

DOCKETED

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July 07, 2015

CALIFORNIA COASTAL COMMISSION

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

**RE: 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 ("City"), PCR Services Corporation ("PCR") submits the following comments in response to the June 24th Report to Commission for the proposed Redondo Beach Energy Project application for Certification #12-AFC-03.

The City concurs with the reasons given for including the 5.93 acres of wetlands as Coastal Commission jurisdiction. Specifically, as stated in the information presented in the report, based upon the site visit conducted by Coastal Commission staff in 2014 and the 2013 data sheets submitted by AES, in addition to the historical context known for the area, the area has continued to exhibit wetland characteristics despite development. All areas examined in the field exhibited one or more of the three parameters used to determine the presence of jurisdictional wetlands per Coastal Commission guidelines. As such, based on the "on ground" data already provided, the City concurs with the findings presented in the above referenced report. The City believes, based on its experience, the position taken in the report is consistent with the treatment of wetlands throughout the area and as such does not impose an undue hardship or standard upon the applicant.

Furthermore, the City concurs with the revisions suggested for BIO9 and finds the suggested mitigation measures provided on pages 26-28 to be consistent with current compensatory mitigation standards relative to this resource and finds the expanded language necessary and prudent.

We hope the above comments provide assistance in this matter. I can be reached at (949) 753-7001, ext. 2108, or b.martinez@pcrnet.com with any questions.

Sincerely,

PCR SERVICES CORPORATION

Beth Jolie Martinez, M.S.
Associate Principle and
Deputy Director of Biological and Regulatory Services