

Appendix A (Continued)



Initial Study, Notice of Preparation (NOP), and
NOP Comment Letters

Appendix A.2

Notice of Preparation (NOP)





CITY OF LONG BEACH

DEPARTMENT OF DEVELOPMENT SERVICES

333 W. Ocean Blvd. Long Beach, CA 90802 (562) 570-6458 - FAX (562) 570-6068

NOTICE OF PREPARATION

TO: Agencies, Organizations, and Interested Parties

SUBJECT: Notice of Preparation of an Environmental Impact Report in Compliance with Title 14, Section 15082(a) of the California Code of Regulations

Pursuant to Public Resources Code Section 21165 and the Guidelines for the California Environmental Quality Act (CEQA) Section 15050, the City of Long Beach is the Lead Agency responsible for preparation of an Environmental Impact Report (EIR) addressing potential impacts associated with the project identified below.

AGENCIES: The purpose of this notice is to serve as a Notice of Preparation (NOP) of an EIR pursuant to the State CEQA Guidelines Section 15082 and solicit comments and suggestions regarding the scope and content of the EIR to be prepared for the proposed project. Specifically, the City of Long Beach requests input on the environmental information that is germane to your agency's statutory responsibility in connection with the proposed project. Your agency may rely on the EIR prepared by the City when considering permits or other approvals for this project.

ORGANIZATIONS AND INTERESTED PARTIES: The City of Long Beach requests your comments and concerns regarding the proposed scope and content of the environmental information to be included in the EIR.

PROJECT TITLE: 100 East Ocean Boulevard

PROJECT LOCATION: 100 East Ocean Boulevard, Long Beach, CA 90802. The property is bounded by Ocean Boulevard to the north, Pine Avenue to the west, Seaside Way to the south, and a commercial building to the east.

PROJECT DESCRIPTION: The proposed Project involves a 30-story, 537,075-square-foot building that would include 429 hotel rooms, 23,512 square feet of restaurant space, and 26,847 square feet of meeting and ballroom space. The proposed building would replace an existing surface parking lot on the Project Site. Pedestrian walkways and new landscaping would be provided. The Project also includes improvements to the portion of Victory Park located within the Project Site boundaries, including new landscaping.

PROBABLE ENVIRONMENTAL EFFECTS OF THE PROJECT: Based on the findings of the Initial Study, the proposed project could have potentially significant impacts with respect to the following environmental issues: **Air Quality, Historic Resources, Greenhouse Gas Emissions, Noise, and Transportation/Traffic.**

PUBLIC REVIEW PERIOD: This NOP is available for public review and comment pursuant to California Code of Regulations, Title 14, Section 15082(b). The public review and comment period during which the City of Long Beach will receive comments on the NOP for this proposed project is:

Beginning: Tuesday December 4, 2018

Ending: Thursday January 3, 2019

THE NOP AND INITIAL STUDY ARE AVAILABLE FOR PUBLIC REVIEW AT THE FOLLOWING LOCATIONS:

City Hall, 333 W. Ocean Boulevard, 5th Floor

Long Beach Main Library, 101 Pacific Avenue

Online at: www.lbds.info/planning/environmental_planning/environmental_reports.asp

RESPONSES AND COMMENTS: Please list a contact person for your agency or organization, include U.S. mail and email addresses, and send your comments to:

Anita Juhola-Garcia
Planning Bureau, Development Services Department
City of Long Beach
333 W. Ocean Boulevard, 5th Floor
Long Beach, CA 90802

Or via email to: anita.juhola-garcia@longbeach.gov

Appendix A.3

NOP Comment Letters





EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH



KEN ALEX
DIRECTOR

Notice of Preparation

December 4, 2018

City of Long Beach
RECEIVED
DEC 27 2018

To: Reviewing Agencies
Re: 100 East Ocean Boulevard
SCH# 2018121006

Planning Bureau

Attached for your review and comment is the Notice of Preparation (NOP) for the 100 East Ocean Boulevard draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Anita Juhola-Garcia
City of Long Beach
333 W. Ocean Boulevard, 5th Floor
Long Beach, CA 90802

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,


Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2018121006
Project Title 100 East Ocean Boulevard
Lead Agency Long Beach, City of

Type **NOP** Notice of Preparation
Description The project involves a 30-story, 537,075-sf building that would include 429 hotel rooms, 23,512 sf of restaurant space, and 26,847 sf of meeting and ballroom space. The proposed building would replace an existing surface parking lot on the project site. Pedestrian walkways and new landscaping would be provided. The project also includes improvements to the portion of Victory Park located within the project site boundaries, including new landscaping.

