

**FINAL RECIRCULATED ENVIRONMENTAL
IMPACT REPORT**

**GENERAL PLAN LAND USE AND
URBAN DESIGN ELEMENTS**

RESPONSE TO COMMENTS AND ERRATA

CITY OF LONG BEACH

SCH NO. 2015051054

LSA

October 2019

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RESPONSE TO COMMENTS AND ERRATA

CITY OF LONG BEACH

SCH NO. 2015051054

Submitted to:

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Development Services/Planning Bureau
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Project No. CLB1804



October 2019

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1.0 INTRODUCTION

This document comprises the Comments and Responses and Errata volume of the Final Environmental Impact Report (EIR) for the General Plan Land Use and Urban Design Elements (proposed project) for the City of Long Beach (City). The purpose of this document is to respond to all comments received by the City regarding the environmental information and analyses contained in the Recirculated Draft EIR. As noted in some of the responses, corrections and clarifications to the Recirculated Draft EIR have been proposed. These changes are reflected in Chapter 3.0, Errata, of this document and should be considered part of the Final EIR for consideration by the City prior to a vote to certify the Final EIR.

As required by the *California Environmental Quality Act (CEQA) Guidelines (State CEQA Guidelines)* Section 15087, a Notice of Completion (NOC) of the Recirculated Draft EIR was filed with the State Clearinghouse on June 18, 2019, and a Notice of Availability (NOA) for the proposed project was filed with the County of Los Angeles (County) Clerk on June 18, 2019.

The Recirculated Draft EIR was circulated for public review for an extended period of 60 days, from June 18, 2019, to August 16, 2019. The NOA and/or copies of the Recirculated Draft EIR were distributed to all Responsible Agencies and to the State Clearinghouse in addition to various public agencies, citizen groups, and interested individuals. Copies of the Recirculated Draft EIR were also made available for public review at the City Development Services Department, local libraries in the City, and on the City's website.

A total of 17 letters commenting on the proposed project were received during the public review period or immediately thereafter. Comments were received from State and local agencies, as well as interested individuals. Comments that address environmental issues are responded to thoroughly in this document. Comments that (1) do not address the adequacy or completeness of the Recirculated Draft EIR; (2) do not raise environmental issues; or (3) do request the incorporation of additional information not relevant to environmental issues do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, the City has attempted to provide a response to each comment.

Section 15088 of the *State CEQA Guidelines*, Evaluation of and Response to Comments, states:

The lead agency shall evaluate comments on environmental issues received from persons who reviewed the Recirculated Draft EIR and shall prepare a written response. The lead agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments.

The lead agency shall provide a written proposed response, either in a printed copy or in an electronic format, to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.

The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail, giving the reasons that specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice. The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment.

The response to comments may take the form of a revision to the Recirculated Draft EIR or may be a separate section in the Final EIR. Where the response to comments makes important changes in the information contained in the text of the Recirculated Draft EIR, the lead agency should either:

1. Revise the text in the body of the Recirculated Draft EIR; or
2. Include marginal notes showing that the information is revised in the responses to comments.

Information provided in this Final EIR clarifies, amplifies, or makes minor modifications to the Recirculated Draft EIR. No significant changes have been made to the information or analysis contained in the Recirculated Draft EIR because of the responses to comments, and no significant new information has been added that would require recirculation of the Recirculated Draft EIR document.

1.1 INDEX OF COMMENTS RECEIVED

The following Table A consists of an index list of the agencies, organizations, and individuals that commented on the Recirculated Draft EIR prior to the close of the public comment period or immediately thereafter. The comments received have been organized by date received and in a manner that facilitates finding a particular comment or set of comments. Each comment letter received is indexed with a number below.

