ Reviewed traffic impact analyses for Project Study Reports evaluating different alternatives for buildout improvements of the I-10 Interchanges at Jefferson Street, Monroe Street, Jackson Street and Golf Center Parkway.
- ❖ Oversaw preparation of plans, specifications, and contract documents and provided construction assistance for over 70 traffic signal installations and modifications.
- ❖ Reviewed and approved over 2,000 work area traffic control plans as well as signing and striping plans for all City and developer funded roadway improvement projects.
- ❖ Oversaw preparation of a City-wide traffic safety study of conditions at all schools.
- ❖ Obtained \$47,000 grant from the California Office of Traffic Safety and implemented the City's Traffic Collision Database System. Annually reviews "Top 25" collision locations and provides traffic engineering recommendations to reduce collisions.
- ❖ Prepared over 1,500 work orders directing City forces to install, modify, and/or remove traffic signs, pavement and curb markings, and roadway striping.
- ❖ Oversaw preparation of engineering and traffic surveys to establish enforceable speed limits on over 500 street segments.
- ❖ Reviewed and approved traffic impact studies for more than 35 major projects and special events including the annual Coachella and Stagecoach Music Festivals.
- ❖ Developed and implemented the City's Golf Cart Transportation Program.

Since forming Tom Brohard and Associates in 2000, Tom has reviewed many traffic impact reports and environmental documents for various development projects. He has provided expert witness services and also prepared traffic studies for public agencies and private sector clients.

Martha Alvarez

From: matthew price <mpriceisright@yahoo.com>
Sent: Sunday, January 31, 2021 6:47 PM
To: Suzanne Hadley; Hildy Stern; Steve Napolitano; Richard Montgomery; Joe Franklin
Cc: City Clerk
Subject: [EXTERNAL] hotel letter
Attachments: Matt Price.pdf

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Please see attached, thank you

Greetings Mayor and Council,

Thank you for your service. As I looked through the 829 page report, it was clear there was no thought given to the adjacent families. I listened to both planning hearing recordings, in which residents were loud and clear in their valid concerns and objections. None of these were addressed by the planning commission or staff. It dawned on me the reason the neighborhood was not notified for years, nor included in the developer's working group, nor referenced in the staff reports, is because there are too many impacts. You let one in, where would that lead. The project has listed these impacts, with the aid of community development and a staff of who knows how many, as 'features':

- 'right hand turn only' - how will drivers be forced to comply
- '45' height' - too big, too dense 20' from neighborhood
- 'reduced parking' - what happens when this is disproven
- 'wood 1x4s'- how does this maintain residents privacy
- 'underground garage, open to air and light' - what about neighborhood air, light, noise
- 'rooftop bar' - on Sepulveda? Til 1am? Anyone measured how loud hotel guests will have to talk to be heard over Sepulveda traffic?

The scope of this project is clearly too big for the site. How did this former restaurant come up as feasible when the Parkview hotel was shut down by city council, because it was too close to the senior living complex. And they didn't have nearly the issues this does.

I ask you, please don't approve this. It will change lives that are now happy. Covid will pass, there's no coming back from this once built.

Thank you,
Matt Price
1220 Tennyson

Martha Alvarez

From: maria dominguez <mariadominoes@yahoo.com>
Sent: Monday, February 1, 2021 7:10 AM
To: Suzanne Hadley; Steve Napolitano; Richard Montgomery; Hildy Stern; Joe Franklin
Cc: City Clerk
Subject: [EXTERNAL] letter re: 600 S Sepulveda for 2.2 meeting
Attachments: maria dominguez.pdf

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thank you for reading!

Hi Mayor and City Council,

I just want to say I hope you hear all our adjacent neighbors' objections concerning this proposed project. I have read supporters' letters, and frankly, they don't live here. Some relate this to Gelsons - if only. This is a 24/7/365 operation, with tremendous bulk and density that will change the neighborhood significantly, and not in a good way. Doesn't the general plan still protect residential neighborhoods? Gelsons does not double the neighborhood population. I ask you to place the supporters in context. Living with this project will be a constant nightmare for us. I find it troubling that this project garnered such support within city staff.

Planning commissioners and staff paid no mind to residents' objections during 2 hearings. They completely deflected by spending hours discussing widening a ramp, changing parking space sizes, and using wooden slats for privacy. I've never seen that at any hotel. A few years ago this project would not have met code. What changed, and who is responsible. The profit to the city may be tempting, but at what cost to a neighborhood. We ask city council to be the voice of reason and deny the project.

Thanks so much,
Maria Dominguez
Resident

Martha Alvarez

From: Larry Katz <larrykatz007@gmail.com>
Sent: Monday, February 1, 2021 9:00 AM
To: Suzanne Hadley; Hildy Stern; Steve Napolitano; Richard Montgomery; Joe Franklin; City Clerk
Subject: [EXTERNAL] 600 S Sepulveda, Poets Section
Attachments: Larry Katz.pdf

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Attached please find my letter, thank you

Dear Madam Mayor and City Council,

The impacts of this monstrous project are numerous. When I tell others there's a 45' hotel going up in our Manhattan Beach neighborhood, they think it's a joke. The impacts of noise, privacy, traffic, parking, bad air - are obvious. What's not so obvious is loss of our neighborhood. Loss of its character, its quiet, its desirability.

We have the high school, preschools, Pennekamp, Montessori, Journey of Faith. We have development on 2 sides. We have families that have enjoyed life here for generations. Maybe this project will line city coffers, maybe it will be a runaway train that you will regret as much as we oppose it today. What happens to our property values. Homeowners behind the residence inn can't sell their homes. There has to be a better way to earn, or how about save, a million per year. Please say no to this.

Thank you for your consideration.

Larry Katz

Martha Alvarez

From: Joe Rivera <jriv1229@gmail.com>
Sent: Monday, February 1, 2021 1:49 PM
To: Suzanne Hadley; Hildy Stern; Steve Napolitano; Richard Montgomery; Joe Franklin
Cc: City Clerk
Subject: [EXTERNAL] 2.2 Council hotel proposal
Attachments: Joe Rivera re hotel proposal.pdf

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see attached, thank you

Dear Council,

The applicant has ties to the Magnolia Hotels, none of which are bordering a residential neighborhood. Looking at the 6 Magnolia properties, all are in large city downtown areas, and none have single family homes anywhere near.

Perhaps a larger site would be more appropriate, given the incredible crowding of the proposed plan, in which losing even a few rooms is deemed fiscally impossible. If that is the case, what happens when the hotel is not completely full. If there is such a slim margin of profitability, find another larger, appropriate site. This is completely unsuitable 29 feet away from homes and families.

The developer has had 3+ years to steer this project along, apparently with city staff's eager help. The speed at which this project is now progressing is disturbing. Residents were not notified during this 3+ years, and now, are kept by Covid from organizing and participating in the process that is rightfully ours. The fact we are forced to deal with this during Covid is wrong. There are older residents in the neighborhood who don't have computer access, or can't navigate the city website.

Supporters of this project should show some empathy. Or think about switching places with poets section residents. Living adjacent to commercial should be a benefit, not a blight. This site has been a restaurant for over 40 years. This is a monstrous change to the area which should not be spearheaded by one developer with city connections.

Deny this, or schedule an EIR and time for us to fully address, after Covid.

Thank you
Joe Rivera
1150 Tennyson

Martha Alvarez

From: paul redfield <redfieldp@yahoo.com>
Sent: Monday, February 1, 2021 2:17 PM
To: Suzanne Hadley; Hildy Stern; Steve Napolitano; Richard Montgomery; Joe Franklin
Cc: City Clerk
Subject: [EXTERNAL] Feb 2 Council Meeting
Attachments: 2.2 paul redfield to city council.pdf

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Hello,

I've attached my letter.

thank you,
Paul

Good Day Madam Mayor and City Council,

The city has been working on this project for over 3 years. At some point, someone noticed there was a single family neighborhood next door. The only notice I received about this project was a neighbor's flyer.

I object to the noise, although the master use permit says it won't be audible past the premises. How will that happen. I object to the reduced parking since anyone should see that 152 for 162 rooms plus retail, office, and employees is insufficient, no matter what experts say. I object to the bulk and density, which is not compatible with the adjacent neighborhood, nor with adjacent commercial, and certainly not with the site's geography. I object to the traffic summary, which never considers traffic will flow east or south by going through our small streets. I'm stymied by a developer who wants fresh air and sunlight to a parking garage, while taking it away from families.

The city of Manhattan Beach should be a place of pride for all residents. Maybe we can't all live on the developer's 'best street'. But we would like to enjoy our homes, backyards, and neighborhood privacy without intrusion, all day and night. The site needs development, but not at the expense of a neighborhood. I respectfully ask you to deny this project.

Thank you for serving the city, and us, and your time.

Paul Redfield

Martha Alvarez

From: eric barnett <ebarnett234@yahoo.com>
Sent: Monday, February 1, 2021 4:06 PM
To: Suzanne Hadley; Hildy Stern; Steve Napolitano; Richard Montgomery; Joe Franklin
Cc: City Clerk
Subject: [EXTERNAL] city council 2.2 correspondence
Attachments: eric barnett 600 S Sepulveda.pdf

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thank you - letter is attached

Dear City Council,

The poets' section is a great neighborhood, and I don't want that to change. The staff report says no impacts, I believe there will be serious impacts. While the site needs to be developed, this extreme usage doesn't fit here. That density, with 2 bars, facing the neighborhood, that design is overblown, considering where they want to build it.

We have a lot to contend with already, with multiple Skechers buildings going up, and the new gym building at Mira Costa. I don't understand the rush to get this project through, during Covid. What is the hurry.

Please pick a development appropriate for the site. We could use a great restaurant, that we could all enjoy. We ask you to deny the hotel.

Thank you,
Eric Barnett
1208 Tennyson

Martha Alvarez

From: Lu Chen <luchen.alphabet@mail.com>
Sent: Monday, February 1, 2021 10:18 PM
To: Suzanne Hadley; Hildy Stern; Steve Napolitano; Richard Montgomery; Joe Franklin
Cc: City Clerk
Subject: [EXTERNAL] 2.2 hotel city council
Attachments: Lu Chen hotel letter.pdf

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hi please see attached, thank you!

Good evening Madam Mayor and Council,

I would like to address the parking demand for the hotel. Peak demand is subjective, and where a hotel is concerned, highly unpredictable. No one can presume what type of traveler has what proclivities. Yet, 152 spaces for 162 rooms doesn't seem right. The developer expressed confidence in a 90% fill rate. That would bring the number needed down to 148, assuming one vehicle per room. That is still awfully close to the 152.

Granted spaces will fill and empty throughout the day, however less when there is a parking fee. In that case, there will always be a certain percentage that drives around the adjacent neighborhood looking for a free space. There is none, therefore we need resident only parking hangtags to replace the Mira Costa hangtags.

Retail, office, and hotel employees amount to 60 at the low end per the developer, from what was clearly stated in the staff report. Adding retail, office customers and hotel guests adds, let's say, another 30 customers and 10 guests of hotel patrons, 40 combined. So now we have $148+60+40= 248$ spaces. This is with everyone driving, which is possible and should be considered. That is a shortfall of 96 spaces. That 248 total is not far from the number which was originally ascribed to the project by the general plan, before the reduction changes in municipal code began.

Covid may have put a permanent damper on ride sharing, and bus ridership is also down, by 65%. Peak demand exacerbates the problem when parking is deficient to begin with. So now there is a 96 space shortfall. The poets' section does not have nearly the amount of spare spaces to accommodate, even if that were possible. Not to mention there are homes within the neighborhood with short, sloping driveways that have no choice but street parking. I don't see any area for project truck parking onsite either.

The developer has a problem. If the hotel is successful, he has insufficient parking, by A LOT. If unsuccessful, he's not able to deliver the promised TOT. And the poets section, and city, are stuck with a white elephant. Building maximum square footage on a lot that cannot park the maximum buildable area is a mistake with grave consequences for the adjacent neighborhood and city. We ask that you deny this project, and wait for a better option to present.

Respectfully,
Lu Chen

Martha Alvarez

From: Peter Romanov <peterromanov22@gmail.com>
Sent: Tuesday, February 2, 2021 7:58 AM
To: Suzanne Hadley; Hildy Stern; Steve Napolitano; Richard Montgomery; Joe Franklin
Cc: City Clerk
Subject: [EXTERNAL] hearing tonight - hotel
Attachments: Peter Romanov.pdf

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good morning Council, my letter's attached.
Have a great day, Peter

Dear City Council,

The project plan, although surprisingly supported by community development, doesn't take several factors into consideration regarding traffic and parking.

The new MCHS gym - seems too short a word to describe it - will seat another 2400 people. This will add traffic on a regular basis as it is the second largest high school athletic facility in SoCal. I do not see any additional onsite parking constructed for it. The tennis courts were initially to become parking, that was not done. Instead, the student parking was re-stripped and deemed adequate. The traffic it will bring, albeit sporadic, will have a large impact on the neighborhood, since the previous 200 seat gym already had a serious impact.

The Skechers retail store was moved to the Manhattan Beach side, to alleviate parking and bulk issues on the Hermosa side. The combined new Skechers traffic, from their EIR, will bring approx. 2k through the area, and most will come from the east/nouth/south. Skechers employees already flow through the neighborhood, and park here, too. Granted, some may travel south. But they will have to have traveled from the south on the way in. Spread out over 10 hours, new Skechers will add 212 vehicles/hour. Any direction, there is opportunity of coming through the neighborhood, and they will. The proposed hotel project will add another 1k trips. Skechers and MCHS are done deals. This is not.

Is anyone reviewing the impact this will have on the roadways? This also adds noise and pollution. Compounding this problem by 50% is not something the poets section can handle. We ask that you request an EIR to fully explore all the issues, including the traffic patterns in the neighborhood, or deny the applicant.

Thank you,
Peter Romanov
Longtime MB Resident

Martha Alvarez

From: george cosio <georgexcasio@gmail.com>
Sent: Tuesday, February 2, 2021 9:19 AM
To: Suzanne Hadley; Hildy Stern; Steve Napolitano; Richard Montgomery; Joe Franklin
Cc: City Clerk
Subject: [EXTERNAL] hotel opposition
Attachments: George Cosio.pdf

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thank you,
George Cosio

Greetings Mayor, City Council

Covid is taking its toll on everyone. I hope we are seeing the back end. Covid altered road traffic and parking. Working from home is redesigning our lives. It is the present, and probably future reality. This makes home offices not only desirable but necessary. My clients haven't traveled in almost a year, and don't miss it.

This project uses data collected during Covid. This is not valid data. The only applicable actual data used is from the 4 year old Skechers project's EIR. The noise data doesn't even include the fact of existing Skechers construction noise that already annoys daily. The developer is pushing this through with haste during Covid, why. It is not as though the hotel industry has such a bright future. In fact, the hotel industry may never get back to what it once was.

What will never go away is food. Everyone likes a good meal. Especially when you're working at home all day, and want to take a break from cooking. We need another restaurant in that location. The lot is too small for the hotel plan. The ingress/egress parking ramp looks ready for bumper cars. The outlet to Chabela at Shelley is ridiculous, MCHS kids will be flowing in there in no time. Day/night noise will be a constant nuisance, privacy concerns breed fear, and the traffic and parking impacts will cripple the neighborhood. The city should not be promoting a hotel, too large for a location, that doesn't benefit the locals. Please deny this.

Thank you
George Cosio

Martha Alvarez

From: Ash Murphy <96murphysurfer@gmail.com>
Sent: Tuesday, February 2, 2021 9:27 AM
To: Suzanne Hadley; Hildy Stern; Steve Napolitano; Richard Montgomery; Joe Franklin
Cc: City Clerk
Subject: [EXTERNAL] 2.2 council I oppose this hotel
Attachments: Ash Murphy.pdf

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thanks, letter below

Dear Council,

We residents have collectively presented data, pictures, and testimony regarding the actual impacts we expect to experience with the construction and operation of this Goliath project. I'd like to know what happens, if the traffic data shows as we expect, the noise is as loud as we fear, and the parking is a nightmare. Missing the sun a few hours per day will be immediate, and miserable. Air pollution will take time to affect health. Residence Inn neighbors can't sell their homes. I would like to know the remedy for us. Commercial development should be a welcome addition. I wish I'd had the opportunity to be a part of this process 3 years ago. Now, experts are arguing over what should be clear. This is a bad plan for this location. We residents are experts of our neighborhood, and have given this much thought - though it's been very difficult trying to catch up in only 3 months, over holidays, and with Covid. The more I read, the worse this project becomes, and it is, finally, about ruining a neighborhood, and the lives within it. We ask you to deny this for all the reasons we have given, or at least arrange for an EIR.

With respect,
Ash Murphy

Martha Alvarez

From: Joshua Woollett <woolsey@postpro.net>
Sent: Tuesday, February 2, 2021 10:33 AM
To: Suzanne Hadley; Hildy Stern; Steve Napolitano; Richard Montgomery; Joe Franklin
Cc: City Clerk
Subject: [EXTERNAL] 2.2 NO HOTEL
Attachments: council meeting hotel Josh Woollett.pdf

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thank you for your time, Council
letter is attached
Josh Woollett

Greetings City Council,

This 45' hotel developer has not made a good impression. He's not started out by being a good neighbor. If this is built, how is the city going to compensate us.

From 11/18 meeting:

The developer said he could build a big brick wall at the property line.

“I'm sure that we could come up to short of just putting a brick wall up that would work just fine”.

I say, by all means,

Put up the Brick Wall

That would be better than looking at, and being looked at, by strangers night and day.

