

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
1000 Ocean Gate, Suite 1000
Long Beach, CA 90802-4302
(562) 590-5071

Filed: 7/19/2004
49th Day: 9/6/2004
180th Day: 1/15/2005
Staff: CP-LB
Staff Report: 8/19/2004
Hearing Date: September 10, 2004
Commission Action:



F6i

RECORD PACKET COPY

STAFF REPORT: CONSENT CALENDAR

APPLICATION NUMBER: 5-04-293

APPLICANT: MCC Redondo Beach II, LLC (Redondo Beach Marina)

AGENT: Leslie Page, Assistant Property Manager

PROJECT LOCATION: 181 North Harbor Drive (public parking lot of the Redondo Beach Marina), City of Redondo Beach, Los Angeles County.

PROJECT DESCRIPTION: Establish and operate a weekly "Redondo Marina Marketplace" arts and crafts fair with farmers' market each Wednesday, including installation and removal of and temporary facilities for vending and entertainment.

Lot Area	7.46 acres
Parking Spaces	813
Zoning	Commercial/Industrial
Plan Designation	Marina/Recreation
Ht above final grade	15 feet (booths & stage)

LOCAL APPROVAL: City of Redondo Beach Temporary Use Permit, 6/24/2004.

SUBSTANTIVE FILE DOCUMENTS:

1. City of Redondo Beach certified Local Coastal Program, 9/11/2003.
2. City of Redondo Beach Lease Agreement with MCC Redondo Beach II, LLC.
3. Parking Analysis Report by Modern Parking, Inc., 5/12/2004 (Exhibit #4).

SUMMARY OF STAFF RECOMMENDATION

The proposed weekly event is located within an area of deferred LCP certification. Therefore, the Commission is processing the required coastal development permit application. The City of Redondo Beach is currently considering the applicant's request for a Conditional Use Permit, but has already issued a Temporary Use Permit for the event on a month-to-month trial basis. The proposed event would displace about 114 public parking spaces and would increase the parking demand in the marina parking lot on Wednesday afternoons. The applicant's parking analysis shows that the marina's 813-space parking lot has sufficient capacity on Wednesday afternoons to accommodate the event and the increased parking demand. Staff is recommending that the Commission **APPROVE** a coastal development permit for the proposed development for a limited time period (two years) with special conditions to protect public access to the marina. **See Page Two for the motion** to carry out the staff recommendation.

STAFF RECOMMENDATION:

The staff recommends that the Commission adopt the following resolution to **APPROVE** the coastal development permit application with special conditions:

MOTION: *"I move that the Commission approve the coastal development permit applications included on the consent calendar in accordance with the staff recommendations."*

Staff recommends a **YES** vote. Passage of this motion will result in approval of all the permits included on the consent calendar. An affirmative vote by a majority of the Commissioners present is needed to pass the motion.

I. Resolution: Approval with Conditions

The Commission hereby **APPROVES** a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3 of the Coastal Act. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. Standard Conditions

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date this permit is reported to the Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. Special Conditions

1. Permit Compliance

All development must occur in strict compliance with the proposal as set forth in the application, subject to any special conditions. Any deviation from the approved plans, including any change in the event location or day of the approved Wednesday event, must be submitted for review by the Executive Director to determine whether an amendment to this coastal development permit is required.

2. Approval Term

Approval of the proposed event is limited to a two-year term commencing on the date of Commission action (Sept. 2004 to Sept. 2006). Prior to the end of the two-year term, when the term of the Commission's approval of the project is due to expire, the applicant may request an amendment to Coastal Development Permit 5-04-293 in order to extend the Commission's approval for another term. The Commission will then reexamine the project's effects on coastal resources and public access using parking lot use data collected by the applicant during the approved term and other relevant information.

3. July 4th

The event shall not occur on July 4th.

4. Parking

The vending and entertainment area for the weekly event approved by Coastal Development Permit 5-04-293 may occupy up to 114 public parking spaces within the marina parking lot on each Wednesday. No public parking shall be reserved for the exclusive use of customers of the farmers' market.

5. Local Government Approval

This action has no effect on conditions imposed by a local government pursuant to an authority other than the Coastal Act, including the conditions of the City of Redondo Beach Conditional Use Permit. In the event of conflict between the terms and conditions imposed by the local government and those of this coastal development permit, the terms and conditions of Coastal Development Permit 5-04-293 shall prevail.

IV. Findings and Declarations

The Commission hereby finds and declares:

A. Project Description

The applicant proposes to establish and operate a weekly "Redondo Marina Marketplace" arts and crafts fair with farmers' market in the parking lot of the Redondo Beach Marina (Exhibit #2). The proposed event would occur once each week on Wednesday afternoons and evenings from 2 p.m. to 8 p.m. Set-up of up to one hundred vending booths would commence at 10a.m. each Wednesday morning, and all vendors and their equipment would be removed by 10p.m. Wednesday night. The vending area and entertainment area would occupy 114 parking spaces within the marina parking lot. An additional 85 spaces in the marina parking lot would be reserved for vendor parking. Event visitors and other marina visitors (including Seaside Lagoon patrons) would park within the remaining 614 parking spaces in the marina's 813-space parking lot (Exhibit #2). Directional signs would be posted to direct people to the event and/or appropriate parking areas within the marina parking lot.

The event has been operating on a temporary basis since August 4, 2004 under a temporary event exclusion issued by Commission staff on July 30, 2004. The temporary event exclusion is valid for a limited term that expires at the end of August 2004. A coastal development permit is required in order for the proposed event to operate on an ongoing basis because a continually operating weekly event does not qualify as a temporary event of limited duration. According to the Coastal Commission's Guidelines for the Exclusion of Temporary Events from Coastal Development Permit Requirements, a temporary event of limited duration is defined as an event that does not exceed a four-month period on an intermittent basis. The applicant proposes to hold the weekly event on an ongoing and permanent basis.