Table A: List of Comments Received

State Agencies		
S-1	California Department of Transportation	August 16, 2019
Local Agencies		
L-1	Sanitation Districts of Los Angeles County	August 14, 2019
L-2	South Coast Air Quality Management District	August 16, 2019
L-3	Orange County Transportation Authority	August 16, 2019
Interested Parties		
I-1	Jean Steele	June 21, 2019
I-2	Janice Furman	June 23, 2019
I-3	Anne Proffit	August 16, 2019
I-4	Corliss Lee	August 16, 2019
I-5	Glennis Dolce	August 16, 2019
I-6	Janet West	August 16, 2019
I-7	Juan E. Ovalle	August 16, 2019
I-8	Kenneth H. Seiff	August 16, 2019
I-9	Lynette Ferenczy (1 of 2)	August 15, 2019
I-10	Lynette Ferenczy (2 of 2)	August 16, 2019
I-11	Melinda Cotton	August 16, 2019
I-12	Robert Fox	August 16, 2019
I-13	Susan Miller	August 16, 2019

1.2 FORMAT OF RESPONSES TO COMMENTS

Responses to each of the comment letters are provided on the following pages. The comment index numbers are provided in the upper right corner of each comment letter, and individual points within each letter are numbered along the right-hand margin of each letter. The City’s responses to each comment letter immediately follow each letter and are referenced by the index numbers in the margins. An Errata section, with text revisions, has been prepared to provide corrections and clarifications to the Recirculated Draft EIR where required.

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2.0 COMMENT LETTERS AND RESPONSES

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2.1 STATE AGENCIES

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*Making Conservation
a California Way of Life.*

August 16, 2019

Alison Spindler
Project Manager
Department of Development Services
333 W. Ocean Blvd., 5th Floor
Long Beach, CA 90802

RE: City of Long Beach – General Plan Land
Use and Land Use Elements Project
Recirculated Draft Environmental Impact
Report (DEIR)
SCH# 2015051054
GTS# 07-LA-2016-02555
Vic. LA-22/ 710/ 405/ 47/ 91

Dear Ms. Spindler:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is an update to the City's existing General Plan and is intended to guide growth and future development through the year 2040. The proposed project includes the approval of both the General Plan Land Use Element (LUE) and Urban Design Element (UDE), which would replace the existing LUE and Scenic Routes Element, respectively. The proposed LUE would introduce the concept of "PlaceTypes," which would replace the current approach in the existing LUE of segregating property within the City through traditional land use designations and zoning classifications. PlaceTypes would divide the City into distinct neighborhoods, thus allowing for greater flexibility and mix of compatible land uses within the areas. The proposed UDE would define the physical aspects of the urban environment and would facilitate the PlaceTypes established in the proposed LUE by creating sustainable places; improving the urban fabric and public spaces; and defining edges, thoroughfares, and corridors.

S-1-1

Caltrans, the Lead Agency (City of Long Beach), and the City's consultancy group (LSA) have been in communication throughout the EIR stage in order to best identify consistent and practical solutions to alleviating congestion on State and Local facilities. Caltrans, the City of Long Beach, and LSA have agreed to a Methodology Memorandum, in which a sample of intersections within Long Beach and surrounding communities would be analyzed and future traffic volume forecasts for analyzing impacts at facilities operated by Caltrans would be developed.

S-1-2

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. As a reminder, the VMT will be the standard transportation analysis metric in CEQA for land use projects starting July 1, 2020 statewide implementation date. You may reference to The Governor's Office of Planning and Research (OPR) for more information.

S-1-3

<http://opr.ca.gov/ceqa/updates/guidelines/>

After reviewing the Recirculated DEIR, Caltrans has the following comments:

1. The General Plan Land Use and Urban Design Elements identified mitigation measures for the intersections (detailed below) with significant impacts within Caltrans' right-of-way (ROW). Although, at this time, there is no established design or program to implement mitigation measures, the implementation of those improvements would require outside agency, once accepted design or program to implement the mitigation measures within Caltrans' right-of-way through the encroachment permit process.

Intersections: Pacific Coast Hwy/ Redondo Avenue
Pacific Coast Hwy/ Anaheim Street
Pacific Coast Hwy/ 7th Street
Pacific Coast Hwy/ 2nd Street

S-1-4

Potential measures to address access or conflict issues may include, but are not limited to the following:

- Pedestrian Safety Treatments.
- Bicycle Safety Treatments.
- Vehicle Safety Treatments such as:
 - a. Installation or reconfiguration of turn lanes
 - b. Improve intersection and freeway ramps capacity and storage
 - c. Traffic control modification and devices
 - d. Access management
 - e. Improve striping and pavement markings

2. Per Caltrans' previous letter dated October 14, 2016, Caltrans recommended the City to consider future improvements at the following locations. Caltrans maintains the following recommendations:

S-1-5

- Widen the westbound State Route (SR)-22 off-ramp at College Park Drive from its current one lane to two lanes
- Install left turn phase signal at Pacific Coast Highway (PCH) and 7th Street
- Add an exclusive right-turn lane to westbound SR-22 to northbound West Campus Drive by striping
- Add a 2nd eastbound left turn on SR-22 to northbound Bellflower Blvd. Add a 2nd left turn lane for westbound SR-22 to southbound Bellflower Blvd
- Add a westbound right-turn lane on SR-22 to northbound East Campus Drive

S-1-5

3. Tables (G, I, & K) of the Traffic Impact Assessment (TIA) show many Caltrans freeway/highway segments and ramp intersections that will be significantly impacted when the “project” is at buildout. However, this “project” is a program document with no proposed specific project. In addition to the Mitigation Measure T-1 as outlined in the TIA, Caltrans will continue to work with the City in identifying feasible mitigation measures when a specific project is identified that may contribute project direct/cumulative impact to Caltrans facilities.

S-1-6

Additionally, in previous correspondence to the City of Long Beach and LSA (5/28/2019), Caltrans expressed the following comments regarding future projects in the Long Beach area. These comments include the following and are applicable to the Recirculated DEIR:

S-1-7

1. Since future developments will be implemented after SB-743 is in full effect, the analysis of traffic impacts must use Vehicle Miles Traveled (VMT) as a metric. The City of Long Beach, as the Lead Agency has discretion to develop and adopt its own, or rely on thresholds of significance recommended or used by other agencies. Given regulatory requirements, comments relating to LOS may still be applicable as noted below:

S-1-8

2. The following guidelines should be used for project level study and analysis:

- Technical Advisory on Evaluating Transportation Impacts in CEQA by Governor’s Office of Planning and Research, dated December 2018. http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf
- Preparation of Transportation Impact Study Guide by Caltrans, latest version available. Caltrans prefers the Highway Capacity Manual (HCM) methodology for analysis of Caltrans freeway mainline, weave, merge and diverge segments according to Caltrans Preparation of Transportation Impact Study Guide 2019. Its performance measures are based on density (pc/mi/ln), as opposed to volume to capacity (v/c).

S-1-9

3. Each project will be evaluated separately. The intersections and freeway segments to be studied and type of analysis to be included, will depend on the location and type of development. Caltrans may request studies on certain intersections and mainline segments that are not identified in the 2010 Metro Congestion Management Program if the project may cause operational/safety issues on the state highway system. S-1-10
4. For project level analysis, add the following criteria to the Performance Standard and Impact Thresholds section:
 - The impact is considered to be significant, if the traffic generated by the project (a) causes one or more freeway segment's demand to exceed capacity (congested flow); or (b) when the segment is already congested, causes an increase in the demand/capacity ratio of greater than 1%. S-1-11
 - Impacts to off-ramps are considered significant if the traffic generated by the project causes queueing that: (a) exceeds 85% of the off-ramp's storage capacity; or (b) when an auxiliary lane is present, exceeds the lesser of one-half the length of auxiliary lane or 1,000 feet.
5. The Performance Standard and Impact Thresholds references degradation from "acceptable LOS to LOS F." This language is ambiguous and does not adequately address degradation from LOS B to C or C to D for instance. After July 1, 2020, VMT will be the standard metric; this section should reflect this. S-1-12
6. Reference to Table B: Freeway Mainline Facilities Level of Service Summary, the LOS results were based on the V/C ratio. It is suggested to analyze freeway segment LOS on the basis of vehicle density (pc/mi/ln) consistent with the most current edition of the Highway Capacity Manual (HCM). S-1-13
7. For freeway mainline, weave, merge and diverge segments, the methodologies in Chapter 12, 13, 14 of the HCM 6th edition are limited to under saturated flow conditions. When a freeway facility has oversaturated flows, Chapter 10, Freeway Facilities Core Methodology, is recommended to be used to determine a more precise density for such conditions. It is acknowledged there are limitations of the HCM methodology and thus its recommended to use a traffic simulation model for the analysis at the project level (not through this Program EIR). S-1-14
8. Regarding freeway ramp terminal signalized intersections, it is suggested that traffic analysis should be performed with actual traffic signal timing, not signal timing optimization. S-1-15

9. It is suggested that managed lane segments be analyzed using the most current edition of the HCM and Caltrans' HOV Guidelines, when managed lanes are present.