Thank you
Josh Woollett

Martha Alvarez

From: Karen Polk <kppolk64@gmail.com>
Sent: Tuesday, February 2, 2021 10:56 AM
To: Suzanne Hadley; Hildy Stern; Steve Napolitano; Richard Montgomery; Joe Franklin
Cc: City Clerk
Subject: [EXTERNAL] letter opposing hotel
Attachments: letter from karen polk.pdf

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please read my letter, thank you

Good evening Mayor, and City Council,

Happy February. I would like to address the impacts of this 162 room 98,000+sq. ft., very imposing project, on our peace, quiet, and security. The criminal incidents at local hotels are troubling. 2019 - Gunman at Marriott on Aviation brings response from 60 SWAT, 6 police departments. 2020 - repeat stabbing at Crimson on Sepulveda. 2020 - shooting at Residence Inn on Sepulveda. On the night of the previous council meeting, 1/19/21, there was a fatal shooting at a Homewood on Marine. None of these properties has so many rooms concentrated so closely to residents, nor such easy viewing or access to them. This project's density is in no way desirable to a neighborhood twenty feet away.

Not all hotels have violence, but adding one of this scope is the wrong decision. Does 25 hotel employees include security - or their parking for that matter.

Having an outlet that leads strangers out onto narrow 23' Chabela Drive, into our neighborhood, is unsettling and potentially unsafe. Having 40+ windows looking out over the entire neighborhood is frightening. Wooden louvers and bamboo don't in any way make us feel more secure. And bamboo doesn't provide sufficient screening, even once it has grown in. There will be no getting away from the feeling of being watched.

The statement that homes closest to the project will build up in the future to provide privacy to the rest of the neighborhood is ludicrous. From 40' up, every home can be seen. Drone footage shows that well. Approving this, in the time of Covid, without proper notice and input from the neighborhood is wrong.

Our neighborhood is primarily original with many single story homes. Just because we don't fill our lots with square footage, don't take our rights away. Please don't approve this, surely there is a better, more suitable future for this site, such as the restaurants that provided great service for all, for at least a half century.

thank you for your time.

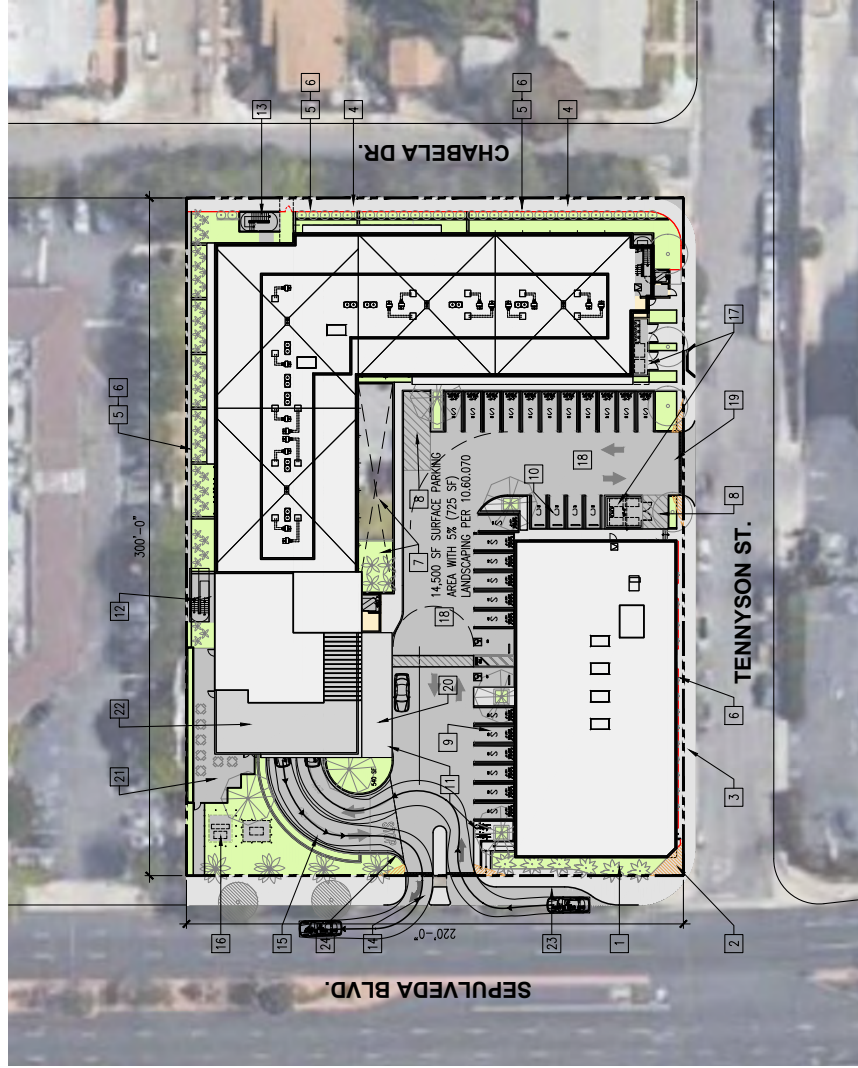
Karen Polk
Resident

Martha Alvarez

From: nancy best <coastwithclouds@yahoo.com>
Sent: Tuesday, February 2, 2021 12:01 PM
To: Suzanne Hadley; Hildy Stern; Steve Napolitano; Richard Montgomery; Joe Franklin
Cc: City Clerk
Subject: [EXTERNAL] Fwd: 2/2/21 CCMtg
Attachments: Direction Letter 2221.pdf; ATT00001.htm; Mapquest 600 S Sepulveda.png; ATT00002.htm; Erik Zandcliet MBCCMtg 11921.pdf; ATT00003.htm; 1.19 DEV PLAN p10.pdf; ATT00004.htm; Lococos 19.jpg; ATT00005.htm

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Please see below, thank you!



MANHATTAN BEACH HOTEL
 600 S. SEPULVEDA BLVD.
 MANHATTAN BEACH, CA 90266

SITE PLAN
 SCALE: N.T.S.

GENERAL NOTES:

1. PROJECT SITE IS LOCATED IN GENERAL COMMERCIAL ZONING AND IT HAS NO SETBACK REQUIREMENT.
2. SEE GROUND FLOOR PLAN FOR SPOT ELEVATIONS, STRIPING PLANS & DIMENSIONS.

KEY NOTES:

- 1 AREA SET ASIDE FOR LOCATION OF WIDENED SHOULDER
- 2 15'x15' CORNER DEDICATION
- 3 SIDEWALK DESIGNED TO MEET PUBLIC WORKS REQUIREMENT OF 6'.
- 4 SIDEWALK DESIGNED TO MEET PUBLIC WORKS REQUIREMENT OF 6'.
- 5 RETAINING WALL
- 6 FENCE
- 7 92'x15' OPENING TO SUBTERRANEAN PARKING BELOW W/ PLANTER & GARAGE W/ TALL PALM TREES.
- 8 LOADING ZONE W/ TALL SCREENING PLANTS
- 9 STANDARD PARKING STALL (8.5'x18')
- 10 COMPACT PARKING STALL (8'x15')
- 11 SHORT TERM BIKE PARKING (TOTAL 8 PROVIDED). LONG TERM BIKE PARKING @ SUBTERRANEAN PARKING (TOTAL 8 PROVIDED).
- 12 CONVENIENCE STAR FROM NEIGHBOR'S PARKING LOT TO LOWER GARAGE
- 13 F.D. REQUESTED STAR FROM CHABELA DR. TO 2ND FLOOR HOTEL AND TO SUBTERRANEAN PARKING.
- 14 NEW RIGHT-IN & RIGHT-OUT DRIVEWAY. 30' WIDE. FIRE DEPT. ACCESS
- 15 RAMP DOWN TO SUBTERRANEAN PARKING. 15% SLOPE MAX.
- 16 TRANSFORMER. FINAL LOCATION TO BE FINALIZED W/ EDISON.
- 17 TRASH ENCLOSURE
- 18 MIN. 28" WIDE DRIVE AISLE (PER FIRE DEPARTMENT) EXISTING DRIVEWAY RELOCATED
- 19 CANOPY AT PORTE COCHERE
- 20 OUTDOOR PATIO @ GROUND LEVEL
- 21 TERRACE @ 4TH FLOOR HOTEL
- 22 FUTURE WIDENED SHOULDER PER CALTRANS/PUBLIC WORKS. FINAL DESIGN TO BE COMPLETED AT A LATER TIME.
- 23 STOP SIGN
- 24



DATE: JAN. 5 2021
 JOB NO.: 18543
 SHEET NO.: 10

AXIS GFF
 ARCHITECTS
 1110 WESTWOOD BLVD., LOS ANGELES, CA 90024
 TEL: 310.206.1000 FAX: 310.206.1001
 WWW.AXISGFF.COM

Hi Council Members!

Here is my slightly unorthodox letter. I have attached Erik Zandvliet comments from 1/19/21, page 32, which is what led me down this rabbit hole. Also attached is the mapquest version of directions and applicants overhead rendering of the Sepulveda exit. Also included is a bit of MB history, a photo of Lococo's with a fab shot of the below mentioned blind downhill sharp curve.

Directions to 600 S. Sepulveda from LAX

Exit LAX heading SOUTH onto Sepulveda

Proceed SOUTH on Sepulveda/PCH

Make a U-TURN at Tennyson St

If you miss the u-turn keep traveling on PCH until you can make one

Heading NORTH on PCH keep to the RIGHT lane but

don't turn onto Artesia (you'll need to u-turn again)

Once you cross Artesia stay way RIGHT, as this is a blind downhill curve,

Be prepared to slam on your breaks as your vehicle will accelerate without stepping on the gas. With any luck you won't get rear ended.

Turn RIGHT into 600 S Sepulveda

You have arrived in one piece - if not, call 1 800 the law

When leaving the underground parking, please note the exit is a hairpin turn with cars gunning it uphill.

Good Luck!

I hope this is being taken in the spirit of fun. Sadly, this is only one of many absurd inconsistencies found within these plans. The voices of the residents fell on deaf ears with city staff and the Planning Commission. Instead focus was steered onto bamboo height, ramp width and 2x6 wooden planks on windows. Really? Is this how the Poet Section Residents are valued by the city?

I urge you to take a trip down memory lane and photo in hand follow the directions. You'll be as amazed as I that it hasn't changed at all. You will also be able to put yourselves into the shoes of every unsuspecting potential patron. If you don't want to drive, take an Uber.

Regards,

Nancy Best

MB Poet Resident having to spend far too much time on this debacle

Please shut this down, too much is too much.

PS Lococo's opened in 1957, in 1984 it became the Magic Pan, in 1988 an attempt was made to turn it into a nightclub - but that didn't pan out.. It then became Acapulco and keeping with the Mexican theme it became El Torito! As you can see the history of a family restaurant spans 60+ years - perhaps it's time for a "Kettle South" or East.

PPS Also in the photo is that great true mid century bank building. It should be declared a Landmark/Historic Building. The LA Conservancy calls it a gem, and with its clamshell roof it deserves to be apart of this seaside city's history. If anyone was serious about a museum . . .

Franklin [01:23:22](#) Okay, great. Thank you. And, um, I... So, the shadow study, uh, so, uh, so then, this would be for Erik, um, your traffic eng- or our traffic engineer. So, we, we talked about coming southbound on Sepulveda and needing to make a left turn in the Tennyson left turn bay, when you're going southbound. Um, just wondering if that comes up rather quickly, especially for someone that's new to the city. They're driving in from [LEX 01:24:00] or whatever, and let's say they missed, uh, so their next option would be to make a left, um, up at the light, uh, at Artesia. You know, assuming they would get it to the far left hand lane.

Presently, um, and I know this is all Caltrans', uh, uh, control, but presently you cannot make a U turn at southbound, uh, Sepulveda, when you're, when you're in the left turn Bay to go eastbound in Artesia. Uh, is there any way or wh- what would be required, uh, the, the short answer. (laughs) Wh- wh- wh- what could be because I know Caltrans is very complicated, but what, what would be required to change that so where you could make, you know, a U turn and I know, i- i- it's impacted by the westbound Artesia, uh, making a right turn because they do get a light, a, a green arrow. So, i- i- is it in the realm of possibility, Erik?

Erik Zandvliet: [01:25:01](#) Oper- operationally, no, it's not. Uh, there's dual left turns as you know, southbound Sepulveda to eastbound Artesia Boulevard. At the same time those left turns are going, there is a westbound right turn arrow that goes from Artesia Boulevard onto northbound Sepulveda Boulevard. That's needed for the capacity in the, in the just the sheer volume of that intersection. So, if you remove any of that, you're going to have, uh, long backups, um, on one or the other street. All right?

The, the practical solution would be that the, the driver if he misses or she misses the, uh, left turn at Tennyson would continue down Sepulveda Boulevard and make a left turn or a U-turn at the next signal. Um, alternately, they would go to, uh, make a left turn at, uh, Artesia Boulevard ahead eastbound at, at, on Ar- on Artesia Boulevard and also make a U turn, uh, to head back where they came from.

Generally speaking, if someone doesn't, is not familiar with the area, they don't go into a residential area. They don't, they don't like that because they don't know if they're going to get stuck.

Franklin [01:26:05](#) Okay.



- Hotels
- Food
- Shopping
- Coffee
- Grocery
- Gas

- [Back](#)
- Save to My Maps
- Share
- Print

Start out going southeast on Post Way.

Then 0.05 miles

Merge onto Pacific Coast Highway/CA-1 S toward I-105.

Then 4.80 miles

Make a U-turn at Tennyson St onto Pacific Coast Highway/Pacific Coast Hwy/CA-1.

If you reach Gould Ave you've gone a little too far.

Then 0.05 miles

600 S Sepulveda Blvd, Manhattan Beach, CA 90266-6913, 600 S SEPULVEDA BLVD.

Your destination is just past Pacific Coast Highway.

If you reach Keats St you've gone a little too far.

600 S Sepulveda Blvd

This leg of your trip is:

8 minutes • 4.89 miles

Help

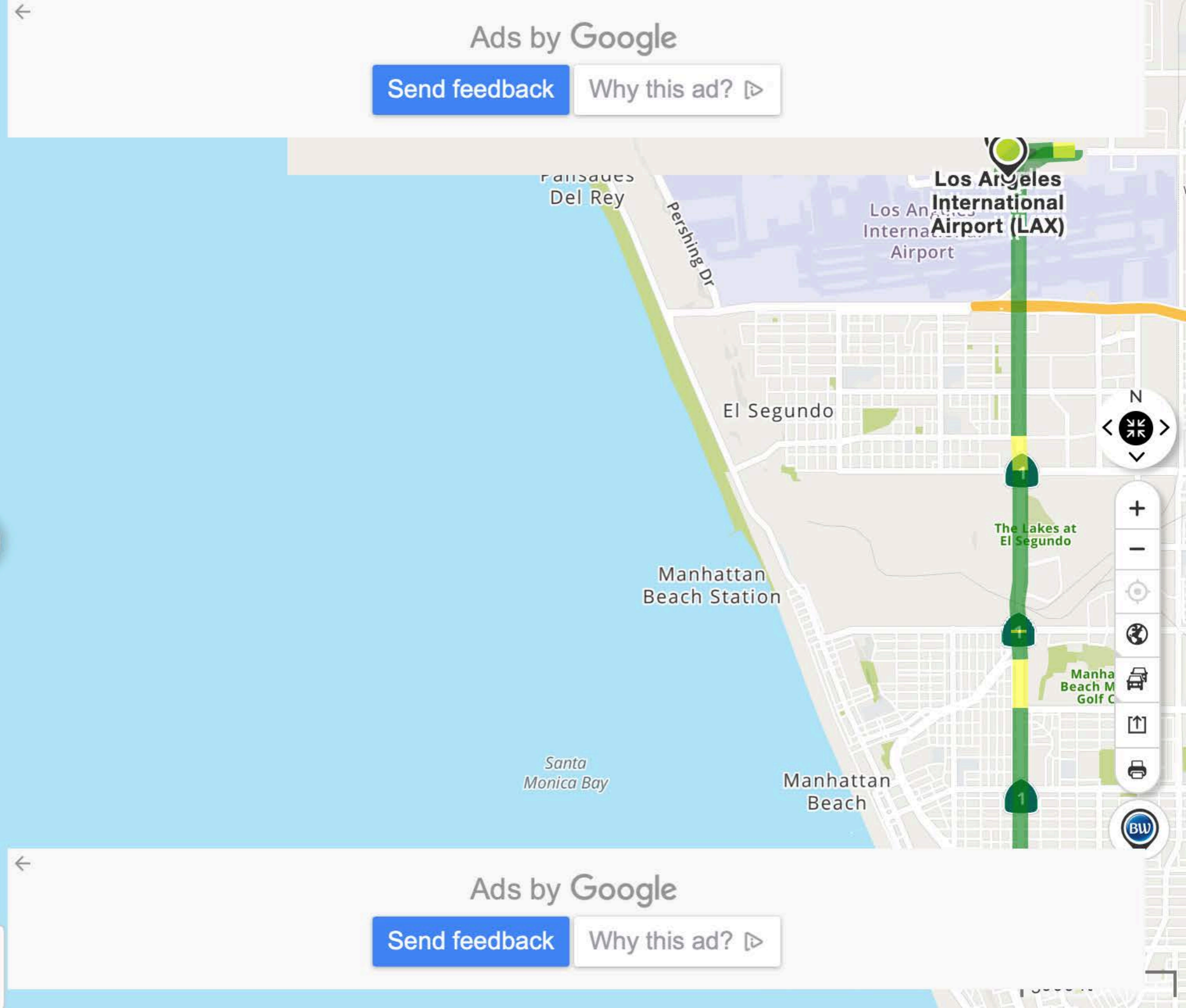
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Martha Alvarez

From: Leslie Gerard <info@email.actionnetwork.org>
Sent: Wednesday, January 20, 2021 5:57 PM
To: City Clerk; Quinn Barrow; Bruce Moe
Subject: [EXTERNAL] Item 10: The Sepulveda hotel project is a bad deal for residents

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

City Council and Staff,

We do not need a hotel at 600 S. Sepulveda. The neighbors have spoken loud and clear from the beginning of the approvals process. The site could be used to provide us with a grocery store, housing, or another community-serving use. Please go back to the drawing board and include residents' voices in a new plan for that site.

