

**ADDENDUM TO CERTIFIED
ENVIRONMENTAL IMPACT REPORT
(SCH. NO. 2000071076)**

for the

LONG POINT RESORT PROJECT
(Coastal Development Permit No. 166,
Variance No. 489, Conditional Use Permit No. 215,
Tentative Parcel Map No. 26073, and Grading Permit No. 2229)

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1.0 EXECUTIVE SUMMARY

1.1 REVISED PROJECT SUMMARY

The revised proposal for the Long Point Resort Project involves 102.1 acres situated on the former Marineland Aquatic Park property in the City of Rancho Palos Verdes, California. With the revised Project, the original 168.4-acre Project area was reduced to approximately 102.1 acres due to the elimination of the approximately 64.9-acre Upper Point Vicente Area (UPVA) and the approximately 1.41-acre CIGNA property. The Long Point Resort Project would limit development to the Resort Hotel Area (RHA) where a destination Resort is proposed.

The revised Project proposes to exclude development of the UPVA together with all improvements proposed thereon. Additionally, the revised Project would not develop a nine-hole golf course as proposed with the previous Project, but rather, would develop a Public Golf Practice Facility, including a driving range and three practice golf holes, on the RHA. The proposed revisions also involve modifications to the RHA, as follows:

- Relocation of the Public Golf Practice Facility and parking to the RHA;
- Reduction of the Golf Clubhouse building area;
- Elimination of one of the three (3) proposed tennis courts;
- Replacement of the subterranean parking garage with a new partially subterranean parking structure; and
- Additional grading on the RHA to reduce the proposed villas' building pad elevations. Overall grading was also reduced.

The revised Long Point Resort Project proposes an approximately 7.9-acre conservation area, an approximately 40.5-acre recreational area, and an approximately 53.7-acre resort hotel development area.

CONSERVATION DISTRICT

The approximately 7.9-acre Conservation District involves native habitat conservation and enhancement within the Habitat Conservation/Enhancement Planning Area. This District is comprised of two components: the Bluff-Face/Habitat Reserve and the Coastal Bluff Scrub Enhancement Area for the El Segundo Blue Butterfly.

RECREATION DISTRICT

The revised Long Point Resort Project proposes approximately 3.0 miles of new public trails including bicycle, equestrian, and pedestrian trails, as well as stairways and coastal access ramps. Additionally, a total of 100 new coastal access public parking spaces would be provided within the RHA, in addition to 825 new visitor serving parking spaces for the Resort Hotel and golf practice facility.

The revised Project proposes a shuttle service between the proposed Resort and the Ocean Trails Golf Course. The shuttle service would utilize low-emission vehicles and would operate 12 hours per day.

RESORT DEVELOPMENT DISTRICT

The Resort Development District is made up of the Resort Hotel are and encompasses approximately 53.7 acres. This area involves development of a full-service Resort Hotel and related public facilities, and visitor-serving resort villas as described below:

- 400 guest rooms (400 keys) in the main building and bungalows;
- 50 resort casita units (would be multiple keyed for a total of up to 150 overnight accommodations);
- 32 resort villas;
- Resort food and beverage facilities;
- Banquet/meeting rooms and retail facilities;
- A full-service health spa/fitness center;
- A maximum of seven (7) swimming pools, spas and/or Jacuzzi
- A maximum of two (2) tennis courts;
- Parking (surface lots and a partially subterranean parking structure); and
- A system of public walkways, jogging paths, and bike trails linking public areas and amenities; passive recreation areas (i.e., lawns, scenic overlooks, and seating areas).

Implementation of the revised Project would require the following discretionary approvals from the City of Rancho Palos Verdes:

- Approval of a Conditional Use Permit (CUP No. 215) for construction of the proposed resort/conference hotel, casitas, villas, and golf practice facility within the Commercial Recreational District (CR), and for the Coastal Specific Plan requirement that a CUP be obtained for “any future development along the former Marineland site”;
- Approval of a Variance (Variance No. 489) to allow the construction of a lower pool and restroom facility seaward of the coastal setback line.
- Approval of a Coastal Development Permit (CDP No. 166) for construction of the proposed resort/conference hotel, casitas, villas, and golf practice facility;
- Approval of a Tentative Parcel Map Application (TPM No. 26073) for the reconfiguration of the land parcels that make up the RHA (four proposed lots); and
- Approval of a Grading Permit (GRP No. 2229) to grade for subdivision, master grading and infrastructure improvements.

1.2 ENVIRONMENTAL ISSUES SUMMARY

As concluded in the certified EIR for the previous Project, this Addendum concluded for the revised Project that, with implementation of mitigation measures and/or compliance with applicable standards, policies and/or City of Rancho Palos Verdes Development Code, no significant impacts would occur related to the following issue areas:

- Aesthetics/Light and Glare;
- Biological Resources;
- Cultural Resources;

- Geology, Soils and Seismicity;
- Hydrology and Drainage;
- Land Use and Relevant Planning;
- Marine Resources;
- Public Health and Safety;
- Public Services and Utilities;
- Traffic and Circulation and
- Recreation.

As with the previous Project, it was determined for the revised Project that the following air quality impacts would remain significant and unavoidable following mitigation:

- NOX and PM10 fugitive dust emissions from construction activities;
- ROG, CO, PM10, NOX emissions from Project operations;
- Cumulative development would also result in significant and unavoidable impacts to regional air quality levels of ROG, NOX, CO and PM10.

Additionally, as with the previous Project, it was determined for the revised Project that the increase in the severity of the existing air quality violations would make the proposed development inconsistent with one of the two indicators of consistency. As with the previous Project, implementation of the revised Project would result in a significant unavoidable impact with respect to consistency with the AQMP.

With respect to noise issues, it was determined that several local roadways would experience noise levels in the future above standards in the absence of both the previous Project and the revised Project. Since the Project-generated trips would further exacerbate a projected exceedance of standards beyond established thresholds, implementation of the revised Project would contribute to a significant and unavoidable impact for adjacent residential areas along the following roadway segments:

- Palos Verdes Drive West (Palos Verdes Drive North to Hawthorne Boulevard);
- Palos Verdes Drive South (Hawthorne Boulevard to Palos Verdes Drive East);
- 25th Street (Palos Verdes Drive East to Western Avenue); and
- Hawthorne Boulevard (Palos Verdes Drive South to Palos Verdes Drive North).

If the City of Rancho Palos Verdes approves the revised Project, as with the previous Project, the City would be required to cite their findings in accordance with Section 15091 of the CEQA Guidelines and prepare a Statement of Overriding Considerations in accordance with Section 15093 of the CEQA Guidelines.

2.0 INTRODUCTION AND PURPOSE

2.1 CEQA COMPLIANCE

The City of Rancho Palos Verdes is the lead agency under the California Environmental Quality Act (CEQA). In accordance with Section 15164(a) of the CEQA Guidelines, *Addendum to an EIR or Negative Declaration*, this Addendum to the Long Point Resort Project EIR (SCH # 2000071076) is being prepared by the City of Rancho Palos Verdes. Section 15164 of CEQA states the following with respect to an Addendum to an EIR:

- (a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

On May 7, 2002, the City certified the Long Point Resort Project EIR for the project described in Section 3.0 of the EIR, *Project Description*. The City determined that an Addendum to the certified EIR would be necessary due to subsequent changes to the Project Description following certification. Changes involved removal of the Upper Point Vicente Area from the Project and reconfiguration of certain elements of the Resort Hotel Area. In determining that an Addendum to the certified EIR is required, the City of Rancho Palos Verdes has concluded that none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. More specifically, Section 15162 of the CEQA Guidelines, *Subsequent EIRs and Negative Declarations*, states the following:

- (a) When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the

involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR, was certified as complete or the negative declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

Based on the revised Project Description which includes removal of the Upper Point Vicente Area from the Project and reconfiguration of the Resort Hotel Area, no new significant environmental effects would occur, nor would the severity of impacts previously identified substantially increase. Further, no new information of substantial importance, which was not known at the time the previous EIR was certified, has been noted. None of the conditions described in Section 15162 of the CEQA Guidelines calling for preparation of a subsequent EIR have occurred. Therefore, this Addendum to the certified EIR is consistent with Sections 15162 and 15164 of the CEQA Guidelines. This Addendum will not be circulated for public review, but will be incorporated into the Final EIR. The City of Rancho Palos Verdes shall consider this Addendum along with the Long Point Resort Project Final EIR prior to making a determination on the Project.

2.2 FORMAT OF THE ADDENDUM

This Addendum to the certified EIR is organized into the following five sections:

- Section 1.0, *EXECUTIVE SUMMARY*, summarizes the revised Project Description and the Environmental Analysis.
- Section 2.0, *INTRODUCTION AND PURPOSE*, identifies Addendum requirements/procedures and the provisions of CEQA.
- Section 3.0, *BACKGROUND AND HISTORY*, provides a description of the Project history and summary of the Final EIR certified on May 7, 2002.
- Section 4.0, *REVISED PROJECT DESCRIPTION*, identifies changes to the previously proposed Project and details the current project with respect to project characteristics, phasing, objectives, and associated discretionary actions required.

- Section 5.0, *ENVIRONMENTAL ANALYSIS*, evaluates the degree of significance of the revised Project's environmental impacts or changes in the severity of impacts, as compared to impacts identified in the certified EIR. The Section provides an update to the mitigation measures subsections and notes changes in a strikeout/shading format. The final subsection verifies the conclusion of significance.

3.0 BACKGROUND AND HISTORY

On April 27, 2000, the Destination Development Corporation (Applicant) submitted to the City of Rancho Palos Verdes an application for development of the Long Point Resort Project. The Project encompassed approximately 168.4 acres and generally involved two geographical areas: the 103.5-acre Resort Hotel Area (RHA) and the 64.9-acre Upper Point Vicente Area (UPVA). The Project proposed development of a mix of uses including the following:

- 400-room hotel (including some bungalow units);
- 50 casita units (with a maximum of 3 keys per unit for a total of up to 150 overnight accommodations);
- 32 single key resort villa units;
- 9-hole public golf course and practice facility;
- Conference center, related commercial uses, and restaurants;
- 34 acres of conserved/enhanced habitat;
- 100 general coastal access public parking spaces;
- 825 resort hotel parking spaces;
- 2 shoreline access ramps;
- 7 public parks and overlooks; and
- 11.1 miles of public walking/hiking trails.

A Draft Environmental Impact Report (EIR) for the Long Point Resort Project was completed and circulated for a 60-day public review period from February 6, 2001 to April 6, 2001. The City received over 300 comment letters on the Draft EIR during this public review period. The Final EIR, which included responses to each of the comment letters and revisions to the Draft EIR text, as necessary, was completed on July 9, 2001.

Subsequent to the Draft EIR review period, the City of Rancho Palos Verdes determined that additional public review was warranted for the Biological Resources section of the Draft EIR (Section 5.3). The additional public review was due to textual clarifications resulting from public comments on the Draft EIR and spring survey data compiled concurrently with the Draft EIR review period. The Biological Resources section was re-circulated for a 30-day public review period from August 1, 2001 to August 31, 2001.

On October 9, 2001, the Planning Commission of the City of Rancho Palos Verdes adopted a motion recommending to the City Council certification of the Long Point Resort Project Final EIR (including the revised Biological Resources Section). On May 7, 2002, the City Council of the City of Rancho Palos Verdes certified the Final EIR. The EIR evaluated potential environmental impacts with respect to the following issue areas:

- Aesthetics/Light and Glare;
- Air Quality;
- Biological Resources;
- Cultural Resources;
- Geology, Soils and Seismicity;
- Hydrology and Drainage;
- Land Use and Relevant Planning;
- Marine Resources;
- Public Health and Safety;
- Public Services and Utilities;
- Traffic and Circulation; and

- Recreation.

The analysis concluded that, with the exception of Air Quality and Noise, no significant impacts related to these aforementioned issue areas were identified following implementation of mitigation measures and/or compliance with applicable standards, policies and/or City of Rancho Palos Verdes Development Code.

It was determined that the following air quality impacts would remain significant and unavoidable following mitigation:

- NO_x and PM₁₀ fugitive dust emissions from construction activities;
- ROG, CO, PM₁₀, NO_x emissions from Project operations;
- Cumulative development would also result in significant and unavoidable impacts to regional air quality levels of ROG, NO_x, CO and PM₁₀.

Additionally, it was determined that the increase in the severity of the existing air quality violations would make the proposed development inconsistent with one of the two indicators of consistency. Project implementation would result in a significant unavoidable impact with respect to consistency with the AQMP.

With respect to noise issues, it was determined that several local roadways would experience noise levels in the future above standards in the absence of the proposed Project. Since the Project-generated trips would further exacerbate a projected exceedance of standards beyond established thresholds, implementation of the proposed Project would contribute to a significant and unavoidable impact for adjacent residential areas along the following roadway segments:

- Palos Verdes Drive West (Palos Verdes Drive North to Hawthorne Boulevard);
- Palos Verdes Drive South (Hawthorne Boulevard to Palos Verdes Drive East);
- 25th Street (Palos Verdes Drive East to Western Avenue); and
- Hawthorne Boulevard (Palos Verdes Drive South to Palos Verdes Drive North).

The EIR for the Long Point Resort Project also evaluated the following Alternatives to the proposed Project:

- No Development Alternative
- No Project Alternative
- With Coast Guard Site Alternative
- Relocate Practice Facility - Option "A" Alternative
- Relocate Practice Facility - Option "B" Alternative
- No Resort Villas - Option "A" Alternative
- No Resort Villas - Option "B" Alternative
- Program of Utilization Alternative
- Point Vicente Park Enhancement Alternative

The environmentally superior alternative was analyzed based on the land use scenarios presented for the UPVA. The basis for what was considered environmentally superior was land development area for the alternatives and in comparison to the Project Description. On this basis, the No Development Alternative, Relocate Practice Facility - Option A Alternative; Point Vicente Park Enhancement Alternative; and Point Vicente

Park Enhancement/Existing Entitlement Alternative would result in less development area on the UPVA when compared to the Project Description and, therefore, were considered environmentally superior to the Project.

The City of Rancho Palos Verdes Planning Commission conducted twelve public hearings to review the proposed Long Point Resort Project applications, which at the time proposed the use of the City owned UPVA. On October 9, 2001, the Planning Commission recommended conditional approval of the Long Point Resort Project to the City Council. At that time, it was anticipated that the City Council would begin considering the Project applications at its November 7, 2001 meeting. However, at the October 16, 2001 City Council meeting, an item was agendaized for the Council to consider directing the Project Applicant to minimize the use of the City's UPVA. After considering public testimony and discussing the concerns raised by the Department of Fish and Game (i.e., regarding the use of City land for the Long Point Resort Project), the City Council unanimously agreed that the Project Applicant would not be allowed use of the City's UPVA.

In response to the Council's October 16, 2001 action, the Applicant submitted to the City a letter requesting that the Council refrain from considering the Project applications that had been forwarded to the Council by the Planning Commission. The request being made to the Council was intended to allow the Applicant adequate time to reassess the Project. On November 7, 2001, the City Council unanimously agreed to place the Project applications "on hold" for a period of six months (until May 7, 2002), during which time the Applicant was directed to either formally withdraw the proposed Project or submit a revised Project excluding the City's Upper Point Vicente property.

As a result of the City Council's decision to deny the Applicant use of the City-owned UPVA, on April 22, 2002 the Applicant formally submitted a revised Project to the Planning Department for consideration. The revised Project proposes to eliminate from the development plan the UPVA (approximately 64.9 acres) together with all improvements proposed thereon and reconfigure the development plan on the RHA (approximately 102.1 acres) as more fully described in Section 4.0 of this Addendum, *Revised Project Description*.

The Long Point Resort Project Final EIR was certified by the City Council on May 7, 2002. Also at this same meeting, the Applicant formally introduced the revised Project to the City Council. Staff was directed by the City Council to process the Project applications along with additional environmental studies.

4.0 REVISED PROJECT DESCRIPTION

4.1 PROJECT LOCATION AND SETTING

The revised proposal for the Long Point Resort Project encompasses approximately 102.1 acres situated in the City of Rancho Palos Verdes, California. As illustrated on Exhibit 4-1, *Project Vicinity*, the proposed Project is situated south of Palos Verdes Drive South, on the Long Point site within the Rancho Palos Verdes' Coastal Specific Plan area. The Project site is the location of the former Marineland Aquatic Park. This area is bounded by Palos Verdes Drive South to the north, the Pacific Ocean to the south, residential areas to the east, and the Pacific Ocean and open space to the west.

4.2 PROJECT CHARACTERISTICS

The revised Project proposes to exclude development of the Upper Point Vicente Area (UPVA) together with all improvements proposed thereon. The improvements that would be removed from the Project are described below.

- Five golf holes and associated golf cart paths proposed on the UPVA;
- Public Golf Practice Facility and associated parking*;
- Golf Maintenance Facility*;
- Cul-de-sac street improvements adjacent to St. Paul's Lutheran Church;
- All trail, park and habitat improvements proposed on the UPVA;
- Tunnel under Palos Verdes Drive South; and
- Reconfiguration of the Rancho Palos Verdes City Hall parking area and relocation of the City's existing Corporate Yard.

*Denotes Project components that would be relocated to the Resort Hotel Area with the revised Project.

Additionally, it should be noted that the revised Project does not propose development of a nine-hole golf course but rather proposes development of a Public Golf Practice Facility on the Resort Hotel Area (RHA), including a driving range and three practice golf holes

The proposed revisions also involve modifications to the RHA, as follows:

- Relocation of the Public Golf Practice Facility and associated parking to the southeastern portion of the RHA;
- Reduction of the Golf Clubhouse building area from 14,000 square feet (SF) to 8,000 SF;
- Elimination of one of the three (3) proposed tennis courts to accommodate relocation of the golf maintenance facility from the UPVA;

Insert Exhibit 4-1

Project Vicinity

- Replacement of the subterranean parking garage previously proposed under the hotel building with a new partially subterranean parking structure proposed directly across from the banquet facility motor courtyard; and
- Additional grading on the RHA to reduce the building pad elevations of the proposed villas (ridgelines would be below the Palos Verdes Drive South elevations). Overall, Project grading was reduced to 411,889 cubic yards of cut and 392,275 cubic yards of fill (including five percent shrinkage).