The event area is set back from the waterfront near the center of the marina parking lot (Exhibit #2). A public boat hoist and recreational boat slips occupy the water area adjacent the site. A public walkway and the marina bulkhead separate the parking lot from the waters of the marina. The proposed project will not interfere with access to and along the boat hoist, public walkway or the marina docks.

According to the Parking Analysis Report (Exhibit #4: Modern Parking, Inc., 5/12/2004), the 813-space marina parking lot has sufficient capacity on Wednesdays to accommodate all of the existing parking demands (e.g. boaters, Seaside Lagoon, restaurants) and the demands of the proposed event (visitor and vendor parking plus use of a portion of the parking lot for the vending and entertainment area). The parking lot is never full on Wednesdays. The Parking Analysis Report states that the marina parking lot has 503 spaces available on Wednesdays to accommodate the needs of the proposed event (Exhibit #4, p.5).

The additional parking demand that would be generated by the proposed event is not known at this time, since it depends largely on its popularity. Therefore, in order to ensure that the marina parking is protected for its primary use (boating and recreation), the permit approval is conditioned and limited as follows:

- The vending and entertainment area may occupy up no more than 114 parking spaces;

- No public parking shall be reserved for the exclusive use of customers of the farmers' market; and,
- Approval of the proposed event is limited to a two-year term.
- The event shall not occur on July 4th because of increased boater use of the marina.

Prior to the end of the two-year term, when the term of the Commission's approval of the project is due to expire, the applicant may request an amendment to Coastal Development Permit 5-04-293 in order to extend the Commission's approval for another term. The Commission will then reexamine the project's effects on coastal resources and public access using parking lot use data collected by the applicant during the approved term and other relevant information. As conditioned, the proposed event will have no negative effects on coastal access, is consistent with Chapter 3 policies of the Coastal Act and previous Commission approvals, and will not prejudice the City's ability to prepare an LCP for this area of deferred certification.

B. Public Access

As conditioned, the proposed development will not have any new adverse impact on public access to the coast or to nearby recreational facilities. Thus, as conditioned, the proposed development conforms with Sections 30210 through 30214, Sections 30220 through 30224, and 30252 of the Coastal Act.

C. Recreation Areas and Parks

As conditioned, the development will not result in significant degradation of adjacent habitat, recreation areas, or parks and is compatible with the continuance of those habitat, recreation, or park areas. Therefore, the Commission finds that the project, as conditioned, conforms with Section 30240(b) of the Coastal Act.

D. Public Recreation

The proposed development, as conditioned, does not interfere with public recreational use of coastal resources. The proposed development, as conditioned, protects coastal areas suited for recreational activities. Therefore, the Commission finds that the proposed development, as conditioned, is in conformity with Sections 30210 through 30214 and Sections 30220 through 30223 of the Coastal Act regarding the promotion of public recreational opportunities.

E. Development

The development is located within an existing developed area and, as conditioned, will be compatible with the character and scale of the surrounding area, has been designed to avoid cumulative adverse impacts on public access. Therefore, the Commission finds that the development, as conditioned, conforms with Sections 30250, 30251, 30252, 30253 and the public access provisions of the Coastal Act.

F. Local Coastal Program

Coastal Act section 30604(a) states that, prior to certification of a local coastal program ("LCP"), a coastal development permit can only be issued upon a finding that the proposed development is in conformity with Chapter 3 of the Act and that the permitted development will not prejudice the ability of the local government to prepare an LCP that is in conformity with Chapter 3. The City of Redondo Beach LCP was effectively certified on September 11, 2003. However, the proposed project is located within an area of deferred LCP certification. The Redondo Beach Land Use Plan (LUP), which was certified on June 18, 1981, includes policies applicable to the project site. The proposed development is consistent with Chapter 3 of the Coastal Act and the certified Redondo Beach LUP. Approval of the project, as conditioned, will not prejudice the ability of the local government to prepare an LCP that is in conformity with the provisions of Chapter 3 of the Coastal Act.

G. California Environmental Quality Act (CEQA)

Section 13096 Title 14 of the California Code of Regulations requires Commission approval of a coastal development permit application to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