Sincerely,

Leslie Gerard
gerard.leslie1@gmail.com
3309 Highland Ave
Manhattan Beach , California
90266

Martha Alvarez

From: Emma Broussard-Wilson <info@email.actionnetwork.org>
Sent: Monday, January 25, 2021 12:15 AM
To: City Clerk; Quinn Barrow; Bruce Moe
Subject: [EXTERNAL] Item 10: The Sepulveda hotel project is a bad deal for residents

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

City Council and Staff,

We do not need a hotel at 600 S. Sepulveda. The neighbors have spoken loud and clear from the beginning of the approvals process. The site could be used to provide us with a grocery store, housing, or another community-serving use. Please go back to the drawing board and include residents' voices in a new plan for that site.

Sincerely,

Emma Broussard-Wilson
emmabwilson16@gmail.com
2908 N Poinsettia Ave
Manhattan Beach, California
90266

Martha Alvarez

From: Candis Duke <candisduke@icloud.com>
Sent: Monday, January 25, 2021 7:32 PM
To: List - City Council; Bruce Moe; Richard Montgomery; City Clerk
Subject: [EXTERNAL] Thank you

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Thank you for providing a helping hand to our local businesses. I can only imagine how difficult it must be for them.

You are appreciated.

Candis Duke

Sent from my iPhone

Martha Alvarez

From: CityOfManhattanBeach@citymb.info on behalf of City of Manhattan Beach
<CityOfManhattanBeach@citymb.info>
Sent: Monday, February 1, 2021 11:43 AM
To: City Clerk
Subject: [EXTERNAL] Public comment for next city council meeting

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Message submitted from the <City of Manhattan Beach> website.

Site Visitor Name: Jonathan Hawes

Site Visitor Email: jonathanhaweselmonte@gmail.com

Good evening. My name is Jonathan Hawes. I served as El Monte City Clerk from 2013 to 2018. Since 2015 I have been a whistleblower on Andre Quintero and Team El Monte's embezzlement of \$10 million from the El Monte Promise Foundation scholarship fund. I have interviewed dozens of El Monte residents who have privately confirmed that Promise funds were used for fraudulent trips to Vietnam and Haiti, a bogus consultant in Salt Lake City, house repairs, and other criminal activities. I have myself been interviewed by the FBI about two dozen times. Documents proving the embezzlement have been submitted to the FBI and the District Attorney's Office and are now available to the public online (https://drive.google.com/file/d/1mH4CC1BCQtj4Lwa7ne9uR33Jf_yZIVrH/view?usp=sharing). I am asking the Manhattan Beach City Council to call out these crimes and protect the vulnerable residents of one of the poorest cities in southern California. El Monte children, who should've been provided with college scholarships, were robbed. Andre Quintero and Team El Monte members must go to prison. If you have any questions, please call or text me at (626) 863-2149. Thank you.



CITY OF MANHATTAN BEACH

CITY NOTIFICATION

(310) 802-5000

CityofManhattanBeach@citymb.info

CITY OF MANHATTAN BEACH 1400 Highland Avenue Manhattan Beach, CA 90266

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Martha Alvarez

From: Quinn M. Barrow <QBarrow@rwglaw.com>
Sent: Monday, February 1, 2021 2:09 PM
To: Martha Alvarez
Cc: Talyn Mirzakhanian; Carrie Tai, AICP; Ted Faturos
Subject: Fwd: [EXTERNAL] I'm on the side of the Poets

Sent from my iPhone

Begin forwarded message:

From: Bruce Moe <bmoe@citymb.info>
Date: February 1, 2021 at 1:50:56 PM PST
To: List - City Council <citycouncil@citymb.info>
Subject: FW: [EXTERNAL] I'm on the side of the Poets

Sent to me but meant for the Council...

From: Murphy/Perkins <murphyperkins@gmail.com>
Sent: Monday, February 1, 2021 12:42 PM
To: City Manager <cm@citymb.info>
Subject: [EXTERNAL] I'm on the side of the Poets

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

I don't understand how a town that consistently votes for the non-moneyed side in state and federal elections still elects a City Council that leans heavily toward \$\$\$ talks and the voters don't matter much. Someday the voters will wake up and our City Council will reflect the real concerns of those of us who would strive to make our town a better place to live and raise families and not a denser, noisier, more polluted place that rakes in more money for Council to spend.

Please deny the MB Hotel's application or if you can't manage that at least require a proper EIR with mitigation.

Except for more money for Council to spend there is no good reason to build this in Manhattan Beach.

Michelle Murphy
4420 The Strand
310-947-2281

[MB Logo]<<http://www.citymb.info/>>
BRUCE MOE
CITY MANAGER

(310) 802-5053

bmoe@citymb.info<mailto:bmoe@citymb.info>

CITY OF MANHATTAN BEACH 1400 Highland Avenue Manhattan Beach, CA 90266 Office

Hours<<https://www.citymb.info/departments/new-city-hall-hours>>: M-Th 7:30 AM-5:30 PM | Fridays 7:30 AM-4:30 PM | Not Applicable to Public Safety Reach Manhattan Beach<<https://www.citymb.info/departments/faqs>> Here for you 24/7, use our click and fix it app Download the mobile app now

[City of Manhattan Beach, CA]<[https://urldefense.com/v3/__https://itunes.apple.com/us/app/reach-manhattan-beach/id954659772?mt=8__;!!AxJhxnnVZ8w!ZkOPda-E4PQInvaFuvjsDM4unzspme6VG7kKxsk0AxrlyvmvOtI3H0L0QIZpz4xfuvQ\\$](https://urldefense.com/v3/__https://itunes.apple.com/us/app/reach-manhattan-beach/id954659772?mt=8__;!!AxJhxnnVZ8w!ZkOPda-E4PQInvaFuvjsDM4unzspme6VG7kKxsk0AxrlyvmvOtI3H0L0QIZpz4xfuvQ$)> [City of Manhattan Beach, CA]<[https://urldefense.com/v3/__https://play.google.com/store/apps/details?id=com.govoutreach.reachmanhattanbeach__;!!AxJhxnnVZ8w!ZkOPda-E4PQInvaFuvjsDM4unzspme6VG7kKxsk0AxrlyvmvOtI3H0L0QIZpThK364c\\$](https://urldefense.com/v3/__https://play.google.com/store/apps/details?id=com.govoutreach.reachmanhattanbeach__;!!AxJhxnnVZ8w!ZkOPda-E4PQInvaFuvjsDM4unzspme6VG7kKxsk0AxrlyvmvOtI3H0L0QIZpThK364c$)>

Click here<[https://urldefense.com/v3/__https://www.mailcontrol.com/sr/w433hxQCfLLGX2PQPOMvUkWM85sEKD4-qeQ_mJZKHB10omv1jam1vQM9emipV8zgGy9xD5G1girgE3KctAewCA==__;!!AxJhxnnVZ8w!ZkOPda-E4PQInvaFuvjsDM4unzspme6VG7kKxsk0AxrlyvmvOtI3H0L0QIZpuzHZII4\\$](https://urldefense.com/v3/__https://www.mailcontrol.com/sr/w433hxQCfLLGX2PQPOMvUkWM85sEKD4-qeQ_mJZKHB10omv1jam1vQM9emipV8zgGy9xD5G1girgE3KctAewCA==__;!!AxJhxnnVZ8w!ZkOPda-E4PQInvaFuvjsDM4unzspme6VG7kKxsk0AxrlyvmvOtI3H0L0QIZpuzHZII4$)> to report this email as spam.

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Quinn Barrow (External)

qbarrow@rwglaw.com
City of Manhattan Beach, CA

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Martha Alvarez

From: Christine Mercer <lexismom.cm@gmail.com>
Sent: Monday, February 1, 2021 4:25 PM
To: City Clerk; List - City Council
Subject: [EXTERNAL] City Council Meeting February 2, 2021 Continued Public Hearing De Novo to Consider a Master Use Permit - 600 S. Sepulveda

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

February 1, 2021

City Clerk
City of Manhattan Beach
1400 Highland Ave.
Manhattan Beach CA 90266

Re: Continued Public Hearing De Novo to Consider a Master Use Permit for a New 162-Room, 81,775 Square-Foot Hotel with Full Alcohol Service for Hotel Patrons and A New 16,348 Square-Foot Retail and Office Building; and Reduced Parking with 152 Parking Spaces at 600 S. Sepulveda Boulevard

Dear Mayor, Mayor Pro Tem, and City Council Members,

My husband and I are 25-year residents of the Poets section, directly east of the planned development. We are opposed to the current hotel and mixed-use development plans. We support the MB Poets appeal and request a proper environmental review prior to approval of the Master Use Permit.

I am concerned of the discrepancies between the January 18, 2021 Public Hearing testimony by the Planning Staff, the Applicant and the Planning Commission Staff reports.

The Planning Staff claim that the dining and full alcohol service is for hotel patrons only. The Applicant stated that there is no rooftop bar. The Planning Commission Staff reports state that the rooftop bar, lounge and deck would be open to the public.

January 19, 2021 Public Hearing Transcript:

Ted Ferterals ([00:15:20](#)):

*Um, there is some limited dining and full alcohol service on the site, **but that is for hotel patrons only.***

Ted Ferterals ([00:24:54](#)):

*So, I wanna be very clear that there is no restaurant onsite. A restaurant is open to the public, meaning anyone can walk in and order something. **All the eating and drinking opportunities on the site are for hotel patrons only.** Um, which means that because the only people going to these establishments are already at the hotel, there is no need to provide more parking. Um, and **therefore it's not part of the parking site.***

Jan Holtze ([01:44:23](#)):

There is no bar on the roof of the hotel. I repeat, there is no rooftop bar.

Planning Commission Meeting Oct 14, 2020 Staff Report:

Page 3

The hotel also incorporates an outdoor terrace on the fourth floor facing Sepulveda Boulevard where alcohol beverages and limited food service like appetizers will be offered to hotel guests.

Page 35 – Attachment E

Level 4 would contain back of house uses, 41 guest rooms, and a rooftop bar and lounge with limited food service and an expansive outdoor deck fronting on Sepulveda Boulevard and offering an ocean view. Although intended primarily for hotel guest use, the rooftop bar, lounge, and deck would be open to the public. The staff report states that no parking demand will occur from public use of the Type 47 alcohol service, because Condition 14 of Resolution PC-20 prohibits public use. The MB Poets ABC expert states that the resolution is a violation of ABC regulations.

I ask you to question these conflicting statements by the Planning Staff and the Applicant.

How can an accurate determination of reduced parking and traffic studies be evaluated based on misleading data? How can an environmental review be deemed exempt based on these studies?

Please resolve to require an environmental review prior to approving the Master Use Permit.

Thank you in advance for your thoughtful consideration of this project and its impact on the surrounding neighborhood.

Sincerely,

Christine Mercer

1151 Tennyson Street

Manhattan Beach CA 90266

Martha Alvarez

From: Christine Mercer <lexismom.cm@gmail.com>
Sent: Monday, February 1, 2021 5:37 PM
To: City Clerk; List - City Council
Subject: [EXTERNAL] City Council Meeting February 2, 2021 Continued Public Hearing De Novo to Consider a Master Use Permit - 600 S. Sepulveda

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

February 1, 2021

City Clerk
City of Manhattan Beach
1400 Highland Ave.
Manhattan Beach CA 90266

Re: Continued Public Hearing De Novo to Consider a Master Use Permit for a New 162-Room, 81,775 Square-Foot Hotel with Full Alcohol Service for Hotel Patrons and A New 16,348 Square-Foot Retail and Office Building; and Reduced Parking with 152 Parking Spaces at 600 S. Sepulveda Boulevard

Dear Mayor, Mayor Pro Tem, and City Council Members,

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Planning Commission Meeting Oct 14, 2020 Staff Report:

Page 3

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Page 35 – Attachment E

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Please resolve to require an environmental review prior to approving the Master Use Permit.

Thank you in advance for your thoughtful consideration of this project and its impact on the surrounding neighborhood.

Sincerely,

Christine Mercer

1151 Tennyson Street

Manhattan Beach CA 90266

Martha Alvarez

From: Devon Murray <devom133@hotmail.com>
Sent: Monday, February 1, 2021 5:53 PM
To: City Clerk
Subject: [EXTERNAL] MB Hotel on Sepulveda

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

To City Council Members-

My name is Devon Murray and live at 1230 Shelley St. I am a second generation Manhattan Beach resident and am raising two 3rd generation daughters in this city. I write to you not in total opposition of the project but rather the way in which this project was brought to the table and the way it has felt to those residents in the Poet section. I, and the rest of those living in the Poet understand that this space will not be vacant forever and we understand the need for tax income in the city especially during these times. What I personally fundamentally disagree with is the process and the size and scope of the project and its effect on the neighborhood.

1. The developer has continually mentioned that this is a local project and he is a local resident of the area. He has lived here since the 80's and built his dream house in the 90's. If it truly was a local project then the developer, and the city planning department has failed to truly interact with the residents in a real way. They could have easily done town halls, local walk arounds and other ways to interact with those that would be impacted. Yet there wasn't any effort to include the neighborhood in this project. This is what developers who aren't part of the local community do, and it disappoints me to no end, especially to someone who has lived in this city longer than he. My simple question for you was would you want this next to your "dream house".
2. While the code for the new Sepulveda corridor says 40' is the height limit, and this project will be 40' and the highest on Sepulveda, no where else on Sepulveda does a project directly impact the residents so considerably. For one, there is a street that directly connects to the neighborhood which will become incredibly overrun. Secondly the development will have direct sunlight and exposure impact on the houses directly to the east, unlike any other location on Sepulveda and lastly there has been nothing done to minimize those impacts on the neighborhood besides trees. The traffic flow in the community is already high with the high school, church parking and other local businesses. This hotel will bring those overflow guests and their traffic into our area.
3. The Bar and parking situation at the new hotel will bring unneeded and unwanted attention to the area. The developer has said that there is no live music or audio. Not only will it be impossible to keep "outside guests" out of the space but audio always carries farther than you think. I work in live entertainment and live audio industry and work directly with audio issues on more than my fair share of events. Audio, unless you have specific equipment, travels in all directions and in actuality behind the speakers mostly uncontrolled in cheap products behind the audio rather than the front side. This audio plan does not attack this and there are no specifics to that plan. The other issue I see is that there is no plan that requires the hotel to keep outside guests from coming in. Where is the detailed plan that we would require any and all events that said they would do this. Would the city council approve a live event like the MB open to operate without a detailed plan? Are they checking and scanning room keys? Are they providing verification in what way? I would like to see this. And the last point is the

parking. Where do the delivery trucks park and idle? Where does the housekeeping and hotel management park? Where do the front desk staff park? I feel like the space is way too developed for the spot it is in with conjunction to the local neighborhood.

4. While I do believe that projects like this are good for the tax base this project does not take the impact to the direct neighborhood, those that have an equal vote in this city as anyone else. I ask that the city council look at some things to help mitigate.
 - a. A true townhall discussion to look at options that both the Poets section neighborhood and the developer can come to an agreement on.
 - b. Lowering the east side to 2 stories of hotel rooms to minimize the impact on the east side
 - c. Enclosing and limiting the restaurant and bar using a detailed plan on how to keep guests out
 - d. Turning Chabela into a one way northbound street with a left turn only sign at Keats
 - e. Making Shelley street at Chabela a dead end.
 - f. Increased signage for all of these new changes to traffic flow.

Thank you very much for your time.

Devon Murray

Martha Alvarez

From: Jim Mercer <jimmsan95@verizon.net>
Sent: Monday, February 1, 2021 6:17 PM
To: City Clerk
Cc: List - City Council
Subject: [EXTERNAL] Proposed Master Use Permit for a 162-room hotel and retail space at 600 S. Sepulveda Blvd..

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

February 1, 2021
City Clerk
City of Manhattan Beach
1400 Highland Ave.
Manhattan Beach CA 90266

Re: Proposed Master Use Permit for a New 162-Room, 81,775 Square-Foot Hotel with Full Alcohol Service for Hotel Patrons and A New 16,348 Square-Foot Retail and Office Building; and Reduced Parking with 158 Parking Spaces at 600 S. Sepulveda Boulevard

This correspondence is in regard to the proposed Master Use Permit for a 162-room hotel and retail space at 600 S. Sepulveda Blvd..

Dear Council Members,

My wife and I are 25-year residents of the Poets section, directly east of the planned development. We are opposed to the current hotel and mixed-use development plans. We support the MB Poets appeal and request a proper environmental review prior to approval of the Master Use Permit.

I am concerned about the discrepancies by the Applicant, Jan Holtze, between what was stated at the Planning Commissioners meeting on November 18 and his testimonies at the City Council Meeting on January 19. City Council member Montgomery asked the Developer about comments made by Planning Commissioner Thompson at the Planning Commission meeting of November 18th. Mr. Thompson clearly stated he was looking for a Hotel setback by eliminating the fourth floor rooms from the east side of the project adjacent to Chabela.