As illustrated on Exhibit 3-4 of the Final EIR, *Property Ownership Map*, CIGNA is the property owner of a 1.41-acre parcel situated along the eastern boundary of the RHA. On May 21, 2002, CIGNA opted to exclude their 1.41-acre property from the development plan. In summary, the original 168.4-acre Project area has been reduced to approximately 102.1 acres as a result of excluding the approximately 1.41-acre CIGNA property and the approximately 64.9-acre UPVA.

The Long Point Resort Project would limit development to the RHA where a destination Resort is proposed. The Resort is planned to provide an approximately 7.9-acre conservation area, an approximately 40.5-acre recreational area, and an approximately 53.7-acre resort hotel development area (refer to Exhibit 4-2, *Land Use Map*).

Implementation of the revised Project would require the following discretionary approvals from the City of Rancho Palos Verdes:

- Approval of a Conditional Use Permit (CUP No. 215) for construction of the proposed resort/conference hotel, casitas, villas, and golf practice facility within the Commercial Recreational District (CR), and for the Coastal Specific Plan requirement that a CUP be obtained for “any future development along the former Marineland site”;
- Approval of a Variance (Variance No. 489) to allow the construction of a lower pool and restroom facility seaward of the coastal setback line.
- Approval of a Coastal Development Permit (CDP No. 166) for construction of the proposed resort/conference hotel, casitas, villas, and golf practice facility;
- Approval of a Tentative Parcel Map Application (TPM No. 26073) for the reconfiguration of the land parcels that make up the RHA (four proposed lots); and
- Approval of a Grading Permit (GRP No. 2229) to grade for subdivision, master grading and infrastructure improvements.

LAND USE PLAN

The Land Use Plan for the revised Long Point Resort is illustrated on Exhibit 4-2, *Land Use Map*, and outlined in Table 41, *Land Use Summary*. As shown on Exhibit 4-2 and Table 4-1, the revised Project is divided into three (3) distinct land use districts including the Conservation District, the Recreation District, and the Resort Hotel District. These Districts are divided into four (4) Planning Areas (PA).

**Table 4-1
Land Use Summary**

Land Use Plan Category	Planning Area	Resort Component	Size		
			Gross Acres	Percent of Area	Overnight Accommodations (Rooms/Units)
Conservation	1	Habitat Conservation/Enhancement			
	1-A	Bluff-face/habitat Reserve Below Resort Hotel	6.7	7%	0
	1-B	Coastal Bluff Scrub Enhancement Area (for El Segundo Blue Butterfly)	1.2	1%	0
Subtotal - Conservation			7.9	8%	0
Recreation	2	Public Parking, Parks, Trails, Coastal Access, and Shore Area			
	2-A	Fishing Access Parking Expansion	1.0	1%	0
	2-B	Bluff-Top Park	2.2	2%	0
	2-C	Bluff Trail, Palos Verdes Drive/Marineland Trails, Resort Entry Trail, and Flowerfield Trail Corridors	3.8	4%	0
	2-D & 2E	Resort Coastal Access Public Parking Area and Small Beach Area	1.0	1%	0
	3	Golf Practice Facility			
	3-A	Practice Areas, Practice Holes 1-3, Clubhouse, and Parking	32.5	32%	0
Subtotal - Recreation			40.5	40%	0
Resort Hotel Development	4-A	Resort Hotel (acres include accommodations, public areas, food and beverage areas, prefunction/function/meeting areas, spa/health center, back of house, pools and decks, landscaped grounds, and surface/underground parking facilities)			
		Main Building Rooms/Bungalows (rooms/maximum keys)	53.7	52%	400
		Resort Casitas (flexible accommodations/maximum keys)	-	-	50/150
		Resort Villas (units/maximum keys)	-	-	32
Subtotal - Resort Hotel Development			53.7	52%	
Total	All		102.1	100%	-

Insert Exhibit 4-2
Land Use Map

CONSERVATION DISTRICT

The approximately 7.9-acre Conservation District involves native habitat conservation and enhancement within the Habitat Conservation/Enhancement Planning Area as detailed in Table 3-2, *Land Use Summary*, and illustrated in Exhibit 4-2, *Land Use Map*. This District is comprised of PA 1-A, *Bluff-Face/Habitat Reserve below the Resort Hotel*, and PA 1-B, *Coastal Bluff Scrub Enhancement Area for the El Segundo Blue Butterfly*. PA 1-A involves approximately 6.7 acres including approximately 5.3 acres of Southern Coastal Bluff Scrub along the westerly bluff-face and approximately 1.4 acres of rocky shoreline above mean sea level (below the Resort Hotel). No modifications to this component of the Project Description are proposed with the revised Project. With the revised Project, PA 1-B involves approximately 1.2 acres of Southern Coastal Bluff Scrub situated adjacent to the bluff-face and immediately east of PA 1-A. PA 1-B is proposed as a plant transition area (i.e., a native plant buffer) between the Bluff-Face/Habitat Reserve (PA 1-A) and the Project development limits. PA 1-B was not a component of the previous Project Description.

RECREATION DISTRICT

The revised Long Point Resort Project would provide a variety of new public recreational facilities and linkages in addition to the public golf practice facility. Approximately 3.0 miles of new public trails including bicycle, equestrian, and pedestrian trails are proposed, as well as stairways and coastal access ramps. These Project improvements would complement existing and planned City facilities in the Project area.

Additionally, a total of 100 new coastal access public parking spaces, equally divided between two new public parking lots would be provided within the RHA, in addition to 825 new visitor serving parking spaces for the Resort Hotel and golf practice facility.

The approximately 40.5-acre Recreation District is made up of two Planning Areas including the Public Parking, Parks, Trails, Coastal Access and Shore Area (PA 2), and the Public Golf Practice Facility (PA 3) (refer to Exhibit 4-2, *Land Use Map*).

Public Parking, Parks, Trails, Coastal Access, and Shore Area (PA 2)

PA 2 contains general recreation facilities which include approximately 8.0 acres of general public parks, parking/trails staging areas, and trails/Coastal access ways (refer to Exhibit 5.13-1 in certified EIR, *Proposed Recreational Facilities*). These facilities are the same as described in the certified EIR's Project Description.

- Fishing Access Parking Expansion (PA 2-A): This component involves an approximately 1.0-acre area adjacent to the existing Point Vicente Fishing Access. This parking area expansion would provide 50 additional public parking spaces in the Project area directly accessible from Palos Verdes Drive South and would be integrated with the existing Fishing Access parking lot. This parking area would serve PA 2-B (Bluff Top Park).
- Public Bluff-Top Park (PA 2-B): This component involves approximately 2.2 acres of open space that would serve as a trail staging area and as a public park area comprised of turf/landscaping for short-term and longer-stay users including

hotel guests as well as other visitors to the area.¹ The Public Bluff Top Park would be improved in conjunction with the 50-space expansion of the Los Angeles County Fishing Access Parking Expansion. Proposed facilities would support passive recreational uses such as ocean viewing, environmental interpretation, photography, family picnics, and informal play.

- Bluff Trail, Palos Verdes Drive/Marineland Trails, Resort Entry Trail, and Flowerfield Trail Corridors (PA 2-C): An approximately 3.8-acre open space and trail corridor would follow along Palos Verdes Drive South the length of the RHA, progressing toward the Ocean as the Flowerfield Trail to a public coastal access point, and ultimately connecting to the Vanderlip Trail. These proposed trails would include pedestrian, multi-use (including bicycle) trails, and potentially an equestrian link. Refer to the discussion below for further details regarding the proposed public trail network.
- Resort Coastal Access Parking Area and Small Public Beach Area (PA 2-D and PA 2-E, respectively): PA 2-D involves an approximately 0.4-acre parking area proposed to be adjacent to the golf practice facility. The 50-space public parking area would be accessed from the Resort Entry Drive. This parking area would include signs along Palos Verdes Drive South and within the RHA as “public coastal access.” PA 2-E involves an approximately 0.6-acre small public beach area situated at the terminus of the Project’s easternmost shore access point. No improvements are proposed in PA-2E.

Public Golf Practice Facility (PA 3)

As a result of the elimination of the UPVA, the revised Project proposes to relocate the Public Golf Practice Facility to the RHA. PA 3 encompasses the proposed 32.5-acre Golf Practice Facility (refer to Exhibit 4-2, *Land Use Map*). This facility would be operated as a public-play, non-membership, and fee-per-round facility, intended for use by Resort Hotel guests, residents and visitors. This area would include an 8,000 SF Golf Clubhouse building including a restaurant, small pro-shop, teaching studio, restrooms, etc. The Practice Facility would offer public golf practice and learning providing 25 to 30 natural turf tees, including a practice range, sand shot and chipping area, and putting green, each designed and constructed to industry standards. Public access to this area would be provided from Palos Verdes Drive South via the Resort Entry roadway. Approximately 45² parking spaces for the golf practice facility are proposed adjacent to the golf clubhouse. Proposed hours of operation for the golf practice facility are daily, dawn to dusk. No netting or night lighting of the golf practice facility is proposed.

A maintenance facility is also proposed in this area and would include the following:

- Storage area for mowers and minor landscape maintenance tools/ equipment;
- Maintenance offices;
- Shop/fertilizer building;
- Trash enclosures;
- Mixing bins;
- Sand/gravel/clippings storage bins; and

¹ PA 2-B is more than twice the size of the park required with the existing entitlement.

² These 45 spaces are in addition to the 50 coastal access public parking spaces being proposed.

- Nursery/growing areas.

The Runoff Management/Water Quality Management Plan has been revised to monitor and manage the quality of runoff from the Golf Practice Facility. This Plan would address issues including the management of herbicides, pesticides and fertilizers used on the Golf Practice Facility, the routing of runoff within and through the Practice Facility, and design details for energy dissipaters and other improvements at storm drainage outlets (refer to the detailed discussion below).

The Project proposes a shuttle service between the proposed Resort and the Ocean Trails Golf Course situated approximately 3.0 miles east of the Project site. The shuttle service would utilize low-emission vehicles and would operate 12 hours per day on a regular basis and on occasion, could be extended for banquets and dining. The regular daily service would be divided into three four-hour shifts as described below.

- Shift #1 involves one shuttle operating between 6 AM and 10 AM, leaving the Project site at 6 am and returning from Ocean Trails at 6:30 AM. This shift would complete two trips per hour, for a total of eight trips per day.
- Shift #2 involves two shuttles operating between 10 AM and 2 PM. This shift would complete four trips per hour, for a total of 16 trips per day.
- Shift #3 involves one shuttle operating between 2 PM and 6 PM. This shift would complete two trips per hour, for a total of eight trips per day.

RESORT DEVELOPMENT DISTRICT

The Resort Development District is made up of Planning Area 4 (Resort Hotel) and encompasses approximately 53.7 acres (refer to Exhibit 4-2, *Land Use Map*). This area involves development of the Long Point Resort Hotel ("Resort Hotel") including a full-service Resort Hotel and related public facilities, and visitor-serving resort villas as described below:

- 400 guest rooms (400 keys) in the main building and bungalows;
- 50 resort casita units would be distributed between the East Casita Village and the West Casita Village. These casitas would be multiple keyed (at up to three keys per casita), for a total of up to 150 overnight accommodations. The casitas could be owned independently from the main hotel facility, but could be maintained as a visitor serving use. Each of the 50 casita units would be offered for sale to one owner per casita. The owner would be permitted to use the casita a maximum of 60 days per calendar year and no more than 29 days consecutively. The balance of the year, the casita would be made available for overnight rental as hotel accommodations.
- 32 resort villas would be situated along Palos Verdes Drive South and designed architecturally similar to the Resort Hotel buildings. As with the casitas, the villas would be owned independently from the main hotel facility, but could be maintained as a visitor serving use. Each of the 32 villas would be offered for sale to one owner per villa. The owner would be permitted to use the villa a maximum of 90 days per calendar year and no more than 29 days consecutively.

The balance of the year, the villa would be made available for overnight rental as hotel accommodations.

- Resort food and beverage facilities would include a maximum of four restaurants/bars (400 seats), conferee dining (200 seats), lounges/beverage bars (150 seats) and a pool bar (2,000 square feet). Additionally, the existing Lookout Bar structure would be renovated;
- Banquet/meeting rooms and retail facilities would include approximately 68,000 square feet of ballroom, banquet, meeting, community, pre-function, foyer, flow, convenience services and retail sales space. This space would be made available for conferences, social occasions, and community and public events;
- An approximately 25,000 square foot full-service health spa/fitness center;
- A maximum of seven (7) swimming pools, spas and/or Jacuzzi spaced throughout the Resort (not including in-room amenities);
- A maximum of two (2) tennis courts;
- Parking to serve the Resort Hotel would be provided by both surface lots distributed throughout PA 4 and a multi-level parking structure adjacent to the Hotel; and
- Public areas and amenities within this area would be linked by a system of public walkways, jogging paths, and bike trails. A range of passive recreation areas such as lawns, scenic overlooks, and seating areas would be provided throughout the Area as well as within the proposed Golf Practice Facility.

CIRCULATION IMPROVEMENTS

The vehicular/pedestrian circulation plan for the proposed Project is illustrated in Exhibit 3-7 of the Final EIR, *Circulation Plan*. Access to the Resort Hotel, including the Public Golf Practice Facility, is proposed via Palos Verdes Drive South at the existing access to the former Marineland site, opposite Crestmont Lane. A 4-lane divided entry is proposed to allow right and left turns onto Palos Verdes Drive South and allow right and left turns into the Resort Hotel. The proposed Resort Entry Drive consists of two 21-foot-wide lanes. Portions of the road (i.e., entry, arrival at intersections and entry courtyard arrival) are divided by a minimum 10-foot variable-width landscape median. A minimum 10-foot-wide landscape parkway lines each side of the drive, with a pedestrian walkway on the eastern side only. Access to the RHA has not changed as a result of the proposed Project modifications.

RUNOFF MANAGEMENT/WATER QUALITY MANAGEMENT PLAN

Drainage Concept

A drainage plan was prepared by the Applicant for the management of stormwater on the Project site. The Project site would be required to manage the waters from several off-site areas in addition to its own, including commercial and residential developments that currently discharge to the site. With the exception of incorporating the Golf Practice

Facility and its water quality runoff needs, no substantial modifications have been made to the drainage plan as a result of the proposed Project modifications.

In order to effectively manage the stormwater from off-site, as well as on-site, a storm water collection and conveyance system is proposed. The system would manage a majority of the Project site's runoff and would discharge to the ocean through two main outlets. The outlets would be located below the bluffs to reduce the amount of erosion currently taking place.

In order to address water quality issues, the Project proposes to employ a Water Quality Management Program consisting of a series of Best Management Practices (BMPs) that would provide source control for pollutants as well as treatment of the stormwater.

Water Quality Evaluation

The effectiveness of the Project's Water Quality Management Program (i.e., BMPs) and the Project effects on stormwater quality was evaluated in two parts. The first was the compliance, or the ability of the Project to comply, with the Standard Urban Stormwater Mitigation Plan (SUSMP) guidelines. The second was the predicted water quality of stormwater being discharged from the Project site, taking into account certain BMPs.

Water quality modeling was conducted for two post-development outlets and one pre-development outlet, for comparison purposes. The results showed that there would be a substantial amount of treatment of on-site and off-site runoff and that post development pollutant concentrations would be less than pre-development concentrations.

4.3 PROJECT OBJECTIVES

The project objectives for the Long Point Resort Project as stated in the Certified EIR are consistent for the revised Project Description. The objectives that apply to development of the revised Project are as follows:

- Establish a successful destination coastal resort that provides a mix of hotel and resort accommodations, recreational amenities, health facilities, restaurants, meeting rooms, and other related visitor-serving uses on the Long Point (former Marineland) site as the core of a successful destination coastal resort.
- Provide a variety of hotel/resort accommodations that serve a wide range of coastal visitors and their needs, such as length of stay, size of units and associated conference and recreational facilities.
- Provide a high-quality, on-site golf experience as an integral part of the destination resort, and ensure that the golf practice and teaching facility is open to the general public.
- Provide for a variety of public open spaces, including natural and active open space areas, trails and general public recreation areas within the Project.
- Provide for expanded public coastal access, including:
 - 100 off-street parking spaces for the general public, in addition to those provided to resort visitors and guests;

- Vertical access from Palos Verdes Drive South, through the resort, safely and conveniently down to the shoreline in two locations; and
 - Continuous horizontal access comprised of a bluff-top trail and scenic overlooks along the full length of coastal bluff.
- Design a destination coastal resort facility that is architecturally and visually compatible with the surrounding landscape.
 - Provide for implementation of the City's Master Plan of Trails in all areas adjacent to the resort.
 - Protect sensitive coastal bluffs on the Long Point site, and limit the degradation of marine resources on or adjacent to the Project, that may occur with increased public access and use of the area.
 - Provide for a Project that is financially feasible for the private sector to develop, operate, and maintain on a sustainable basis and for the benefit of the City of Rancho Palos Verdes, its residents and the surrounding communities.
 - Protect the ecological values of the offshore marine areas through creation of a conservation area adjacent to the Fisherman's Access Area. This conservation area would provide protection of native vegetation, including a transitional planting area (ecotone) between the bluff edge and the adjacent public park and provisions to direct drainage and surface runoff away from the bluff.
 - Improve water quality through construction and implementation of a Runoff Management/Water Quality Management Plan.
 - Provide for the redevelopment of the former Marineland site with visitor-serving uses that would attract new visitors to the area and provide economic benefits to the City.

4.4 PHASING

It is anticipated that improvements to the revised project would be completed within an approximately 24-month period. The conceptual phasing schedule for the Resort is detailed in Exhibit 4-3, *Conceptual Phasing Schedule*.

The schedule illustrates five linked construction operations over the 24 months, following City and other public agency reviews and approvals. The Developer and the City would determine the precise timing of these operations.