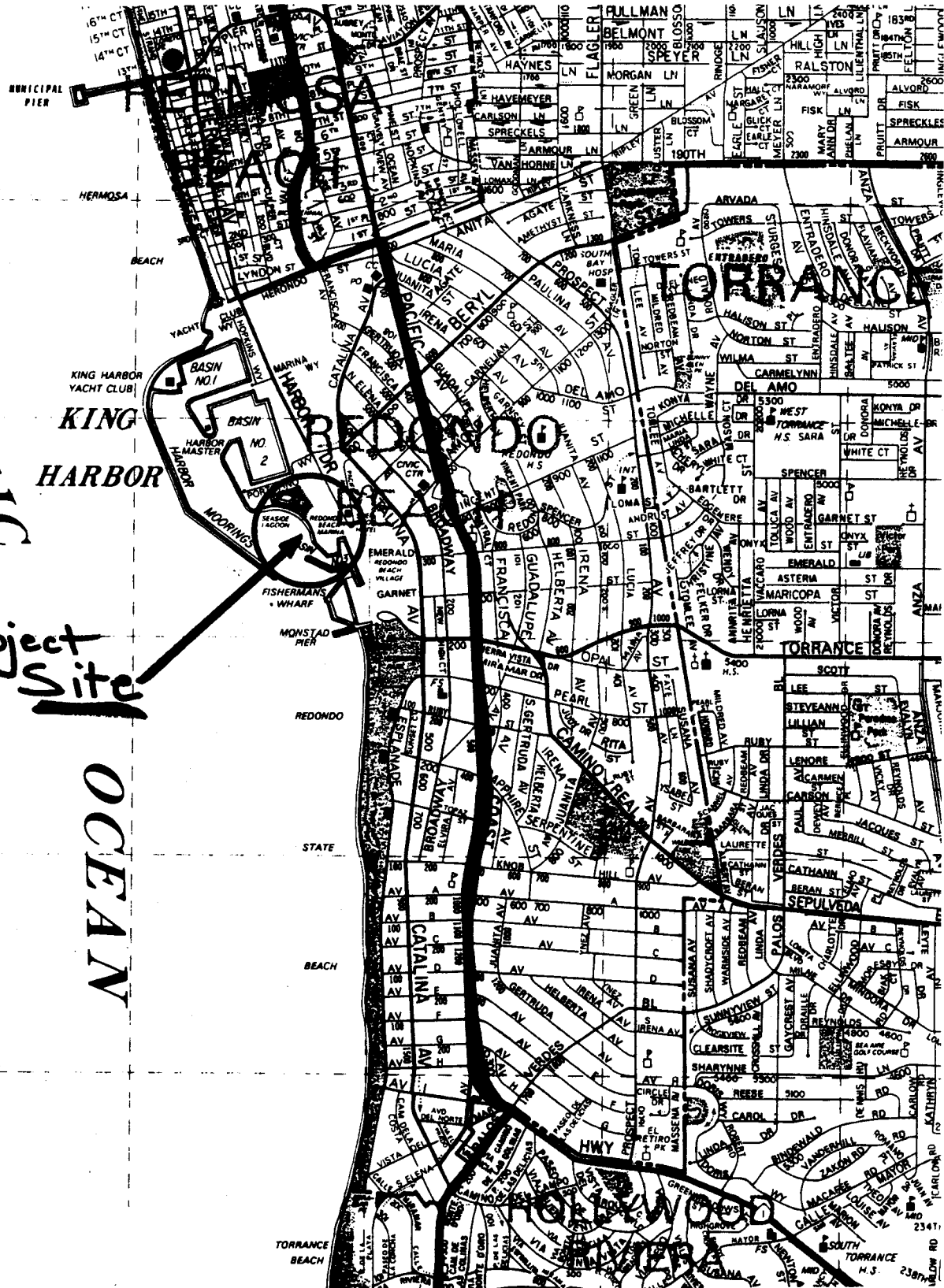
The proposed project has been found consistent with the Chapter 3 policies of the Coastal Act. All adverse impacts have been minimized by the recommended conditions of approval and there are no feasible alternatives or additional feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project as conditioned can be found consistent with the requirements of the Coastal Act to conform to CEQA.

End/cp

PACIFIC

Project Site

OCEAN



City
of
Redondo Beach

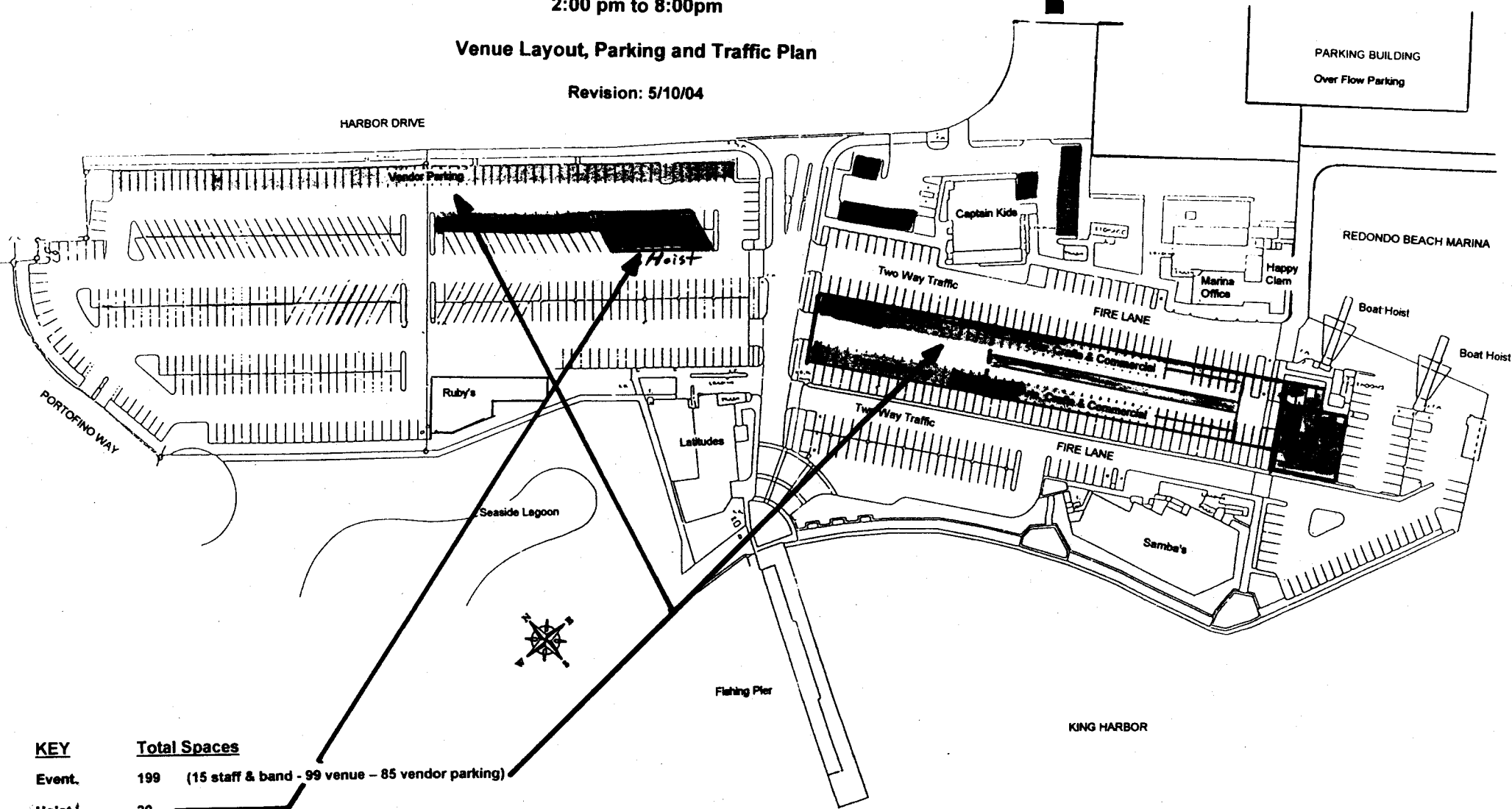
COASTAL COMMISSION
5-04-293

EXHIBIT # 1
PAGE 1 OF 1

**Redondo Beach Marina
Marketplace
Every Wednesday
2:00 pm to 8:00pm**

Venue Layout, Parking and Traffic Plan

Revision: 5/10/04



KEY

Event.

