



November 25, 2014

Laurie Jester
Planning Manager
Community Development Department
CITY OF MANHATTAN BEACH
1400 Highland Ave.
Manhattan Beach, CA 90266

RE: REVIEW OF APPLICANT'S PROPOSED CONDITIONS REGARDING THE MANHATTAN VILLAGE SHOPPING CENTER PROJECT

Dear Laurie:

Matrix Environmental (Matrix) prepared the Draft and Final EIR for the Manhattan Village Shopping Center Project (Project). At the City's request, Matrix has reviewed the additional conditions recently proposed by the Applicant for the Project. The proposed conditions that are physical in nature include the following:

- In response to the request from City Council, add a stairway and elevator to the west side of the North parking structure;
- Provide 30 additional parking spaces adjacent to 3500 Sepulveda Boulevard building in the culvert with a stairway leading directly to the building;
- Provide interim landscaping and signage at the corner of Rosecrans Avenue and Sepulveda Boulevard; and
- Provide a right-turn/deceleration lane at the 33rd Street entrance to the Project Site.

All of these proposed conditions are within areas of the Project Site that were expected to be developed as part of the Project. As indicated in the attached letter from Gibson Transportation Consulting, Inc., the proposed conditions would not result in new traffic or parking impacts and the analysis and conclusions reached in the EIR with regard to traffic and parking remain valid. With regard to all other environmental issues, the proposed conditions are minor and would not substantively change any of the analyses within the EIR and would not result in significant environmental impacts, or require any additional mitigation. Furthermore, no changes to the Project have been made that would



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modify or undermine the conclusions of the EIR since the Final EIR was presented to City Council in Spring 2014.

CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR. Specifically, Section 15088.5 of the CEQA Guidelines states:

“New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.”

As the proposed conditions would not result in a new substantial adverse environmental effect, recirculation of the EIR is not required.

Please call me should you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephanie Eyestone-Jones", written in a cursive style.

Stephanie Eyestone-Jones
MATRIX ENVIRONMENTAL
President

Attachment: Letter from Gibson Transportation Consulting, Inc.



November 20, 2014

Ms. Laurie Jester
Planning Manager
City of Manhattan Beach
1400 Highland Avenue
Manhattan Beach, California 90266

**RE: REVIEW OF NEW CONDITIONS PROPOSED FOR
THE MANHATTAN VILLAGE SHOPPING CENTER DATED NOVEMBER 2014**
REF: J1106

Dear Ms. Jester:

Gibson Transportation Consulting was asked to review new conditions proposed by the developer of the Manhattan Village Shopping Center in response to the City Council's request in May 2014. The intent of this review was to analyze the proposed conditions to determine whether any additional environmental review or study is necessary. We have previously reviewed the project ("Project") in connection with the preparation of the Environmental Impact Report ("EIR") and prior modifications to the Project.

NEW CONDITIONS PROPOSED IN MAY 2014

The City Council directed staff to draft the necessary resolutions to approve the project, subject to five additional items. The first item was to approve all three phases, including Phase 3. The environmental impacts associated with Phase 3 were fully analyzed in the EIR. Thus, no additional review of a decision to approve Phase 3 is necessary. Two of the items-(a) providing a copy of an agreement between Macy's and Deutsche, and (b) good faith negotiations with Hacienda-do not involve any physical changes to the project, and thus do not require any environmental review. The council requested that the developer reduce the north parking structure to G+1, but the developer has stated that it is unable to reduce the core parking area. The developer has agreed to install an elevator and stairway on the west side of the north parking structure. In addition, the developer has offered to install 30 new parking spaces adjacent to the Hacienda Building, and to dedicate land for and construct a right turn/deceleration lane at the main entrance of the Shopping Center (Sepulveda/33rd Street) for northbound traffic to ingress the Center.

Accordingly, we have analyzed any potential environmental impacts arising from the following minor modifications:

1. The addition of an elevator and stairway to the west side of the north deck.
2. Construction of an additional 30 parking spaces in the culvert adjacent to the Hacienda Building to be allocated to the Hacienda Building. A stairway to the Hacienda Building will also be constructed.

3. The addition of a northbound right turn lane into the Center from Sepulveda at 33rd Street.

All other aspects of Phases 1 and 2 of the modified proposal remain in place.