Lead Agency Contact

Name Anita Juhoia-Garcia
Agency City of Long Beach
Phone (562) 570-6469 **Fax**
email
Address 333 W. Ocean Boulevard, 5th Floor
City Long Beach **State** CA **Zip** 90802

Project Location

County Los Angeles
City Long Beach
Region
Cross Streets East Ocean Blvd and Pine Ave
Lat / Long 33° 46' 1.2" N / 118° 11' 31.2" W
Parcel No. 7278-007-928
Township 5S **Range** 13W **Section** 1 **Base**

Proximity to:

Highways I-710, CA-1
Airports
Railways Metro Blue Line
Waterways LA River
Schools Cesar Chavez ES
Land Use PD-6 Subarea 7, LUD 7, LUD11

Project Issues Air Quality; Archaeologic-Historic; Noise; Traffic/Circulation; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; California Coastal Commission; Office of Historic Preservation; Department of Parks and Recreation; Department of Fish and Wildlife, Region 5; Department of Housing and Community Development; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; State Water Resources Control Board, Division of Water Quality; San Gabriel & Lower Los Angeles Rivers & Mountains Conservancy

Date Received 12/04/2018 **Start of Review** 12/04/2018 **End of Review** 01/02/2019

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH 18121006

Project Title: 100 East Ocean Boulevard

Lead Agency: City of Long Beach Contact Person: Anita Juhola-Garcia
Mailing Address: 333 West Ocean Boulevard, 5th Floor Phone: 562-570-6469
City: Long Beach Zip: 90802 County: Los Angeles

Project Location: County: Los Angeles City/Nearest Community: Long Beach
Cross Streets: East Ocean Boulevard and Pine Avenue Zip Code: 90802
Longitude/Latitude (degrees, minutes and seconds): 33 046 ' 1.2 " N / 118 011 ' 31.2 " W Total Acres: 1.36
Assessor's Parcel No.: 7278-007-928 Section: S1 Twp.: T5S Range: R13W Base:
Within 2 Miles: State Hwy #: I-710, CA-1 Waterways: Los Angeles River
Airports: Railways: Metro Blue Line Schools: Cesar Chavez Elem.

Document Type:

CEQA: [X] NOP [] Draft EIR NEPA: [] NOI Other: [] Joint Document
[] Early Cons [] Supplement/Subsequent EIR [] EA [] Final Document
[] Neg Dec (Prior SCH No.) [] Draft EIS [] Other:
[] Mit Neg Dec Other:

Local Action Type:

[] General Plan Update [] Specific Plan [] Rezone [] Annexation
[] General Plan Amendment [] Master Plan [] Prezone [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [X] Coastal Permit
[] Community Plan [X] Site Plan [] Other:

Governor's Office of Planning & Research

DEC 04 2018

STATE CLEARINGHOUSE

Development Type:

[] Residential: Units Acres
[] Office: Sq.ft. Acres Employees
[X] Commercial: Sq.ft. 537075 Acres Employees
[] Industrial: Sq.ft. Acres Employees
[] Educational:
[] Recreational:
[] Water Facilities: Type MGD
[] Transportation: Type
[] Mining: Mineral
[] Power: Type MW
[] Waste Treatment: Type MGD
[] Hazardous Waste: Type
[] Other:

Project Issues Discussed in Document:

[] Aesthetic/Visual [] Fiscal [] Recreation/Parks [] Vegetation
[] Agricultural Land [] Flood Plain/Flooding [] Schools/Universities [] Water Quality
[X] Air Quality [] Forest Land/Fire Hazard [] Septic Systems [] Water Supply/Groundwater
[X] Archeological/Historical [] Geologic/Seismic [] Sewer Capacity [] Wetland/Riparian
[] Biological Resources [] Minerals [] Soil Erosion/Compaction/Grading [] Growth Inducement
[] Coastal Zone [X] Noise [] Solid Waste [] Land Use
[] Drainage/Absorption [] Population/Housing Balance [] Toxic/Hazardous [X] Cumulative Effects
[] Economic/Jobs [] Public Services/Facilities [X] Traffic/Circulation [X] Other: GHG

Present Land Use/Zoning/General Plan Designation:

PD-6 Subarea 7, LUD 7, LUD 11

Project Description: (please use a separate page if necessary)

The Project involves a 30-story, 537,075-square-foot building that would include 429 hotel rooms, 23,512 square feet of restaurant space, and 26,847 square feet of meeting and ballroom space. The proposed building would replace an existing surface parking lot on the Project Site. Pedestrian walkways and new landscaping would be provided. The Project also includes improvements to the portion of Victory Park located within the Project Site boundaries, including new landscaping.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

NOP Distribution List

County: Los Angeles *OK*

SCH#

2018121006

Resources Agency

- Resources Agency**
Nadell Gayou
- Dept. of Boating & Waterways**
Denise Peterson
- California Coastal Commission**
Allyson Hitt
- Colorado River Board**
Elsa Contreras
- Dept. of Conservation**
Crina Chan
- Cal Fire**
Dan Foster
- Central Valley Flood Protection Board**
James Herota
- Office of Historic Preservation**
Ron Parsons
- Dept of Parks & Recreation**
Environmental Stewardship Section
- S.F. Bay Conservation & Dev't. Comm.**
Steve Goldbeck
- Dept. of Water Resources**
Resources Agency
Nadell Gayou

Fish and Game

- Depart. of Fish & Wildlife**
Scott Flint
Environmental Services Division
- Fish & Wildlife Region 1**
Curt Babcock
- Fish & Wildlife Region 1E**
Laurie Harnsberger
- Fish & Wildlife Region 2**
Jeff Drongesen
- Fish & Wildlife Region 3**
Craig Weightman

- Fish & Wildlife Region 4**
Julie Vance
- Fish & Wildlife Region 5**
Leslie Newton-Reed
Habitat Conservation Program
- Fish & Wildlife Region 6**
Tiffany Ellis
Habitat Conservation Program
- Fish & Wildlife Region 6 I/M**
Heidi Calvert
Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Wildlife M**
William Paznokas
Marine Region

Other Departments

- California Department of Education**
Lesley Taylor
- OES (Office of Emergency Services)**
Monique Wilber
- Food & Agriculture**
Sandra Schubert
Dept. of Food and Agriculture
- Dept. of General Services**
Cathy Buck
Environmental Services Section
- Housing & Comm. Dev.**
CEQA Coordinator
Housing Policy Division

Independent Commissions, Boards

- Delta Protection Commission**
Erik Vink
- Delta Stewardship Council**
Anthony Navasero
- California Energy Commission**
Eric Knight

- Native American Heritage Comm.**
Debbie Treadway
- Public Utilities Commission**
Supervisor
- Santa Monica Bay Restoration**
Guangyu Wang
- State Lands Commission**
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)**
Cherry Jacques

Cal State Transportation Agency CalSTA

- Caltrans - Division of Aeronautics**
Philip Crimmins
- Caltrans - Planning HQ LD-IGR**
Christian Bushong
- California Highway Patrol**
Suzann Ikeuchi
Office of Special Projects

Dept. of Transportation

- Caltrans, District 1**
Rex Jackman
- Caltrans, District 2**
Marcelino Gonzalez
- Caltrans, District 3**
Susan Zanchi
- Caltrans, District 4**
Patricia Maurice
- Caltrans, District 5**
Larry Newland
- Caltrans, District 6**
Michael Navarro
- Caltrans, District 7**
Dianna Watson
- Caltrans, District 8**
Mark Roberts

- Caltrans, District 9**
Gayle Rosander
- Caltrans, District 10**
Tom Dumas
- Caltrans, District 11**
Jacob Armstrong
- Caltrans, District 12**
Maureen El Harake