As indicated, Phase 1 entails site preparation, grading, and construction of the Resort Hotel improvements and infrastructure by the Master Developer. Subsequent phases depend upon the Resort Hotel and Golf Practice Facility builder(s) and operator(s), as well as their completion and City approval of precise civil engineering, architectural, and

landscape architectural construction documents.

The schedule would reflect market conditions, resort tourism, the real estate market, financial institution lending policies, City of Rancho Palos Verdes schedules, and other factors and public agency actions potentially including conditions of approval, development agreement, and/or other agreement(s) between the Master Developer and the City. Phasing, therefore, is subject to change over time to respond to these various factors, and individual phases may overlap one another. Provided below is a more detailed discussion of what is entailed in each of the phases.

SITE PREPARATION AND INFRASTRUCTURE

LANDSCAPE RECOVERY

This initial operation is projected to begin in the second quarter of 2003 and involves the excavation, boxing, and preservation (for replanting) of arborist identified specimen trees and shrubs existing within RHA, primarily from the Marineland era.

DEMOLISH STRUCTURES/RECYCLE CONSTRUCTION MATERIALS

During the second sub-phase, the RHA would be cleared of buildings, paving, and other construction debris associated with Marineland and subsequent uses of the property. This work would be accomplished in accordance with City policies and the certified EIR and would also involve the abandonment/removal of obsolete subsurface/ surface infrastructure and utility lines. The recycling of asphalt, concrete, and other paving construction materials on the site would be used, where practicable, to reduce costs and the amount of demolition material to be exported from the Project area, thereby reducing construction-related air emissions and haul truck traffic to and from the site.

GRADE PROJECT AREAS

The RHA would be graded consistent with the Grading Plan that involves balancing cut and fill on-site.

Insert Exhibit 4-3
Conceptual Phasing Schedule

According to the Grading Plan (May 20, 2002), a total of 411,889 cubic yards (CY) of cut and 392,275 CY of fill (including five percent shrinkage) are proposed. Based on these estimates, and in consideration of the five percent shrinkage factor, grading would be balanced on-site. Grading of both documented and undocumented fills within the interior of the RHA is anticipated. To ensure a firm and stable foundation for Resort development, the details of grading operations would be based upon detailed engineering studies conducted by a team of City-approved and State-licensed geotechnical consultants.

Finish grading for the site would be consistent with the Grading Plans and would incorporate detailed grading design for roadways and guest parking areas, building pads, infrastructure, golf practice facility, and public parking and park areas as approved by the City of Rancho Palos Verdes.

INFRASTRUCTURE IMPROVEMENTS

The backbone infrastructure for all resort development would be installed. This would include improvements to the roadway and storm drainage system, sewer and water systems, and other underground facilities and utilities as described. It would also include connections to existing on-site and off-site infrastructure. As the backbone infrastructure is installed, the Palos Verdes Drive South entry and internal roadways, parkways, trails, walkways, and similar master site improvements would be constructed, as practicable.

Project-level infrastructure to serve individual buildings and facilities would be provided in conjunction with the development of individual Project areas.

Master and interim landscape associated with common areas, easements, entries, and remediation/stabilization would, as appropriate, occur in conjunction with Master Developer finish grading and infrastructure improvements, particularly where necessary for erosion control and other geotechnical reasons.

HOTEL IMPROVEMENTS

The Resort Hotel development includes the main building, bungalows, casitas, and resort villas, as well as the associated restaurants, the Lookout Bar, meeting rooms, spa facilities, parking areas, arrival courts, pools, decks, and grounds.

MAIN BUILDING AND BUNGALOWS

Construction of the Main Hotel Building is the most lengthy and complex assignment and is estimated to require 21 to 24 months, beginning in the first quarter of 2004, and culminating in a grand opening in the first quarter of 2006. All of the bungalows would be constructed within this time frame.

CASITAS

Construction of the casita accommodations may be developed in multiple phases

depending upon market demand, however, would not precede completion of the Main Hotel Building.

RESORT VILLAS

Construction of the resort villas may be separate from the other accommodations of the Resort Hotel, and may be developed in multiple phases. Completion of the resort villas would not precede completion of the Main Hotel building.

GOLF PRACTICE FACILITY IMPROVEMENTS

It is anticipated that improvement of the Public Golf Practice Facility and three practice golf holes would begin the first quarter of 2005 with an estimated completion in 12 months (concurrent with Hotel grand opening). Construction would include the clubhouse, public parking areas, and the land necessary for construction staging areas associated with the main building, bungalows, casitas, and resort villas.

PUBLIC PARKING, PARKS, AND TRAIL IMPROVEMENTS

Improvement of the public parks and parking areas, as well as the public coastal access and trail system would occur such that completion corresponds with or precedes the opening of the Resort Hotel and Golf Practice Facility.

HABITAT RESTORATION/ENHANCEMENT/CREATION

The phasing of habitat restoration, enhancement, and creation would reflect City approvals and permit requirements. The Master Developer proposes to implement this habitat restoration, enhancement, and creation as soon as practicable, with completion of habitat improvements in conjunction with completion of adjacent resort and recreation areas of the Project.

Bluff-Face/Habitat Reserve (PA 1-A) and Coastal Bluff Scrub Enhancement Area (PA 1-B).

Planning Area's 1-A and 1-B which contain Coastal Bluff Scrub would be deed-restricted in conjunction with the City's issuance of a grading permit for the RHA.

4.5 AGREEMENTS, PERMITS AND APPROVALS

**Table 4-2
Discretionary Actions**

Discretionary Action	Planning Commission	City Council	Other	Notes
Conditional Use Permit (CUP No. 215)	X	X	X ¹	1. The Coastal Commission may exercise its review authority over CUP No. 215 as it falls within the City=s Coastal Zone.
Tentative Parcel Map (TPM No. 26073)	X	X	X ²	2. The Coastal Commission may exercise its review authority over TPM No. 26073 as it falls within the City=s Coastal Zone.
Grading Permit (GRP No. 2229)	X	X	X ³	3. The Coastal Commission may exercise its review authority over GRP No. 2229 as it falls within the City=s Coastal Zone.
Coastal Development Permit (CDP No. 166)	X	X	X ⁴	4. The Coastal Commission may exercise its review authority over CDP No. 166 as it falls within the City=s Coastal Zone.
Variance (Var. No. 489)	X		X ⁵	5. Coastal Commission may exercise its review authority over Variance No. 489 as it falls within the City=s Coastal Zone.
Development Agreement	X	X		6. If undertaken after a decision is made on the Project.

5.1 AESTHETICS/LIGHT AND GLARE

5.1-1 SHORT-TERM IMPACTS

The certified EIR concluded that grading and construction activities associated with implementation of the previous Project had the potential to temporarily degrade the existing visual character or quality of the Project sites and their surroundings. Analysis concluded that impacts would not be significant since construction impacts would be short-term in nature, would cease upon completion of construction activities, and would be further reduced through compliance with the City's Development Code.

The revised Project would not result in any short-term aesthetic impact within the UPVA since the area has been eliminated from the development plan.

No change to the remainder of the conclusions identified in the certified EIR would occur with the revised Project with respect to short-term aesthetic impacts on the RHA. Construction impacts would be considered as less than significant through compliance with the Development Code. Further, construction-related impacts are not considered significant as they are anticipated to be short-term and would cease upon Project completion. The conclusion of significance for these impacts would not change with the revised Project.

5.1-2 LONG-TERM IMPACTS

VISUAL CHARACTER

The certified EIR concluded that implementation of the previous Project had the potential to permanently degrade the existing visual character or quality of the Project sites and their surroundings. Analysis concluded that this impact was considered less than significant through compliance with applicable Development Codes.

The existing nature and appearance of the UPVA would not be altered with the revised Project since the UPVA has been eliminated from the development plan. No impacts to the visual character of the UPVA would occur with the revised Project.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the visual character of the RHA. As with the previous Project, the visual character of the RHA would be altered with the revised Project's proposed resort hotel and recreational facilities (i.e., golf practice facility, parks, trails, etc.). This alteration of appearance is permanent and would continue throughout the life of the Project. Nonetheless, implementation of the proposed Project on the RHA would be considered an aesthetic enhancement to the site. The transformation of the RHA resulting from the proposed improvements would not be considered a degradation to the character of the site or its surroundings. The conclusion of significance for these impacts would not change with the revised Project and a significant impact would not occur in this regard.

As with the previous Project, the revised Project's design, height and architecture would be subject to review by the City to ensure conformance with applicable Development Codes, thus, reducing potential impacts to less than significant levels.

5.1-3 RANCHO PALOS VERDES GENERAL PLAN

The certified EIR concluded that implementation of the previous Project had the potential to adversely effect a scenic vista or resource identified in the General Plan. Analysis concluded that compliance with applicable City codes would reduce impacts to less than significant levels.

Visual Aspects

Views. Views of the golf practice facility (UPVA) in the foreground and the Resort Hotel and Pacific Ocean in the background, as illustrated on Exhibit 5.1-12 of the certified EIR, *Photo Simulation 7*, would not occur with the revised Project since the UPVA improvements have been eliminated from the development plan. With the revised Project, views of vacant land on the UPVA in the foreground and the Resort Hotel and Pacific Ocean in the background would be experienced as illustrated in Exhibit 5.1-1 of this Addendum, *Photo Simulation 12*.

Views of the previous Project as illustrated on Exhibit 5.1-12 of the certified EIR, *Photo Simulation 7*, would be slightly different than the view of the revised Project as illustrated in Exhibit 5.1-1 of this Addendum, *Photo Simulation 12*. With the revised Project, views of the elevated portion of the partially subterranean parking structure would be visible from this vantage point. However, development of the parking structure would not obstruct views of the Pacific Ocean in the background. Additionally, the visual buffering techniques proposed, including landscaping and berming, would conceal the elevated portion of the parking structure. As with the previous Project, implementation of the revised Project would eliminate the current blighted condition, replacing the existing structures and large scale parking lots with a golf practice facility, tennis courts, casitas, villas, bungalows and a hotel; therefore, creating a beneficial effect on the RHA. The conclusion of significance for these impacts would not change with the revised Project and a less than significant impact is anticipated in this regard.

No change to the remainder of the conclusions identified in the certified EIR would occur with the revised Project with respect to the views of Catalina Island and the Pacific Ocean from the Palos Verdes Drive South corridor (refer to Photo Simulations 1, 2, 5, 6, and 8 of the certified EIR). Views of the revised Project would not result in appreciable changes to these views.

As with the previous Project, the revised Project would be in compliance with each of the zoning districts on the RHA and would be required to demonstrate compliance with the specified development standards for each district regarding lot size, building height, lot coverage and parking. Compliance with applicable Development Codes for each zoning district would further reduce impacts to a less than significant level. Additionally, Project design, height and architecture would be subject to design review by the City to ensure conformance with applicable Development Code standards. The conclusion of significance for these impacts would not change with the revised Project and a less than significant impact is anticipated in this regard.

Vista. No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the two vistas noted in the Project area of what was once the location of the Marineland Aquatic Park tower. These vistas are illustrated in Exhibit 5.1-6 of the certified EIR, *Photo Simulation 1*, and Exhibit 5.1-9 of the certified EIR,

Photo Simulation 4. The conclusion of significance for these impacts would not change with the revised Project and no impact is anticipated in this regard.

Visual Accents

Structural Focal Point. The structural focal point identified on the UPVA (i.e., the Nike Missile site) would not be impacted with the revised Project since the UPVA and improvements proposed thereon have been eliminated from the development plan.

No change to the conclusion identified in the certified EIR would occur with the revised Project with respect to the structural focal point identified on the RHA (i.e., the Marineland Park Tower). The conclusion of significance for this impact would not change with the revised Project and a less than significant impact is anticipated in this regard.

Natural Focal Point. No change to the conclusion identified in the certified EIR would occur with the revised Project with respect to the natural focal point identified on the RHA (i.e., the numerous palm and non-native trees that are dispersed throughout). The conclusion of significance for this impact would not change with the revised Project and a less than significant impact is anticipated in this regard.

View Corridors

Vehicular Corridor. The segment of Palos Verdes Drive South, extending along the northern boundary of the RHA provides vehicular view corridor opportunities. Exhibit 5.1-8 of the certified EIR, *Photo Simulation 3*, and Exhibit 5.1-13 of the certified EIR, *Photo Simulation 8*, illustrate the views along Palos Verdes Drive South of the Pacific Ocean, Catalina Island, and of the former Marineland area, that would be experienced with the previous Project. These views would be slightly different than the views that would be experienced with the revised Project due to the introduction of the proposed partially subterranean parking structure (refer to Exhibit 5.1-1 of this Addendum, *Photo Simulation 12*, and Exhibit 5.1-2 of this Addendum, *Photo Simulation 13*). Development of the parking structure would not obstruct views of the Pacific Ocean in the background. The conclusion of significance for this impact would not change with the revised Project and a less than significant impact is anticipated in this regard.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to views of Point Fermin from the Palos Verdes Drive South vehicular corridor as illustrated on Photo Simulation 1 of the certified EIR. Views of the revised Project would not result in appreciable changes to these views. However, it should be noted that the revised Project's villas are proposed at pad elevations lower than Palos Verdes Drive South's elevations. Although impacts associated with the revised Project would be less than with the previous Project due to the revised Project's proposed lowering of the resort villas' pad elevations, the conclusion of significance for this impact would not change with the revised Project.

Exhibit 5.1-1, Photo Simulation 12

Exhibit 5.1-2, Photo Simulation 13

The segment of Hawthorne Boulevard immediately north of the UPVA provides vehicular view corridor opportunities looking south-southeast. As with the previous Project, implementation of the revised Project would not impact views along this corridor. No change to the existing condition of the UPVA is proposed, thus, the immediate viewshed would remain unaltered.

Adjacent Lands Impacting Corridors.

Adjacent Land Areas to be Preserved

The revised Project would not alter the land on the UPVA situated adjacent to Palos Verdes Drive South and identified as “adjacent land areas to be preserved” since the UPVA and improvements proposed thereon have been eliminated from the development plan.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the land on the RHA situated adjacent to Palos Verdes Drive South and identified as “adjacent land areas to be preserved.” As with the previous Project, the revised Project would not significantly impact these lands and the conclusion that this impact is less than significant would not change with the revised Project.

Undeveloped Lands Impacting Views

The RHA along Palos Verdes Drive South is largely undeveloped and allows for views of the Pacific Ocean and Catalina Island. The proposed resort villas would be located within an area designated in the General Plan as “undeveloped lands impacting views” (refer to Exhibit 5.1-9 in the certified EIR, *Photo Simulation 4*). With the revised Project, these views would be less impacted than with the previous Project. The revised Project proposes that the resort villas be located approximately 10.0 feet lower than the previous Project. Although impacts associated with the revised Project would be less than with the previous Project due to the revised Project’s proposed lowering of the resort villas’ pad elevations, the conclusion of significance for this impact would not change with the revised Project.

Natural Areas

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the natural areas located on the south facing bluffs that underlie the RHA. As with the previous Project, these bluffs would not be developed with the revised Project. Conformance with Development Code Section 17.48.030 regarding setbacks would ensure the preservation of these bluffs. The conclusion of significance for this impact would not change with the revised Project and a less than significant impact is anticipated in this regard. Additionally, the revised Project proposes PA 1-B as a plant transition area (i.e., a native plant buffer) between the Bluff-Face/Habitat Reserve (PA 1-A) and the Project development limits. This buffer area would further lessen the potential for impacts to the bluff habitat.

Viewing Areas

Viewing Points. No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to views from the Fisherman's Access point of the former Marineland Park area, Pacific Ocean, Catalina Island, Point Fermin and the bluffs (refer to Exhibit 5.1-6 of the certified EIR, *Photo Simulation 1*, and Exhibit 5.1-7, *Photo Simulation 2*). As with the previous Project, the revised Project is not anticipated to intrude on the overall panoramic view of the seacoast, Pacific Ocean or Catalina Island. However, as with the previous Project, the introduction of ornamental vegetation may obstruct views of Point Fermin and the Pacific Ocean. This would be considered a less than significant impact upon review by the City of the Project's design, landscape, building height, and architecture to ensure conformance with applicable Development Code standards. The conclusion of less than significant impact would not change with the revised Project.

5.1-4 RANCHO PALOS VERDES COASTAL SPECIFIC PLAN

The certified EIR concluded that the previous Project had the potential to result in a substantial adverse effect on a scenic vista or resource identified in the Coastal Specific Plan. This impact was considered less than significant with mitigation.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to views from the Palos Verdes Drive South view corridor of the direct full view of a landmark (Marineland Tower). A less than significant impact would occur in this regard.

Direct Full View of Point Fermin. As with the previous Project, with the revised Project, the westernmost resort villas proposed would be situated within Vertical Zone 1. However, with the revised Project, the villas' proposed pad elevations would be lower than with the previous Project. More specifically, the revised Project's westernmost resort villas are proposed at pad elevations ranging between 160 and 174 feet and are proposed lower than the Palos Verdes Drive South elevations ranging between 180 and 200 feet. As with the previous Project, the easternmost east casita, the golf clubhouse, one tennis court, portions of the surface parking lots and the golf practice facility would be situated within Vertical Zone 1. The obstruction of views to Point Fermin would be considered significant unless mitigated. Impacts would be reduced to less than significant levels with implementation of mitigation requiring that any buildings within the Point Fermin vista corridor be one-story or redesigned to comply with the 16-foot height limit. Alternatively, in accordance with the City's Development Code, buildings in excess of 16 feet in height may be permitted pursuant to a Conditional Use Permit if the Planning Commission makes certain findings regarding the Project and its consistency with the Coastal Specific Plan, and other view policies as set forth in the Development Code. Although impacts associated with the revised Project would be less than with the previous Project due to the revised Project's proposed lowering of the resort villas' pad elevations, the conclusion of significance for this impact would not change with the revised Project.

Partial/Indirect View of Catalina Island. As with the previous Project, with the revised Project the northernmost resort villas would be situated within Vertical Zone 1. However, with the revised Project, the villas are proposed at pad elevations lower than with the previous Project. More specifically, the revised Project's northernmost resort villas are

proposed at pad elevations ranging between 174 and 176 feet and are situated lower than the Palos Verdes Drive South elevations ranging between 180 and 200 feet. None of the resort villas located in Vertical Zone 1 would diminish the integrity of the Catalina Vista Corridor from Palos Verdes Drive South. Although impacts associated with the revised Project would be less than with the previous Project due to the revised Project's proposed lowering of the resort villas' pad elevations, the conclusion of significance for this impact would not change with the revised Project. A less than significant impact is anticipated in this regard.