*Excerpts from the Nov 18th Planning Commission meeting **Planning Commission Transcript: Richard Thompson: 02:19:35** Uh, I'd love to. Um, first of all, I wanna thank the residents and I wanna share all the residents, um, that I've read all the correspondence, I listened to the testimony of the public hearing, it's really important, and I really appreciate your participation in this, uh, very important project. Um, and I wanna assure you that it's, it's not a revenue issue, the Planning Commission, we make decisions based on codes and consistency with the city's general plan. Um, I do agree with the residents that we can do better on this project. And I have a few suggestions that I'd like to mention. **The first is, I, I think the building is just too massive, particularly facing east, um, facing the residents along Chick-fil-A.** So I agree with the residents there. And I think the fix there, um, **the solution is to remove all the fourth floor rooms that face east, which is essentially 13 rooms. That's the fourth floor, 13 rooms, or it's about 8% of the number of rooms that they're proposing. And I think by removing those rooms that face the residents, it will help with privacy and many of their concerns.***

*Excerpts from the Nov 18th Planning Commission meeting **Planning Commission Transcript: Richard Thompson.2:32:33** And my suggestion of taking, um, **the fourth floor rooms facing east, um, we just take a row off.** If you look at the plans carefully, it would leave, uh, the row, the anterior row of rooms on the fourth floor. So if you just look at the fourth floor, you'll see that the rooms line up there, what I'm suggesting is **those rooms that are up against the east elevation would be removed.** And what **that would do is that would provide, um, more buffer to the residents.** And it really doesn't impact the hotel that much. **It's actually 13 rooms that, uh, would have to be removed and take a lot of***

*the bulk away from that elevation. But the other areas of the hotel could remain at 40 feet. **It's just along Chabela, and, and that's what we heard. We heard that from the residents. They're concerned about the size, the massiveness, they just build the buildings too big.***

*Excerpts from the Nov 18th Planning Commission meeting **Planning Commission Transcript: Richard Thompson. 02:38:49** Well, I have two thoughts. **One is that it's not just the privacy issue, but it's also the massiveness of that. A 40 foot building right up against residential is, uh, will be impactful, major impact to those residents. And if that fourth floor is, you could see in that cross section, if that was just pushed back, you can clearly see that would have a benefit, uh, to the view of that elevation along Chabela. So, um, I think it, it really, it deals with, it addresses two issues, the privacy issue, and also the massiveness of that elevation right up against the residents.***

The Developer understood the question, but stated he could make modifications, but that it may be difficult to do.

*Excerpts from the Nov 18th Planning Commission meeting **Planning Commission Transcript: Jan Holtze: 02:48:14** Um, I, I hear you clearly. And I think that those are, uh, you know, it's a great suggestion that, you know, here is a person who's making the proposal. Um, and, uh, um, I would say that, you know, um, I, I would hesitate to say that something like that can work, anything can work, but my question is, is where would it stop? You know, it's like, okay, we do this. Um, and it would take, uh, you know, the hallways don't line up with the stairwells, the elevators, you know, all those sorts of issues that we would have to deal with. Um, and the fact is, is we kind of thought that we had already kind of achieved what it is I think you're getting at, which is as much setback as you can get and still make the project viable.*

Mr Montgomery asked the developer, J. Holtze whether he was asked about the "**massing concerns**"

*Excerpts from the the January 19th **City Council Meeting Transcript: Montgomery: 01:52:43** Thank you, Jan. Just to make sure I had this part earlier, I- you heard the part, the question I asked, commission discussion, which I didn't read every single minute of their discussion, **did they ever talk to you about The massing concerns fourth floor?***

*Excerpts from the January 19th **City Council Meeting Transcript: Jan Holtze: 01:53:06** Well, there were some- there were some concer- or some questions by Commissioner Thompson, um, I think, um, that he was- he was trying to voice, um, his- his own opinion, um, about **not necessarily the massing of the building**, but more, uh, I think having to do with articulation, as I kind of understand it, of the building. So **it wasn't necessarily a height issue, um, or a setback issue** as much as it was I think kind of historically, um, I the- **I think he has an aversion to- to tall, vertical walls.***

*Excerpts from the January 19th **City Council Meeting Transcript: Montgomery: 01:53:54** So the third and fourth floor articulation was discussed. **Did you- and the reason why you didn't take it or you didn't discuss it past that point because was why?***

*Excerpts from the January 19th **City Council Meeting Transcript: Jan Holtze: 01:54:05** Well, I think it was, it was, uh, it came up after, uh, uh, pretty much all the debate at the end of the second hearing, um, and, um, I think it was a subject that had, uh, uh, you know, been brought up very quickly and, uh, you know, with- with very little discussion and was not something necessarily that, uh, uh, you know, we felt that- that it was possible to be eliminating a whole stack of r- or whole line of rooms as he was suggesting. I think, you know, having thought about it later that **he might have been trying to ask for something else, but I'm not sure.***

Mr Holtze's comments at the last City Council meeting on January 19th did not adequately explain what Mr Thompson was asking for. He incorrectly stated Mr Thompson was concerned **not about setback issue and privacy issues**, but that Mr Thompson "**I think he has an aversion to- to tall, vertical walls**". It is very clear from the meeting minutes what Mr Thompson was concerned about and why he voted to NOT Approve this project. I do not know why Mr Holtze did not state the concerns Mr Thompson had and in fact stated it was "**not a setback issue**". I also was surprised and disappointed that none of the Manhattan Beach City staff, among them Ted Faturios and Carrie Tai, did not correct this misstatement of facts as they were in attendance at both the Planning Commission meetings and the last City Council meeting. Is it not part of their job to ensure statements are accurate and if not, to correct those statements? I believe the City Council members must have a complete and honest understanding of what was requested by Planning Commissioner Thompson and what Mr Holtze's comments were. In addition. you have all received the letter from former Planning Commissioner Ben Burkhalter who opposed the Hotel Project for the same reasons Mr Thompson voted not to approve this project citing the local residents concerns.

I hope you review this letter carefully and raise these same concerns at the next City Council meeting on February 2nd with the Hotel Developer.

In closing I am opposed to the current hotel and mixed-use development plans. I support the MB Poets appeal and request a proper environmental review prior to approval of the Master Use Permit.

Respectfully,

Jim Mercer
1151 Tennyson St.
Manhattan Beach, CA

Martha Alvarez

From: Kathyclarke1141@gmail.com
Sent: Monday, February 1, 2021 7:53 PM
To: Darryl Franklin
Cc: List - City Council; Liza Tamura; Ted Fatuross; Carrie Tai, AICP; Martha Alvarez; Doug CARSTENS; Bob Clarke
Subject: [EXTERNAL] Re: 600 S Sepulveda Hotel Application - Items for the record re traffic accidents

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Darryl, I'm so sorry about your nanny and son. My son, Dylan, was almost killed in the crosswalk of the same intersection 6 years ago. A guy taking a left going North on Prospect sped up his car to beat me and my stroller and didn't see Dylan ahead of me because he was only 5 years old and smaller. I screamed and the driver slammed on his breaks stopping a foot from hitting Dylan dead on.

The same year, a high schooler sped through the stop sign at Prospect and Keats and hit Henry's stroller and broke it while I was crossing the street. She never stopped at the stop sign and her bumper missed Henry's 9 month old hand by 2 inches.

We've also had 2 cars bust through the road block in front of my house breaking the wood with such force that it landed across our yard.

I can't imagine adding more traffic to this area. It would be a nightmare.

Kathy Clarke

Sent from my iPhone

On Feb 1, 2021, at 4:28 PM, Darryl Franklin wrote:

Dear Mayor, City Councilors and others

As has been raised by numerous persons throughout the various hearings on the hotel application there are very real traffic accident concerns that have to be looked at that through an EIR with the involvement of CalTrans who have jurisdiction over Sepulveda and the City of Hermosa who are on the other side of the road.

As you are aware the proposed granting of the Sec 32 exemption would sidestep that important examination with likely and foreseeable fatal results.

As the reports of MB Poets traffic expert and the other appellant's traffic expert report shows the applicant's traffic expert has significantly understated trips generated and failed to analyze the impact of the development's traffic on the residential roads where much of the traffic will be carried (and which traffic will in turn enter and exit on the major arterial routes from those side streets).

I am attaching for the record information obtained by me today from CHP on accidents in the last 3 years on Sepulveda from Artesia to Keats. Please bear in mind 2020 had very reduced traffic due to COVID. Ther Hermosa PD email also raises the issue that this data may not be complete. You will see reports of 14 accidents on Sepulveda between Artesia and Keats, many with injuries and one fatality. These do NOT include the cyclist and motorcyclist fatalities at Tennyson and Keats that were more than 3 years ago (but are still very recent). This information was obtained by me today from Janelle Fallan

Dunham, Information Officer – Office of Community Outreach and Media Relations, California Highway Patrol.

Also attached is information from Hermosa PD on accidents in the last 12 months on their portion of PCH approaching the Artesia junction. Obviously the information in this email is not as detailed as that provided above by CHP but both attachments highlight that there are many serious accidents on this road on a regular basis and adding to the traffic in a significant way cannot and morally should not just be glossed over.

The City should already be well familiar with the detailed accidents analysis contained in the traffic reports done as part of the EIR for the Skechers developments (37 accidents in a 5 year period at the Artesia/Sepulveda junctions).

In closing and unfortunately making my point all the more personal, last week my nanny and 3 year old were hit in her car at 10.30am crossing over Artesia on Prospect heading South. Her car was written off by a pickup truck driver who went through a very red light at full speed. The attending police officer told me if the driver had hit the doors instead of the front of the car over the wheel well, they would both likely be dead. The difference between two funerals and an interesting story?...about 36 inches. Please for the sake of the community you represent do not exempt this project from an EIR to make sure that what is developed here does not create a bunch of entirely foreseeable adverse impacts.

Yours truly

Darryl Franklin

(1) 818 231 1182 (-8hrs GMT)

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You received this message because you are subscribed to the Google Groups "600 S Sepulveda" group.

To unsubscribe from this group and stop receiving emails from it, send an email to 600-s-sepulveda+unsubscribe@googlegroups.com.

To view this discussion on the web visit <https://groups.google.com/d/msgid/600-s-sepulveda/FC9E9C6D-2160-4467-89F3-A1AB8F0E6F74%40hxcore.ol>.

For more options, visit <https://groups.google.com/d/optout>.

Martha Alvarez

From: K C <kathyclarke1141@gmail.com>
Sent: Monday, February 1, 2021 9:32 PM
To: City Clerk; Suzanne Hadley
Cc: Bob Clarke
Subject: [EXTERNAL] Re: Strongly Oppose the Hotel at 600 S. Sepulveda, MB

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Dear City Council and Mayor Hadley,

I just wanted to add to my previous emails the following...

Hotel:

Ted Faturos said during the last city council meeting that he didn't think people on the 2nd floor of the hotel could see over my fence and into my windows. I want you to see the view from my bedroom window.



I would be looking directly into the 2nd story windows and they would be looking back into my windows and yard. And as a reminder, those beautiful carrot trees that add so much charm to Chabela, will be removed when the hotel is built so they won't be there to block visibility like they do now.

What's down on paper doesn't always translate into reality. This is true for our safety and privacy as well as the traffic and parking issues. I invite anyone in the planning commission and city council to come to my backyard and see for yourself how the wall of windows would be towering over us.

Construction:

We just had a utility truck use a jack hammer outside of our window on the sidewalk today while my kids were trying to zoom with their classes. Both of my kids couldn't concentrate because it was so loud. This was only for one day....how are they going to concentrate for 18 months during construction of a 4 story hotel 30-40 feet from their bedrooms?

Warm regards,
Kathy Clarke (Dylan and Henry's mom)
310-956-9496

On Tue, Jan 19, 2021 at 10:02 AM K C <kathyclarke1141@gmail.com> wrote:

Dear Manhattan Beach City Council,

First, I want to thank you for listening to the concerns of the residents in the Poets Section regarding the development at 600 S Sepulveda. If one positive has come out of this proposed hotel development, it's that it has brought the Poets Section community closer together. As a community, we truly want what's best for this location and we seek to find a more appropriate plan that will be a better fit for the Poet's Section community.

Unfortunately, my home is one of the most impacted homes in the Poets Section because it sits on the corner of Chabela and Tennyson Street directly across the street from the proposed hotel. I'm including below my previous emails that I wrote to the Planning Commission in opposition to the hotel being built. They list all of my concerns in detail. I also want to thank Suzanne Hadley for sending me such a kind response to my November 18 email listed below. As a mom of 2 younger children, safety is my number one concern. Safety from too much traffic, a hotel bar open to 1am across the street from my home and strangers looking down into my backyard and windows. The only thing I want to add to my previous emails listed below is the attached pictures of my sons who are age 11 and 6. They are standing in my backyard facing Chabela/600 S. Sepulveda. If this proposed hotel is built at 600 S. Sepulveda, the sky that you see behind them will be replaced by a 4 story building that will be blocking out sunlight after 4pm each day and will allow a multitude of strangers to look down into our backyard and into our windows. We will no longer see sunsets from our yard or have the ocean breeze that travels up the hill. The hotel will block all of that. The hotel will be as high or higher than the utility poles you are in the background. As you can see, our old growth trees don't provide privacy from the peering eyes of strangers looming above in the hotel. I know bamboo has been suggested to block the visibility into our backyard but we have to wait years for the bamboo to grow tall enough to cover the hotel room windows. By the time it's grown tall enough, my boys will be in high school. I invite the City Council to come take a look from our backyard so you can see for yourself the layout of the hotel in relation to our home. I think if you see it from my perspective, you will understand how serious of a negative impact this hotel will have on my home.

Also, here is a link to the online petition that I created for the MB Poets.

<https://www.change.org/p/manhattan-beach-residents-manhattan-beach-poets-section-against-development-of-hotel-at-600-s-sepulveda-blvd>

As of 9am today, we have 180 signatures opposing the hotel development and its rapidly gaining more signatures. I have requested a pdf of the signatures and comments but Change.org is saying it won't be available until 5pm. I will send it to you once I have it available.



On Wed, Nov 18, 2020 at 12:04 PM K C <kathyclarke1141@gmail.com> wrote:

Dear Manhattan Beach Planning Commission,

My name is Kathy Clarke and I live directly across the street from where you are proposing this hotel be built at 600 S. Sepulveda and we believe we will be severely impacted from the construction of this hotel directly across the street from our home. I have two young boys (age 6 and 11) and many concerns about all of the strangers up high in the 4 story hotel looking down on our single story home and backyard after this hotel is built. I'm also very concerned about how much traffic will be flying by my house around the corner on Chabela and Tennyson during construction and after the hotel is built. As it is now, cars already fly around this corner. They barely slow down at the stop sign and cut the corner as they speed to take a left from Tennyson onto Chabela. I have always been so worried about the safety of my boys on this corner. Since I have lived here, 3 cars have driven through the current road block busting through the wood causing it to fly across my front yard with such force and having it landing in front of my door. It's really scary! We've also had several cars drive over our front lawn to get around the road block. The hotel's increased traffic will just add to the likelihood that this will happen more frequently.

When my son was nine months old he was hit in his stroller by a high schooler in her car as I crossed the stop sign at Prospect and Keats. Her bumper hit his stroller an inch away from his hand, where it would have crushed it. My other son was almost hit by a car when he was 5 while we were crossing Artesia at Prospect in the crosswalk. The driver was trying to hurry up and make a left from Prospect going North and I screamed. Thankfully, the driver heard my scream and slammed on his brakes, stopping just inches from my son. My point is, there is already so much danger with drivers not stopping at stop signs and gunning it through intersections, that to increase the traffic in this little quiet neighborhood will make it even more dangerous. **Both of my boys could have been killed.**

While I'm on the topic of traffic, I also wanted to point out that the traffic coming out of the Afterburn/Chase Bank parking lot is so dangerous. I can't tell you how many times I've taken a left on Tennyson from Sepulveda going South to drive to my house and cars will just pull out in front of you from this parking

lot. It's a big problem. I mention this because this parking lot is directly across Tennyson from 600 S. Sepulveda. Also, taking a right onto Sepulveda from Tennyson is really difficult. Cars fly down Sepulveda going North and there is very limited visibility. There's no way you can add to this with more traffic from the hotel. There will be so many accidents if we increase the numbers of cars pulling out onto Sepulveda there.

I have talked to my friend who's a realtor and she has talk to other realtors to get their take on out situation and her biggest concern is the lack of sunlight and the years of construction right next to our home.I also worry about the lack of privacy that my children will have with hotel guests/strangers staring down at them from the rooms. **It is really creepy to think that strangers from the hotel will be looking at my kids in their own backyard.** I know you said that you would have plants there to block all of the windows but I just don't see how you would be able to block everything plus it will take years for those plants to be big enough. If I look out my bathroom and bedroom windows I will be looking straight at the hotel. The construction alone will make it impossible for my children to concentrate while distance learning during this pandemic. The noise and the vibrations will be such a distraction. Regarding the lack of sunlight, we will lose sunlight after 4pm and will lose our view of the beautiful sunsets through the trees. Instead, we will see a 4 story building blocking the sun while more cars wiz by our house adding to noise and air pollution. This hotel will be towering over our single story home.

I understand that the city wants the hotel tax revenue...I get that. I understand business and the need for money but a much better place for this hotel is where the Chase Bank is on Artesia and Sepulveda. There is more room, it's further away from the residents - you won't be looking down into residences' back yards, you won't be disturbing the neighborhood with construction, there are multiple ways to get in and out of the parking lot and you are at a light, making it safer. The Poet's section is filled with families and little kids. We are a quiet residential community that is not designed for a big 4 story hotel right next to it. This hotel needs more space and shouldn't be directly across the street from resident's homes. Just curious, what do you think is going to happen when the high school opens back up and you have all of their traffic as well as the Journey of Faith traffic?

Please hear us and understand how worried and concerned we are about the environmental impact of this proposed hotel at 600 S. Sepulveda.