Hoist

Public

Total Spaces

199 (15 staff & band - 99 venue - 85 vendor parking)

20

551

24 (Capt. Kids)

**COASTAL COMMISSION
5-04-293**

EXHIBIT # 2

PAGE 1 OF 1

**Redondo Beach Marina
Market Place
Wednesdays from 2:00pm to 8:00pm
Arts/Crafts/Commercial Vendors
Farmers Market**

The Redondo Beach Marina management group and Conte Productions Inc. have complied with all matters pertaining to this event. We are now completing the final phase and submitting this application, which include all modifications required by the City, with the intent to begin production of the weekly Marina Market Place event as soon as possible. We thank you for your support and assistance in this matter and look forward to starting this project.

To reiterate, this concept is a time tested, powerful promotional tool that will certainly meet its objective, to generate increased foot traffic and repeat business to the Marina and King Harbor area.

Together, staff members of the Marina and Conte Productions have carefully considered the issues that will affect the dynamics of daily operations at the Marina and have prepared this document for your review. Included is a detailed break down of our operation plan, map, event timetable, traffic, parking counts, Police and Fire concerns and management solutions.

Management Staff

Mark Conte	Market Place Coordinator
Bj Conte	Market Place Manager
John Giusa	Operations/Security
Steve McKenna	Operations/Security
Steve Shoemaker	Audio Technician
3 staff members	Operation/Security/Clean Up
Farmers Market	Manager TBA

Vendors

Up to 80 Arts, Crafts and Commercial vendors, each designated a specific 10' x 10' booth space, will be chosen to participate base on uniqueness, display and product quality and overall event product mix. Vehicles for these vendors will not be on site during event hours. 80 parking spaces are designated "Vendor Parking Only" as shown on map.

COASTAL COMMISSION

5-04-293

EXHIBIT # 3

PAGE 1 OF 9

Revised

**Redondo Beach Marina / City of Redondo Beach
Marina Marketplace, Page two**

Approximately 20 qualified participants will be included in the Farmers Market. Their vehicles are part of their sales display and will remain on the event venue during the hours of operation.

Parking , Fire, Traffic and Signage

Fire Lanes will be a minimum 20' width. The South Hoist will be the only operational unit event days. Fire hydrants will be accessible at all times. Six Fire Extinguishers will be zip tied to poles with an identifying sign. All vendors will be within 80' of an extinguisher. Food vendors who will be cooking will be required to have an extinguisher. All Fire rules related to outdoor events will be enforced. See map for locations of Fire Extinguishers.

Signs will be placed at the main entrance and at each north/south lot access directing the general public to the specific Marina businesses, Fishing Pier and Seaside Lagoon parking.

Boat Hoist directional signs and designated "Hoist Parking Only" signs will be placed at the entrance and in the Hoist Parking area. CP staff will coordinate traffic at the entrance.

Permanent "No Parking Wednesdays, 8:00 am to 10:00 pm " should be installed in the parking spaces designated as the Market Place venue and operations area.

No Parking signs for Vendor and Hoist parking areas will be set up each morning on the day of the event. Guest/Public, vendors and local business parking will be directed to designated parking zones as shown on the map.

On event day directional signs will be placed at the following locations:

1. Catalina at Pacific
2. Catalina at Beryl
3. Harbor Dr. at Beryl
4. Harbor Dr. at Anita
5. Harbor Dr. at Marina entrance

"Private Parking No Event Parking" sign at Captain Kids' entrance

A promotional banner should be reserved at the King Harbor arch as often as possible. Rotating the banner to other locations when available would be beneficial as well.

COASTAL COMMISSION

EXHIBIT # 3
PAGE 2 OF 9

Redondo Beach Marina / Conte Productions Inc.
Marina Market Place, Page three

Audio and Power

A small stage, 16' x 12' x 2' will be erected each week, for location see MAP
A small audio system designed to "play to the room" with speakers facing south will be erected on the stage. Volume level will not project out of the area. Sound level will drop off significantly at 100' from the front of the stage. Our Audio technician will control sound levels, all bands are required to play through our system.

Audio system:

- | | | |
|----|-------|---------------------------------------|
| a. | 1 | 24 Channel Mixing Board |
| b. | 1 | Technical station Equalizer Rack |
| c. | 2 | 2 way, 15" speaker cabinets |
| d. | 2 | Speaker Stands |
| e. | 4 | Stage Monitors |
| f. | 1 | Power Conditioner |
| g. | Misc. | Microphones, Transformers and Stands |
| h. | | Cables as needed (minimum 7 per show) |
| i. | 1 | Power Conditioner |
| j. | 5 | Power Strips |
| k. | 5 | Electrical Cables |
| l. | 6 | Speaker Cables |
| m. | 1 | CD Player w/ CD's |
| n. | | Cable Matting |
| o. | | Assortment of Connectors |

Entertainment

Bj Conte and Steve Shoemaker will be responsible for all entertainment arrangements and contracts. The variety and style of music will vary each week, providing our guests with an array of musical experiences from week to week. The following is a list of potential entertainers from which we will choose the first four weeks of stage shows and beyond. Each group will be made up of no more than 3 entertainers per show.