Cal EPA

Air Resources Board

- Airport & Freight**
Jack Wursten
- Transportation Projects**
Nesamani Kalandiyur
- Industrial/Energy Projects**
Mike Tollstrup
- California Department of Resources, Recycling & Recovery**
Kevin Taylor/Jeff Esquivel
- State Water Resources Control Board**
Regional Programs Unit
Division of Financial Assistance
- State Water Resources Control Board**
Cindy Forbes - Asst Deputy
Division of Drinking Water
- State Water Resources Control Board**
Div. Drinking Water # _____
- State Water Resources Control Board**
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality
- State Water Resources Control Board**
Phil Crader
Division of Water Rights
- Dept. of Toxic Substances Control Reg. # _____**
CEQA Tracking Center
- Department of Pesticide Regulation**
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- RWQCB 1**
Cathleen Hudson
North Coast Region (1)
- RWQCB 2**
Environmental Document Coordinator
San Francisco Bay Region (2)
- RWQCB 3**
Central Coast Region (3)
- RWQCB 4**
Teresa Rodgers
Los Angeles Region (4)
- RWQCB 5S**
Central Valley Region (5)
- RWQCB 5F**
Central Valley Region (5)
Fresno Branch Office
- RWQCB 5R**
Central Valley Region (5)
Redding Branch Office
- RWQCB 6**
Lahontan Region (6)
- RWQCB 6V**
Lahontan Region (6)
Victorville Branch Office
- RWQCB 7**
Colorado River Basin Region (7)
- RWQCB 8**
Santa Ana Region (8)
- RWQCB 9**
San Diego Region (9)

Other _____

San Gabriel & Lower LA
Conservancy

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-9140
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

City of Long Beach
RECEIVED

DEC 31 2018

Planning Bureau

December 20, 2018

Anita Juhola-Garcia
City of Long Beach
333 W. Ocean Boulevard, 5th floor
Long Beach, CA 90802

RE: 100 East Ocean Boulevard
SCH # 2018121006
GTS # 07-LA-2018-02077

Ms. Juhola-Garcia:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this hotel construction project. The project involves a 30-story, 537,075-sf building that would include 429 hotel rooms, 23,512 sf of restaurant space, and 26,847 sf of meeting and ballroom space. The proposed building would replace an existing surface parking lot on the project site. Pedestrian walkways and new landscaping would be provided. The project also includes improvements to the portion of Victory Park located within the project site boundaries, including new landscaping

After reviewing the notice of Preparation (NOP), Caltrans has the following comments:

To avoid traffic conflicts such as inadequate weaving distances and queues spilling back onto the freeway, the project should evaluate the adequacy of freeway segment operations in the project vicinity. Caltrans would like to request a Traffic Impact Study, Trip generation and queue analysis of the on-ramps/off-ramps for Interstate 710 in the project vicinity.

Caltrans seeks to promote safe, accessible multimodal transportation and as indicated in the projects Initial Study, the safety/connectivity of the pedestrian/bike plan may be significantly impeded. Any reduction in vehicle speed benefits pedestrian and bicyclist safety, since there is a direct link between impact speeds and the likelihood of fatality. Methods to reduce pedestrian and bicyclist exposure to vehicles improve safety by lessening the time that the user is in the likely path of a motor vehicle. These methods include the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing.

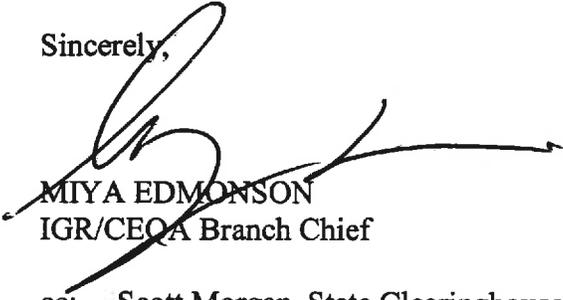
Pedestrian and bicyclist warning signage, flashing beacons, crosswalks, and other signage and striping should be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists. Formal information from traffic control devices should be reinforced by informal sources of information such as lane widths, landscaping, street furniture, and other road design features