Warm regards,
Kathy Clarke (Dylan and Henry's mom)
310-956-9496

On Wed, Oct 14, 2020 at 2:07 PM K C <kathyclarke1141@gmail.com> wrote:

Dear Planning Commissioners,

My name is Kathy Clarke and I'm writing to you regarding the proposed hotel at 600 S. Sepulveda, Manhattan Beach (the old El Torito). I don't know all the laws and the ins and outs of city regulations but I wanted to show you the human impact this development will have. I want to put a face to our address so you know who you are impacting if this hotel is approved. Attached are pictures of my children and in the background of the picture, you can see the proximity of our house which is directly across the

street from the proposed hotel property. I've been told that the 4 story hotel will be built right along Chabela directly across from my house. Due to the pandemic we are forced to homeschool our children, which has already created stress for my children. Building this massive construction 30 feet away from our home will only cause more stress in their lives and between the dust, noise and vibrations, it will make our home very hard to live in. Our house is already rattling from the Skechers construction across Sepulveda but now there will be 2 constructions going on at the same time. How are my kids going to do homeschooling during the construction noise, dust and the vibrations? Due to health concerns, we are not comfortable homeschooling outside of our home. It is just too much and too large of a construction so close to homes.

Once the 4 story Hotel is completed, we will also have privacy issues because the hotel guests will be able to look directly into our backyard from their hotel room window.

In addition, I am told that the hotel will have their bar/balcony open until 1am. How are my elementary school aged children going to sleep when next door a bar/balcony is open until 1am? So please tell me, what will life be like for my children while you are building a massive hotel next door and how will they sleep when the hotel bar is in full swing with the noise, music and drunkenness going on directly across the street from them until 1 o'clock in the morning?

I ask you to reach deep into your hearts and really consider the environmental impact this project will create. I understand that the city can collect a lot more in taxes with a new hotel but it shouldn't be at the expense of its residents. I speak from a mother's perspective and there are many other families in this neighborhood with small children who probably will have a similar impact. I ask you to please delay this approval and do an independent environmental study to see how it will impact this quiet Poet section community. I feel like this is the wrong location for this hotel and the wrong time to do such a large construction so close to families who are already dealing with the effects of a pandemic.



Warm regards,
Kathy Clarke (Dylan and Henry's mom)
310-956-9496

Martha Alvarez

From: Dylan Clarke <clarkedylan3@gmail.com>
Sent: Monday, February 1, 2021 10:04 PM
To: City Clerk; Suzanne Hadley
Subject: [EXTERNAL] Against Hotel at 600 S. Sepulveda

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Dear City Council and Mayor Hadley,

My name is Dylan Clarke and I live at 1141 Tennyson Street. I'm currently in the 5th grade at Pennekamp and I wanted to let you know that I am against the hotel being built across the street from my house.

I have four main concerns:

1. The loud construction will lead me to be distracted while doing my school work and that will make a negative impact on my grades.
2. Each night, I run to the freezer in our garage to get ice cream. If there is a hotel next to my house, won't there be a bunch of people looking down at me while I run through my yard to my garage?
3. This hotel and all of the eyeballs looking at me will creep me out when I'm in the backyard playing basketball and jumping on my trampoline with my little brother. What if there's a weirdo in there looking at me or my brother.
4. This hotel will totally disrupt the neighborhood vibe.

I plan to speak at the city council meeting so you can hear the impact this construction project will have on the children in this neighborhood. I'm going to have my 7 year old brother talk with me, too. I think it's important for you to hear what we have to say.

Dylan Clarke

Martha Alvarez

From: Carrie Tai, AICP
Sent: Tuesday, February 2, 2021 7:34 AM
To: City Clerk; Talyn Mirzakhanian; Ted Faturos
Subject: Fwd: [EXTERNAL] Proposed Hotel on Tennyson and Sepulveda

Begin forwarded message:

From: Carol Shibuya <carolshibuya@gmail.com>
Date: February 2, 2021 at 6:41:08 AM PST
To: Benjamin Burkhalter <bburkhalter@citymb.info>, "Gerry T. Morton" <gmorton@citymb.info>, Joseph Ungoco <jungoco@citymb.info>, List - Planning Commission <PlanningCommission@citymb.info>, Richard Thompson <rthompson@citymb.info>, Stewart Fournier <sfournier@citymb.info>
Subject: [EXTERNAL] Proposed Hotel on Tennyson and Sepulveda

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Dear Manhattan Beach City Council Members:

I have been a homeowner in the Poets section on Shelley Street since 1963. My one story house is second to the corner to Chabela Drive (very close to the proposed hotel). I am also very close to one way barrier on Shelley supposedly stopping traffic from turning from Chabela onto Shelley. In the hearings about the hotel much has been made anecdotally of this barrier when it comes to talking about the impact of traffic from the hotel on the residential streets and how it will stop traffic coming off Chabela. As someone who lives right by the barrier I can tell you it does not stop traffic turning onto Shelley. The traffic simply turns onto Shelley (often at unsafe speed) on the wrong side of the road and then moves over. This barrier does not stop traffic from coming from Chabela Drive onto Shelley Street and the City is being totally unrealistic if they think it works as intended.

Turning to parking - During the Mira Costa High School student days, the neighbors had to initiate a No Parking sign on school days from 8am-10:00am. In addition on Sundays the Church on the corner of Prospect and Artesia Blvd infiltrate parking spaces in the Poet's section neighborhood. Hotel traffic will be making illegal and dangerous turns onto Shelley and they will come to Shelley to park.

The City cannot say there will be no adverse impact when it comes to traffic and parking when the site is seriously deficient in its parking capacity and there has been no analysis of impact of

traffic on the residential streets. There will be impact which has to be analyzed properly and then mitigated.

Turning lastly to noise - The hotel has a rooftop bar, 25 rooftop machines that will be working much of the time and the noise from both bars and machines has been unrealistically minimized in the applicant's reports. On top of that the applicant's report ignores any noise coming up from the underground parking structure which is open to the air all along Chabela Drive (tires screeching, people talking by their cars, on their phones, people arguing, general noise from people leaving the bar, car alarms, etc.). This development will have audible noise coming from it and will breach City Code in various places as it relates to noise.

Again the City cannot find that this development is exempt under Section 32 and needs to require a full EIR.

Yours truly,

Carol Shibuya

1151 Shelley Street, Manhattan Beach, CA 90266



CARRIE TAI, AICP

DIRECTOR OF COMMUNITY DEVELOPMENT

ACTING PUBLIC WORKS DIRECTOR

310-802-5502

ctai@citymb.info

The City of Manhattan Beach cares about your health and safety. During state and local COVID-19 restrictions, most Community Development services are available [online](#) and various divisions can be reached at (310) 802-5500 or [Email](#) during normal City business hours. The [Citizen Self Service \(CSS\) Online Portal](#) is now available for City permit and planning applications and inspections.

CITY OF MANHATTAN BEACH 1400 Highland Avenue Manhattan Beach, CA 90266

[Office Hours](#): M-Th 7:30 AM-5:30 PM | Fridays 7:30 AM-4:30 PM | Not Applicable to Public Safety

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Download the mobile app now



Martha Alvarez

From: Talyn Mirzakhonian
Sent: Tuesday, February 2, 2021 9:50 AM
To: Martha Alvarez
Cc: Carrie Tai, AICP; Ted Faturros; Quinn Barrow
Subject: FW: Hotel proposal

Talyn Mirzakhonian
Planning Manager
310-802-5510
tmirzakhonian@citymb.info
City of Manhattan Beach, CA

Office Hours: M - Th 7:30 AM - 5:30 PM | Fridays 7:30 AM - 4:30 PM | Not Applicable to Public Safety

Here for you 24/7, use our click and fix it app www.citymb.info/reachmanhattanbeach

-----Original Message-----

From: Jack Gillespie [mailto:jack.gillespie@vistasir.com]
Sent: Tuesday, February 2, 2021 9:48 AM
To: List - Planning Commission <PlanningCommission@citymb.info>
Subject: [EXTERNAL] Hotel proposal

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

I would like all members of the planning commission to know that Jack and Maureen Gillespie support the new hotel proposal being discussed in tonight's meeting.

PLEASE DISTRIBUTE A COPY OF THIS TO ALL MEMBERS

SINCERELY
JACK AND MAUREEN GILLESPIE

Sent from my iPad

Martha Alvarez

From: Michael Beuder <mikebeuder@gmail.com>
Sent: Tuesday, February 2, 2021 10:50 AM
To: City Clerk
Cc: nancy best
Subject: [EXTERNAL] Oppose 40' Hotel Proposal

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

It's a sad day in Manhattan Beach when it took only 3 people to decide it was ok to increase commercial building height and completely kill the enjoyment of living in Manhattan Beach for so many residents in pursuit of the almighty buck. I'm a 5th generation resident, who also lives adjacent to commercial property, so I completely understand the NEW (i.e. various people over last 10 years, not current council make-up necessarily) city leadership and their pro-business/anti-resident mentality. Two of the three city council members who voted to increase the height to allow a hotel size that doesn't fit our town are no longer on city council. Go figure. Make a terrible decision and then make sure you aren't around for its effect. One lifetime resident council member, Steve Napolitano, understands the small town atmosphere of Manhattan Beach and he voted against raising the height limit. Good for him; he did the right thing. The Shade Hotel seems to fit in downtown with the prior height limits. It seems like a hotel that fits the surroundings. The hotel proposed for the old El Torito is a sad joke. Not one of the three council members who voted for raising height limits would be caught dead living in its shadow. Again, the fact that it only takes 3 people to trash Manhattan Beach indicates something is wrong with the process, in whole. Only one of the council members who voted to raise height limits, Montgomery, is still on the city council; not a life long MB resident like myself or Napolitano. BTW - the remodeled building that was formerly El Torito actually looks quite nice and keeps with our town's atmosphere much, much more than what is being proposed.

Mike Beuder, 1121 5th St. MB, CA 90266

Martha Alvarez

From: robertbush dslextreme.com <robertbush@dslextreme.com>
Sent: Wednesday, January 20, 2021 2:56 PM
To: robertbush @dslextreme.com
Cc: robertbush @dslextreme.com; Steve Napolitano; Richard Montgomery; Suzanne Hadley; Hildy Stern; jfenton; Bruce Moe; Quinn Barrow; Joe Franklin; List - City Council; mmatthews; kkomatinsky; bfournell; jfenton; speel; cgraves; jboxer; jcochran; jcocran; rideformbef
Subject: [EXTERNAL] 1 in 3 L.A. County infected by COVID-19

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

1 in 3 L.A. County residents have been infected by coronavirus since pandemic began.

by Robert Bush

One in three Los Angeles County residents [have been infected](#) with the coronavirus since the beginning of the pandemic, according to new estimates by county scientists, an astonishing sign of how rapidly the virus is [spreading in the hard-hit region](#).

The [estimate](#), based on scientific modeling, means officials believe more than 3 million of L.A. County's 10 million residents have been infected with [the coronavirus](#), including nearly 13,000 who have died.

That's more than triple the cumulative number of coronavirus cases that have been confirmed by testing. Officials have long believed that testing only captures a certain percentage of those who are infected because many with the virus don't show symptoms or suffer only mild symptoms.

The rising number of those infected has actually slowed the pace of coronavirus transmission, as the virus is increasingly coming into contact with people who have survived the infection and likely developed immunity.

“Unfortunately, we are still engaging in behaviors that facilitate spread of the virus, so it is still able to find plenty of susceptible people to infect,” said Dr. Roger Lewis, director of COVID-19 hospital demand modeling for the L.A. County Department of Health Services.

About 75% of L.A. County’s population will need to be immune to the virus through widespread vaccinations to dramatically slow its spread, Lewis estimated. Even if half of L.A. County’s population were immune, “and yet we decide to just pretend that we don’t have to take precautions, we will still have a very, very devastating pandemic.”

L.A. County [averaged more than 15,000](#) new coronavirus cases a day over the past week — one of the highest such rates seen so far in the pandemic.

L.A. County Board of Supervisors

First District	88 Incorporated Cities	4,084 square miles	Budget \$28 billion
Population 10,170,929			
Hilda Solis	Barbara Ferrer, Ph D	L.A. County Public Health Director	
Second District	Christina Ghaly, M.D.	L.A. County Director of Health Services.	
Holly Mitchell			
Third District			
Sheila Kuehl			
Fourth District			
Janice Hahn			
Fifth District			
Kathryn Barger			

[1918 Pandemic \(H1N1 virus\)](#) 500 million people or one-third of the world’s population became infected with this virus.

2021 – 103 years since the 1918 Pandemic (H1N1 virus) with Man on Moon, Internet, STE M, Medical Miracles and now **LA is the COVID-19 capital and the most dangerous county to live in the US, says FEMA.**

COVID-19 vaccine has been developed by Pfizer and Moderna at “warp speed”, but the vaccine is delivered at “snail pace”.

Where is our vaccine - out of the lab into our arms?

ARE THE L.A. COUNTY SUPERVISORS AND MEDICAL DIRECTORS REALLY PROTECTING THE RESIDENTS FROM COVID-19 AND VARIANTS?

1918 Pandemic (H1N1 virus)

1918 influenza pandemic was the most severe pandemic in recent history. It was caused by an H1N1 virus with genes of avian origin. It is estimated that about 500 million people or one-third of the world's population became infected with this virus. The number of deaths was estimated to be at least 50 million worldwide with about 675,000 occurring in the United States.

With no vaccine to protect against influenza infection and no antibiotics to treat secondary bacterial infections that can be associated with influenza infections, control efforts worldwide were limited to non-pharmaceutical interventions such as isolation, quarantine, good personal hygiene, use of disinfectants, and limitations of public gatherings, which were applied unevenly.

Martha Alvarez

From: Shannon Sharp <shannoncsharp@gmail.com>
Sent: Thursday, January 21, 2021 7:42 AM
To: List - City Council
Subject: [EXTERNAL] Open outdoor seating and outdoor dining

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Dear Counsel,

I missed the opportunity to vote on the issues surrounding outdoor seating, but my husband and I would 100% vote for them to be open.

What is currently occurring in Manhattan Beach, and has been occurring, is destroying our city. Hundreds of people have already left, and hundreds more will . Everything that makes Manhattan Beach special is on the line (at least what's left of it). There is no scientific evidence that these dining areas should be closed.

All of these forced closures are causing people to gather inside with others outside their immediate family, which makes the spread even worse.

Make the right decision for our precious city before there's nothing left.

Sincerely,
Shannon Sharp
East Manhattan Beach

--

Sincerely,
Shannon

Martha Alvarez

From: Michael Monaghan <michaelcmonaghan@gmail.com>
Sent: Thursday, January 21, 2021 7:25 PM
To: List - City Council
Subject: [EXTERNAL] UCLA and UCSF medical schools concerned on outdoor closures.

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Mayor and Council

Passing along comments from UCSF. We now have both UCSF medical school and UCLA medical school sounding alarm bells about closing outdoor activities.

Please act in the best interests of public safety, consider the science, and open all outdoors activities up.

<https://www.sfgate.com/news/editorspicks/amp/California-outdoor-dining-ban-COVID-19-surge-worse-15882565.php>

Michael

Martha Alvarez

From: Lanita Mac <lanitamac@gmail.com>
Sent: Friday, January 22, 2021 5:07 PM
To: List - City Council
Subject: [EXTERNAL] Please open parklets

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

I live here and have for 23 years. We are home owners of two properties in this city. We strongly urge you to consider opening our parklets. Please please be pragmatic. We beg you.

Kindly
Lanita and marcus mac
574 35th st
229 marine pl

Sent from my iPhone

Martha Alvarez

From: Thomas Chang <changhathomas@yahoo.com>
Sent: Sunday, January 24, 2021 6:03 PM
To: List - City Council; Bruce Moe
Subject: [EXTERNAL] Comments to the Task Force in Red

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Racist systems in our nation and in our local community, whether overtly adopted or practiced in the guise of legitimate policy, have formed complex networks of racially motivated discrimination against black Americans and other persons of color that have divided the society.

Provide current data that residents and businesses are racist and that there is systemic racism in Manhattan Beach. If you can not provide data then there is no support for stating that there is systemic racism in Manhattan Beach.

Even in the first days of 2021, the imperative of national healing took on new and alarming urgency as the country witnessed a mob of white extremists attack and occupy the Capitol Building in Washington, D.C., to the horror of those watching. The rioters attempted to halt the constitutional process of certifying the national election in order to advance their white supremacist agenda. Five people died in the violence. These events brought new focus of mind and emphatic urgency to our local efforts toward racial harmony and reconciliation.

Why is the above paragraph included in the document? What is the political motive?

To this end, the City must undertake serious change.

What serious change must the city undertake? Provide objective data. The Bruce's Beach task force was tasked with a plaque, apology and art piece. Anything beyond that is out of scope.

#3 Create a Bruce's Beach website to share the history, present the apology letter, inform about the plaque and art installation, announce

upcoming community events and provide a virtual forum where current experiences from people of color can be shared.

This can be part of the City web site of Historical society web site and should be done by IT department

#4 The City Council will create a Commission on Equity, Diversity, Social Justice and Inclusion (EDSJI) tasked with redressing the enduring harmful impact of systemic discrimination against Black Americans and other persons of color in the City of Manhattan Beach. The Commission will establish specific, measurable, attainable, relevant, and time-based goals, and will submit periodic reports to the City Council on its progress. The Commission will work to advance racial equity and support educational and cultural programs for residents of the City of Manhattan Beach. The Commission will work with the MBUSD EDSJI to inspire educational programs related to Bruce's Beach history, and issues related to diversity, equity, and inclusion in Manhattan Beach

Provide evidence of systemic racism in MB. One should not form a Committee without data, because there might not be a problem. People's stories do not equate to systemic racism. Who will comprise this committee and what is the expertise. Also further in the document there is mention of this committee reviewing police data. What is the basis for that review?

