

## DOCKETED

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# **ENVIRONMENTAL AUDIT, INC.**®

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July 7, 2015

Project No. 2951

California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105-2219

Subject: Coastal Commission's 30413(d) Report for the Proposed Redondo Beach Energy Project – Application for Certification #12-AFC-03

Dear Commissioners:

On behalf of the City of Redondo Beach, Environmental Audit, Inc. (EAI) has reviewed the draft Coastal Commission Report on the Application for Certification for the Redondo Beach Energy Project (RBEP). EAI has prepared the following comments regarding the analysis of Visual Resources in the Report.

Coastal Act Section 30413(d) requires the Report to consider and make findings regarding the impact of the project on Visual Resources. Specifically, it requires an analysis of all the following issues:

- (1) The compatibility of the proposed site and related facilities with the goal of protecting coastal resources.
- (2) The degree to which the proposed site and related facilities would conflict with other existing or planned coastal-dependent land uses at or near the site.
- (3) The potential adverse effects that the proposed site and related facilities would have on aesthetic values.
- ...
- (5) The conformance of the proposed site and related facilities with certified local coastal programs in those jurisdictions which would be affected by any such development.
- (6) The degree to which the proposed site and related facilities could reasonably be modified so as to mitigate potential adverse effects on coastal resources, minimize conflict with existing or planned coastal-dependent uses at or near the site, and promote the policies of this division.

The Energy Commission's Preliminary Staff Assessment (PSA) included a comprehensive analysis of the visual impacts of the project. The analysis identified three key observation points (KOPs) where the project will have significant negative impacts. Thus far, AES has not complied with Energy Commission Staff requests to develop mitigation to reduce the impacts to less than significant.

The Energy Commission's findings on Visual Resources establish that the RBEP does not comply with Coastal Act requirements for the protection of Visual Resources. Coastal Act Section 30251 provides:

The scenic and visual qualities of the coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal area, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.

The City therefore recommends that the Coastal Commission add the following statement to its Report:

In the PSA, Energy Commission Staff conclude that the RBEP will have a significant negative visual impact in multiple locations within the coastal zone, unless substantial new mitigation is required. The proposed project thus fails to comply with Coastal Act Section 30251 in the following ways: (1) the project has not been designed to protect views to the ocean and coast; (2) the project is not visually compatible with the character of the surrounding area; and (3) the project is not designed to restore and enhance the visual quality in a visually degraded area.

The Coastal Commission should also recommend a condition that ensures the requirements of Coastal Act Section 30251 are met.

If further clarification is needed, please contact me at (714) 632-8521 ext. 237.

Sincerely,

ENVIRONMENTAL AUDIT, INC.



Marcia Baverman, P.E.  
Project Manager/Senior Engineer

MB:ds