As with the previous Project, the remainder of the structures affected by this vista corridor, essentially all those located on the eastern half of the site, are situated within Vertical Zone 3. None of the structures located in Vertical Zone 3, including the hotel, would diminish the integrity of the Catalina Vista Corridor from Palos Verdes Drive South. The conclusion of significance for this impact would not change with the revised Project and a less than significant impact is anticipated in this regard.

5.1-5 LIGHT AND GLARE

The certified EIR concluded that development of the previous Project would create a new source of light/glare that could potentially adversely affect day or nighttime views in the area. Analysis concluded that compliance with applicable City codes would reduce potential impacts to less than significant levels.

The revised Project would not create new sources of light and glare on the UPVA since the area has been eliminated from the development plan.

No change to the remainder of the conclusions identified in the certified EIR would occur with the revised Project with respect to the creation of new sources of light and glare on the RHA. As with the previous Project, the revised Project would introduce new sources of lighting into the RHA that may also create spillover light impacts on surrounding land uses. Compliance with the City Development Code and the use of directional lighting techniques would reduce potential impacts to less than significant levels. The conclusion of significance for these impacts would not change with the revised Project.

5.1-6 CUMULATIVE IMPACTS

The certified EIR concluded that development of the previous Project, together with cumulative projects, had the potential to result in greater urbanization in the Project area. Analysis concluded that compliance with applicable City codes would reduce potential impacts to less than significant levels.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to cumulative aesthetic and light/glare impacts.

5.1-7 MITIGATION MEASURES

Each of the mitigation measures referenced in the certified EIR remains applicable to the revised Project with the exception of those measures noted below which have been omitted or amended. It should be noted that ~~strike-out~~ text refers to omitted measures and shaded text refers to amended measures.

5.1-4b The two easternmost casitas, as well as any and all tennis courts or other structures, shall be redesigned to the satisfaction of the City Planning Department so that the maximum finished height within horizontal limits of the Point Fermin corridor from Palos Verdes Drive South does not exceed the 16-foot height limitation set forth in the adopted Coastal Specific Plan, so that the view of Point Fermin is not obstructed. Alternatively, the Applicant may submit an application for a conditional use permit to the City Planning Commission to construct buildings in excess of 16 feet as permitted under Section 17.22.D of the Development Code.

~~5.1-4c The resort Villa buildings shall be redesigned to the satisfaction of the City Planning Department so that the maximum finished height within the horizontal limits of the Catalina View Corridor from Palos Verdes Drive South conform to the height restrictions set forth in the adopted Coastal Specific Plan – in particular that buildings in Height Zone 1 (closest to Palos Verdes Drive) do not exceed the 16-foot height limitation and those in Height Zone 2 do not exceed the 30-foot height limitations, so that the view of Catalina Island is not obstructed. Alternatively, the Applicant may submit an application for a conditional use permit to the City Planning Commission to construct buildings in excess of 16 feet as permitted under Section 17.22.D of the Development Code.~~

5.1-8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The certified EIR concluded that no significant impacts related to Aesthetics/Light and Glare were identified following implementation of mitigation measures and/or compliance with applicable standards, policies and/or City of Rancho Palos Verdes Development Code. This conclusion of significance referenced in the certified EIR with respect to Aesthetics/Light and Glare remains applicable for the revised Project.

5.2 AIR QUALITY

5.2-1 SHORT-TERM AIR QUALITY IMPACTS

The certified EIR concluded that significant short-term air quality impacts could potentially occur during site preparation and project construction. These impacts were considered significant before and after mitigation for NO_x emissions from construction equipment exhaust and significant before and after mitigation for PM₁₀ fugitive dust. Impacts were less than significant for other pollutants. (Mitigation in this instance refers to applicable City Development Code sections and SCAQMD rules.)

Short-term air quality impacts associated with development of the revised Project would be less than those identified in the certified EIR since the UPVA has been eliminated from the Project. Nonetheless, short-term air quality impacts would occur during grading and construction activities associated with the revised Project including short-term power plant, vehicle, and fugitive dust (PM₁₀) emissions. Emissions associated with demolition and construction equipment within the RHA are anticipated to exceed SCAQMD construction thresholds. Feasible mitigation measures are not available to reduce the significance of short-term construction NO_x and PM₁₀ emissions to less than significant levels. As such, the conclusion of significance for impacts would not change and impacts are considered significant and unavoidable. As with the previous Project, if the City approves the revised Project, the City would be required to make findings in accordance with Section 15091 of the CEQA Guidelines and adopt a Statement of Overriding Considerations in accordance with Section 15093 of the CEQA Guidelines.

5.2-2 LONG-TERM OPERATIONAL IMPACTS

The certified EIR concluded that the previous Project had the potential to result in increases in the local and regional pollutant load due to direct impacts from vehicle emissions and indirect impacts from electricity and natural gas consumption. This impact was considered significant and unmitigatable for ROG, CO, and NO_x emissions and less than significant for emissions of other pollutants.

Exclusion of the UPVA from the revised Project would result in fewer long-term operational air quality impacts than those identified in the certified EIR. However, the revised Project would still result in long-term air quality impacts including mobile source emissions associated with project-related traffic and stationary source emissions generated directly from the natural gas consumed and indirectly from the power plant providing electricity to the Project site.

Additionally, it should be noted that the Project proposes a shuttle service between the proposed Resort and the Ocean Trails Golf Course. The shuttle service would involve as many as two shuttles and would operate 12 hours per day. The increase in emissions associated with these shuttles is anticipated to be negligible since the use of low-emission vehicles is proposed. A less than significant impact would occur in this regard.

As with the previous Project, the mobile source and area emissions associated with the revised Project would generate pollutant emissions in excess of SCAQMD thresholds. Thus, implementation of the revised Project would create a significant and unavoidable

individual impact from ROG, NO_x and CO emissions and is consistent with the certified EIR conclusions. As with the previous Project, if the City approves the revised Project, the City would be required to make findings in accordance with Section 15091 of the CEQA Guidelines and adopt a Statement of Overriding Considerations in accordance with Section 15093 of the CEQA Guidelines.

As was concluded in the certified EIR, the revised Project is not anticipated to create a significant localized emission of CO or create significant localized impacts to nearby sensitive receptors.

5.2-3 CONSISTENCY WITH AIR QUALITY MANAGEMENT PLAN

The certified EIR concluded that the previous Project had the potential to conflict with the AQMP and RCPG. A significant unavoidable impact was anticipated in this regard.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to consistency with the AQMP. The volume of ADT generated by the current proposal would not exceed the ADT projected for the existing entitlement. Thus, the revised Project would not exceed the AQMP's assumptions and would be considered consistent with the AQMP in this regard. As with the previous Project, the revised Project would result in an increase in the severity of existing air quality violations.

The Basin is presently in non-attainment for ROG, NO_x and CO emissions. The mobile source and area emissions associated with the revised Project would generate pollutant emissions in excess of SCAQMD thresholds. This increase in the severity of the existing violations would make the proposed development inconsistent with one of the two indicators of consistency. As with the previous Project, implementation of the revised Project would result in a significant unavoidable impact with respect to consistency with the AQMP. As with the previous Project, if the City approves the revised Project, the City would be required to make findings in accordance with Section 15091 of the CEQA Guidelines and adopt a Statement of Overriding Considerations in accordance with Section 15093 of the CEQA Guidelines.

5.2-4 CUMULATIVE IMPACTS

The certified EIR concluded that impacts to regional air quality resulting from development of cumulative projects may significantly impact existing air quality levels. Impacts were considered significant and unavoidable for ROG, CO, NO_x and PM₁₀ emissions.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to cumulative air quality impacts.

5.2-5 MITIGATION MEASURES

Each of the mitigation measures referenced in the certified EIR remains applicable to the revised Project and no changes are identified.

5.2-6 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The certified EIR concluded that the following air quality impacts from the previous Project would remain significant and unavoidable following mitigation:

- NOX and PM₁₀ fugitive dust emissions from construction activities;
- ROG, CO, PM₁₀, NO_x emissions from project operations;
- Cumulative development would also result in significant and unavoidable impacts to regional air quality levels of ROG, NO_x, CO and PM₁₀.

Analysis concluded that the increase in the severity of the existing air quality violations would make the previous Project inconsistent with one of the two indicators of consistency. Implementation of the previous Project would result in a significant unavoidable impact with respect to consistency with the AQMP.

This conclusion of significance referenced in the certified EIR with respect to air quality remains applicable for the revised Project. If the City of Rancho Palos Verdes approves the revised Project, as with the previous Project, the City would be required to cite their findings in accordance with Section 15091 of CEQA and prepare a Statement of Overriding Considerations in accordance with Section 15093 of CEQA.

5.3 BIOLOGICAL RESOURCES

5.3-1 SPECIAL STATUS BIOLOGICAL RESOURCES

The certified EIR concluded that implementation of the previous Project would have the potential to affect species identified as special status. The analysis concluded that impacts were less than significant with the implementation of mitigation measures.

Plants

Impacts to the Catalina mariposa lily and the Lyon's pentachaeta, two special status plant species that are potentially present on the UPVA, would not occur with the revised Project since the UPVA has been eliminated from the development area.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to potential Project impacts on special status plant species. Implementation of the revised Project has the potential to result in significant impacts on special status plant species. These impacts are considered less than significant with implementation of mitigation measures recommended in the certified EIR.

Wildlife

Impacts to the following special status wildlife species would not occur with the revised Project since the UPVA has been eliminated from the development area and suitable habitat does not exist on the RHA:

- Ferruginous hawk (*Buteo regalis*)
- Coastal cactus wren (*Campylorhynchus brunneicapillus couesi*);
- White-tailed kite (*Elanus leucurus*); and
- Coastal California gnatcatcher (*Polioptila californica californica*).

The revised Project proposes a new planning area (Planning Area 1-B, *Coastal Buff Scrub Enhancement Area for the El Segundo Blue Butterfly*) within the Conservation District as a plant transition area (i.e., a native plant buffer) between the Bluff-Face/Habitat Reserve (PA 1-A) and the Project development limits. With this Project design feature and mitigation measures recommended in the certified EIR, indirect impacts to the El Segundo Blue Butterfly would be reduced to less than significant levels. The conclusion of significance for these impacts would not change with the revised Project.

No other changes to conclusions identified in the certified EIR would occur with the revised Project with respect to potential Project impacts on special status wildlife species. The proposed Project would result in the loss of potential habitat for several special status wildlife species potentially present on the Project site. For these species expected to occur, the conclusion of significance would not change and potential impacts are considered less than significant with implementation of mitigation measures recommended in the certified EIR.

5.3-2 SENSITIVE NATURAL COMMUNITIES/HABITATS

The certified EIR concluded that implementation of the previous Project had the potential to impact portions of the RHA and the UPVA that are habitat for referenced sensitive species. Analysis concluded that implementation of recommended mitigation measures would reduce impacts associated with the previous Project to a less than significant level.

None of the impacts on the UPVA to the existing scrub communities (i.e., mixed coastal sage scrub (including burned and disturbed), disturbed chenopod scrub, and southern cactus scrub (including disturbed)) and the ephemeral drainage (approximately 0.03 acre of ACOE jurisdiction) identified in the certified EIR would occur with the revised Project since the UPVA has been eliminated from the development area.

The certified EIR concluded that the coastal bluff scrub and disturbed coastal bluff scrub along the western bluffs of the RHA would be impacted with the previous Project. As discussed above, the revised Project proposes Planning Area 1-B as a plant transition area between the Bluff-Face/Habitat Reserve (PA 1-A) and the Project development limits. With this design modification the potential impacts to the bluff-face habitat would be greatly reduced. Implementation of the recommended mitigation measures, identified in the Certified EIR would further reduce impacts in this regard. The conclusion of significance would not change and potential impacts to coastal bluff scrub are considered less than significant with implementation of mitigation measures recommended in the certified EIR.

No change to the remainder of the conclusions identified in the certified EIR would occur with the revised Project, including impacts to riparian habitats and jurisdictional drainages, as well as direct and indirect impacts to sensitive wildlife habitats. Impacts in this regard would be reduced to less than significant levels with implementation of mitigation measures recommended in the certified EIR.

It should be noted that the Long Point Habitat Conservation Plan (LPHCP) proposed with the previous Project was intended primarily to mitigate impacts associated with development of the UPVA. With the elimination of the UPVA, the LPHCP is no longer necessary. Mitigation measures have been identified that pertain to impacts associated with development of the RHA. As noted above, no unavoidable significant impacts were identified following implementation of recommended mitigation measures and compliance with the City Development Code.

5.3-3 WILDLIFE MOVEMENT

The certified EIR concluded that implementation of the previous Project had the potential to interfere with the movement of a native resident or migratory wildlife species. Analysis in the EIR concluded that impacts associated with the previous Project were considered less than significant.

Potential impacts associated with reduced connectivity between the open space areas to the northeast, and west of the UPVA would not occur with the revised Project since the UPVA has been eliminated from the development area. The revised Project is not anticipated to affect local travel routes since the steep cliffs of the RHA that provide a

narrow linkage for wildlife east and west of the site would be maintained as permanent open space and would not be impacted. The conclusion of significance would not change in this regard and potential impacts are considered less than significant.

5.3-4 LOCAL POLICIES/ORDINANCES

The certified EIR concluded that the previous Project would result in no impacts to any local policies/ordinances protecting biological resources since there are no approved local policies/ordinances within the City of Rancho Palos Verdes regarding the protection of biological resources.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to potential Project impacts on local policies/ordinances protecting biological resources. Potential Project impacts would be considered less than significant.

5.3-5 CUMULATIVE IMPACTS

The certified EIR concluded that cumulative development in the Project area would have the potential to impact the area's biological resources. Analysis concluded that implementation of the previous Project would not result in significant biological impacts after compliance with the recommended mitigation and the City's development of the NCCP program.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to potential cumulative impacts on biological resources.

5.3-6 MITIGATION MEASURES

Each of the mitigation measures referenced in the certified EIR remains applicable to the revised Project with the exception of those measures noted below which have been omitted or amended. It should be noted that ~~strike-out~~ text refers to omitted measures and **shaded** text refers to amended measures.

~~5.3-1c — Prior to Demolition Permit issuance, the Project Applicant shall comply with the FESA (through either Section 4[d], 7, or 10) with regards to any impacts to the coastal California gnatcatcher. The LPHCP has been developed to ensure compliance with FESA and to be consistent with the City's NCCP, when adopted. The LPHCP would provide for the creation of 16.80 acres of new coastal sage scrub habitat area (UPVA Conservation Planning Area and Recreation Area). This, combined with the 14.63 acres of existing coastal sage scrub habitat, the 4.44 acres of coastal bluff scrub habitat, and the 3.87 acres of rocky shore/coastal bluff habitat that would be retained, would result in the protection and/or creation of a total of 39.74 acres of coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff habitat.~~

5.3-2a All habitat revegetation activities ~~identified in the LPHCP~~ shall be initiated prior to issuance of the Certificate of Occupancy for the hotel, to the satisfaction of the City. ~~The LPHCP shall contain habitat restoration and enhancement design details for the Conservation Planning Areas through revegetation with drought-tolerant species, transitional areas of planting~~

between the Conservation Area and Resort Hotel/Recreation Planning Areas, and design for long-term sustainability. The plant palette of the LPHCP Conservation Planning Areas shall be reviewed by a botanist to ensure that any landscape zones that are adjacent to the natural open space areas do not contain any invasive non-native plant species. In addition, the Project's drainage and surface runoff shall be directed away from the bluff habitat areas in the RHA.

5.3-2h ~~Prior to issuance of grading permits, the Project Applicant shall develop a sage scrub restoration plan. The plan shall be approved by the USFWS, CDFG, and City of Rancho Palos Verdes. The plan shall contain the following items:~~

- ~~• Responsibilities and qualifications of the personnel to implement and supervise the plan. The responsibilities of the landowner, specialists and maintenance personnel that would supervise and implement the plan shall be specified.~~
- ~~• Site selection. The site for the mitigation shall be determined in coordination with the Project Applicant, City staff, and resource agencies. The site shall be located in a dedicated open space area and shall be contiguous with other natural open space.~~
- ~~• Site preparation and planting implementation. Site preparation shall include: 1) protection of existing native species, 2) trash and weed removal, 3) native species salvage and reuse (i.e. duff), 4) soil treatments (i.e., imprinting, decompacting), 5) temporary irrigation installation, 6) erosion control measures (i.e., rice or shallow wattles), 7) seed mix application, and 8) container species.~~
- ~~• Schedule. A schedule shall be developed which includes planting to occur in late fall and early winter, between October and January 30.~~
- ~~• Maintenance plan/guidelines. The maintenance plan shall include: 1) weed control, 2) herbivory control, 3) trash removal, 4) irrigation system maintenance, 5) maintenance training, and 6) replacement planting.~~
- ~~• Monitoring Plan. The monitoring plan shall include: 1) qualitative monitoring (i.e., photographs and general observations), 2) quantitative monitoring (i.e., randomly placed transects), 3) performance criteria as approved by the resource agencies, 4) monthly reports for the first year and bimonthly reports thereafter, and 5) annual reports which shall be submitted to the resource agencies for five years. The site shall be monitored and maintained for five years to ensure successful establishment of sage scrub habitat within the restored and created areas; however, if there is successful coverage prior to five years, the Project Applicant may request from USFWS and CDFG to be released from monitoring requirements.~~
- ~~• Long-Term Preservation. Long-term preservation of the site shall be outlined in the conceptual mitigation plan to ensure the mitigation site is~~

not impacted by future development.