The city should commission a professional educational media piece (either documentary film or podcast) on the history of Bruce's Beach that would be easily distributable and accessible to South Bay residents and schools and include first person sources and remaining descendants.

This is out of scope. There is no cost and there is a pandemic from which the city must recover.

The City of Manhattan Beach will join the Government Alliance on Race and Equity (GARE), a national network of government working to achieve racial equity and advance opportunities for all, demonstrating Manhattan Beach's commitment to applying a racial equity lens toward creating a fair and just community, and rejecting all forms of bigotry, hatred, intolerance, racism and violence.

The cost to join should be documented
Should not there be evidence that minorities in MB are systematically excluded before MB embarks on this endeavor

#10 City Council members and members of the EDSJI will attend the 2-day Phase I workshop led by the Racial Equity Institute (REI). The mission of these workshops is to help a community grow in its understanding and analysis of structural racism, and to develop the tools needed to challenge patterns of power and to grow equity. Currently, these workshops are online and held through Zoom, with a max attendance of 35 people. REI trainers will lead the workshop. The cost to a community is \$11,000.

Should not there be evidence that minorities in MB are systematically excluded before MB embarks on this endeavor.

#11 The Manhattan Beach Police Department will expedite and implement the collection of race-based data in line with requirements outlined in the Racial and Identity Profiling Act. The department will report on its progress to the City Council and to the DEIC. City Council and the Department will implement the program in order to begin making regular data reports on or before December 31, 2021.

The DEIC sounds like a committee to side step the authority of the CC. It is unclear who will sit on this committee, their power, goals, expertise etc...

#12 The city sponsor an annual scholarship for high school students who will study African American history in college administered by the EDSJI.

#13 The city provide grants, administered by the EDSJI, to graduate students who pursue the study of the racial history of Manhattan Beach.

Why not a non profit. I am against the city spending any money outside the city at this point in time. What is the cost per year and for how long?

Social Practice Art (SPA) Installations: Her work involved months of events and consultation with the residents of her city.

I am against spending money at this time. This is out of scope and there is no cost provided. It is out of scope of the Task Force

Martha Alvarez

From: Bob Kellogg <rkellogg@gmail.com>
Sent: Monday, January 25, 2021 2:29 PM
To: List - City Council; City Manager
Subject: [EXTERNAL] Keep Parklets Closed

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

MB City Council:

I am writing to you as a resident and voter to express my extreme disappointment at the City Council's decision to reopen outdoor dining. By doing so, Manhattan Beach would be acting in defiance of County public health orders that prohibit outdoor dining and would be directly putting the health and safety of our residents at risk.

Manhattan Beach's cases and deaths have soared throughout January. Now is not the time to let up. Please reconsider this reckless and dangerous decision. Find other ways to support businesses and workers affected by the pandemic so that we can all survive this crisis.

Thank you,
Bob Kellogg
1207 Second St

Martha Alvarez

From: Talia Frederick <taliafrederick@gmail.com>
Sent: Monday, January 25, 2021 3:48 PM
To: List - City Council
Subject: [EXTERNAL] THANK YOU!!!

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Dear City Council,

We are so grateful the outdoor dining is opening back up and all our wonderful businesses will have a chance to recuperate! Thank you for your support in getting this done! I think its the right move for our State of California and our economy. People will continue to stay home and protect themselves if they are concerned for their own health! Again, thank you for your efforts!

Talia Frederick

Sent from my iPhone

Martha Alvarez

From: Ryan Rothman <ryan90254@icloud.com>
Sent: Monday, January 25, 2021 6:16 PM
To: List - City Council; City Manager
Subject: [EXTERNAL] Keep Parklets Closed

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

MB City Council:

I am writing to you as a constituent and voter to express my vehement disapproval of the City Council's move to reopen outdoor dining. By doing so, Manhattan Beach would be acting in defiance of County public health orders that have prohibited outdoor dining and would be directly putting the health and safety of our residents at risk. We are in the midst of an ongoing crisis, and it is by no means safe to reopen anything. We lost four MB residents to Covid in all of 2020—and 7 more in just the last 25 days. What about those numbers makes MB City Council feel comfortable reopening dining?

I understand that Councilmember Steve Napolitano, who sits on the council's Long Term Business Solutions Ad Hoc Committee, gave this excuse for reopening: "we saw the infection rates and hospitalizations going down. As a result, we made the decision to reopen the public seating this week." But again, MB's cases have soared throughout January, and we've lost seven more residents. The drop in cases in the last couple of days is likely only because Dodger Stadium is now being used as a vaccination site, not a testing site—but fewer tests administered just means fewer cases reported, not fewer cases occurring.

Outdoor dining encourages unmasked mingling and poses a threat to public health. Doctors are saying no. Public health officials are saying no. The county is saying no. Why is City Council pushing forward?

Reconsider this reckless and dangerous decision. Find other ways to support businesses and workers affected by the pandemic so that we can all survive this crisis. Human lives are not expendable.

Thank you.

Ryan Rothman

Martha Alvarez

From: Candis Duke <candisduke@icloud.com>
Sent: Monday, January 25, 2021 7:32 PM
To: List - City Council; Bruce Moe; Richard Montgomery; City Clerk
Subject: [EXTERNAL] Thank you

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Thank you for providing a helping hand to our local businesses. I can only imagine how difficult it must be for them.

You are appreciated.

Candis Duke

Sent from my iPhone

Martha Alvarez

From: Kim Isaacs <kimmystar1021@yahoo.com>
Sent: Monday, January 25, 2021 9:51 PM
To: List - City Council; City Manager
Subject: [EXTERNAL] Keep Parklets Closed

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

MB City Council:

I am writing to you as a constituent of Redondo Beach and neighbor to Manhattan Beach to express my vehement disapproval of the City Council's move to reopen outdoor dining. By doing so, Manhattan Beach would be acting in defiance of County public health orders that have prohibited outdoor dining and would be directly putting the health and safety of our residents at risk. We are in the midst of an ongoing crisis, and it is by no means safe to reopen anything. We lost four MB residents to Covid in all of 2020—and 7 more in just the last 25 days. What about those numbers makes MB City Council feel comfortable reopening dining?

I understand that Councilmember Steve Napolitano, who sits on the council's Long Term Business Solutions Ad Hoc Committee, gave this excuse for reopening: "we saw the infection rates and hospitalizations going down. As a result, we made the decision to reopen the public seating this week." But again, MB's cases have soared throughout January, and we've lost seven more residents. The drop in cases in the last couple of days is likely only because Dodger Stadium is now being used as a vaccination site, not a testing site—but fewer tests administered just means fewer cases reported, not fewer cases occurring.

Outdoor dining encourages unmasked mingling and poses a threat to public health. Doctors are saying no. Public health officials are saying no. The county is saying no. Why is City Council pushing forward?

Reconsider this reckless and dangerous decision. Find other ways to support businesses and workers affected by the pandemic so that we can all survive this crisis. Such as free grants to restaurants, weekly unemployment for restaurant workers and other ways to support restaurants and other businesses that have been affected by Covid.

Thank you!

Kim Isaacs

Sent from my iPhone

Martha Alvarez

From: Amy Poyer <amy.poyer@gmail.com>
Sent: Monday, January 25, 2021 10:09 PM
To: List - City Council; City Manager
Subject: [EXTERNAL] Keep Parklets Closed

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

MB City Council:

I am writing to you as a constituent and voter to express my vehement disapproval of the City Council's move to reopen outdoor dining. By doing so, Manhattan Beach would be acting in defiance of County public health orders that have prohibited outdoor dining and would be directly putting the health and safety of our residents at risk. We are in the midst of an ongoing crisis, and it is by no means safe to reopen anything. We lost four MB residents to Covid in all of 2020—and 7 more in just the last 25 days. What about those numbers makes MB City Council feel comfortable reopening dining?

I understand that Councilmember Steve Napolitano, who sits on the council's Long Term Business Solutions Ad Hoc Committee, gave this excuse for reopening: "we saw the infection rates and hospitalizations going down. As a result, we made the decision to reopen the public seating this week." But again, MB's cases have soared throughout January, and we've lost seven more residents. The drop in cases in the last couple of days is likely only because Dodger Stadium is now being used as a vaccination site, not a testing site—but fewer tests administered just means fewer cases reported, not fewer cases occurring.

Outdoor dining encourages unmasked mingling and poses a threat to public health. Doctors are saying no. Public health officials are saying no. The county is saying no. Why is City Council pushing forward?

Reconsider this reckless and dangerous decision. Find other ways to support businesses and workers affected by the pandemic so that we can all survive this crisis.

Amy

Martha Alvarez

From: robertbush dslextreme.com <robertbush@dslextreme.com>
Sent: Wednesday, January 27, 2021 5:36 PM
To: robertbush @dslextreme.com
Cc: robertbush @dslextreme.com; Steve Napolitano; Richard Montgomery; Suzanne Hadley; Hildy Stern; Bruce Moe; Quinn Barrow; List - City Council; mmatthews; jfenton; speel; Joe Franklin; cgraves; jboxer; jcochran; jcocran
Subject: [EXTERNAL] California Unemployment Fraud - \$11,4 billion

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

**California Unemployment Fraud - \$11.4 billion (10% confirmed) plus \$19 billion (17% suspicious claims that have not yet been proven to be fraudulent)
Total - \$30.4 billion**

by Robert Bush

California has paid out \$114 billion in unemployment benefits since March 2020, when the state stay-at-home orders caused many businesses to close or reduce operations, putting millions out of work. Some 19 million claims have been processed by the agency.

California officials said Monday they have confirmed that \$11.4 billion in unemployment benefits paid during the COVID-19 pandemic involve fraud.

In addition to the 10% of benefits confirmed to involve fraud, the state is investigating another 17% of benefits involving suspicious claims that have not yet been proven to be fraudulent - about \$19 billion worth.

Federal Government failed to provide adequate guidance and resources to California to counter fraudulent claims, almost all of which were filed through a new federal program that provides unemployment benefits to gig workers, independent contractors and the self-employed.

Millions of Californians applied for help, international and national criminal rings were at work behind the scenes working relentlessly to steal unemployment benefits using sophisticated methods of identity theft.

The agency hired a contractor, ID.me, to verify the identity of claimants online, and about 30% of claims filed between Oct. 1 and Jan. 11 were blocked for fraud. The firm said it identified some 463,724 fraudulent claims during the period, which would represent more than \$9 billion if the EDD had paid \$20,000 on each claim.

The EDD announcement on the scope of fraud outraged lawmakers, including Assemblyman Jim Patterson (R-Fresno), who said the new fraud tally “is bad enough. The fact that there are more than 940,000 people still waiting to get their unemployment checks is [EDD’s] fault alone.

The state’s work in the future may be complicated by the loss of top officials involved in the process. State Labor Secretary Julie Su, whose office oversees the EDD is being tapped by President Biden to become the number two administrator at the U.S. Department of Labor, according to a report by Bloomberg Law.

Sounds reasonable. Since State Labor Secretary Julie Su, whose office oversees the EDD (California Unemployment Fraud - \$11.4 billion (10% confirmed) plus \$19 billion (17% suspicious claims that have not yet been proven to be fraudulent) Total - \$30.4 billion) has done an excellent job for California, she should be promoted by President Biden to become the number two administrator at the U.S. Department of Labor.

Martha Alvarez

From: robertbush dslextreme.com <robertbush@dslextreme.com>
Sent: Friday, January 29, 2021 4:32 PM
To: robertbush @dslextreme.com
Cc: robertbush @dslextreme.com; Steve Napolitano; Richard Montgomery; Suzanne Hadley; Hildy Stern; Joe Franklin; Bruce Moe; Quinn Barrow; List - City Council; mmatthews; jfenton; speel; cgraves; jboxer; jcochran
Subject: [EXTERNAL] Capitol Under Siege

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Capitol Under Siege

by Robert Bush

Former President Donald Trump – Impeachment Trial for "incitement of insurrection". Who is responsible for the Security Breach?

The question of why it failed at that job ought to be directed to Pelosi and congressional leaders.

The following three men are the Scapegoats for Capitol Siege – Security Breach: Resignation of Capitol Police Chief Steven Sund, Michael Stenger, Senate Sergeant at Arms and Doorkeeper and Paul Irving, House Sergeant-at-Arms, the chamber's top protocol officer.

Capitol Riots - Capitol Police Inauguration – Capitol Police, FBI Agents and 20,000 National Guard Members.

Congress should be embarrassed when the rioters stormed the U.S. Capitol (inside job), because the siege was an insult to every Military Personnel that has served and died to protect this country from an enemy outside. (outside job)

The Capitol riot should have been just another stressful encounter that would have been contained at the expense of injuring some officers and rioters without breaching Congress.

Federal officials, who were harshly criticized for the law enforcement crackdown on BLM (Black Lives Matter) peaceful protests last June near the White House, were intent on avoiding any appearance that the federal government was deploying active-duty or National Guard troops against Americans.

These mixed messages may have been due to the Black Lives Matter effect, a successor to the Ferguson Effect, which left many police officers afraid to resist criminals for fear of losing their jobs and even going to jail.

When Capitol Hill came under siege, there was no congressional leadership to respond to it. Instead of taking command of the situation, House members panicked, squabbled, and let their private police flail with the situation while they hid away.

Congress waited for their private police force to protect them whose members knew that whatever happened, they would be blamed for overreacting or underreacting to the protest by a leadership that doesn't understand what they do and is sacrificing them to cover its asses.

Capitol Police - Capitol Police Chief Steven Sund - 2,300 officers who patrol 16 acres of ground and protect the 435 House members, 50 senators and their staffs. operating budget of \$460 million and has experience with high-security, high-stakes moment. It is used to managing large crowds and large events such as the inauguration, the State of the Union and mass demonstrations.

Capitol Police had planned for a free-speech demonstration and didn't need more help. Pentagon asked the U.S. Capitol Police if it needed National Guard

manpower and Justice Department leaders reached out to offer up FBI agents. Capitol Police turned both of them down.

D.C. Mayor Muriel Bowser had warned of impending violence for weeks, and businesses had closed in anticipation. She requested National Guard help from the Pentagon on Dec. 31, but the Capitol Police turned down the Jan. 3 offer from the Defense Department, according to Kenneth Rapuano, assistant Defense secretary for homeland security.

There were signs for weeks that violence could strike on Jan. 6, when Congress convened for a joint session to finish counting the electoral college votes that would formalize Democrat Joe Biden's election as president.

Capitol ended up being overrun, overwhelming a law enforcement agency sworn to protect the lawmakers inside. Four rioters died, including one who was shot inside the building.

The entire available Capitol Police force, at an estimated 1,400 to 1,500 officers, plus roughly 1,000 officers from Washington, D.C.'s Metropolitan Police Department, were on the scene at the Capitol at the time of the incursion. The extremist mob was violent, swinging lead pipes and other weapons at officers, leaving 15 officers in the hospital, including one in critical condition.

Free-speech demonstration - but make no mistake - these mass riots were not 1st Amendment activities; they were criminal riotous behavior. A protest is "the act of objecting or a gesture of disapproval," according to Merriam-Webster Dictionary. The 1st Amendment of the U.S. Constitution protects the right of people to assemble for peaceful protest.

Martha Alvarez

From: dmcphersonla@gmail.com
Sent: Saturday, January 30, 2021 12:15 PM
To: List - City Council
Cc: Liza Tamura; Martha Alvarez
Subject: [EXTERNAL] Silly Approval of Eat & Drink Encroachments on Manhattan Ave

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Mayor Suzanne Hadley
City Council
City of Manhattan Beach

Via Email: citycouncil@citymb.info

Mayor Hadley and Councilmembers,

The recent decision to permit eat & drink encroachments on Manhattan Ave between MB Blvd and 12th St discriminates against the vast majority of Downtown owners, while benefiting just a few.

The three parcels on the east have one owner. Dash Dash, Tacolicious and Nando have one property owner. Slay adds a third.

Against opposition by some residents, I participated in the process that increased outdoor-dining closing times from 9 PM to midnight during the pandemic emergency. That Covid relief, however, properly benefited most owners, as opposed to the recently-approved Manhattan Ave parklet.

The new street parklet will disturb nearby residents in several ways, but the most egregious impacts on everyone will result from substantial increased-congestion in Downtown traffic, as illustrated below. The parklet diverts all Manhattan Ave traffic to nearby residential streets, as well as to the intersections: 1) Man. Ave-MB Blvd; 2) Highland-MB Blvd; and, 3) 12th St-Highland. This unnecessary traffic-increase on Downtown streets will also greatly add to left-turns at these three critical intersections, exacerbating the congestion.

Those who concocted this silly scheme to benefit a mere handful of eat & drink owners on Manhattan Ave need to have their heads examined.

Don McPherson
1014 1st St, Manhattan Beach CA 90266
Cell 310 487 0383
dmcphersonla@gmail.com



Martha Alvarez

From: robertbush dslextreme.com <robertbush@dslextreme.com>
Sent: Monday, February 1, 2021 2:00 PM
To: robertbush @dslextreme.com
Cc: robertbush @dslextreme.com; Steve Napolitano; Richard Montgomery; Suzanne Hadley; Hildy Stern; Joe Franklin; Bruce Moe; Quinn Barrow; List - City Council; mmatthews; jfenton; speel; cgraves; jboxer; jcochran
Subject: [EXTERNAL] Former President Donald Trump - 2nd Impeachment Trial "Incitement of Insurrection"

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Former President Donald Trump - 2nd Impeachment Trial "Incitement of Insurrection"

by Robert Bush

Opening arguments in the Senate impeachment trial for Donald Trump over the Capitol riot will begin the week of Feb. 8, the first time a former president will face such charges after leaving office.