Also, storm water run-off is a sensitive issue for Los Angeles and Ventura counties. The project needs to be designed to discharge clean run-off water. The completed project could incorporate green design elements that can capture storm water. Incorporating measures such as permeable pavement, landscaping, and trees to reduce urban water run-off should be considered.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

We look forward to reviewing the draft environmental impact report and will provide additional comments at that time, if warranted. If you have any questions, please contact Reece Allen, the project coordinator, at reece.allen@dot.ca.gov, and refer to GTS # 07-LA-2018-02077

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

CALIFORNIA COASTAL COMMISSION

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



January 2, 2019

City of Long Beach
Attn: Anita Juhola-Garcia
333 West Ocean Boulevard, 5th Floor
Long Beach, CA 90802

Re: Initial Study for 100 East Ocean Boulevard Project.

Dear Anita Juhola-Garcia:

Thank you for the opportunity to review the Notice of Preparation and December 2018 Initial Study for the 100 East Ocean Boulevard Project (received in our offices on December 12, 2018) and submit the following comments. The comments contained herein are preliminary and those of Coastal Commission staff only and should not be construed as representing the opinion of the Coastal Commission itself.

As indicated in the December 2018 Initial Study, the proposed project (construction of a new 30-story, 537,075 square foot hotel building up to 375.5 feet in height with 429 hotel rooms and restaurant, meeting, and ballroom spaces and improvements to Victory Park) at the Jergins Trust Building site at 100 East Ocean Boulevard is located within the City of Long Beach coastal zone. In Long Beach, the requirements of the California Coastal Act are met through compliance with the certified Local Coastal Plan (LCP). The City will process a local coastal development permit for the proposed project under the provisions of the certified LCP. The project site is also located within the appealable area of the coastal zone. Therefore, the City's final action on the required local coastal development permit can be appealed to the Coastal Commission. The City's action on the local coastal development permit may be appealed to the Commission on the grounds that the approved development does not conform to the policies and standards of the certified LCP.

The City's Downtown Shoreline Planned Development Ordinance (PD-6) contains the relevant standards and policies of the certified LCP to which the proposed project must conform. The proposed project is located within Subarea 7 of the Downtown Shoreline Planned Development District. The standards of the certified LCP for Subarea 7 of the Downtown Shoreline Planned Development District carry out the Coastal Act requirements to protect public access to the coast and to protect visual resources, including public views toward the shoreline. Therefore, any findings regarding the project's consistency with the City of Long Beach LCP and California Coastal Act must contain a detailed discussion of how the proposed project meets the requirements laid out in certified PD-6, Subarea 7, and other LCP policies including, but not limited to:

Access.

- a. Primary vehicle access via Pine Avenue (PD-6, General Development and Use Standards, Policy b.1).
- b. Continuation of the east/west pedestrian walkway and improvement of the park strip and plazas (PD-6, General Development and Use Standards, Policy b.5 & Subarea 7, Policy e).
- c. All public walkways and viewing areas shall be guaranteed for public access through deed restrictions and/or easements (PD-6, General Development and Use Standards, Policy b.3).

Building Design.

- a. Provision of views between buildings (PD-6, General Development and Use Standards, Policy c.1).
- b. Minimum 80-foot setback from Ocean Boulevard or setback the width of the City park strip for new development (PD-6, General Development and Use Standards, Policy c.4).
- c. Provision of a northeast corner cut-off to create a cohesive entry feature to Promenade South from Pine Avenue (PD-6, Subarea 7, Policy c.1).
- d. Conformance with the conditions required in order to exceed the 250-foot height limit (PD-6, Subarea 7, Policy c.2).
- e. Payment of in-lieu fee equivalent to one-half the cost of a bridge structure across Pine Avenue (PD-6, Subarea 7, Policy c.4.G).
- f. Design of building with bird-safe treatments (PD-6, General Development and Use Standards, Policy c.5).

Parking.