- ~~Performance standards shall be identified and shall apply for the restoration of sage scrub habitat. Revegetation shall be considered successful at three years if the percent cover and species diversity of the restored and/or created habitat areas are similar to percent cover and species diversity of adjacent existing habitats, as determined by quantitative testing of existing and restored and/or created habitat areas. Testing shall be conducted by a qualified biologist selected by the Applicant and subject to approval by City staff.~~

~~5.3-2i All activities of any kind involving the removal of coastal sage scrub habitat occupied by the coastal California gnatcatcher shall be prohibited during the breeding and nesting season of this species (February 15 through August 30). All grading/grubbing operations shall be monitored by a qualified biologist, selected by the Applicant and subject to approval by City staff. The monitoring biologist shall ensure that only the permitted amount of coastal sage scrub would be removed. The monitoring biologist shall flush gnatcatchers and other birds from the vegetation prior to disturbance, to ensure no gnatcatchers are directly impacted during the removal of the vegetation. The monitoring biologist shall have the authority to stop or direct construction at any time she/he feels that a gnatcatcher is in danger.~~

5.3-2k Prior to issuance of grading permits, the Resort Hotel Area Infrastructure Plan and the Upper Point Vicente Area Infrastructure Plan shall be revised, to the satisfaction of the City of Rancho Palos Verdes City Engineer such that the proposed water, sewer and storm drain lines are re-aligned to the "impact areas" illustrated in Exhibit 5.3-5, Biological Resources Impacts Within the Resort Hotel Area, and Exhibit 5.3-6, Biological Resources Impacts Within the Upper Point Vicente Area.

5.3-7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The certified EIR concluded that no unavoidable significant impacts related to biological resources were identified following implementation of recommended mitigation measures and compliance with the City Development Code. The conclusion of significance referenced in the certified EIR with respect to biological resources remains applicable for the revised Project.

5.4 CULTURAL RESOURCES

5.4-1 ARCHAEOLOGICAL/HISTORICAL RESOURCES

The certified EIR concluded that implementation of the previous Project had the potential to cause a significant impact to archaeological and/or historical resources on-site. Analysis concluded that implementation of mitigation measures recommended in the certified EIR would reduce impacts to less than significant levels.

Impacts to the following cultural resources would not occur with the revised Project since the UPVA has been excluded from the development area.

- Site CA-LAN-103 (Rock Shelter and Shell Midden);
- Site 19-180589 (Base End Stations);
- Site 19-180590 (Battery 240);
- Site 19-180591 (Nike Air Defense Site LA-55-L); and
- Site 19-180593 (Documented Long Point Defense District).

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to impacts on the Ishibashi Farmhouse Complex (6621 Beachview Drive). Development of the revised Project would not constitute a significant effect to the farmhouse complex since it does not meet CEQA's definition of a historical resource.

However, the complex does merit special planning considerations as a point of local historical interest. The conclusion of significance for impacts in this regard would not change and impacts would be reduced to a less than significant level with implementation of mitigation measures recommended in the certified EIR.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to other construction level impacts. With implementation of mitigation measures recommended in the certified EIR, impacts in this regard would be reduced to a less than significant level.

5.4-2 PALEONTOLOGICAL RESOURCES

The certified EIR concluded that implementation of the previous Project had the potential to impact paleontological resources that may exist on-site but have not been documented. It was determined that implementation of recommended mitigation measures would reduce impacts associated with the previous Project to a less than significant level.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to Project impacts on paleontological resources. The potential loss or destruction of fossil resources and the concomitant loss of scientific knowledge would be considered a significant impact under CEQA. Mitigation measures recommended in the certified EIR would reduce impacts to a less than significant level.

5.4-3 BURIAL SITES

The certified EIR concluded that implementation of the previous Project had the potential to disturb human remains. It was concluded in the EIR that implementation of the recommended mitigation would reduce impacts associated with the previous Project to less than significant levels.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to Project impacts on potential burial sites. Any alterations to human remains associated with Project implementation would be considered a significant adverse impact. Implementation of the mitigation measures in the certified EIR would reduce impacts in this regard to a less than significant level.

5.4-4 CUMULATIVE IMPACTS

The certified EIR concluded that cumulative development has the potential to adversely affect cultural resources. Resources are evaluated and mitigated on a project-by-project basis.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to cumulative impacts on cultural resources.

5.4-5 MITIGATION MEASURES

Each of the mitigation measures referenced in the certified EIR remains applicable to the revised Project with the exception of those measures noted below which have been omitted or amended. It should be noted that ~~strike-out~~ text refers to omitted measures and **shaded** text refers to amended measures.

~~5.4-1a Site CA-LAN-103 (Rock Shelter and Shell Midden). The Project Applicant shall retain a qualified, City approved archaeologist to conduct archaeological testing in order to determine the depth, breadth, and nature of the contents of Site CA-LAN-103, and whether or not it qualifies as a historical resource. Such a testing program would consist of scientific excavation units, artifact analysis, and report preparation for a sample of the site area, so that a conclusion can be reached regarding site integrity and the research potential of its intact deposits.~~

~~If the testing program determines that Site CA-LAN-103 qualifies as a historical resource as defined in CEQA Guidelines Section 15064.5, three options are available to reduce impacts to a less than significant level:~~

- ~~• Capping the site to preserve in situ;~~
- ~~• Redesign to avoid impacting Site CA-LAN-103; or~~
- ~~• Retain a qualified archaeologist to prepare and implement a data recovery plan prior to issuance of a Grading Permit for the immediate area of CA-LAN-103.~~

~~5.4-1b Site 19-180589 (Base End Stations). Since the proposed Project would have no effect on the Base End Stations, the only further requirement regarding this site is to ensure its proper protection during construction activities. No other treatment is recommended for this historical resource.~~

~~5.4-1c — Site 19-180590 (Battery 240). Due to the proposed Project's potential to cause a change in the significance of this historical resource, prior to Grading Permit issuance, Project effects to this site shall be avoided by preserving the portion of the site within the Project area and incorporating it into the Project design in such a way as to retain the historic characteristics of this resource.~~

~~5.4-1d — Due to the likelihood of encountering subsurface features or buried artifacts from the WWII era in the vicinity of Battery 240, earth-moving activities near the site shall be monitored by a qualified archaeologist.~~

~~5.4-1e — Site 19-180591 (Nike Air Defense Site La-55-L). One of the following two mitigation options shall be implemented regarding disposition of Site 19-180591 prior to Demolition Permit issuance:~~

- ~~• Option 1. Project effects to this site shall be avoided by preserving components of the site and incorporating them into the Project design in such a way as to retain the historic characteristics of this resource.~~
- ~~• Option 2 (if demolition is unavoidable). The Project effects to this site shall be mitigated through recordation procedures compatible to Level 2 of the Historic American Buildings Survey (HABS) and the Historic American Engineering Record (HAER).~~

~~Established in 1933 and 1967, respectively, HABS and HAER have been adopted by the National Park Service as the primary methods of preserving important information about architectural, engineering, and industrial sites of historic value, and are often initiated as the means of mitigating adverse effects of federal undertakings on such sites (NPS 1993:1). At Level 2, HABS/HAER requires detailed textual and photographic recordation, sketch maps and drawings of structural features, and historical documentation to record the subject property's history. The results of such documentation are to be made accessible to the public at one or more local repositories, such as the local history collection of the Palos Verdes Library and/or the Palos Verdes Historical Society's museum.~~

~~5.4-1f — Site 19-180593 (Documented Long Point Defense District). Refer to Mitigation Measures 5.4-1b, 5.4-1c and 5.4-1e. If these recommendations are adopted, the Project's potential effects on the documented historic district would be reduced to a level less than significant.~~

5.4-6 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The certified EIR concluded that no significant impacts related to Cultural Resources were identified following implementation of the recommended mitigation measures. This conclusion of significance referenced in the certified EIR with respect to Cultural Resources remains applicable for the revised Project.

5.5 GEOLOGY, SOILS AND SEISMICITY

5.5-1 RUPTURE OF A KNOWN EARTHQUAKE FAULT

The certified EIR concluded that development of the previous Project had the potential to increase the number of people/structures exposed to effects associated with rupture of a known earthquake fault. The analysis concluded that a less than significant impact would occur in this regard. Compliance with the City Development Code and the California Building Code would maintain potential impacts associated with the previous Project at less than significant levels.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the exposure of people/structures to potential substantial adverse effects associated with seismic activity. Project implementation is anticipated to result in a less than significant impact in this regard after compliance with the City Development Code and the California Building Code.

5.5-2 STRONG SEISMIC GROUND SHAKING

The certified EIR concluded that development of the previous Project had the potential to increase the number of people/structures exposed to effects associated with seismically induced ground shaking. Impacts were considered less than significant with implementation of the specified mitigation and compliance with the City Development Code and the California Building Code.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the exposure of people/structures to potential substantial adverse effects associated with seismically induced ground shaking. Impacts associated with seismically induced ground shaking would be considered significant unless mitigated. Impacts would be reduced to less than significant levels with implementation of mitigation measures recommended in the certified EIR. Impacts in this regard would be further reduced through compliance with the City Development Code and the California Building Code.

5.5-3 SEISMICALLY INDUCED LANDSLIDES

The certified EIR concluded that development of the previous Project had the potential to increase the number of people/structures exposed to effects associated with seismically induced landslides. Impacts were considered less than significant with implementation of the specified mitigation and compliance with the City Development Code and the California Building Code.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the exposure of people/structures to potential substantial adverse effects associated with seismically induced landslides. Impacts associated with seismically induced landslides on the RHA would be considered significant unless mitigated. Impacts would be reduced to less than significant levels with implementation of mitigation measures recommended in the certified EIR.

5.5-4 OTHER SEISMICALLY INDUCED HAZARDS

The certified EIR concluded that development of the previous Project had the potential to increase the number of people/structures exposed to effects associated with seismically induced liquefaction, ground lurching, lateral spreading, settlement and/or tsunamis. The analysis concluded that a less than significant impact would occur in association with these hazards. Compliance with the City Development Code and the California Building Code would maintain potential impacts at less than significant levels.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the exposure of people/structures to potential substantial adverse effects associated with seismically induced liquefaction, ground lurching, lateral spreading, settlement and/or tsunamis. Project implementation is anticipated to result in a less than significant impact regarding the exposure of people/structures to potential substantial effects associated with liquefaction and lateral spreading since the subsurface conditions favorable for these hazards are not present within the RHA. Potential impacts associated with ground lurching, settlement, and tsunamis were considered less than significant.

5.5-5 EROSION

The certified EIR concluded that development of the previous Project had the potential to result in substantial soil erosion. Implementation of the specified mitigation and compliance with the City Development Code and the California Building Code would reduce potential impacts to less than significant levels.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to soil erosion. Impacts associated with soil erosion would be considered significant unless mitigated. Impacts would be reduced to less than significant levels with implementation of mitigation measures recommended in the certified EIR. In addition, impacts associated with soil erosion would be reduced through compliance with the City Development Code and the California Building Code.

5.5-6 EXPANSIVE SOILS

The certified EIR concluded that the previous Project had the potential to be located on expansive soils. Implementation of the specified mitigation and compliance with the City Development Code and the California Building Code would reduce potential impacts to less than significant levels.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to expansive soils. Impacts associated with expansive soils would be considered significant unless mitigated. Impacts would be reduced to less than significant levels with implementation of mitigation measures recommended in the certified EIR. In addition, impacts associated with expansive soils would be further reduced through compliance with the City Development Code and the California Building Code, as well as with implementation of specified hydrological and drainage mitigation.

5.5-7 LANDSLIDES

The certified EIR concluded that development of the previous Project had the potential to increase the number of people/structures exposed to potential significant effects associated with landslides. Implementation of the specified mitigation and compliance with the City Development Code and the California Building Code would reduce potential impacts to less than significant levels.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the exposure of people/structures to potential substantial adverse effects associated with landslides. Portions of the development adjacent to the existing landslides on the RHA could be significantly impacted by renewed landslide movement resulting from strong ground motion from nearby earthquakes, potential groundwater buildup within the landslides, erosion at the toe of the bluff from storm generated waves, and ongoing natural erosion of the bluffs. Impacts to the proposed RHA from existing landslides and sea cliff instability/erosion can be mitigated by compliance with the building setback line previously adopted and implemented by the City of Rancho Palos Verdes. The conclusion of significance for impacts in this regard would not change and a less than significant impact is anticipated.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the exposure of people/structures to potential substantial adverse effects associated with the buildup of water. As with the previous Project, the addition of storm water runoff, landscape irrigation for the golf practice facility and resort areas, etc., anticipated with the revised Project could result in the localized building up of groundwater beneath the Project area. With the buildup of groundwater comes the increased potential of localized failures on the bluffs and/or reactivation of existing landslides. This impact would be considered significant unless mitigated. As with the previous Project, the revised Project proposes to employ a Water Quality Management Program consisting of a series of Best Management Practices (BMPs) that would provide source control for pollutants as well as treatment of the stormwater. The conclusion of significance for impacts in this regard would not change and a less than significant impact is anticipated with implementation of mitigation measures recommended in the certified EIR.

5.5-8 SEA CLIFF RETREAT

The certified EIR concluded that the previous Project could potentially be located on a geologic unit that is unstable or that may become unstable. The analysis concluded that implementation of the specified mitigation and compliance with the City Development Code and the California Building Code would reduce potential impacts to less than significant levels.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to sea cliff retreat. Active sea cliff/bluff retreat has the potential to pose a significant impact on development within 50 to 75 feet of the current bluff top area. Impacts associated with sea cliff retreat would be considered significant unless mitigated. Impacts would be reduced to a less than significant level with implementation of mitigation measures recommended in the certified EIR.

5.5-9 CUMULATIVE IMPACTS

The certified EIR concluded that the previous Project, combined with future development, had the potential to result in increased short-term impacts such as erosion and sedimentation, and long-term seismic impacts within the area. The analysis concluded that mitigation would be incorporated on a project-by-project basis to reduce impacts to a less than significant level in areas deemed suitable for development.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to cumulative geologic, soils, and seismicity impacts.

5.5-10 MITIGATION MEASURES

Each of the mitigation measures referenced in the certified EIR remains applicable to the revised Project with the exception of those measures noted below which have been omitted or amended. It should be noted that ~~strike-out~~ text refers to omitted measures and **shaded** text refers to amended measures.

- 5.5-7a Prior to Building Permit issuance, permanent structures and structures of all-hours occupancy shall be placed landward of the existing City-approved building setback line on the RHA and ~~the structural (building) setback line established by Neblett & Associates (July, 2000) on the UPVA.~~

5.5-11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The certified EIR concluded that no significant impacts related to Geology, Soils and Seismicity were identified following implementation of mitigation measures and/or compliance with applicable standards, policies and/or City of Rancho Palos Verdes Development Code. This conclusion of significance referenced in the certified EIR with respect to Geology, Soils and Seismicity remains applicable for the revised Project.

5.6 HYDROLOGY AND DRAINAGE

5.6-1 DRAINAGE AND RUNOFF

The certified EIR concluded that the previous Project had the potential to significantly alter drainage patterns that could result in increased erosion potential and runoff. Impacts were considered less than significant with implementation of the proposed design features (i.e., the provision of adequate outlet structures, storm drains to contain flows and proper bluff drainage).

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the alteration of drainage patterns. As with the previous Project, the revised Project would alter the drainage patterns on the RHA that could be considered potentially significant to erosion potential. However, the Project proposes design features (i.e., proper bluff drainage and impact basin installation) that would likely improve bluff stability and curb bluff erosion. As with the previous Project, the revised Project would slightly increase the amount of runoff leaving the site. However, increases in flows would not be a significant impact since the watersheds drain directly to the ocean and adequate outlet structures at the base of the cliffs have been included in the proposed plan. The conclusion of significance would not change with respect to drainage and runoff and impacts are considered less than significant.

5.6-2 WATER QUALITY – CONSTRUCTION

The certified EIR concluded that grading; excavation and construction activities associated with the previous Project had the potential to impact water quality due to sheet erosion of exposed soils and subsequent deposition of particles and pollutants in drainage areas. Impacts were considered less than significant with incorporation of the specified mitigation measures.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to water quality impacts associated with grading, excavation, and construction activities. Implementation of mitigation measures recommended in the certified EIR (i.e., compliance with the NPDES requirements) would reduce construction related impacts to water quality to a less than significant level.

5.6-3 WATER QUALITY – LONG-TERM

The certified EIR concluded that development of the previous Project had the potential to result in long-term impacts to the quality of storm water and urban runoff, subsequently impacting water quality. Impacts were considered less than significant level with incorporation of the specified mitigation measures and State, County, and City Development Code requirements.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the long-term quality of storm water and urban runoff, and subsequent water quality impacts. The Project has the potential to significantly violate water quality standards. However, the Project proposes a comprehensive Water Quality Management Plan, including both Structural and Non-Structural BMPs that have been

revised to address the proposed golf practice facility and parking structure. The original Plan proposed by the Applicant partially complies with the Standard Urban Stormwater Mitigation Plan (SUSMP) as required by the Los Angeles Regional Water Quality Control Board. Additional mitigation is specified to ensure compliance with SUSMP requirements and that impacts are reduced to less than significant levels. The conclusion of significance for long-term water quality impacts would not change and impacts are considered less than significant with implementation of mitigation measures recommended in the certified EIR.

5.6-4 CUMULATIVE IMPACTS

The certified EIR concluded that the previous Project along with other future development, had the potential to result in increased hydrology and drainage impacts in the area. The EIR determined that impacts would be evaluated on a project-by-project basis in order to mitigate to a less than significant level.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to cumulative hydrology and drainage impacts.

5.6-5 MITIGATION MEASURES

Each of the mitigation measures referenced in the certified EIR remains applicable to the revised Project with the exception of those measures noted below which have been omitted or amended. It should be noted that ~~strike-out~~ text refers to omitted measures and **shaded** text refers to amended measures.

- 5.6-3b It was determined that the current Water Quality Management Plan did not meet the SUSMP requirements for the design of several Standard BMPs. The Water Quality Management Plan shall be revised to include the additional Standard BMPs listed below:

Standard BMPs

From the California Storm Water Best Management Practice Handbook - Construction Activity:

- CA 20 Solid Waste Management - This BMP describes the requirements to properly design and maintain trash storage areas. The primary design feature requires the storage of trash in covered areas.