- | | |
|--------------------------|-----------------------|
| 1. Dayton Borders: | Classic Rock, Top 40 |
| 2. California Home Boys: | Blue Grass |
| 3. Robbie Armstrong: | Blues and R&B |
| 4. Mike Forbes: | Classic Rock |
| 5. Mike Gealer: | Slow Jazz |
| 6. Zydeco Party Band: | Cajun Byau |
| 7. Peach Frog: | Doors Tribute, Top 40 |

COASTAL COMMISSION

EXHIBIT # 3
PAGE 3 OF 9

Redondo Beach Marina / Conte Productions Inc.
Marina Market Place, Page four

Entertainment cont.:

- | | |
|------------------------------------|-----------------|
| 8. Cynthia Jones & the Blue Tones: | Jazz and Blues |
| 9. Candies: | Bubble Gum Pop |
| 10. Soul Sacrifice: | Santana Tribute |
| 11. Lion Heart: | Reggae |
| 12. Island Jam: | Steal Drum |
| 13. Gravity: | Pop |

Market Place Timetable

- | | |
|----------|---|
| 10:00 am | Venue closed to public
Vendor spaces marked in chalk
Sanitation Rentals delivered |
| 11:00 am | Management staff arrives
Operations area secured
Venue closure equipment and signage deployed
Vendors begin to arrive and set up |
| 12:00 pm | Vendor set up continues
Vendors vehicles begin to exit site to designate parking
Trash receptacles distributed |
| 1:30 pm | All Vendor vehicles off venue to designated parking |
| 2:00 pm | Market Place opens to the public |
| 3:00 pm | Audio system set up and tested |
| 3:30 pm | Band arrives and set up
Sound check |
| 4:30 pm | Stage entertainment begins |
| 7:30 pm | Stage entertainment ends |
| 8:00 pm | Market Place closes
Vendor breakdown begins
Event staff coordinate vendor and public traffic
Trash cleared, venue cleaned |
| 10:00 pm | Venue open to public
All event equipment stored
Event staff leave site |

COASTAL COMMISSION

EXHIBIT # 3
PAGE 4 OF 9

**Redondo Beach Marina / Conte Productions Inc.
Marina Market Place, Page five**

Equipment & Staff

AC Temporary Power and Audio equipment for the event infra structure, materials and supplies will be provided by Conte Productions Inc. Our staff will be responsible for venue and the overall event from set up to clean up. This includes security, vehicle traffic, sanitation, City and County permits, entertainment, audio and amusements, vendor parking, procurement and recruitment.

Conte Productions, Inc. is the production and management service contractor. We are responsible for all aspects of the event production including Farmers Market management, vendor procurement and all event related matters. Refer all event production issues to Conte Productions Inc.; 310- 316-1725 voice, 310- 316-1730 fax, [Conteevents@ AOL.com](mailto:Conteevents@AOL.com) – email.

COASTAL COMMISSION

EXHIBIT # 3
PAGE 5 OF 9



239 N. Harbor Drive
Redondo Beach, CA

Redondo Beach Marina
Susan Leighton

The management and the owners of Latitudes are supporting the possible Farmer's Market and Art show at the south end of the marina's parking lot. The proposed time would be Wednesdays from 2pm to 8pm. We would like to contribute any way we can. If we can help with the set up or the planning just ask any of the mangement at Latitudes.

Matthew Johnson
General Manager

A handwritten signature in black ink, appearing to read 'Matt Johnson', is written below the printed name and title. The signature is fluid and cursive, with a long horizontal stroke at the end.

COASTAL COMMISSION

EXHIBIT # 3
PAGE 6 OF 9



May 19, 2004

Ms. Susan Leighton
MCC Redondo Beach II LLC
181 No. Harbor Drive
Redondo Beach, CA 90277

Dear Susan:

I believe that a weekly arts and crafts and farmer's market on the marina property on Wednesdays from 2:00 p.m. until 8:00 p.m. will bring customers to the surrounding businesses. I am in favor of any venue that will attract new visitors to the marina, especially during the week when the parking lot is visibly empty.

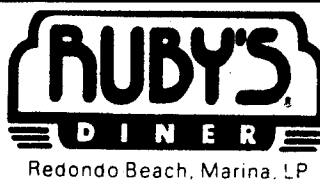
Usually events take place on the north end of the property, which doesn't help the businesses on the south end. It will be nice to reap the benefits of having more activity near Samba's.

Sincerely,

George Moussalli
Owner, Samba Brazilian Steakhouse

COASTAL COMMISSION

EXHIBIT # 3
PAGE 7 OF 9



Tony Ugliano
General Manager

May 3, 2004

TO: SUSAN LEIGHTON
FROM: TONY UGLIANO *TU*
RE: BEACHSIDE FARMERS MARKET AND EXPO

As per our previous discussions on holding a weekly event here at the Marina Property, I am in full support of anything that can be done here to attract and retain new visitors to this area.

Over the last several years we have seen a steady decline in traffic to this property. I know that I speak for all the tenants of this property when I state that this facility needs to be reintroduced to the general population of this city. The Farmers Market idea has the possibility of beginning a new trend here, and it is as exciting as it will be rewarding.

If there is any thing I can do to further this process along please do not hesitate to contact me.

245 N. Harbor Drive • Redondo Beach • California, 90277
(310) 376-7829 • Fax (310) 798-4157

An Independently owned franchise of RFS, Inc.

COASTAL COMMISSION

EXHIBIT # 3
PAGE 8 OF 9

May 3, 2004

City of Redondo Beach
P.O. Box 270
Redondo Beach, CA 90277

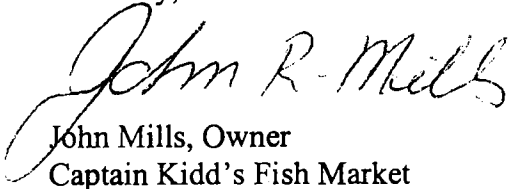
To Whom It May Concern:

This letter was written to show my support and approval to have a weekly arts and crafts and farmer's market on Wednesday afternoons on the Redondo Beach Marina property.