Republicans - give Trump a chance to organize his legal team and prepare a defense on the sole charge of incitement of insurrection.

Senate Republican allies argue that the impeachment trial is pointless and potentially even unconstitutional.

If Trump is convicted, the Senate could vote to bar him from holding office ever again, potentially upending his chances for a political comeback.

Democrats would need the support of at least 17 Republicans to convict Trump, a high bar. While most Republican senators condemned Trump's actions that day, far fewer appear to be ready to convict.

South Carolina Sen. Lindsey Graham - there is "a very compelling constitutional case" on whether Trump can be impeached after his term. Republicans will argue Trump's words on Jan. 6 were not legally "incitement."

Other Republicans had stronger words, suggesting there should be no trial at all. Wyoming Sen. John Barrasso said Pelosi is sending a message to Biden that "my hatred and vitriol of Donald Trump is so strong that I will stop even you and your Cabinet from getting anything done." Wisconsin Sen. Ron Johnson suggested Democrats are choosing "vindictiveness" over national security as Biden attempts to set up his government.

Harvard Law School Professor Emeritus Alan Dershowitz noted that Trump asked for peaceful and patriotic demonstrations. And in America, it has been a custom to differentiate the advocate and the actor, meaning the law should go after the people who commit the crimes, and not the speaker, saying that this principle goes back to a letter that Thomas Jefferson wrote in 1801.

“They also have the option of voting against trying the case, they won’t do that, because all you need is a majority, to try the case you need two thirds to convict. But they have a majority now and they will vote to have a trial and that trial will be unconstitutional,” he commented.

“My own view, and it’s not a view shared by other liberal academics, is that a Senate conviction would be null and void and Mr. Trump, citizen Trump could simply ignore the consequences. And if he decides to run for president in 2024,

he should be free to do it. And the courts will have to decide whether the Senate had any authority to determine who the presidential candidates in 2024 are.”

Dershowitz thinks that if the trial goes on it would take a long time and the spotlight would go back to Trump, which would not be beneficial for Democrats or America.

Finally, on the question of what recourse Trump could follow to uphold the Constitution, Dershowitz said that he could file a lawsuit in the federal district court, stating that he’s been subject to an unconstitutional bill of attainder.

Martha Alvarez

From: Christine Mercer <lexismom.cm@gmail.com>
Sent: Monday, February 1, 2021 4:25 PM
To: City Clerk; List - City Council
Subject: [EXTERNAL] City Council Meeting February 2, 2021 Continued Public Hearing De Novo to Consider a Master Use Permit - 600 S. Sepulveda

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

February 1, 2021

City Clerk
City of Manhattan Beach
1400 Highland Ave.
Manhattan Beach CA 90266

Re: Continued Public Hearing De Novo to Consider a Master Use Permit for a New 162-Room, 81,775 Square-Foot Hotel with Full Alcohol Service for Hotel Patrons and A New 16,348 Square-Foot Retail and Office Building; and Reduced Parking with 152 Parking Spaces at 600 S. Sepulveda Boulevard

Dear Mayor, Mayor Pro Tem, and City Council Members,

My husband and I are 25-year residents of the Poets section, directly east of the planned development. We are opposed to the current hotel and mixed-use development plans. We support the MB Poets appeal and request a proper environmental review prior to approval of the Master Use Permit.

I am concerned of the discrepancies between the January 18, 2021 Public Hearing testimony by the Planning Staff, the Applicant and the Planning Commission Staff reports.

The Planning Staff claim that the dining and full alcohol service is for hotel patrons only. The Applicant stated that there is no rooftop bar. The Planning Commission Staff reports state that the rooftop bar, lounge and deck would be open to the public.

January 19, 2021 Public Hearing Transcript:

Ted Ferterals ([00:15:20](#)):

*Um, there is some limited dining and full alcohol service on the site, **but that is for hotel patrons only.***

Ted Ferterals ([00:24:54](#)):

*So, I wanna be very clear that there is no restaurant onsite. A restaurant is open to the public, meaning anyone can walk in and order something. **All the eating and drinking opportunities on the site are for hotel patrons only.** Um, which means that because the only people going to these establishments are already at the hotel, there is no need to provide more parking. Um, and **therefore it's not part of the parking site.***

Jan Holtze ([01:44:23](#)):

There is no bar on the roof of the hotel. I repeat, there is no rooftop bar.

Planning Commission Meeting Oct 14, 2020 Staff Report:

Page 3

The hotel also incorporates an outdoor terrace on the fourth floor facing Sepulveda Boulevard where alcohol beverages and limited food service like appetizers will be offered to hotel guests.

Page 35 – Attachment E

Level 4 would contain back of house uses, 41 guest rooms, and a rooftop bar and lounge with limited food service and an expansive outdoor deck fronting on Sepulveda Boulevard and offering an ocean view. Although intended primarily for hotel guest use, the rooftop bar, lounge, and deck would be open to the public. The staff report states that no parking demand will occur from public use of the Type 47 alcohol service, because Condition 14 of Resolution PC-20 prohibits public use. The MB Poets ABC expert states that the resolution is a violation of ABC regulations.

I ask you to question these conflicting statements by the Planning Staff and the Applicant.

How can an accurate determination of reduced parking and traffic studies be evaluated based on misleading data? How can an environmental review be deemed exempt based on these studies?

Please resolve to require an environmental review prior to approving the Master Use Permit.

Thank you in advance for your thoughtful consideration of this project and its impact on the surrounding neighborhood.

Sincerely,

Christine Mercer

1151 Tennyson Street

Manhattan Beach CA 90266

Martha Alvarez

From: Christine Mercer <lexismom.cm@gmail.com>
Sent: Monday, February 1, 2021 5:37 PM
To: City Clerk; List - City Council
Subject: [EXTERNAL] City Council Meeting February 2, 2021 Continued Public Hearing De Novo to Consider a Master Use Permit - 600 S. Sepulveda

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

February 1, 2021

City Clerk
City of Manhattan Beach
1400 Highland Ave.
Manhattan Beach CA 90266

Re: Continued Public Hearing De Novo to Consider a Master Use Permit for a New 162-Room, 81,775 Square-Foot Hotel with Full Alcohol Service for Hotel Patrons and A New 16,348 Square-Foot Retail and Office Building; and Reduced Parking with 152 Parking Spaces at 600 S. Sepulveda Boulevard

Dear Mayor, Mayor Pro Tem, and City Council Members,

My husband and I are 25-year residents of the Poets section, directly east of the planned development. We are opposed to the current hotel and mixed-use development plans. We support the MB Poets appeal and request a proper environmental review prior to approval of the Master Use Permit.

I am concerned of the discrepancies between the January 19, 2021 Public Hearing testimony by the Planning Staff, the Applicant and the Planning Commission Staff reports.

The Planning Staff claim that the dining and full alcohol service is for hotel patrons only. The Applicant stated that there is no rooftop bar. The Planning Commission Staff reports state that the rooftop bar, lounge and deck would be open to the public.

January 19, 2021 Public Hearing Transcript:

Ted Ferterals ([00:15:20](#)):

*Um, there is some limited dining and full alcohol service on the site, **but that is for hotel patrons only.***

Ted Ferterals ([00:24:54](#)):

*So, I wanna be very clear that there is no restaurant onsite. A restaurant is open to the public, meaning anyone can walk in and order something. **All the eating and drinking opportunities on the site are for hotel patrons only.** Um, which means that because the only people going to these establishments are already at the hotel, there is no need to provide more parking. Um, and **therefore it's not part of the parking site.***

Jan Holtze ([01:44:23](#)):

There is no bar on the roof of the hotel. I repeat, there is no rooftop bar.

Planning Commission Meeting Oct 14, 2020 Staff Report:

Page 3

The hotel also incorporates an outdoor terrace on the fourth floor facing Sepulveda Boulevard where alcohol beverages and limited food service like appetizers will be offered to hotel guests.

Page 35 – Attachment E

Level 4 would contain back of house uses, 41 guest rooms, and a rooftop bar and lounge with limited food service and an expansive outdoor deck fronting on Sepulveda Boulevard and offering an ocean view. Although intended primarily for hotel guest use, the rooftop bar, lounge, and deck would be open to the public. The staff report states that no parking demand will occur from public use of the Type 47 alcohol service, because Condition 14 of Resolution PC-20 prohibits public use. The MB Poets ABC expert states that the resolution is a violation of ABC regulations.

I ask you to question these conflicting statements by the Planning Staff and the Applicant.

How can an accurate determination of reduced parking and traffic studies be evaluated based on misleading data? How can an environmental review be deemed exempt based on these studies?

Please resolve to require an environmental review prior to approving the Master Use Permit.

Thank you in advance for your thoughtful consideration of this project and its impact on the surrounding neighborhood.

Sincerely,

Christine Mercer

1151 Tennyson Street

Manhattan Beach CA 90266

Martha Alvarez

From: Jim Mercer <jimmsan95@verizon.net>
Sent: Monday, February 1, 2021 6:17 PM
To: City Clerk
Cc: List - City Council
Subject: [EXTERNAL] Proposed Master Use Permit for a 162-room hotel and retail space at 600 S. Sepulveda Blvd..

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February 1, 2021
City Clerk
City of Manhattan Beach
1400 Highland Ave.
Manhattan Beach CA 90266

Re: Proposed Master Use Permit for a New 162-Room, 81,775 Square-Foot Hotel with Full Alcohol Service for Hotel Patrons and A New 16,348 Square-Foot Retail and Office Building; and Reduced Parking with 158 Parking Spaces at 600 S. Sepulveda Boulevard

This correspondence is in regard to the proposed Master Use Permit for a 162-room hotel and retail space at 600 S. Sepulveda Blvd..

Dear Council Members,

My wife and I are 25-year residents of the Poets section, directly east of the planned development. We are opposed to the current hotel and mixed-use development plans. We support the MB Poets appeal and request a proper environmental review prior to approval of the Master Use Permit.

I am concerned about the discrepancies by the Applicant, Jan Holtze, between what was stated at the Planning Commissioners meeting on November 18 and his testimonies at the City Council Meeting on January 19. City Council member Montgomery asked the Developer about comments made by Planning Commissioner Thompson at the Planning Commission meeting of November 18th. Mr. Thompson clearly stated he was looking for a Hotel setback by eliminating the fourth floor rooms from the east side of the project adjacent to Chabela.

*Excerpts from the Nov 18th Planning Commission meeting **Planning Commission Transcript: Richard Thompson: 02:19:35** Uh, I'd love to. Um, first of all, I wanna thank the residents and I wanna share all the residents, um, that I've read all the correspondence, I listened to the testimony of the public hearing, it's really important, and I really appreciate your participation in this, uh, very important project. Um, and I wanna assure you that it's, it's not a revenue issue, the Planning Commission, we make decisions based on codes and consistency with the city's general plan. Um, I do agree with the residents that we can do better on this project. And I have a few suggestions that I'd like to mention. **The first is, I, I think the building is just too massive, particularly facing east, um, facing the residents along Chick-fil-A.** So I agree with the residents there. And I think the fix there, um, **the solution is to remove all the fourth floor rooms that face east, which is essentially 13 rooms. That's the fourth floor, 13 rooms, or it's about 8% of the number of rooms that they're proposing. And I think by removing those rooms that face the residents, it will help with privacy and many of their concerns.***

*Excerpts from the Nov 18th Planning Commission meeting **Planning Commission Transcript: Richard Thompson.2:32:33** And my suggestion of taking, um, **the fourth floor rooms facing east, um, we just take a row off.** If you look at the plans carefully, it would leave, uh, the row, the anterior row of rooms on the fourth floor. So if you just look at the fourth floor, you'll see that the rooms line up there, what I'm suggesting is **those rooms that are up against the east elevation would be removed.** And what **that would do is that would provide, um, more buffer to the residents.** And it really doesn't impact the hotel that much. **It's actually 13 rooms that, uh, would have to be removed and take a lot of***

*the bulk away from that elevation. But the other areas of the hotel could remain at 40 feet. **It's just along Chabela, and, and that's what we heard. We heard that from the residents. They're concerned about the size, the massiveness, they just build the buildings too big.***

*Excerpts from the Nov 18th Planning Commission meeting **Planning Commission Transcript: Richard Thompson. 02:38:49** Well, I have two thoughts. **One is that it's not just the privacy issue, but it's also the massiveness of that. A 40 foot building right up against residential is, uh, will be impactful, major impact to those residents. And if that fourth floor is, you could see in that cross section, if that was just pushed back, you can clearly see that would have a benefit, uh, to the view of that elevation along Chabela. So, um, I think it, it really, it deals with, it addresses two issues, the privacy issue, and also the massiveness of that elevation right up against the residents.***

The Developer understood the question, but stated he could make modifications, but that it may be difficult to do.

*Excerpts from the Nov 18th Planning Commission meeting **Planning Commission Transcript: Jan Holtze: 02:48:14** Um, I, I hear you clearly. And I think that those are, uh, you know, it's a great suggestion that, you know, here is a person who's making the proposal. Um, and, uh, um, I would say that, you know, um, I, I would hesitate to say that something like that can work, anything can work, but my question is, is where would it stop? You know, it's like, okay, we do this. Um, and it would take, uh, you know, the hallways don't line up with the stairwells, the elevators, you know, all those sorts of issues that we would have to deal with. Um, and the fact is, is we kind of thought that we had already kind of achieved what it is I think you're getting at, which is as much setback as you can get and still make the project viable.*

Mr Montgomery asked the developer, J. Holtze whether he was asked about the "**massing concerns**"

*Excerpts from the the January 19th **City Council Meeting Transcript: Montgomery: 01:52:43** Thank you, Jan. Just to make sure I had this part earlier, I- you heard the part, the question I asked, commission discussion, which I didn't read every single minute of their discussion, **did they ever talk to you about The massing concerns fourth floor?***

*Excerpts from the January 19th **City Council Meeting Transcript: Jan Holtze: 01:53:06** Well, there were some- there were some concer- or some questions by Commissioner Thompson, um, I think, um, that he was- he was trying to voice, um, his- his own opinion, um, about **not necessarily the massing of the building**, but more, uh, I think having to do with articulation, as I kind of understand it, of the building. So **it wasn't necessarily a height issue, um, or a setback issue** as much as it was I think kind of historically, um, I the- **I think he has an aversion to- to tall, vertical walls.***

*Excerpts from the January 19th **City Council Meeting Transcript: Montgomery: 01:53:54** So the third and fourth floor articulation was discussed. **Did you- and the reason why you didn't take it or you didn't discuss it past that point because was why?***

*Excerpts from the January 19th **City Council Meeting Transcript: Jan Holtze: 01:54:05** Well, I think it was, it was, uh, it came up after, uh, uh, pretty much all the debate at the end of the second hearing, um, and, um, I think it was a subject that had, uh, uh, you know, been brought up very quickly and, uh, you know, with- with very little discussion and was not something necessarily that, uh, uh, you know, we felt that- that it was possible to be eliminating a whole stack of r- or whole line of rooms as he was suggesting. I think, you know, having thought about it later that **he might have been trying to ask for something else, but I'm not sure.***

Mr Holtze's comments at the last City Council meeting on January 19th did not adequately explain what Mr Thompson was asking for. He incorrectly stated Mr Thompson was concerned **not about setback issue and privacy issues**, but that Mr Thompson "**I think he has an aversion to- to tall, vertical walls**". It is very clear from the meeting minutes what Mr Thompson was concerned about and why he voted to NOT Approve this project. I do not know why Mr Holtze did not state the concerns Mr Thompson had and in fact stated it was "**not a setback issue**". I also was surprised and disappointed that none of the Manhattan Beach City staff, among them Ted Faturos and Carrie Tai, did not correct this misstatement of facts as they were in attendance at both the Planning Commission meetings and the last City Council meeting. Is it not part of their job to ensure statements are accurate and if not, to correct those statements? I believe the City Council members must have a complete and honest understanding of what was requested by Planning Commissioner Thompson and what Mr Holtze's comments were. In addition. you have all received the letter from former Planning Commissioner Ben Burkhalter who opposed the Hotel Project for the same reasons Mr Thompson voted not to approve this project citing the local residents concerns.

I hope you review this letter carefully and raise these same concerns at the next City Council meeting on February 2nd with the Hotel Developer.

In closing I am opposed to the current hotel and mixed-use development plans. I support the MB Poets appeal and request a proper environmental review prior to approval of the Master Use Permit.

Respectfully,

Jim Mercer
1151 Tennyson St.
Manhattan Beach, CA

Martha Alvarez

From: Kathyclarke1141@gmail.com
Sent: Monday, February 1, 2021 7:53 PM
To: Darryl Franklin
Cc: List - City Council; Liza Tamura; Ted Faturous; Carrie Tai, AICP; Martha Alvarez; Doug CARSTENS; Bob Clarke
Subject: [EXTERNAL] Re: 600 S Sepulveda Hotel Application - Items for the record re traffic accidents

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Darryl, I'm so sorry about your nanny and son. My son, Dylan, was almost killed in the crosswalk of the same intersection 6 years ago. A guy taking a left going North on Prospect sped up his car to beat me and my stroller and didn't see Dylan ahead of me because he was only 5 years old and smaller. I screamed and the driver slammed on his breaks stopping a foot from hitting Dylan dead on.

The same year, a high schooler sped through the stop sign at Prospect and Keats and hit Henry's stroller and broke it while I was crossing the street. She never stopped at the stop sign and her bumper missed Henry's 9 month old hand by 2 inches.

We've also had 2 cars bust through the road block in front of my house breaking the wood with such force that it landed across our yard.

I can't imagine adding more traffic to this area. It would be a nightmare.