From the California Storm Water Best Management Practice Handbook - Industrial/Commercial:

- SC 3 Vehicle and Equipment Washing & Steam Cleaning - This BMP provides regulations for the cleaning of equipment used on-site. The BMP requires the consideration of utilizing off-site commercial washing and steam cleaning business. If on-site washing is preferred, designated wash areas must be identified and designed to the standards listed in the handbook.

- SC 4 Vehicle and Equipment Maintenance and Repair - This BMP details appropriate measures to keep oil and grease, heavy metals and toxic material from coming in contact with stormwater runoff.
- SC 5 Outdoor Loading/Unloading of Materials - This BMP describes measures to prevent and reduce the discharge of pollutants to stormwater from outdoor loading and unloading of materials. The primary design features to reduce pollution are: covering the loading/unloading docks; preventing storm run on; and containing spills.

Treatment BMPs

Two areas identified in the impact analysis as needing additional mitigation are the proposed east swale and those golf course practice facility drainage areas not addressed in the Water Quality Management Plan.

The east swale does not meet the minimum criteria for optimal swale performance as detailed in Appendix B, Section B.13 of the SUSMP Manual. Specifically, the hydraulic residence time for the eastern swale is less than the 5 minute optimum criteria. Therefore, the swale shall either be lengthened, using a large radius curved path or if it is not possible to lengthen the swale, the swale shall be enlarged by increasing the flow depth and/or swale width. If none of these options are feasible, detention to attenuate flows shall be incorporated as part of a treatment train.

For those areas of the golf course practice facility which have been identified as not receiving specific treatment before discharging into natural areas or storm drains, appropriate treatment shall be incorporated into the Project. Appropriate treatment is either vegetative swales, enhanced vegetated swales utilizing check dams and wide depressions, a series of small detention facilities designed similarly to a dry detention basin, or a combination of these treatment methods into a treatment train. The Water Quality Management Plan shall address treatment for all areas of the golf course practice facility to assure that the runoff from the golf course practice facility is treated to the "maximum extent practicable."

In order for the vegetation swales to be effective in the removal of potential pollutants, the swales shall be treated as a water quality feature and shall be maintained in a different manner than the turf of the golf courses practice facility. Specifically, pesticides, herbicide, and fertilizers, which may be used on the golf course practice facility turf shall not be used in the vegetation swales.

All swales or basins, shall be designed to treat the First Flush Treatment per the SUSMP criteria of designing mitigation to treat the volume of runoff from the 0.75" of rainfall. This treatment along with other the other components of the WQMP shall fulfill the requirements of the SUSMP.

5.6-3c Water Quality Monitoring and Adaptive Management Plan

The Water Quality Management Plan does not address BMP maintenance nor does it detail how the water quality monitoring would be completed and

how the results would affect the Adaptive Management Plan. Additional mitigation required includes a comprehensive Water Quality Monitoring and Adaptive Management Plan. The Plan shall address the following issues:

- **BMP Maintenance** - Maintenance for the treatment BMPs (filtration units, swales, detention basins) shall be performed at specific intervals depending on the specific BMP. At a minimum the BMPs shall be maintained at the beginning of the rainy season (October 15), at least once during the rainy season, and following the rainy season (April 15). Maintenance for swales shall consist of mowing, irrigation maintenance, and sediment removal. Mowing shall take place on an as-needed basis to maintain optimal grass height. Filtration units shall be maintained and inspected once per month, after each storm event, and at the end of the dry season. Detention basins shall be inspected based on the minimum standards above and sediment shall be removed on an as-needed basis pending the results of monthly inspections during the rainy season.
- **Proof of BMP Maintenance and Inspection** - The plan shall identify who is responsible for maintenance and inspection. The plan shall also set forth a method for logging, tracking, and reporting BMP maintenance and inspection to the appropriate City officials.
- **Water Quality Monitoring** - The plan shall identify who will perform and be responsible for the monitoring of the treatment BMPs. The monitoring shall take place for at least 6 years post construction. Monitoring shall be completed for a minimum of 5 storms per year and twice during the dry weather months. Monitoring shall include gathering data on flow measurement, and constituent levels for both pre- and post-treatment. This information shall be logged, tracked, and reported to the appropriate City officials.
- **Adaptive Management Plan** - Using the BMP inspection, maintenance, and monitoring data collected on a yearly basis, an adaptive management plan shall be issued on an annual basis for a **minimum 5-year** period once construction is completed. The adaptive management plan shall not only report the findings of inspection, maintenance, and monitoring, it shall utilize this information to determine any necessary changes in the current WQMP. The report shall also specifically discuss the effectiveness of the **Golf Course Practice Facility** Management Portion of the Water Quality Management Plan. The Plan shall be submitted to the City for their review and approval.

5.6-6 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The certified EIR concluded that no significant impacts related to Hydrology and Drainage were identified following implementation of mitigation measures and/or compliance with applicable standards, policies and/or City of Rancho Palos Verdes codes. This conclusion of significance referenced in the certified EIR with respect to Hydrology and Drainage remains applicable for the revised Project.

5.7 LAND USE AND RELEVANT PLANNING

5.7-1 ESTABLISHED COMMUNITY

The certified EIR concluded that implementation of the previous Project had the potential to physically divide an established community. Analysis concluded that a less than significant impact would occur in this regard.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the division of an established community. As with the previous Project, the revised Project would not result in the physical division of an established community. Therefore, the conclusion of significance would not change and impacts are considered less than significant impact.

5.7-2 RANCHO PALOS VERDES GENERAL PLAN

The certified EIR concluded that the previous Project had the potential to conflict with the land use plan, policies and regulations of the City of Rancho Palos Verdes General Plan. Analysis concluded that a less than significant impact would occur for the previous Project with approval of a General Plan Amendment on the UPVA changing the land use designation from Recreational Passive to Recreational Active.

The revised Project would not require a General Plan Amendment for the UPVA (changing the existing Recreational Passive designation to Recreational Active) since the UPVA has been eliminated from the Project.

No change to the remainder of the conclusions identified in the certified EIR would occur with the revised Project with respect to the City of Rancho Palos Verdes General Plan. Implementation of the revised Project would not conflict with the land use plan, policies or regulations of the General Plan. A less than significant impact is anticipated in this regard.

5.7-3 COASTAL SPECIFIC PLAN

The certified EIR concluded that the previous Project had the potential to conflict with the land use plan, policies and regulations of the City of Rancho Palos Verdes Coastal Specific Plan. Analysis concluded that a less than significant impact would occur for the previous Project with approval of a Conditional Use Permit.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the Coastal Specific Plan (CSP). The revised Project is considered consistent with all of the applicable goals, policies and recommendations in the Coastal Specific Plan. As with the previous Project, the revised Project would necessitate approval of a Conditional Use Permit (CUP) consistent with the CSP requirement that a CUP be obtained for "any future development on the site". Impacts in this regard would be considered as less than significant for the revised Project with approval of a CUP.

5.7-4 DEVELOPMENT CODE/ZONING ORDINANCE

The certified EIR concluded that the previous Project had the potential to conflict with the land use plan, policies and regulations of the City of Rancho Palos Verdes Development Code/Zoning Ordinance. Analysis concluded that a less than significant impact would occur for the previous Project with approval of a Conditional Use Permit.

The revised Project would not require a CUP for the Open Space Recreational District (OR) (for development of a golf course, driving range and related ancillary uses) nor the Institutional District (I) (for development of a golf course) within the UPVA since the area has been eliminated from the Project.

No change to the remainder of the conclusions identified in the certified EIR would occur with the revised Project with respect to the City of Rancho Palos Development Code. The revised Project would not conflict with the land use plan, policies and regulations of the City of Rancho Palos Verdes Development Code. The revised Project would also require approval of a CUP for development of the proposed resort/conference hotel and golf practice facility in the Commercial Recreational District (CR) District of the RHA. The conclusion of significance for impacts would not change for the revised Project with respect to compliance with the Development Code.

As with the previous Project, issuance of a Grading Permit would be required with the revised Project consistent with Section 17.76.040 of the Municipal Code. A less than significant impact would occur in this regard with Permit approval.

As with the previous Project, the revised Project would be required to demonstrate compliance with the specified development standards for the CR District regarding lot area, landscaping, design, and height during the Plan Review process. The revised Project would result in a less than significant impact after compliance with the specified standards.

Subsequent to preparation of the certified EIR, the City determined that a Variance would be required for the revised Project. Section 17.72.040 of the Zoning Ordinance, *Uses and Developments Permitted*, notes that “any new permanent structures in this [Coastal Setback] zone are prohibited, including, but not limited to, pools, spas, vertical support members and chimneys.” Accordingly, construction of the revised Project’s proposed lower pool and restroom facility seaward of the coastal setback line would require approval of a Variance (Variance No. 489). With approval of the Variance, the revised Project would be in compliance with Code requirements and a less than significant impact would occur in this regard. The conclusion of significance would not change with the revised Project in this regard.

5.7-5 PROGRAM OF UTILIZATION

The certified EIR concluded that development of the UPVA as proposed with the previous Project had the potential to conflict with the Program of Utilization. Analysis concluded that a less than significant impact would occur for the previous Project in this regard provided written concurrence was obtained from the Secretary of the Interior.

The revised Project would not require written concurrence from the Secretary of the Interior for development of the UPVA since the area has been eliminated from the Project.

5.7-6 CUMULATIVE IMPACTS

The certified EIR concluded that the previous Project, combined with other future development, had the potential to increase the intensity of land uses in the area. Analysis concluded that impacts were less than significant and no mitigation was required. Projects would be evaluated on a project-by-project basis in accordance with the City of Rancho Palos Verdes General Plan, Coastal Specific Plan and Development Code.

No change to the conclusions identified in the certified EIR with respect cumulative land use impacts would occur with the revised Project.

5.7-7 MITIGATION MEASURES

No mitigation measures were referenced in the certified EIR and no new mitigation measures would be applicable to the revised Project.

5.7-8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The certified EIR concluded that based upon the analysis pertaining to consistency with relevant planning policies and cumulative impacts, no significant land use impacts were identified and no mitigation measures were required. The conclusion of significance referenced in the certified EIR with respect to Land Use impacts remains applicable for the revised Project.

5.8 MARINE RESOURCES

5.8-1 GRADING AND STORM DRAIN CONSTRUCTION

The certified EIR concluded that grading activities and storm drain construction associated with implementation of the previous Project had the potential to disturb intertidal resources, nearshore resources, sensitive species and sensitive habitats. The EIR determined that impacts would be reduced to a less than significant level with implementation of mitigation (i.e., development of an Erosion Control Plan and Storm Water Pollution Prevention Plan).

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to grading and storm drain construction impacts on intertidal resources, nearshore resources, sensitive species and sensitive habitats. Grading impacts on resources, species and habitats would be reduced to less than significant levels with the mitigation measures recommended in the certified EIR (i.e., Storm Water Pollution Prevention Plan (SWPPP), Best Management Practices (BMPs), and a Construction Erosion Control Plan).

5.8-2 LONG-TERM IMPACTS

The certified EIR concluded that operation of the previous Project would have the potential to result in long-term effects that could impact marine biological resources. Because the Project incorporated a long-term Runoff Management Plan/Water Quality Management Plan as a Project Design Feature, long term water quality impacts would be minimized. The EIR further determined that remaining impacts would be reduced to less than significant levels with incorporation of the specified mitigation measures and compliance with State, County, and City Development Code requirements.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to long-term impacts on marine biological resources. Project implementation has the potential to adversely affect shoreline and nearshore marine resources. As with the previous Project, impacts associated with the revised Project would include (1) degradation of water quality as a consequence of stormwater and dry weather runoff from the Project site and a subsequent degradation of marine habitat and (2) from the direct and indirect effects of increased tourism (visitor use) to the local shoreline. Implementation of the WQMP as a Project Design Feature, compliance with the Standard Urban Stormwater Mitigation Plan (SUSMP) guidelines, and conducting detailed runoff monitoring programs during operation of the Long Point Resort would ensure that potentially significant water quality and hydrological impacts associated with stormwater and dry weather runoff would be less than significant. The conclusion that impacts would be mitigated to less than significant levels would not change for the revised Project.

5.8-3 VISITOR USE

The certified EIR concluded that the previous Project had the potential to draw a considerable number of both local and out of town guests and resultant guest activities would increase the recreational use value of the area shoreline. Implementation of the recommended mitigation measures, including development of a visitor use plan, would reduce potential impacts from the previous Project to a less than significant level.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to long-term impacts on marine biological resources resulting from visitor use. As with the previous Project, increased use of the tide pools has the potential to result in long-term habitat degradation and reduction in rocky intertidal biodiversity. Implementation of the mitigation measures recommended in the certified EIR (i.e., a Visitor Use Plan) would reduce impacts in this regard to a less than significant level. The conclusion of significance would not change for the revised Project.

5.8-4 CUMULATIVE IMPACTS

The certified EIR concluded that implementation of the previous Project would have the potential to result in a long-term cumulative impact on marine biological resources with respect to visitor use and water quality degradation. Analysis concluded that impacts would be reduced to a less than significant level with implementation of mitigation measures recommended in the certified EIR.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to cumulative impacts on marine resources.

5.8-5 MITIGATION MEASURES

Each of the mitigation measures referenced in the certified EIR remains applicable to the revised Project and no changes are identified.

5.8-6 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The certified EIR concluded that impacts to Marine Biological Resources would be reduced to a less than significant level with implementation of the recommended mitigation measures. This conclusion of significance referenced in the certified EIR with respect to Marine Biological Resources remains applicable for the revised Project.

5.9 NOISE

5.9-1 SHORT-TERM CONSTRUCTION NOISE IMPACTS

The certified EIR concluded that grading and construction within the Project area had the potential to result in temporary noise impacts to nearby noise sensitive receptors. The EIR determined that adherence to City Code requirements would reduce construction noise impacts to a less than significant level.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to short-term noise impacts from grading and construction activities. As with the previous Project, short-term excessive noise levels resulting from construction activities would occur with development of the revised Project. In addition, construction would also cause traffic noise along access routes to the site due to the movement of equipment and workers. These impacts, however, are considered less than significant since the Code limits construction activity to between the hours of 7 AM and 7 PM, Monday through Saturday (excluding legal holidays). The conclusion of significance for this impact would not change with the revised Project and a less than significant impact is anticipated in this regard.

5.9-2 MOBILE NOISE IMPACTS – LONG-TERM

The certified EIR concluded that implementation of the previous Project would generate additional vehicular travel on the surrounding roadway network, thereby resulting in noise level increases along these roadways. EIR analysis concluded that the Project would contribute to a significant and unavoidable noise impact along several roadways.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to long-term noise impacts from mobile noise sources. The revised Project would generate a similar volume of traffic on adjacent roadways as the previous Project; thus, increases in vehicular generated noise in the vicinity of existing and proposed residential uses would be similar. Additionally, Project generated traffic would exacerbate a current exceedance along the four major roadways that were modeled (Palos Verdes Drive West, Palos Verdes Drive South, 25th Street, and Hawthorne Boulevard) thereby contributing to a significant and unavoidable cumulative noise impact to adjacent residences. The conclusion of significance would not change in this regard.

As with the previous Project, the noise increase due to the revised Project, in and of itself, would not create a “substantial permanent increase in ambient noise levels,” as established by CEQA. The increase would further exacerbate a current (and anticipated Future 2010 Without Project) exceedance of the 60 CNEL noise standards for sensitive receptors located along various roadways. As such, the revised Project traffic would contribute to a significant and unavoidable increase in cumulative noise levels along local roadways. The conclusion of significance would not change in this regard.

5.9-3 STATIONARY NOISE IMPACTS – LONG-TERM

The certified EIR concluded that long-term resort operations associated with the previous Project would result in the generation of on-site noise associated with club house activities, loading/unloading activities, mechanical equipment, parking lots, maintenance, etc. The EIR further concluded that this Project-related noise generation had the potential to result in significant impacts to ambient noise levels. However, analysis concluded that impacts would be reduced to less than significant levels with adherence to City Noise standards and implementation of the specified mitigation measures.

Stationary noise impacts associated with development of the revised Project would be less than those of the previous Project since the UPVA and all improvements proposed thereon (i.e., practice facility and associated parking) have been relocated to the RHA. More specifically, noise impacts to the Villa Capri Condominiums and St. Paul's Lutheran Church would not occur with the revised Project.

No change to the remainder of the conclusions identified in the certified EIR would occur with the revised Project with respect to stationary noise impacts. The revised Project would not introduce additional new stationary noise sources beyond those analyzed for the previous Project. However, as with the previous Project, new stationary noise sources would be created by development of the resort hotel and golf practice facility uses and associated mechanical equipment and parking areas proposed with the revised Project. Long-term stationary noise generated from the revised Project would be reduced to less than significant levels with adherence to City Noise standards and implementation of the mitigation measures recommended in the certified EIR. The conclusion of significance would not change in this regard.

5.9-4 CUMULATIVE IMPACTS

The certified EIR concluded that implementation of the previous Project, together with cumulative projects, would increase the ambient noise levels in the Project vicinity. Vehicular traffic from the previous Project and cumulative projects was anticipated to cause current exceedances of noise standards along local roadways to be exacerbated. As such, the previous Project combined with cumulative projects, was expected to contribute to a significant and unavoidable cumulative noise impact.

No change to the conclusions identified in the certified EIR with respect cumulative air quality impacts would occur with the revised Project.

5.9-5 MITIGATION MEASURES

Each of the mitigation measures referenced in the certified EIR remains applicable to the revised Project with the exception of those measures noted below which have been omitted or amended. It should be noted that ~~strike-out~~ text refers to omitted measures and **shaded** text refers to amended measures.