We need to find new ways to bring more people to the property during the week when it is normally very quiet down here.

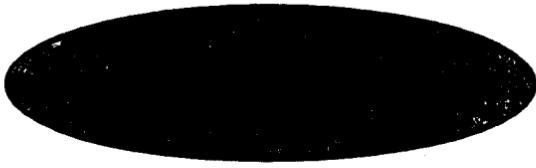
I feel that a weekly fair and farmer's market will enhance the harbor and the businesses that are located here.

Sincerely,


John Mills, Owner
Captain Kidd's Fish Market

COASTAL COMMISSION

EXHIBIT # 3
PAGE 9 OF 9



MODERN PARKING, INC.
NATIONWIDE

May 12, 2004

Ms. Susan Leighton
Property Manager
Redondo Beach Marina
181 N. Harbor Drive
Redondo Beach, CA 90277

Dear Susan:

Per your request, Modern Parking is presenting our parking analysis report relating to the addition of a weekly arts & crafts fair and farmers market (Event) that is planned to be held on the surface lot at the Redondo Beach Marina (RBM). The preliminary time and day of the week for the event is scheduled for Wednesdays between 2:00pm and 8:00pm throughout the year.

Project Description and Background

The Redondo Beach Marina has a total stall count of 813 parking spaces. The parking lot services the property restaurants, sport fishing boats, boat slips, boat launch, and Seaside Lagoon. We anticipate the total spaces required for use by the Event's trading merchants to be limited to a 199 space area. This leaves approximately 614 spaces to accommodate the RBM tenants' requirements and Event visitors.

There are approximately 200 spaces that are designated for use specifically by visitors to the Seaside Lagoon. They are not currently using any spaces daily, therefore they are not included in our statistical counts. Subsequently, we are deducting their designated 200 spaces from the overall space count analysis in this report. Additionally, we found from previous use in 2003 that on Wednesdays, lagoon visitors rarely have a need for spaces over and above the allocated amount. It should be noted that we are able to stack park vehicles in their designated area, which increases the space available in their allocation.

Parking spaces for visitors to the Events will require an undetermined amount of parking. We anticipate that the majority of Event attendees will require parking, but also expect that a significant group of attendees will walk and ride bicycles as well as use other forms of transportation from the neighboring residences. We believe that there is a significant amount of parking that is available to meet the needs of Event attendees at the RBM and that weekday parking is abundant in the area to accommodate any overflow requirements.

COASTAL COMMISSION
5-04-293

EXHIBIT # 4
PAGE 1 OF 8

TOTAL QUALITY MANAGEMENT

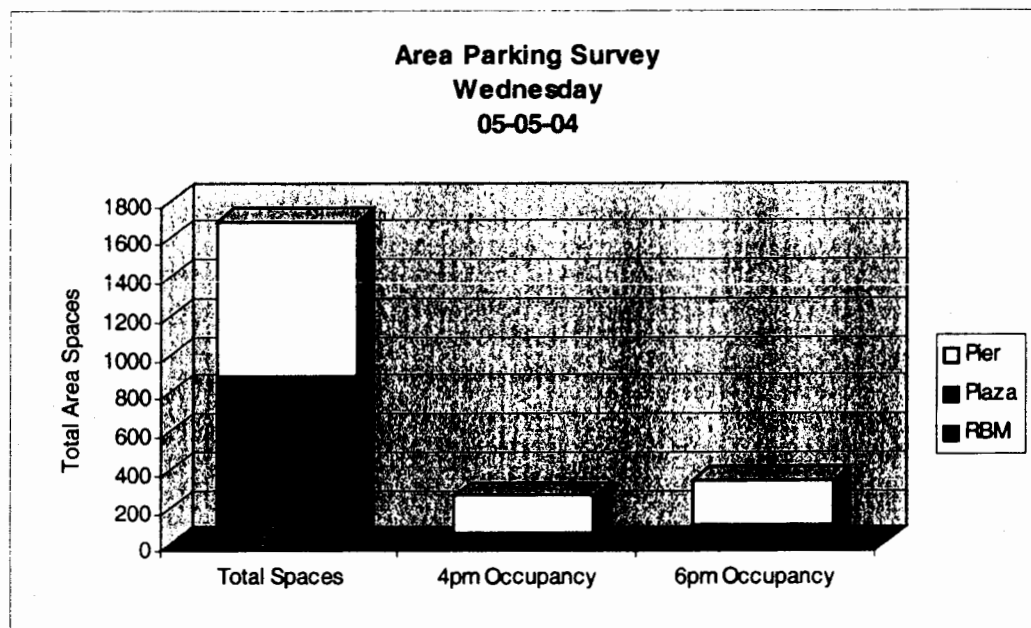
1200 Wilshire Blvd. Suite 300, Los Angeles, Ca. 90017 • Phone 213 482-8400 Fax 213 482-7800

Area Parking

The RBM Event site is situated in the center of a commercial and private development. The area has both public parking and street parking. There are approximately 1,900 stalls amongst the RBM parking lot, Plaza, City Pier structures, and a nominal number of on-street parking space on Harbor Drive. The RBM has 813 stalls, the Plaza structure has approximately 300, and the Pier has approximately 800 stalls.

An occupancy survey of the Plaza and Redondo Beach Pier parking locations was conducted on Wednesday, May 5, 2004. At 4:00pm there were approximately 200 vehicles parked at the Pier structure, 40 at the Plaza and 31 at the RBM lot. By 6:30pm, there were 240, 60 and 49 respectively. This provides an availability of 1,629 spaces at 4:00pm and 1,551 spaces at 6:30pm.