S-1-16

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

S-1-17

If you have any questions, please contact project coordinator Mr. Carlo Ramirez, at carlo.ramirez@dot.ca.gov and refer to GTS# 07-LA-2016-02555.

S-1-18

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief
Cc: Scott Morgan, State Clearinghouse

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CALIFORNIA DEPARTMENT OF TRANSPORTATION- DISTRICT 7

LETTER CODE: S-1

DATE: August 16, 2019

RESPONSE S-1-1

This comment thanks the City of Long Beach (City) for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed project and briefly summarizes the primary project components.

This comment is introductory and does not address the adequacy or completeness of the Recirculated Draft Environmental Impact Report (EIR); does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. No further response is necessary.

RESPONSE S-1-2

This comment notes that the City and its environmental consultant (LSA) have been in coordination with Caltrans throughout the preparation of the Recirculated Draft EIR in order to identify the best solutions to alleviate traffic on State and local facilities. The comment also notes that the City, LSA, and Caltrans have agreed to a Methodology Memorandum, which outlines intersections to be analyzed and the manner in which they would be analyzed as part of the *Traffic Impact Analysis* (TIA) (June 2019) for the Recirculated Draft EIR.

This comment is correct in stating that LSA, the City, and Caltrans have been in coordination throughout the Recirculated Draft EIR process. The commenter is also correct in that a Methodology Memorandum was prepared for the TIA. The Methodology Memorandum was finalized in January 2019 and is included as Appendix E of the Recirculated Draft EIR.

RESPONSE S-1-3

This comment notes that the mission of Caltrans is to provide, “a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability.” The comment goes on to note that Senate Bill (SB) 743 was recently codified into California Environmental Quality Act (CEQA) law. SB 743 requires that transportation analyses use Vehicle Miles Traveled (VMT) as the primary metric for evaluating transportation impacts of proposed projects. The comment concludes with a reminder that the VMT metric will be required in all transportation analyses in CEQA starting on July 1, 2020. A link to the updated *State CEQA Guidelines* of the Governor’s Office of Planning and Research is also provided.

The City of Long Beach is aware of the changes to the *State CEQA Guidelines* and the upcoming transition to VMT as a transportation impact metric. The City is developing, but has not yet adopted new thresholds and has yet to move completely away from level of service (LOS) and delay to a formal VMT metric. Therefore, primary analysis is for LOS but VMT is also disclosed. An explanation of SB 743 can be found on pages 23 and 24 of the TIA, and an evaluation of VMT impacts with

respect to the proposed project can be found starting on page 70 of the TIA and page 4.8-51 of the Recirculated Draft EIR. As correctly stated by Caltrans, the VMT metric will be required in all transportation analyses in CEQA starting on July 1, 2020. Therefore, project-related traffic impacts were evaluated in a manner that is consistent with the requirements set forth in SB 743.

RESPONSE S-1-4

The comment indicates that the Recirculated Draft EIR identified mitigation measures for four intersections along Pacific Coast Highway (PCH) with significant impacts within Caltrans' rights-of-way. The comment notes that while there is no established program to implement the mitigation measures identified in the Recirculated Draft EIR, the future implementation of these measures would require input from Caltrans. The comment also provides example measures to address access and/or conflict issues at these intersections, including pedestrian safety treatments, bicycle safety treatments, and vehicle safety treatments (e.g., the installation or reconfiguration of turn lanes, improvements to intersection and freeway ramp capacity and storage, traffic control modification and devices, access management, and improvements to striping and pavement markings).

The City acknowledges the potential measures to address future impacts to the four identified intersections. As outlined in Mitigation Measure T-1, if these recommendations are identified as feasible operational or physical improvements in a valid traffic study prepared by Caltrans, then prior to approval of any discretionary project that is anticipated to result in a potential traffic impact to these intersections, the City will consider and may require the Caltrans-recommended improvements as project-level mitigation. At such time, the City will coordinate with Caltrans on the most appropriate mitigation and improvement measures to alleviate traffic impacts to the fullest extent possible. Caltrans will also be a reviewing agency to any project-level CEQA documents and traffic analyses that may affect these four intersections.