- a. Consistency with requirements for off-street parking associated with new hotels (Downtown Shoreline Policy Plan, Residential Uses and Overnight Accommodations, South Side of Ocean Boulevard [Excluding Pike Area]).
- b. Enclosed and subterranean parking, unless parking blends into the façade of the rest of the building (PD-6, Subarea 7, Policy d).
- c. Consistency with certified policies of Chapter 21.41, *Off-street Parking and Loading Requirements*, of the City of Long Beach Zoning Code.

Landscaping.

- a. Consistency with certified policies of Chapter 21.42, *Landscaping Requirements*, of the City of Long Beach Zoning Code.

Park Improvements.

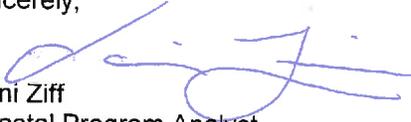
- a. 2:1 acre replacement of any displaced parkland (Open Space and Recreation Element, Program 4.5).
- b. Consistency of all Victory Park improvements with the City's certified Victory Park Design Guidelines.

In addition, please take into consideration the Coastal Commission's approval of Coastal Development Permit A-5-LOB-99-135 for a similar hotel development project proposed at this site and all related permit conditions and findings, including the required provision of a public viewing deck on the roof of the hotel. Furthermore, in accordance with Section 30213 of the Coastal Act (*Lower cost visitor and recreational facilities; encouragement and provision; overnight room rentals*), the Commission has strongly supported the maintenance and creation of lower cost overnight accommodations in past actions. The City of Long Beach has a similar policy in the certified LCP (PD-6, General Use and Development Standards, Policy j), which states: "*It shall be the goal of the City to develop a program/policy for the Downtown Shoreline area that **protects and encourages lower cost overnight visitor accommodations.***" The lack of a City-developed program or policy and the lack of proposed lower cost accommodations in the subject project description are of concern to Coastal Commission staff. Please consider project alternatives that include lower cost accommodations.

100 East Ocean Boulevard Comments, Long Beach
January 2, 2019
Page 3 of 3

We appreciate the opportunity to comment on the Initial Study for the project at 100 East Ocean Boulevard. Commission staff request notification of any future activity associated with these or related sites. Please feel free to contact me at (562) 590-5071 with any questions.

Sincerely,


Dani Ziff
Coastal Program Analyst



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Congestion Management Program

Metro must notify the Project Sponsor of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the “2010 Congestion Management Program for Los Angeles County,” Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed Project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed Project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the Project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions, please contact David Lor by phone at 213-922-2883, by email at lord@metro.net, or by mail at the following address:

**Metro Development Review
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952**

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:
 - 3.5% of Total Person Trips Generated for most cases, except:
 - 10% primarily Residential within 1/4 mile of a CMP transit center
 - 15% primarily Commercial within 1/4 mile of a CMP transit center
 - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
 - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
 - 5% primarily Residential within 1/4 mile of a CMP transit corridor
 - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
 - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

NATIVE AMERICAN HERITAGE COMMISSION

Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>
Twitter: @CA_NAHC

City of Long Beach
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DEC 27 2018

December 17, 2018

Planning Bureau

Anita Juhola-Garcia
City of Long Beach
333 W. Ocean Boulevard, 5th Floor
Long Beach, CA 90802

RE: SCH# 2018121006 100 East Ocean Boulevard, Los Angeles County

Dear Ms. Juhola-Garcia:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subs. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Katy.Sanchez@nahc.ca.gov.

Sincerely,



for

Katy Sanchez
Associate Environmental Planner

cc: State Clearinghouse



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

anita.juhola-garcia@longbeach.gov

Anita Juhola-Garcia

Planning Bureau, Development Services Department

City of Long Beach

333 W. Ocean Boulevard, 5th Floor

Long Beach, CA 90802

December 19, 2018

Notice of Preparation of an Environmental Impact Report for the Proposed 100 East Ocean Boulevard

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Environmental Impact Report (EIR). Please send SCAQMD a copy of the EIR upon its completion. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from SCAQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

SCAQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. SCAQMD's CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the proposed project and all air pollutant sources related to the proposed project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the proposed project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

available to assist the Lead Agency with identifying potential mitigation measures for the proposed project, including:

- Chapter 11 “Mitigating the Impact of a Project” of SCAQMD’S *CEQA Air Quality Handbook*. SCAQMD’s CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD’s Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

In the event that the proposed project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.