CHART 1



RBM Parking Occupancy and Usage

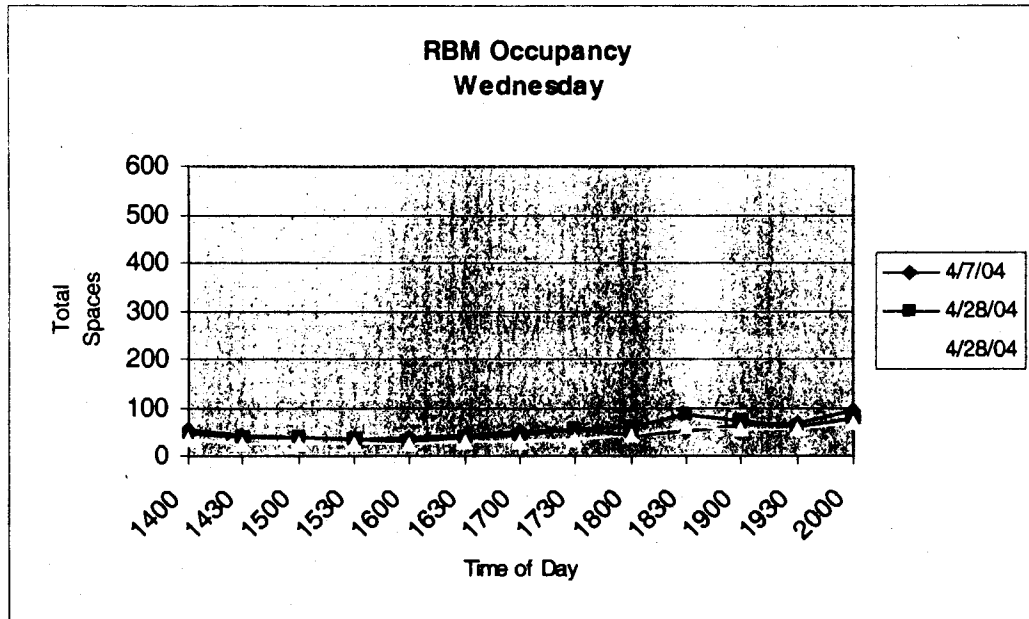
The RBM parking utilization study was conducted over three (3) Wednesdays: April 7, April 21, and April 28, 2004. Parking ticket data for these dates were individually entered by date into the system. Such data included time-in, time-out, validation type and ticket number. After this process was completed, these parking tickets were organized and analyzed to produce the following graphs.

The occupancy results includes all tickets to the property. The overall occupancy averages 48 spaces during this period, which equates to 565 parking spaces available to visitors to the property.

COASTAL COMMISSION

EXHIBIT # 4
PAGE 2 OF 8

CHART 2



This graph discounts 200 Seaside Lagoon spaces from the total space inventory

Tenant Allocation and Usage

Tenants of RBM have lease right usage for guests. Listed below are the number of allocated spaces that are available to each tenant.

Table A

<i>Merchant</i>	<i>Allocation</i>
Captain Kidds	43
Happy Clam	67
Hoist	43
Latitude	80
Ruby's	61
Samba's	115
Sport's Fishing/Polly's	60

*Slip & Boat Tenant parking listed in card access section of the report.

Listed below are the actual number of customers that visited the RBM on the indicated dates between the projected Event operating hours from 2:00pm to 8:00pm.

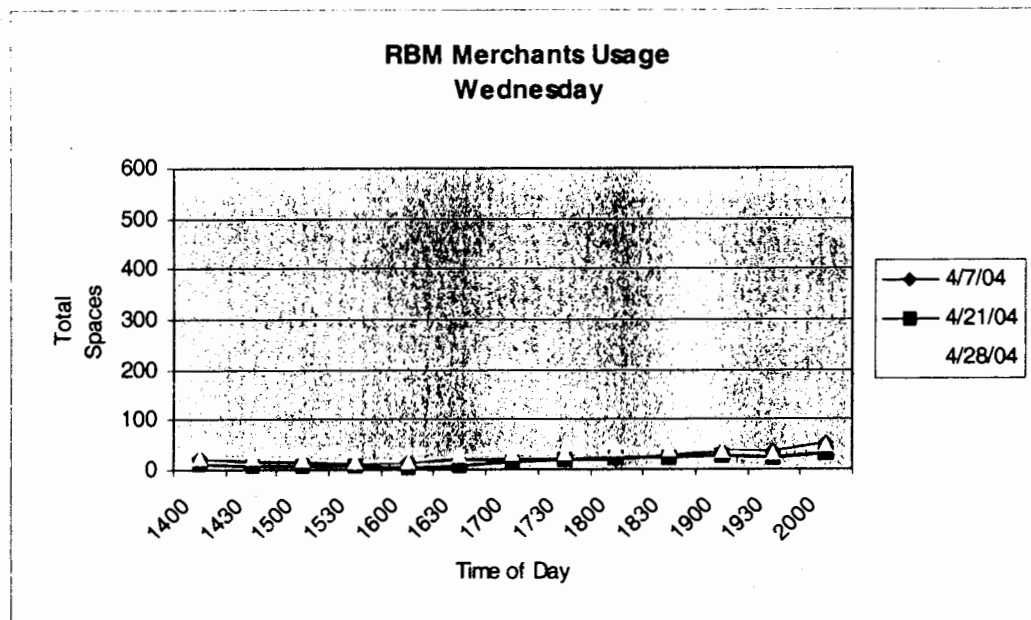
Table B

<i>Merchant</i>	<i>4/7/04</i>	<i>4/21/04</i>	<i>4/21/04</i>
Captain Kidds	12	7	19
Happy Clam	32	21	20
Hoist	1	0	0
Latitude	2	2	14
Ruby's	75	86	95
Samba's	26	16	25
Sport Fishing/Polly's	21	7	27

COASTAL COMMISSION

To better understand the number of spaces required to accommodate the quantity of tenant visitors listed in Table B, we have analyzed these specific visitors and the associated validated tickets. Through sorting the information, we are able to determine the number of spaces needed at any given time during the test period, and have listed the results on the following chart.