RESPONSE S-1-5

This comment notes that Caltrans continues to recommend improvements to several Caltrans facilities, as noted in a previously submitted comment letter in response to the 2016 Draft EIR. The 2016 Caltrans comment letter specifically recommended that the City consider future improvements at the following locations:

- Widen the westbound State Route 22 (SR-22) off-ramp at College Park Drive from its current one lane to two lanes;
- Install a left-turn phase signal at PCH and 7th Street;
- Add an exclusive right-turn lane to westbound SR-22 to northbound West Campus Drive by striping;
- Add a second eastbound left-turn lane on SR-22 to northbound Bellflower Boulevard and add a second left-turn lane for westbound SR-22 to southbound Bellflower Boulevard; and
- Add a westbound right-turn lane on SR-22 to northbound East Campus Drive.

In response to receiving the 2016 Caltrans comment letter, intersections associated with the recommended improvements were included in the study area. The TIA identified potential traffic impacts at some of these intersections. In those circumstances, the TIA investigated potential mitigation measures including the recommended improvements. However, mitigation of traffic growth through 2040 (as identified in Table 4.8.I) required additional physical improvements at some of the intersections. Physical improvements of the potential traffic impacts identified in this programmatic document were found to be potentially infeasible when they could not be accomplished within the existing right-of-way or when they conflict with the goals for other travel modes as laid out in the City's Mobility Element towards a more balanced multimodal transportation system. For more detail, please refer to 4.8-44 of the EIR. The City acknowledges Caltrans' request for the five specific improvements included in the comment and will consider and evaluate them at the time future projects are proposed and project-specific analyses disclose significant impacts requiring mitigation. As previously stated, Caltrans will also be a reviewing agency to project-level CEQA documents and traffic analyses that may affect these improvement areas.

RESPONSE S-1-6

This comment notes that Tables G, I, and K of the TIA show many Caltrans freeway segments and ramp intersections that will be significantly impacted under the anticipated project buildout (2040) scenario. However, the comment notes that the project is a long-range planning document with no specific projects proposed at this time. The comment concludes by asserting that Caltrans will continue to work with the City in identifying feasible mitigation measures, in addition to Mitigation Measure T-1, when a specific project is identified as having a significant impact to Caltrans facilities.

The City looks forward to working with Caltrans in identifying feasible mitigation measures when a specific project is identified that may contribute project and cumulative impacts to Caltrans facilities. As previously stated, Caltrans will also be a reviewing agency to any project-level CEQA documents and traffic analyses that may affect Caltrans facilities.

RESPONSE S-1-7

This comment notes that in previous correspondence with the City (dated May 28, 2019), Caltrans expressed additional comments regarding future projects in the City. These additional comments are outlined in Responses to Comments S-1-8 through S-1-16, and largely relate to the use of VMT as the primary metric for identifying traffic impacts under CEQA.

The City of Long Beach, as Lead Agency, has the responsibility to develop and utilize CEQA Thresholds of Significance for all topical areas, including transportation. The City is in the process of developing revised transportation metrics that may include VMT and/or delay based on the application (i.e., land use vs. capital projects) and will apply them by July 1, 2020.

Please also refer to Responses to Comments S-1-8 through S-1-16 for further discussion related to the use of VMT in evaluating project-related traffic impacts.

RESPONSE S-1-8

This comment notes that future projects will be required to comply with SB 743, which requires an analysis of traffic impacts using VMT as the metric for evaluating impacts. The comment also notes that the City may develop and adopt its own VMT thresholds, or may rely on thresholds of significance recommended by other agencies. The comment concludes by indicating that comments related to LOS may still be applicable, as noted in Response to Comment S-1-9.

The City of Long Beach, as Lead Agency, has the responsibility to develop and utilize CEQA Thresholds of Significance for all topical areas, including transportation. The City is in the process of developing revised transportation metrics that may include VMT and/or delay based on the application (i.e., land use vs. capital projects) and will apply them by July 1, 2020.