Kathy Clarke

Sent from my iPhone

On Feb 1, 2021, at 4:28 PM, Darryl Franklin <600sepulvedacomunity@gmail.com> wrote:

Dear Mayor, City Councilors and others

As has been raised by numerous persons throughout the various hearings on the hotel application there are very real traffic accident concerns that have to be looked at that through an EIR with the involvement of CalTrans who have jurisdiction over Sepulveda and the City of Hermosa who are on the other side of the road.

As you are aware the proposed granting of the Sec 32 exemption would sidestep that important examination with likely and foreseeable fatal results.

As the reports of MB Poets traffic expert and the other appellant's traffic expert report shows the applicant's traffic expert has significantly understated trips generated and failed to analyze the impact of the development's traffic on the residential roads where much of the traffic will be carried (and which traffic will in turn enter and exit on the major arterial routes from those side streets).

I am attaching for the record information obtained by me today from CHP on accidents in the last 3 years on Sepulveda from Artesia to Keats. Please bear in mind 2020 had very reduced traffic due to

COVID. Ther Hermosa PD email also raises the issue that this data may not be complete. You will see reports of 14 accidents on Sepulveda between Artesia and Keats, many with injuries and one fatality. These do NOT include the cyclist and motorcyclist fatalities at Tennyson and Keats that were more than 3 years ago (but are still very recent). This information was obtained by me today from Janelle Fallan Dunham, Information Officer – Office of Community Outreach and Media Relations, California Highway Patrol.

Also attached is information from Hermosa PD on accidents in the last 12 months on their portion of PCH approaching the Artesia junction. Obviously the information in this email is not as detailed as that provided above by CHP but both attachments highlight that there are many serious accidents on this road on a regular basis and adding to the traffic in a significant way cannot and morally should not just be glossed over.

The City should already be well familiar with the detailed accidents analysis contained in the traffic reports done as part of the EIR for the Skechers developments (37 accidents in a 5 year period at the Artesia/Sepulveda junctions).

In closing and unfortunately making my point all the more personal, last week my nanny and 3 year old were hit in her car at 10.30am crossing over Artesia on Prospect heading South. Her car was written off by a pickup truck driver who went through a very red light at full speed. The attending police officer told me if the driver had hit the doors instead of the front of the car over the wheel well, they would both likely be dead. The difference between two funerals and an interesting story?...about 36 inches.

Please for the sake of the community you represent do not exempt this project from an EIR to make sure that what is developed here does not create a bunch of entirely foreseeable adverse impacts.

Yours truly

Darryl Franklin

(1) 818 231 1182 (-8hrs GMT)

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You received this message because you are subscribed to the Google Groups "600 S Sepulveda" group.

To unsubscribe from this group and stop receiving emails from it, send an email to 600-s-sepulveda+unsubscribe@googlegroups.com.

To view this discussion on the web visit <https://groups.google.com/d/msgid/600-s-sepulveda/FC9E9C6D-2160-4467-89F3-A1AB8F0E6F74%40hxc0re.ol>.

For more options, visit <https://groups.google.com/d/optout>.

<Hermosa traffic info.pdf>

<Manhattan Beach collisions 18-20.pdf>

<SW.LSTREFNWrev2020.pdf>

Martha Alvarez

From: CityOfManhattanBeach@citymb.info on behalf of City of Manhattan Beach
<CityOfManhattanBeach@citymb.info>
Sent: Tuesday, February 2, 2021 9:04 AM
To: List - City Council
Subject: [EXTERNAL] Thank You . Email contact from City of Manhattan Beach

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Message submitted from the <City of Manhattan Beach> website.

Site Visitor Name: Lauren Kolodny
Site Visitor Email: righttribeinfo@gmail.com

Hello Everyone,

This email is long overdue, I'm sorry. I would like to say Thank You. Thank you for the mask enforcement downtown. As a resident of downtown and a business owner in downtown I can't thank you enough for the presence of these people. They are always polite and their presence does work. I see it all the time, people without masks walking in downtown and then they see the enforcement and put their masks on. I also know they have been an added sense of security with them walking some stores employees to their cars in the evening. Thank You for having them.

Lauren



CITY OF MANHATTAN BEACH

CITY NOTIFICATION

(310) 802-5000
CityofManhattanBeach@citymb.info

CITY OF MANHATTAN BEACH 1400 Highland Avenue Manhattan Beach, CA 90266

Office Hours: M-Th 7:30 AM-5:30 PM | Fridays 7:30 AM-4:30 PM | Not Applicable to Public Safety

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Martha Alvarez

From: Kelly Gordon <kelly.gordon.mb@gmail.com>
Sent: Tuesday, February 2, 2021 11:46 AM
To: Suzanne Hadley; Steve Napolitano; Richard Montgomery; Joe Franklin; List - City Council; City Manager
Subject: [EXTERNAL] Help Opening Schools
Attachments: health.jpg

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Dear Mayor Hadley & MB City Council -

I'm reaching out for your help in getting our beloved school district up and running for in person learning. I'm copying the email I sent to our board below here. Anything you can do will be appreciated and we appreciate everything you are doing for our city! Our parents are fleeing MBUSD at record #'s which will hurt our property values and the value of this city.

Dear MBUSD School Board Members,

As a mom of 3 kids in our schools, I'm reaching out for your help. I love our schools, love public school, and was raised by a mom who is a 47 year veteran public school teacher. I believe in public schools. However, I'm tired of seeing all of our friends flee MBUSD this year. Unfortunately, residents of MB have the money to pay for whatever education they want and they are all leaving for private schools who are offering in person learning. I'm at the point that I'm ready to pull mine as well as I cannot watch them cry every single morning on zoom. Zoom school DOES NOT WORK. My kids are bright, they love school, they are motivated, but now, I watch them stare at the computer with tears rolling down their faces because they don't understand and are too scared to ask with 30 other faces staring at them. One of my kids is dyslexic and a few years behind grade level in reading so we had to hire him a private tutor to help him keep up. At this point, I might as well file a PSA and homeschool my kids.

We urge this board to get creative and get our kids back on campus. The health department has approved 25% capacity to return to all campuses yet we're nowhere near that especially in middle and high schools. Demand that our teachers are offered the vaccine now! You said 94% of them want it, get it for them! Demand it from the health department. Districts all around us are open, why are we still not? I'm tired of seeing all our friends leaving the district and sadly more will continue to leave until you start fighting for our kids. I've stayed quiet trusting that you will do what's right but I cannot keep quiet any longer. Our kids are suffering. I cannot watch my kids cry every single morning because zoom school is too confusing. Get creative with the cohorts. For example, at Davinci middle school, they designed their school year so that each middle school teacher teaches ALL subjects so that when the kids return in person, there is no need for rotating or breaking up cohorts. (I understand they are a homeschool hybrid so already only teach a few subjects but we can do something similar) Maybe each teacher can teach two subjects per day in a block schedule so kids are on campus for a few hours a day but with only one teacher. We can do this!

We need to move forward NOW or Fall is going to be just as big of a disaster. If you announce a "hybrid schedule" for fall, prepare to see a mass exodus of families who cannot take yet another year of this mess.

For reference:

Attached is the LACDPH guidelines for how many kids can be allowed on campus. ALL campuses can have up to 25% capacity NOT including the TK-2 that already has a waiver for specialized

services. Our secondary grades have no hope of returning if we wait for cases to get under 7 per 100K but 25% of them can return NOW for special services (the district can get creative with this and get more kids back!). PS. None of our campuses are at 25% capacity - in our secondary campuses there are 32 students when 25% would be over 800 kids.

We need to ask that all teachers are offered the vaccine NOW! (Offer the vaccine, not require it. Matthews already said 94% of our teachers want the vaccine!).

A friend pulled her kids who are in full time in person HIGH SCHOOL in Utah. There, all teachers were vaccinated if they wanted it and all students are rapid tested every other week. There has been no transmission at school and anyone who tests positive goes to distance learning until they provide a negative test. Link to this public highschool: <https://pchs.pcschools.us/>

Las Virgenes sent back ALL grade levels of special needs back in OCTOBER (their district is twice the size of ours):

https://abc7.com/las-virgenes-schools-school-unified-district-opening-return-to-la/7808004/?fbclid=IwAR2xA5yxD7mNmFv1d3IB-X7V_Mx00OCzGgEeVl1GZF0Us4OTVeewKWdwPVO

Governor in Iowa signs into law to require at least the OPTION of in person school - distance learning would still be an option: https://www.desmoinesregister.com/story/news/politics/2021/01/29/gov-kim-reynolds-signs-law-requiring-iowa-schools-offer-in-person-classes/4307252001/?fbclid=IwAR3B5CXnG0W13wOWckKG0HX20K1Gq3bloa1Dx1WK2eBAP7n-quv-iDjD_Vk

COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH ORDER OF THE HEALTH OFFICER



Important additional details for implementation of cohorts are available from the CA Department of Public Health at [Guidance for Small Cohorts](#).

LIMITED ON-CAMPUS DENSITY

While Local Education Agencies (LEAs) or schools may configure as many cohorts as are appropriate to meet student needs for specialized services, the total on-campus population may not exceed 25% of the total student body at any one time for this particular purpose. The 25% limit does not apply to school age children on campus receiving day care while engaged in distance learning activities, nor does it apply to students in grades TK - 2 returning after granting of a school waiver. Schools that have been granted a waiver to return students in grades TK - 2 may bring additional students onto campus for specialized services in grades above grade 2 but not up to 25% of total student enrollment. If the school has been granted a waiver for grades TK - 2, schools may bring additional students onto campus for specialized services and assessments up to a maximum of 25% of student enrollment in grades 3 and above, as long as the school can adhere to distancing, infection control, and cohorting requirements.

SUPERVISING ADULTS

A supervising adult is an adult assigned to one cohort of children or youth, who does not physically interact with any other cohorts. Supervising adults may be child care staff, certificated or classified school staff, volunteers, participating parents or caregivers, or other designated supervising adult(s). An aide who is

Martha Alvarez

From: ROBERT CLARKE <clarkebobccc@yahoo.com>
Sent: Tuesday, February 2, 2021 3:45 PM
To: Kathy Clarke; List - City Council; City Manager; Suzanne Hadley; Ted Faturous; Carrie Tai, AICP; Steve Napolitano; Richard Montgomery
Subject: [EXTERNAL] Letter of opposition to proposed hotel at 600 Sepulveda Blvd. public hearing 2/2/21 additional written content & images
Attachments: Opposition to hotel at 600 Sepulveda leter2-21-21.docx; 20201014_085505.jpg

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Dear Mayor and members of the City Council,

Please find additional information and pictures of examples to be added to my previous letters on this topic(see attached). Please give me a call if you would to meet on the location in question . **Thank you** .

***Robert Clarke(lifetime resident and native)
1141 Tennyson Street (across the street from the development)
Manhattan Beach , CA 90266
(310) 505-7391
clarkebobccc@yahoo.com***



Tennyson St

Joe FRANKLIN
San Diego City Council

STOP

Opposition to hotel at 600 Sepulveda Blvd. with out a State required EIR that will properly evaluate the impacts to the families just across the street

Per Both Commissioner Thomson & Commissioner Ben Burkhalter- The height, size and mass of the development overpowers the residential houses next to it. Little to nothing has been done to modify how building **the tallest building on Sepulveda(45' tall) directly across the a small street** will take away the residence's sunlight, privacy, mature trees , airflow, peace and quite, put us in the shadows of this enormously out of place tall wall of glass with people able to see though any screening into our backyards

When asked why he could not reduce or eliminate the 4th floor of rooms or move the building further to the West his answer is extra cost or loss of income ? That he could have built right up to the curb ?. This is not true! he is required to complete the westside of the street with a ADA approved sidewalk 6' minimum plus to match the Eastside the city should under normal circumstances include a parkway to match what is on the Eastside of the street now

Why would the City let the developer violate good planning and design that would require them to maintain the 45 degree daylight plane by using the proper setback, staggering the height away from the residential side of the structure? The City has long followed these requirements. The Overlay ordinance that passed without any public involvement from residents (we did not know about it) allowed a 40 tall hotel but it did not specify that the height would be placed up against the East/ residential side of these lots instead of Sepulveda ? It also stated that a proper Environmental report (EIR) was still required for each development none was completed here or for the Overlay itself . None of the cumulative impacts of neighboring developments were properly analyzed :

- Expand the sidewalk width- make them donate 8' to 10' behind the existing curb, leave the mature Carrot trees in place and move the property line over so the City maintains the walk and trees. **Make them properly " complete the street to City Standards"**
- Eliminate the open air parking structure set up that will allow noise (car alarms, fights, idling cars, light ,and wheel squeaks, and exhaust) to spill out of the openings onto the sidewalk – make him pay for a traditional ventation and lighting system(an enclosed set up per normal design)- ***see attached examples of this set up at the parking structure in Manhattan Village – good idea for a mall but not next to residents homes***







Pedestrians and residents next door hear all of the noise from underground (car alarms, squeaking wheels, fights, car engines, drunks 24/7 – example open to street/walk at mb village

- Set to the structure further to the West – Match the existing offset followed by the commercial developments there now on the North and South of the Property construct a wall and include a setback wide enough on the East side of the structure to allow trucks to unload – ***There is no way they can unload 40' trucks where they show on the drawings with parked cars and tight turns they will end up double parked blocking parking on Tennyson with their flashers on***
- Eliminate the 4th and possibly the 3rd floor rooms (on the east bank) or stagger them to allow the **45 degree daylight plane** when we look out from our house or from across the street (per your commissioner's recommendations). The developer could also drop the entire hotel down in his shoring "drive down into the development" to reduce its height
- ***Bamboo is not a proper screen for privacy*** it just makes the overpowering wall of glass look greener (see some examples I found at a hotel the Hyatt House off Rosecrans in El Segundo – a similar height parking structure with bamboo used as describe) you can see through the stalks

EXAMPLES: OF BAMBOO SCREEN you can easily see right through it down into our yards!









You can clearly see through the bamboo

Parking :

- **Make the developer add at least one more level of underground parking along with eliminating the office space to use as additional parking**- No one in the right mind believes their flawed parking study or that little blue signs will keep people from parking on the residential streets without residential only permits !! every night I have to search for parking. People park on Tennyson for the gym(afterburn) for the high school, and for the church on Sundays. How much will our houses be worth if we have zero parking available for guest, or family members. There is no way to add parking once you build the hotel without enough parking! The parking study does not take into account that the hotel besides its 162 room will have room with people that have more than one car, that guest or people going to the bar to eat (Type 47 license applied for not a limited lic- a bona fide food establishment license and a 200 capacity lounge he say no one can eat there or drink there all he wants the license does not restrict the hotel from doing so). Question would you pay \$25+ a night to park in his lot when you can just park on Tennyson ? I would walk a block / even two for \$25.00.
- Make Residential Streets parking by resident permit only
- Install Speed humps on Chebela and/or no trucks over 5 tons on Chebela or cut off Tennyson Eastbound traffic past hotel driveway with 2nd road block to prevent hotel traffic on residential streets

What about the cost of loss of quality of life for the residence? What about the loss of home value that building such a large development on such as undersized out of place location will cause .

This is just very poor planning. We support thoughtful development that takes into account the residents that live there. That enhances our City but not at the expense of the neighborhood, and the home owners next to it. You cant trade our quality of life and home values for a small source of potential taxes how do we recoup our losses? our home values? All we are asking is for City to protect the residences and our nice family neighborhood and do the right thing require a EIR and include using developing a responsible development if the report finds it cant mitigate these negative impacts then build this somewhere else like where FRYs is or behind Manhattan Village in its current state it does not belong here too big , too much , no good

Please envision your Family living next to this when you cast your vote.



Robert Clarke (310) 505-7391

Martha Alvarez

From: robertbush dslextreme.com <robertbush@dslextreme.com>
Sent: Tuesday, February 2, 2021 1:35 PM
To: robertbush @dslextreme.com
Cc: robertbush @dslextreme.com; Steve Napolitano; Richard Montgomery; Suzanne Hadley; Hildy Stern; Joe Franklin; Bruce Moe; Quinn Barrow; List - City Council; mmatthews; jfenton; speel; cgraves; jfenton; jcochran
Subject: [EXTERNAL] Huntington Beach City Council Grants Tito Ortiz a Second Chance as Mayor Pro Tem

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Huntington Beach City Council Grants Tito Ortiz a Second Chance as Mayor Pro Tem

by Robert Bush

Tito Ortiz is no stranger to defending a championship title and on Monday night the newly-elected councilman found himself protecting his role as Huntington Beach's mayor pro tem from a frustrated City Council majority.

He is keeping the ceremonial title for now after hours of resident and council debate.

Over 42,000 people voted for the UFC hall of famer in November, electing Ortiz with not only the most votes in the council race but the most votes in city history as well.

However, since his victory Ortiz has increasingly worried most of his fellow council members and many residents because of his refusal to wear a mask at public meetings, at a local burger spot and at Oak View Elementary School.

Council members in December bestowed the title of mayor pro tem on Ortiz but at their meeting Monday night some lectured

him for not being more proactive in his role and not wearing a mask, as well as ignoring them when they reached out to speak to him.

On the verge of being stripped of his leadership role, Ortiz continued to question public health officials' recommendations of a face covering and blamed getting sick after a recent trip to Las Vegas on having to wear one.

"I'm thankful that it is not COVID," he said at the meeting.

"I get the fact that you may not agree with it, but you're taking on a job that requires certain things for us to do," Councilwoman Barbara Delgleize said about his refusal to wear masks.

Councilman Mike Posey listed off people he knew who have been hospitalized because of the coronavirus and assure Ortiz that the virus is real.

"I do it out of respect for others not because I believe in masks or I don't believe in masks," Posey said.