CHART 3



This graph discounts 200 Seaside Lagoon spaces from the total space inventory

Card Access Employee/Slip & Boat Tenant Parking

There are currently 369 access cards that are assigned to boaters, tenant employees, and RBM employees at the property. A number of the card assignees are visiting and/or working only during weekends when activity is at a premium. Through our review of the card list, we have determined that 135 cards are being used during the time when the Event will take place with an average occupancy of about 50 vehicles at any given time.

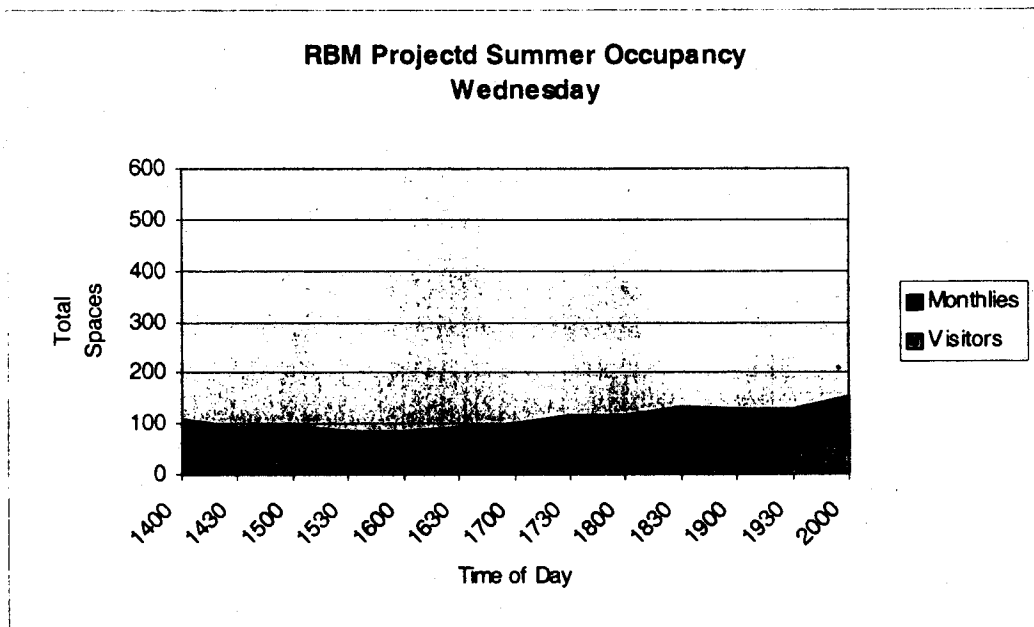
Projected Use and Occupancy

We have formulated our projection of use based on the information listed above. We are increasing the demand for summer months in this projection by 25% for tenant visitors. Based on our projections, there should be an average occupancy of 110 spaces at peak periods and an average of 503 spaces available during 2:00pm to 8:00pm. This projection includes card access users.

COASTAL COMMISSION

EXHIBIT # 4
PAGE 4 OF 8

CHART 4



Overflow Plan

It is important to recognize the need to meet the parking requirements of all visitors to the property in a professional manner. Based on our study, there is no reason to believe that the property will not be able to provide adequate parking for Event visitors.

In the Event that usage requirement increases for tenants and their visitors, we may need to direct Event visitors to other parking options that exist. We would accomplish this by posting staff at the entrance to poll drivers before pulling into the lot as well as by adding signage directing visitors to the Plaza and Pier parking lots. Additionally, we would furnish these visitors with user friendly maps displaying the locations where spaces are available. Our management team will communicate with the various garages to determine space availability as well as coordinate traffic flow with the other parking operators.

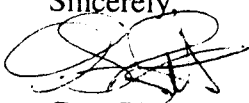
Conclusion

Based on this information, Modern Parking, Inc., believes there is adequate parking space available to meet the Event demand. From the occupancy study (Chart 4), we are projecting the availability of 503 spaces, which should be sufficient in meeting the Event demand of 199 spaces for merchants and leave a balance of 304 spaces for visitor use. We estimate that the average length of stay per Event visitor to be between 20-30 minutes, which will allow parking space use to receive multiple turn over for attendee vehicles. In order to maximize vehicle access at each entrance and exit, the RBM parking staff can coordinate the Event and other related tenant parking needs in advance of event occurrences and staff the operation accordingly. This should limit the potential for traffic flow problems that might develop in the RBM parking lot or on the local streets.

COASTAL COMMISSION

We hope that our research and findings are helpful. If we can be of any further assistance with this matter, please feel free to contact me.

Sincerely,



Gary Pitts
Senior Vice President of Operations

COASTAL COMMISSION

EXHIBIT # 4
PAGE 6 OF 8

4

Employee Cars Parked on Wednesdays from 2:00 p.m. – 8:00 p.m.

Sport boats:	Betty G	2
	City	3
	Special	3
	Highliner	3
	Sea Spray	3
	Pacific Star	3
	RSF	3
	Bait Co.	1
	Samba	15
	Ruby's	16
	Latitude's	6
RBM office	7	
Polly's	0	
Happy Clam	6	
Mar Ventures	1	
VIP's	2	
Capt Kidd's	16	
Total	90	

COASTAL COMMISSION

EXHIBIT # 4
PAGE 7 OF 8

**HOISTS ON WEDNESDAYS
2003**

Day of Week	January	February	March	April	May	June	July	August	September	October	November	December
1	1									2		
2				0			4					
3									3			1
4						3						
5		2	0								1	
6								3				
7					0							
8	0									6		
9				2			3					
10									5			
11						0						4
12		0	4								2	
13								5				
14					0							
15	2									5		
16				3			4					
17									4			1
18						2						
19		2	4								3	
20								1				
21					3							
22	1									3		
23				2			3					
24									1			1
25						5						
26		2	0								3	
27								2				
28					2							
29	2									5		
30				2			2					
31												4
Total	6	6	8	9	5	10	16	11	13	21		

COASTAL COMMISSION