Permits and SCAQMD Rules

In the event that the proposed project requires a permit from SCAQMD, SCAQMD should be identified as a Responsible Agency for the proposed project. The assumptions in the air quality analysis in the EIR will be the basis for permit conditions and limits. For more information on permits, please visit SCAQMD’s webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD’s Engineering and Permitting staff at (909) 396-3385.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling SCAQMD’s Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at SCAQMD’s webpage at: <http://www.aqmd.gov>.

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

January 3, 2019

Ref. Doc. No.: 4869885

Ms. Anita Juhola-Garcia
Planning Bureau
Development Services Department
City of Long Beach
333 West Ocean Boulevard, 5th Floor
Long Beach, CA 90802

Dear Ms. Juhola-Garcia:

NOP Response to 100 East Ocean Boulevard Project

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on December 5, 2018. The proposed project is located within the jurisdictional boundaries of District No. 3. We offer the following comments regarding sewerage service:

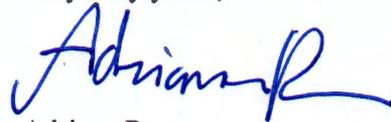
1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' De Forest Avenue Trunk Sewer, located in Broadway just west of the Long Beach Freeway northbound entrance. The Districts' 36-inch diameter trunk sewer has a capacity of 39.4 million gallons per day (mgd) and conveyed a peak flow of 5.2 mgd when last measured in 2012.
2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently produces an average flow of 254.7 mgd.
3. The expected average wastewater flow from the project, described in the notice as a 429-room hotel with 23,512 square feet of restaurant space and 26,847 square feet of meeting and ballroom space, is 80,493 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link.
4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org,

Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer and General Manager will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: A. Schmidt
A. Howard

From: [Anita Juhola-Garcia](#)
To: [Brad Napientek](#)
Subject: FW: Tribal Consultations for 100 East Ocean Blvd
Date: Wednesday, March 6, 2019 3:03:03 PM

Hi Brad,

Below is the NOP response from the Gabrieleno Tongva San Gabriel Band of Mission Indians.

-Anita

From: Alexis Oropeza
Sent: Wednesday, March 06, 2019 11:58 AM
To: Anita Juhola-Garcia <Anita.Juhola-Garcia@longbeach.gov>
Subject: FW: Tribal Consultations for 100 East Ocean Blvd

Anita,

Is this yours?

From: Adrian Morales [<mailto:moralesadrian66@yahoo.com>]
Sent: Wednesday, March 06, 2019 11:10 AM
To: Alexis Oropeza <Alexis.Oropeza@longbeach.gov>
Cc: Arlene Morales <chiefrbwife@aol.com>; Gttribalcouncil <gttribalcouncil@aol.com>
Subject: Tribal Consultations for 100 East Ocean Blvd

To

Alexis Oropeza, Senior Planner
Planning Bureau, Development Services Department City of Long Beach
333 W. Ocean Blvd, 5th Floor
Long Beach, CA. 90802

Greetings

Thank you for the Notice of Preparation of an EIR for the above named project. Considering that the CEQA environmental consultation is an ongoing process, therefore the Gabrieleno Tongva San Gabriel Band of Mission Indians would make recommendations to assist the landowners & their representatives to adequately identify, treat, and or avoid Tribal Cultural Resources within the project's limits prior to the construction phase in an effort to reduce the construction down time cost & the possibility of a redesignment of the project if inadvertent discoveries occur.

Pursuant to CA PRC 21080.3.2.(a), the Gabrieleno Tongva San Gabriel Band of Mission Indians will list recommendations in sequence to be incorporated into the project's EIR as mitigation measures:

1) Consultation with the Gabrieleno Tongva San Gabriel Band of Mission Indians to initiate a

Preliminary Extended Phase Identification Study to determine the presence or absence of intact cultural sediments that may have potential to obtain Tribal Cultural Resources within the project's limits.