~~5.9-3b — Prior to Final Development Plan approval, a subsequent noise analysis shall be prepared, to the satisfaction of the Director of Planning and Building and the City Engineer, which demonstrates that all feasible sound attenuation has been incorporated into the practice facility's parking lot, such as berms, landscaping and brushed driving surfaces, such that noise from the parking~~

~~It would not exceed noise standards indicated in the State Land Use Noise Compatibility Guidelines for the adjacent Church.~~

5.9-6 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The certified EIR concluded that even in the absence of the previous Project, several local roadways would experience noise levels in the future above standards. Since the previous Project-generated trips would further exacerbate a projected exceedance of standards beyond established thresholds, implementation of the previous Project would contribute to a significant and unavoidable impact for adjacent residential areas along the following roadway segments:

- § Palos Verdes Drive West (from Palos Verdes Drive to Hawthorne Boulevard);
- § Palos Verdes Drive South (from Hawthorne Boulevard to Palos Verdes Drive East);
- § 25th Street (from Palos Verdes Drive East to Western Avenue); and
- § Hawthorne Boulevard (from Palos Verdes Drive South to Palos Verdes Drive North).

This conclusion of significance referenced in the certified EIR with respect to Noise impacts remains applicable for the revised Project. If the City of Rancho Palos Verdes approves the revised Project, as with the previous Project, the City would be required to cite their findings in accordance with Section 15091 of CEQA and prepare a Statement of Overriding Considerations in accordance with Section 15093 of CEQA.

5.10 PUBLIC HEALTH AND SAFETY

5.10-1 HAZARDOUS MATERIALS

The certified EIR concluded that implementation of the previous Project had the potential to create a significant hazard to the public and the environment through the disposal of hazardous materials. The EIR determined that implementation of the specified mitigation would reduce impacts to a less than significant level.

Potential hazardous materials impacts associated with site conditions and historical uses on the UPVA would not occur with the revised Project since the UPVA has been eliminated from the development area.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to potential Project impacts associated with site conditions and historical uses on the RHA. Impacts in this regard would be considered significant unless mitigated. Impacts would be reduced to less than significant levels with implementation of mitigation measures recommended in the certified EIR.

5.10-2 GOLF SAFETY

The certified EIR concluded that development of the previous Project's proposed golf course and practice facility had the potential to cause significant safety effects on human beings. The EIR analysis concluded that, with mitigation, impacts would be reduced to less than significant levels.

Potential golf safety impacts associated with the golf course and practice facility proposed on the UPVA with the previous Project would not occur with the revised Project since the UPVA and the uses proposed thereon have been eliminated from the development area.

The golf course component proposed with the previous Project has been eliminated from the revised Project. Additionally, the golf practice facility proposed on the UPVA with the previous Project is proposed with the revised Project to be relocated to the RHA. The revised Project's proposed golf practice facility would include a driving range and three practice golf holes on the RHA. The design of the golf practice facility, driving range and three practice golf holes has taken into consideration the safety recommendations provided in the Golf Course Safety Analyses conducted for the previous Project. The safety recommendations considered the resort villas and adjacent practice golf holes, as well as streets and pedestrian traffic. The revised Project's proposed layout of the golf practice facility, driving range, and three practice golf holes on the RHA is generally consistent with the layout proposed with the Relocate Practice Facility – Option "B" Alternative (Alternative 7.5) evaluated in the certified EIR. More specifically, Alternative 7.5's proposed layout of the golf practice facility/driving range and Hole #1, #8, and #9 is generally consistent with the revised Project's proposed layout of the golf practice facility/driving range and Hole #1, #2, and #3, respectively. The revised Project varies from Alternative 7.5 in that Hole #3 was shortened (to a par 3) with the revised Project due to the exclusion of the Cigna property. As with the previous Project, mitigation has been recommended to reduce potential golf safety impacts to less than significant levels.

5.10-3 EMERGENCY RESPONSE PLANS

The certified EIR concluded that implementation of the previous Project had the potential to impair implementation of or physically interfere with an adopted emergency response plan/emergency evacuation plan for the area. The EIR analysis concluded that compliance with the City Development Code would result in a less than significant impact.

General Plan (Civil Defense and Disaster)

Implementation of the revised Project would result in fewer potential impacts with respect to an adopted Emergency Response Plan. Certain modifications to Palos Verdes Drive South proposed with the previous Project (i.e., access to the practice facility, access to the golf maintenance facility, and a golf cart tunnel crossing under Palos Verdes Drive South) are no longer proposed with the revised Project. The revised Project proposes only one modification to Palos Verdes Drive South, the main entry to the RHA at the existing access to the former Marineland project. Fewer interruptions to traffic flow along Palos Verdes Drive South, thus fewer potential interferences with emergency evacuations, would occur with the revised Project. It is anticipated that the Project would not have a significant impact relative to the implementation of or interference with emergency response/evacuation plans.

SEMS Multihazard Functional Plan

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the Project's potential to physically interfere with an emergency evacuation plan for the area would occur with the revised Project. A significant impact would not occur in this regard.

5.10-4 FIRE ANTS

The certified EIR concluded that development of the previous Project's proposed golf course and practice facility had the potential to introduce fire ants that may cause significant safety affects on human beings. The EIR analysis concluded that with mitigation, impacts were reduced to less than significant levels.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the Project's potential to introduce fire ants. Implementation of mitigation measures recommended in the certified EIR would reduce impacts in this regard to a less than significant level.

5.10-5 CUMULATIVE IMPACTS

The certified EIR concluded that the previous Project, in combination with other cumulative projects, had the potential to increase exposure of the public to hazardous substances or interfere with emergency response plans.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to potential cumulative Project impacts associated with health and safety.

5.10-6 MITIGATION MEASURES

Each of the mitigation measures referenced in the certified EIR remains applicable to the revised Project with the exception of those measures noted below which have been omitted or amended. It should be noted that ~~strike-out~~ text refers to omitted measures and **shaded** text refers to amended measures.

~~5.10-1h — Prior to Grading Permit issuance, a Phase II level investigation shall be conducted to determine the level of potential contamination associated with the historic use of the UPVA. The focus of the investigation shall include, but not be limited, to the following:~~

- ~~• Determine the actual absence or presence of the suspected underground storage tanks located near the Point Vicente Bunker. If determined present within the UPVA, soil sampling and/or testing to determine the characteristics and extent of potential contaminants shall be performed. Upon completion of soil testing and/or sampling, a Risk Assessment shall be prepared to determine the appropriate measures for remediation of the tank sites; and~~
- ~~• The 100-square foot area of distressed vegetation located adjacent to the abandoned concrete slab in the northern portion of the UPVA shall be examined to determine the potential for a release of hazardous materials. In addition, a subsurface investigation shall be conducted to determine if any other structures or substances are located below the concrete slab. Any stained soil shall be tested to determine the absence or presence of hazardous materials.~~

~~5.10-1i — Prior to Demolition Permit issuance, the Project Applicant shall coordinate with the appropriate authorities from the United States Department of Interior, National Park Service regarding any proposed modifications to the Nike missile silos.~~

~~5.10-1j — Prior to Demolition Permit issuance or modification to Battery 240, a site-specific investigation to determine the contents of the interior shall be conducted. In the event that hazardous materials are encountered, they shall be properly tested and then properly disposed of prior to modification/demolition activities.~~

~~5.10-1k — Prior to Grading Permit issuance, soil sampling of the agricultural portion of the Upper Point Vicente Area shall be conducted to determine the presence or absence of banned agricultural pesticides.~~

~~5.10-2a — The proposed golf course design shall be modified prior to plan check submittal of Grading Plans approval, to the satisfaction of the Planning Department, pursuant to the recommendations cited in the Golf Safety Study contained in Appendix 15.11, Golf Course Peer Review and Safety Analysis,~~

of this EIR (September 15, 2000) as follows:

~~Hole # 1. Additional support (i.e., higher mounding) shall be added along the parking area by providing vegetation on top of the mounding. The tee shall be moved back slightly to the left.~~

~~Hole # 2. The back two tee complexes shall be moved to the left and down the slope. The sand bunker shall be moved toward the green.~~

~~Hole # 3. This hole shall be made a Par 4. The green shall be located beyond the shallow draw near what is now the proposed second landing area.~~

~~The support (mounding) situated to the right of the first landing (separating the landing area from the 4th green complex) is necessary and shall be retained, however, the fairway area shall be cut by five to ten feet through the areas that are currently at elevation of 360 feet. The highest point in the fairway shall be at 355 feet while the sides (rough areas) shall be five to ten feet higher.~~

~~The first landing area shall be lowered by 10 to 15 feet (leaving the support that separates the 3rd fairway from the 4th green).~~

~~One of the two following options shall be implemented regarding the relationship between the third and fourth holes:~~

- ~~• Option # 1 — The third hole becomes a par four with the green just short of where the original second landing area is. The fourth tees remain where they are; or~~
- ~~• Option # 2 — The third hole's second landing moves out to the right (to a distance at least 150 — ideally 175 feet — away from the property boundary). This way the hole would remain as a par five. The fourth hole would become a par three (about 185 yards from the back tee).~~

~~Hole # 4. The fifth tee location shall be moved to the south by 35 to 40 feet and a retaining wall provided similar to that around the fourth tees. The landing area on the fourth hole shall move by approximately 30 feet. Signage shall be provided on the fourth tee to let players on the right of the third fairway play first prior to playing shots off the fourth tee. The overall profile of the entire third and fourth fairways shall be lowered for improved vision with each shot. Also refer to the Hole #3 discussion.~~

~~Hole # 5. Two or three more bunkers shall be added down the slope to the right of the green. The back tee shall be moved to the south. One or the other of the following recommendations shall be implemented:~~

- ~~• The hole shall be shorted slightly by moving the green back towards the tee; or~~
- ~~• Dense vegetation of medium height shall be added to screen against long shots landing near the pedestrian trails.~~

~~Hole # 6. A bunker or strong shaping (grass hollows) shall be provided~~

between the sixth green and first tee. The back tee on the first hole shall be moved to the left slightly (closer to the property boundary).

Hole # 7. Additional support (i.e., higher mounding) shall be added on the back left. The cart path shall be relocated behind the back tee and down the left hand side.

Hole # 8. The landform to the right of the eighth tees shall be landscaped to protect players from shots off the ninth tee.

Hole # 9. Vegetation shall be added to the right hand support (higher mounding) past the landing area. The walking trails shall be screened with small to medium height vegetation near the landing.

5.10-2b The proposed practice facility design shall be modified prior to Plan Check submittal of Grading Plans approval to the satisfaction of the Planning Department, pursuant to the recommendations cited in the Golf Safety Study contained in Appendix 15.11, Golf Course Peer Review and Safety Analysis, of this EIR (September 15, 2000). One of the following modifications to the practice facility's design shall be implemented:

- The low area between the range and property boundary shall be excavated out. The range's elevation shall be decreased by between 10 and 15 feet and then revegetated with native materials; or
- The elevation of the driving range tee shall be lowered to approximately the 230-foot elevation.

5.10-2a Prior to submittal of the Grading Plans for plan check approval, the proposed golf practice facility design shall be modified, to the satisfaction of the Planning Department, to reflect the following recommendations:

Driving Range. The tees shall be moved up the slope approximately 150 feet and then moved to the west about 100 to 120 feet such that the left edge of the tee is close to the sand trap for the chipping green that is nearest to the clubhouse. Dense vegetation shall be provided to screen the berm that frames the range. The sand traps proposed around the chipping green shall be relocated to the other side of the green such that players would hit out of them toward the range and not toward the clubhouse or other areas where people may be walking. Also, the ends of the range tees shall be turned in slightly (toe them in) such that the range tee is on a slight arc.

Hole #1. The tees on this hole shall be moved slightly to the south such that Hole #2 can move to the south as well (refer to the Hole #2 discussion below). This can be accomplished by moving the tees to between 75 and 80 feet of the property boundary to the south.

Hole #2. The corridor widths at the tee, landing area, and green are acceptable as they relate to the property boundary on the left. However, the first landing area shall be moved to the south (toward Hole #1) by approximately 25 feet to allow for additional separation between the golf holes and the resort villas to the left.

The area just short of the second landing area is within 120 feet of the property boundary. The second landing area shall be moved at least 60 feet to the right of its proposed location. That would allow for the minimum width of 150 feet from the property line while also leaving a space for an additional buffer area. The tees on Hole #1 shall be moved to the south to ensure that there is a minimum of 200 feet between the revised centerline of Hole #2 and the tee on Hole #1.

The Hole #2 green shall be pulled back away from the road approximately 100 feet or more. Tees on Hole #2 shall be moved back slightly without interfering with the Hole #1 green. As an option, this hole may be shortened from a par five to a par four.

Hole #3. Light berming is proposed to separate the practice facility from the pedestrian trail and adjacent properties. Light vegetation shall be provided on this berm for added separation. This green shall be moved approximately 50 to 60 feet to the right and back toward the fairway approximately 20 feet. The bridge behind the green shall be moved toward the ocean (to increase the space for the green complex).

- 5.10-4a Prior to delivery to the UPVA and the RHA, all nursery stock and other items likely to carry fire ants shall be inspected for their presence and identified as free of ants by the landscape and native plant nursery used for the Project.
- 5.10-4b The Project Applicant shall develop for the suppression of fire ants a Fire Ant Management Program. The Program shall be included as part of the Landscaping Plans for both the UPVA and RHA and shall be submitted for review and approval to the City Planning Department or City approved Biologist Consultant prior to Landscape Plan approval. The Program shall include measures that (1) identify appropriate treatments that can be administered most effectively and at the right times, (2) identify the area to be managed and establish a level of acceptable pest presence/damage/tolerance, (3) establish regular monitoring visits as part of the landscape maintenance program, and (4) treat infestation when monitoring indicates that the situation exceeds the established level of presence.

5.10-7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The certified EIR concluded that no significant impacts related to Public Health and Safety were identified following implementation of mitigation measures and/or compliance with applicable standards, policies, and/or City of Rancho Palos Verdes Development Code. This conclusion of significance referenced in the certified EIR with respect to Public Health and Safety remains applicable for the revised Project.

5.11 PUBLIC SERVICES AND UTILITIES

5.11-1 FIRE PROTECTION

The certified EIR concluded that the previous Project had the potential to result in significant physical impacts with respect to fire protection. Analysis concluded that implementation of the mitigation measures identified in the certified EIR and compliance with all applicable codes and ordinances would reduce potential fire service impacts to less than significant levels.

Impacts to the Fire Department's Helispot Pad #53A would not occur with the revised Project since the UPVA has been eliminated from the development area.

No change to the remainder of the conclusions identified in the certified EIR would occur with the revised Project with respect to fire protection services. As with the previous Project, the revised Project would potentially impact the Fire Department's level of service and would contribute to the need for construction of a new fire station. A less than significant impact would occur in this regard with payment of property taxes. Additionally, the revised Project would be required to comply with all applicable City and County code and ordinance requirements with respect to fire protection. The conclusion of significance would not change for the revised Project and a less than significant impact would occur in this regard.

5.11-2 POLICE PROTECTION

The certified EIR concluded that implementation of the previous Project had the potential to result in significant physical impacts with respect to police protection. Potential impacts were considered less than significant level with implementation of the specified mitigation.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to police protection services. As with the previous Project, the revised Project would result in an increase in the number of calls for service and patrol requirements. Implementation of the mitigation measures identified in the certified EIR would reduce this impact to a less than significant level.

5.11-3 SCHOOLS

The certified EIR concluded that implementation of the previous Project had the potential to result in significant physical impacts to existing school facilities. Analysis concluded that a less than significant impact would occur in this regard.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to school facilities. As with the previous Project, the potential increase in student population resulting from interdistrict transfers associated with the revised Project is considered a less than significant impact.

5.11-4 LIBRARIES

The certified EIR concluded that implementation of the previous Project had the potential to result in an increase in the demand for library service. Analysis concluded that significant physical impacts to library facilities would not occur and a significant impact was not anticipated in this regard.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to library facilities. As with the previous Project, substantial adverse physical impacts to library facilities would not occur with the revised Project.

5.11-5 WASTEWATER (SEWER)

The certified EIR concluded that implementation of the previous Project would generate additional wastewater beyond current conditions and had the potential to require an incremental expansion of the existing sewerage system and expansion of the water treatment facility. With payment of appropriate connection fees, impacts would be reduced to a less than significant level.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the wastewater system and treatment facilities. As with the previous Project, an increase the quantity of wastewater attributed to the Project site would occur with the revised Project. With a permit and payment of fees to offset the costs to construct an incremental expansion of the existing sewerage system, the revised Project's impact would be considered as less than significant. Additionally, the wastewater flow associated with the revised Project would not exceed levels associated with approved growth as identified in the RCPG. The conclusion of significance would not change for the revised Project.

5.11-6 WATER

The certified EIR concluded that implementation of the previous Project had the potential to increase the demand for water beyond current conditions requiring the expansion of existing facilities. Analysis concluded that a less than significant impact would occur in this regard.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the water system. Although water consumption with the revised Project would be less than identified with the previous Project due to the exclusion of the UPVA, an increase in the demand for water beyond current conditions would also occur with the revised Project. Sufficient water supplies are available to serve the revised Project from existing resources and a less than significant impact would occur in this regard. Additionally, the demand for water services created by the revised Project would not exceed the demand for water anticipated for the Project area that the CWSC has projected. The conclusion of significance would not change for the revised Project.

5.11-7 SOLID WASTE

The certified EIR concluded that development of the previous Project would result in increased solid waste generation. Analysis concluded that compliance with the City's AB 939 waste reduction requirements would reduce the amount of solid waste that is disposed of at the landfill maintaining potential impacts at less than significant levels.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to solid waste. As with the previous Project, the revised Project would result in increased solid waste generation thereby increasing the demand to provide disposal service and impacting the capacity at the landfill. Potential impacts would be maintained at less than significant levels after compliance with the City's AB 939 waste reduction requirements. The conclusion of significance would not change for the revised Project.

5.11-8 ELECTRIC

The certified EIR concluded that implementation of the previous Project would result in an increased demand for electrical service beyond existing conditions and had the potential to require an expansion of the existing electrical system. Analysis concluded that with implementation of the mitigation recommended in the certified EIR, impacts to the U.S. Coast Guard site and associated electrical easement would be reduced to less than significant levels.

Impacts to the U.S. Coast Guard site and associated electrical easement would not occur with the revised Project since the UPVA has been eliminated from the development area.