EIR TRAFFIC STUDY VALIDITY

The question asked by the City is whether or not the above modifications would change the analysis or conclusions of the 2014 EIR for the Project. The following areas are the most sensitive from the traffic and parking perspective.

Project Trip Generation

The modifications do not increase the trip generation of the Project because the trip generation of a shopping center is based on the size of the center (i.e., number of square feet of gross leasable area) and not on the number of parking spaces provided within the center. The addition of the stairway and the addition of 30 new parking spaces would therefore not affect the trip generation of the project.

Thus from the perspective of Project trip generation, the analysis in the EIR is applicable, if not conservative, to the Project with the new conditions.

Base Conditions

The issue of Base Conditions was raised and studied during the FEIR. Typically if the Base Conditions change, there is the possibility that the Project traffic could have a significant impact on the transportation system that it did not have at the time of the EIR analysis. The three minor modifications would not affect the Base Conditions studied in the Project EIR.

New traffic counts were conducted in September 2013 along Rosecrans at the request of City Council for the purpose of checking traffic growth and verifying that the Project did not cause significant impacts along Rosecrans to the east of the center. The counts did indeed verify that the Project did not add enough incremental traffic to the Rosecrans Avenue corridor to cause significant impacts.

More importantly for the purpose of this discussion, the new counts confirmed that the traffic volumes on the arterial streets in the vicinity of Manhattan Village Shopping Center were still well within the Base Conditions traffic levels assumed in the Project EIR. The Base Conditions in the EIR assumed a 1% annual background growth in traffic levels and it assumed the addition of over 58,000 daily trips added to the background traffic as a result of 33 related projects in the study area. Most of these related projects have not been constructed, and therefore the trips have not been added to the background traffic levels even though they have been assumed to be on the street system in the Project EIR.

If new study intersection traffic counts were conducted today, we believe that they would be consistent with the counts shown in the EIR. Hundreds of intersection traffic counts

conducted throughout Southern California have shown a leveling off of traffic in the peak hours and we would expect that to be the case here also. In addition, the Cumulative analysis in the Project EIR still contains background traffic from 33 related projects – most of which have still not been built.

Parking Ratio

The addition of 30 new spaces is well within the range that was discussed in the Project EIR. A total of 30 spaces spread over the 650,000 +/- square feet at the end of Phases 1 and 2 would change the parking ratio by 0.046 spaces per 1,000 square feet. This change would not be noticed. The Project, as modified, still is proposed to meet the minimum required parking ratio and the additional 30 spaces are within the +10% range allowed by the City.

The new distribution of parking (+30 spaces in the culvert) is not substantial enough to change the traffic performance at the Project driveways.

Intersection Improvement: a Northbound Right Turn/Deceleration Lane on Sepulveda at the 33rd Street entrance.

On a typical weekday pm peak hour, the predominant flow on Sepulveda is southbound so the traffic signal timing is controlled by the southbound flow of traffic. Thus the addition of northbound capacity to the intersection would not change the weekday pm peak hour Level of Service of the intersection.

On Saturday afternoon however, the predominant flow of traffic is northbound so the addition of a right turn lane would move the 126 northbound right turning vehicles out of the curb through lane and into the right turn lane. This would have the effect of improving the Saturday afternoon volume/capacity ratio at the intersection, but the overall intersection would continue to perform at Level of Service C.

The addition of the northbound right turn lane/deceleration lane at Sepulveda/33rd Street (designed to the satisfaction of the City Traffic Engineer) will allow better distribution of traffic across the through lanes on Sepulveda so the intersection operation will improve, even if the effects don't show up in the capacity calculation.

The Project did not have a significant impact at this location under the previous proposal and it will not have an impact under the Project, as modified, with the reconfigured intersection.

SUMMARY

The modifications proposed are minor as far as traffic and parking are concerned. The analysis and conclusions of the Project EIR are still valid and are still applicable to the Project, as modified by these conditions of approval.



It is our opinion that no additional technical analyses are needed to evaluate the impacts of the Project, as modified by these conditions of approval. The traffic and parking impacts of the modified Project will be slightly less than those reported in the Project EIR.

Please call with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Patrick A. Gibson', written in a cursive style.

Patrick A. Gibson P.E., PTOE
President