2) A Native American Monitor representative of the Gabrieleno Tongva San Gabriel Band of Mission Indians to be onsite during all construction phase sub surface excavations into native sediments, including but not limited to grading excavations, utility trench excavations, and also support pile drilling excavations.

3) When appropriate, a Treatment Mitigation Plan process to address inadvertent Tribal Cultural Resources discoveries & impacts in consultation with the Gabrieleno Tongva San Gabriel Band of Mission Indians.

Thank you for your attention regarding the recommendations provided.

Direct Contact:

moralesadrian66@yahoo.com

Please continue to send all project correspondences to:

Anthony Morales, Chairperson
Gabrieleno Tongva San Gabriel Band of Mission Indians
P. O. Box 693
San Gabriel, CA. 91778

Sincerely

Adrian Morales

Tribal Consultations, Cultural Resource Management

Gabrieleno Tongva San Gabriel Band of Mission Indians

[Sent from Yahoo Mail on Android](#)

UNITEHERE! Local 11

464 Lucas Ave., Suite 201 • Los Angeles, California 90017 • (213) 481-8530 • FAX (213) 481-0352

January 3, 2019

VIA EMAIL

Planning Commission
City of Long Beach
c/o Anita Juhola-Garcia
Planning Bureau, Development Services Department
333 W. Ocean Blvd, 5th Floor
Long Beach, CA, 90802
Anita.juhola-garcia@longbeach.gov

Re: Notice of Preparation of an Environmental Impact Report for 100 East Ocean Boulevard

Dear Planning Commissioners:

On behalf of UNITE HERE Local 11 (“Commenters”), this office submits the following comments to the City of Long Beach (“City”) regarding the above-referenced Notice of Preparation (“NOP”) for an Environmental Impact Report (“EIR”) for the proposed project at 100 East Ocean Avenue (“Project”).

Pursuant to the California Code of Regulations Title 14 § 15082(a) the City has released the NOP with a solicitation of comments from the public. Commenters have the following concerns to be addressed in the EIR, including potential environmental impacts such as traffic and air quality, presentation of alternative sites, and if found any significant but unavoidable impacts be addressed in a thorough statement of overriding considerations.

First, Commenters are concerned about several potentially significant environmental impacts and believe full studies must be completed. There is substantial development taking place in the Long Beach downtown area as well as the Long Beach coast. There are at least thirty new developments taking place in Downtown Long Beach with at least seven of those occurring on Ocean Avenue and five within a two-block radius.¹ The potentially significant environmental impacts of the Project for the City on air quality, traffic congestion, and noise each deserve careful consideration through studies. When taking the additional developments in the immediate vicinity and in Downtown Long Beach as a whole, the Commenters are concerned with potentially cumulative impacts that need to be addressed.

¹ <https://la.curbed.com/maps/long-beach-development-downtown-project-map>

Second, Commenters request a thorough analysis of alternative sites for the Project. CEQA Guidelines § 15126.6(a) states that the EIR “shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” In addition, pursuant to CEQA Guidelines § 15126.6(e), a “no project” alternative evaluating the environmental effects of the circumstance in which the project does not proceed should be prepared. The EIR should also take into consideration the cumulative impacts of the above-mentioned concentration of developments in the City’s downtown area.

Third, if any potentially significant but unavoidable impacts are found that cannot be mitigated, Commenters request that the EIR contain a Statement of Overriding Considerations pursuant to CEQA Guidelines § 15093 and Public Resources Code § 21081(b). Commenters acknowledge the competing objectives that will be weighed in the EIR by the lead agency. In light of any potentially significant environmental impacts that are found to be unavoidable, suitable social and community benefit must be provided.

Finally, Commenters request, to the extent not already on the notice list, all notices of CEQA actions and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. *See* Pub. Res. Code §§ 21080.4, 21083.9, 21092, 21092.2, 21108, 21167(f) and Gov. Code § 65092. Please send notice by electronic and regular mail to: Anna E. Evans-Goldstein, 464 S. Lucas Ave, Los Angeles, 90017, agoldstein@unitehere11.org (cc: cdu@unitehere11.org).