No change to the remainder of the conclusions identified in the certified EIR would occur with the revised Project with respect to electrical service. As with the previous Project, the revised Project would not result in a significant impact with respect to electric services as it would not significantly impact SCE's system capacity or ability to provide service. Impacts. The conclusion of significance would not change for the revised Project and a less than significant impact is anticipated in this regard.

5.11-9 NATURAL GAS

The certified EIR concluded that implementation of the previous Project would increase in the demand for natural gas service beyond existing conditions and had the potential to require expansion of the existing gas system. Analysis concluded that a less than significant impact would occur in this regard.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to natural gas service. As with the previous Project, facilities exist in the area and gas service would be provided without any significant impact on the environment. The conclusion of significance would not change for the revised Project and a less than significant impact is anticipated in this regard.

5.11-10 TELEPHONE

The certified EIR concluded that development of the previous Project would result in the need for additional telephone service beyond existing conditions. Analysis concluded that a less than significant impact would occur in this regard.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to telephone service. As with the previous Project, telephone

facilities would not be significantly impacted and telephone services would be available for the revised Project. The conclusion of significance would not change for the revised Project and a less than significant impact is anticipated in this regard.

5.11-11 CUMULATIVE IMPACTS

The certified EIR concluded that cumulative development had the potential to result in an increase in the demand for public services and an increase in the consumption rates for public utilities, potentially requiring expansions of the existing utility systems. Analysis concluded that cumulative development is subject to standards and requirements of reviewing agencies and no additional mitigation is required.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to cumulative impacts on public services and utilities.

5.11-12 MITIGATION MEASURES

Each of the mitigation measures referenced in the certified EIR remains applicable to the revised Project with the exception of those measures noted below that have been omitted or amended. It should be noted that ~~strike-out~~ text refers to omitted measures and shaded text refers to amended measures.

5.11-1 ~~Prior to Grading Permit issuance for the UPVA, the Project Applicant shall consult with the Los Angeles County Fire Department with respect to avoidance of Helispot Pad #53A or the provision of an alternate pad within the Project area.~~

5.11-8 ~~Prior to Grading Permit issuance, the Project Applicant shall consult with the U.S. Coast Guard regarding the 40-foot wide electrical easement which exists on the UPVA. The Applicant shall either underground or relocate this electrical utility line; however, electrical service to the Coast Guard shall not be interrupted. Additionally, the Project Applicant shall consult with the U.S. Coast Guard regarding the provision of a vehicle access road to the U.S. Coast Guard site.~~

5.11-13 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The certified EIR concluded that no unavoidable significant impacts related to public services and utilities were identified following implementation of recommended mitigation measures and compliance with the City Development Codes. This conclusion of significance referenced in the certified EIR with respect to public services and utilities remains applicable for the revised Project.

5.12 TRAFFIC AND CIRCULATION

5.1-1 TRAFFIC GENERATION

The certified EIR concluded that implementation of the previous Project had the potential to cause a significant increase in traffic when compared to the traffic capacity of the street system and to exceed an established LOS standard. Analysis concluded that impacts would be reduced to less than significant levels with implementation of the mitigation measures recommended in the certified EIR.

The revised Project proposes revisions to Project circulation and to the number of access points from Palos Verdes Drive South. Fewer access points from Palos Verdes Drive South are proposed with the revised Project since the UPVA has been eliminated from the development area. More specifically, only the main access to the Resort Hotel is proposed via Palos Verdes Drive South at the existing access to the former Marineland project (opposite the existing gated Crestmont Lane). As with the previous Project, this access is proposed as a four-lane divided entry to allow right and left turns onto Palos Verdes Drive South and allow right and left turns into the RHA. The following access points off of Palos Verdes Drive South have been eliminated from the revised Project:

- Access to the golf practice facility adjacent to an existing emergency access roadway to the Villa Capri townhouse development;
- Access to the golf maintenance facility via an access road to be aligned consistent with that of an existing unpaved dirt road; and
- One golf cart tunnel crossing under the roadway connecting the RHA with the UPVA.

In addition to fewer access points, the Project proposes a shuttle service between the proposed Resort and the Ocean Trails Golf Course situated approximately 3.0 miles east of the Project site. Based on the proposed shuttle service as described in Section 4.0, *Revised Project Description*, the shuttle service would generate a total of 32 average daily trips (ADT) including eight (8) trips during the AM peak hour and eight (8) trips during the PM peak hour.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to traffic generation and circulation. As with the previous Project, the revised Project would generate an increase in traffic volumes beyond current conditions.¹ The revised Project would result in a similar trip distribution pattern as the previous Project with two exceptions: the 290 ADT generated by the golf practice facility

that would be relocated to the RHA2; and the 32 ADT generated by the shuttle service

¹ For purposes of this analysis, the increase in traffic volumes generated by the revised Project is projected to be similar to the previous Project. This is considered a conservative and worst case traffic analysis since elimination of the golf course component would decrease the Projects overall traffic volumes.

² It should be noted that the 290 ADT from the golf practice facility were included in the previous Project's overall traffic projections. These 290 ADT would be relocated to the RHA with the revised Project. The revised Project would

as discussed above. The revised Project's proposed changes to trip distribution are not anticipated to result in a significant impact. As noted in Table 5.12-9 of the certified EIR, the intersection of the Project Entrance (NS) and Palos Verdes Drive South (EW) would operate at Level of Service (LOS) "A" in both the AM and PM peak hours under existing plus ambient growth plus proposed project plus other development conditions. Therefore, sufficient capacity would exist at this intersection such that the golf practice facility and shuttle traffic could occur at this location and the intersection would continue to operate at an acceptable LOS.

As with the previous Project, the revised Project is expected to have a significant traffic impact at three study area intersections. Impacts to these intersections would be reduced to less than significant levels with implementation of mitigation measures recommended in the certified EIR. The conclusion of significance for these impacts would not change with the revised Project.

5.12-2 CONGESTION MANAGEMENT PLAN (CMP) ANALYSIS

The certified EIR concluded that the revised Project had the potential to exceed standards established by the Los Angeles County CMP. Analysis concluded that implementation of specified mitigation measures would reduce impacts to a less than significant level.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to CMP intersection. As with the previous Project, the addition of the revised Project's traffic at the three (3) CMP arterial monitoring intersections would not be significant after implementation of mitigation measures recommended in the certified EIR. The conclusion of significance for these impacts would not change with the revised Project.

5.12-3 INTERNAL CIRCULATION AND PROJECT ENTRY GEOMETRICS

The certified EIR concluded that implementation of the previous Project had the potential to significantly increase hazards due to a design feature. Analysis concluded that implementation of the recommended mitigation measures would reduce impacts to a less than significant level.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the main entrance spine road and traffic signal warrant. As with the previous Project, the forecast traffic volume could be accommodated by a two-lane roadway serving all of the uses on site. Additionally, a traffic signal is projected to be warranted at the Project Entrance (NS) at Palos Verdes Drive South (EW) intersection. The conclusion of significance for these impacts would not change with the revised Project and a less than significant impact is anticipated in this regard.

5.12-4 PARKING CAPACITY

not result in greater traffic volumes than the previous Project.

The certified EIR concluded that implementation of the previous Project had the potential to result in inadequate parking capacity. Analysis concluded that, based on the City of Rancho Palos Verdes standards, adequate on-site parking was proposed to meet the demand created by the proposed uses. Analysis concluded that a less than significant impact would occur in this regard with implementation of the recommended mitigation measures.

As with the previous Project, the revised Project includes a parking supply of 825 spaces (excluding approximately 100 spaces designated for coastal access public parking). The total parking supply also includes the partially subterranean valet parking structure for the hotel guests. Based on this information and the total parking supply provided, the Project would have a parking ratio of 1.5 spaces per room, not including the coastal access public parking spaces. As with the previous Project, the parking rate for the revised Project for the 400 hotel rooms, the 150 casitas (multiple keyed) and all of the amenities on site, including the public meeting space, would meet the overall parking demand for hotel guests and employees. The conclusion of significance for these impacts would not change with the revised Project and a less than significant impact is anticipated in this regard.

5.12-5 MITIGATION MEASURES

Each of the mitigation measures referenced in the certified EIR remains applicable to the revised Project with the exception of the measure noted below which has been omitted or amended. It should be noted that ~~strike-out~~ text refers to omitted measures and **shaded** text refers to amended measures.

~~5.12-1c — Prior to Occupancy Permit issuance, access to the driving range shall be restricted to right turns in/out only.~~

5.12-6 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The certified EIR concluded that no significant impacts related to Traffic and Circulation were identified following implementation of mitigation measures and/or compliance with applicable standards, policies, and/or City of Rancho Palos Verdes Development Code. This conclusion of significance referenced in the certified EIR with respect to Traffic and Circulation remains applicable for the revised Project.

5.13 RECREATION

5.13-1 EXISTING RECREATIONAL ACTIVITY

The certified EIR concluded that implementation of the previous Project had the potential to increase the use of existing neighborhood and regional parks and other recreational facilities thereby creating the potential for physical deterioration of each facility. Analysis concluded that a less than significant impact would occur in this regard.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to existing recreational activity. As with the previous Project, the employment generated by the revised Project would have the potential to create a demand for additional parkland. The revised Project proposes the development of approximately 8.0 acres of various recreational features including public parking, parks, trails, coastal access, a shore area and a golf practice facility. Of these 8.0 acres, approximately 4.2 acres of general public parkland are proposed. Further, although the revised Project no longer proposes the development of a nine-hole golf course, a 32.5-acre golf practice facility is currently proposed. As with the previous Project, the revised Project proposes the development of recreational uses in excess of the demand it would potentially create, and would provide a net increase in the total amount of recreational facilities that would be available in the City. Therefore, implementation of the revised Project would not increase the use of existing facilities such that substantial physical deterioration would occur and a significant impact is not anticipated in this regard. The conclusion of significance for these impacts would not change with the revised Project.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to potential impacts on recreational facilities from the transient population. As with the previous Project, a significant impact to existing recreational facilities is not anticipated in relation to the transient population. The conclusion of significance for these impacts would not change with the revised Project.

5.13-2 PROPOSED RECREATIONAL ACTIVITY/FACILITIES

The certified EIR concluded that the previous Project included recreational facilities that had the potential to result in physical impacts on the environment. Analysis concluded that compliance with the City Development Code and implementation of mitigation measures specified in Sections 5.1 through 5.12 of the certified EIR would reduce impacts to a less than significant level.

The removal of approximately 2.0 acres of the existing Civic Center Park for golf course use proposed with the previous Project would not occur with the revised Project since the UPVA has been eliminated from the development area.

The recreational facilities proposed with the revised Project are described in detail in Section 4.0, *Revised Project Description*. Sections 5.1 through 5.12 of this Addendum include analyses of the revised Project's effects on the environment resulting from the proposed recreational facilities, as well as other Project components. As with the previous Project, analyses in these sections concluded that these impacts would be reduced to less than significant levels after compliance with the City Development Code and implementation of recommended mitigation measures.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to the increased demand for parkland. As with the previous Project, the revised Project has the potential to create a demand for additional parkland. However, the Project proposes the development of approximately 4.2 acres of general public parkland, 3.8 acres of public trails, staging areas, and coastal access ways, and a 32.5-acre golf practice facility including a driving range and three practice golf holes. Accordingly, Project implementation would result in a net increase in recreational facilities in the City. The conclusion of significance for these impacts would not change with the revised Project and a significant impact is not anticipated in this regard.

5.13-3 PATH AND TRAILS NETWORK

The certified EIR concluded that the previous Project would include a trails network that has the potential to result in a physical effect on the environment. Analysis concluded that a less than significant impact would occur following compliance with the City Development Code and implementation of mitigation measures specified in Sections 5.1 through 5.12 of the certified EIR.

The following paths and trails proposed with the previous Project would not be implemented with the revised Project since the UPVA and the improvements proposed thereon have been eliminated from the revised development plan:

- City Hall Trail- Salvation Army Segment;
- City Hall Trail- Lighthouse Segment; and
- The system of public trails and scenic view points proposed around the perimeter of City Hall.

Notwithstanding, the revised Project would not preclude the City's future implementation of such trails.

A variety of pedestrian trail links are proposed with the revised Project, including single-use and multi-use trails, an entry drive sidewalk, resort walkways, coastal access walkways, and a coastal bluff-top walkway with scenic viewpoints. The revised Project proposes approximately 3.0 miles of new public bicycle trails, equestrian trails, pedestrian trails and stairways, and coastal access ramps, as described in Section 5.13 of the certified EIR, *Recreation*. As with the previous Project, development of the trails network proposed with the revised Project would result in physical effects on the environment. These effects are addressed in Sections 5.1 through 5.12 of this Addendum EIR. Analyses in these Sections has concluded that a less than significant impact would occur after compliance with the City Development Code and implementation of the mitigation measures specified in each of the respective sections.

5.13-4 COMPLIANCE WITH THE GENERAL PLAN AND COASTAL SPECIFIC PLAN

The certified EIR concluded that the previous Project's proposed trails network had the

potential to conflict with the policies and recommendations identified in the General Plan and Coastal Specific Plan. Analysis concluded that the previous Project would be consistent with the recommendations and a less than significant impact would occur in this regard.

One recommendation identified in the General Plan with respect to the trails network on the UPVA would not be satisfied with the revised Project since the UPVA and the improvements proposed thereon have been eliminated from the development plan. The urban trail along Hawthorne Boulevard consisting of the segment of the City Hall Trail proposed parallel to Hawthorne Boulevard and along the northern boundary of the UPVA would not be implemented with the revised Project. Notwithstanding, the revised Project would not preclude the City's future implementation of such trails.

No change to the remainder of the conclusions identified in the certified EIR would occur with the revised Project with respect to compliance with the policies and recommendations identified in the General Plan and Coastal Specific Plan. As with the previous Project, the revised Project's proposed trails network would not conflict with the recommendations made in these Plans. The conclusion of significance for these impacts would not change with the revised Project and a significant impact is not anticipated in this regard.

5.13-5 PARKS MASTER PLAN

The certified EIR concluded that the recreational components proposed with the previous Project had the potential to conflict with the City's Parks Master Plan. Analysis concluded that a less than significant impact would occur in this regard.

The following recommendations identified in the Parks Master Plan with respect to the recreational components on the UPVA would not be satisfied with the revised Project since the UPVA and the improvements proposed thereon, have been eliminated from the development plan:

- Municipal golf course at Point Vicente Park;
- Point Vicente Park/Civic Center additional facilities; and
- High Priority Park Facility (golf course).

Notwithstanding, the revised Project would not preclude the City's future implementation of such recreational components.

The revised Project would not relocate the City's maintenance yard to the location where the Pt. Vicente Park athletic field presently exists since the UPVA and the improvements proposed thereon, have been eliminated from the development plan. The revised Project would result in no impacts in this regard.

No change to the remainder of the conclusions identified in the certified EIR would occur with the revised Project with respect to compliance with the recommendations for park development identified in the Parks Master Plan. As with the previous Project, the revised Project's proposed recreational components would not conflict with the Parks Master Plan since the proposed recreational facilities would be generally consistent with the Plan's recommendations. The conclusion of significance for these impacts would not change with the revised Project and a significant impact is not anticipated in this

regard.

5.13-6 PALOS VERDES CONCEPTUAL TRAILS PLAN

The certified EIR concluded that the recreational components of the previous Project had the potential to conflict with the City's Conceptual Trails Plan. Analysis concluded that a less than significant impact would occur in this regard.

Two recommendations identified in the City's Conceptual Trails Plan with respect to the trails network on the UPVA would not be satisfied with the revised Project since the UPVA and the improvements proposed thereon, have been excluded from the development plan. The Palos Verdes Loop Trail - City Hall Segment and the Palos Verdes Loop Trail - Salvation Army Segment would not be developed with the revised Project. Notwithstanding, the revised Project would not preclude the City's future implementation of such trails.

No change to the remainder of the conclusions identified in the certified EIR would occur with the revised Project with respect to compliance with the recommendations for the trails network identified in the City's Conceptual Trails Plan. As with the previous Project, the revised Project would not conflict with the Conceptual Trails Plan since the proposed trails network would be generally consistent with the Plan's recommendations. The conclusion of significance for these impacts would not change with the revised Project and a significant impact is not anticipated in this regard.

5.13-7 PALOS VERDES CONCEPTUAL BIKEWAYS PLAN

The certified EIR concluded that the recreational components of the previous Project had the potential to conflict with the City's Conceptual Bikeways Plan. Analysis concluded that a less than significant impact would occur in this regard.

Two recommendations identified in the City's Conceptual Bikeways Plan with respect to the bikeways network on the UPVA would not be satisfied with the revised Project since the UPVA and the improvements proposed thereon, have been eliminated from the development plan. The Hawthorne Boulevard - Southern Segment and the Palos Verdes Drive West - Golden Cove Segment would not be developed with the revised Project. Notwithstanding, the revised Project would not preclude the City's future implementation of such trails.

No change to the remainder of the conclusions identified in the certified EIR would occur with the revised Project with respect to compliance with the recommendations for the bikeways network identified in the City's Conceptual Bikeways Plan. As with the previous Project, the revised Project would not conflict with the Conceptual Bikeways Plan since the proposed bikeways network would be generally consistent with the Plan's recommendations. The conclusion of significance for these impacts would not change with the revised Project and a significant impact is not anticipated in this regard.

5.13-8 CUMULATIVE IMPACTS

The certified EIR concluded that cumulative development had the potential to increase the use of existing recreational facilities, thereby creating the potential for physical

deterioration of each facility. Additionally, cumulative development may include recreational facilities with the potential to result in physical impacts on the environment. Mitigation necessary for reducing impacts on recreational facilities to a less than significant level would be identified on a project-by-project basis.

No change to the conclusions identified in the certified EIR would occur with the revised Project with respect to cumulative impacts on recreational facilities.

5.13-9 MITIGATION MEASURES

Each of the mitigation measures referenced in the certified EIR remains applicable to the revised Project and no changes are identified.

5.13-10 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The certified EIR concluded that no unavoidable significant impacts related to recreational facilities were identified following implementation of recommended mitigation measures and compliance with the City Development Code. This conclusion of significance referenced in the certified EIR with respect to recreational facilities remains applicable for the revised Project.