RESPONSE S-1-9

This comment suggests that the following guidelines should be used for future project-level studies and analyses:

- *Technical Advisory on Evaluating Transportation Impacts in CEQA* by the Governor's Office of Planning and Research, dated December 2018.
- Preparation of Transportation Impact Study Guide by Caltrans, latest version available. The comment notes that Caltrans prefers the Highway Capacity Manual (HCM) methodology for analysis of Caltrans' facilities according to the *Caltrans' Preparation of Transportation Impact Study Guide 2019*. The comment also notes that its performance measures are based on density (passenger car/per mile/per lane [pc/mi/ln]), as opposed to volume to capacity (v/c).

The City will use all available and appropriate materials to develop new CEQA metrics and thresholds. This may include the Technical Advisory or a body of substantial evidence supporting the final metric and threshold recommendations. The City will continue to apply Caltrans' methods of analysis to Caltrans' facilities.

RESPONSE S-1-10

This comment notes that each future project occurring as a result of project approval should be evaluated separately. The comment also notes that intersections and freeway segments must be studied; however, the type of analysis to be utilized when studying these facilities will be depend on the location and types of development. The comment concludes by indicating that Caltrans may request studies on certain intersections and mainline segments that are identified in the 2010 Congestion Management Program if the project may cause operational/safety issues on the State Highway System.

The specific intersections and their recommended improvements may or may not be evaluated separately, depending on the project context. It may be that a single project triggers the need for one or more of the improvements. It is understood that Caltrans will comment on future traffic analysis study areas and methods related to State highways.

RESPONSE S-1-11

The comment requests that future project-level analyses add the following criteria to the Performance Standard and Impact Thresholds:

- The impact is considered to be significant if traffic generated by the project (a) causes one or more freeway segment's demand to exceed capacity (congested flow); or (b) when the segment is already congested, causes an increase in the demand/capacity ratio of greater than one percent.
- Impacts to off-ramps are considered significant if traffic generated by the project causes queuing that: (a) exceeds 85 percent of the off-ramp's storage capacity; or (b) when auxiliary lane is present, exceeds the lesser of one-half the length of the auxiliary lane or 1,000 feet.

The City will follow the criteria requested by Caltrans for analysis of State facilities at the time of a project-specific environmental review. This may include the specific Performance Standards articulated in the comments or the standards present at that time.

RESPONSE S-1-12

The comment notes that Performance Standard and Impacts Thresholds references degradation from "acceptable LOS to LOS F." The comment notes that this language is ambiguous and does not adequately address degradation from LOS B to C or C to D. The comment concludes that after July 1, 2020, VMT will be the standard metric, and the analysis should reflect this.

The City will follow the criteria requested by Caltrans for analysis of State facilities at the time of a project-specific environmental review. This may include the specific Performance Standards articulated in the comments or the standards present at that time.

RESPONSE S-1-13

This comment notes that the LOS results in Table B, Freeway Mainline Facilities Level of Service Summary, of the TIA were based on v/c ratio. The comment suggests analyzing freeway segment LOS based on vehicle density (pc/mi/ln) consistent with the most current edition of the Highway Capacity Manual (HCM).

The analysis included in the Recirculated Draft EIR concluded that most of the freeway facilities operate in excess of their designed capacity during the peak commute periods. While preparing the TIA, existing conditions were analyzed using both the HCM vehicle density (pc/mi/ln) methodology and the v/c methodology. This exercise demonstrated that analysis of traffic volume or traffic density would reach this same conclusion. Analysis of potential impacts to freeway mainline facilities presented in the Recirculated Draft EIR followed the v/c methodology outlined in the scope of work approved by Caltrans. As project-specific analyses are prepared, the City will follow the HCM vehicle density (pc/mi/ln) methodology requested by Caltrans for analysis of freeway mainline facilities.

RESPONSE S-1-14

This comment notes that methodologies in Chapters 12 through 14 of the HCM (6th edition) are limited to undersaturated flow conditions when applied to freeway mainline, weave, merge, and diverge segments. The comment also notes that when a freeway facility has oversaturated flows,

Chapter 10, Freeway Facilities Core Methodology, it is recommended to determine a more precise density for such conditions. The comment concludes by noting that there are limitations of the HCM methodology. Therefore, it is recommended to use a traffic simulation model for the analysis at the project level (although not appropriate for this Program Recirculated Draft EIR).

The City will work with Caltrans to identify appropriate methodologies to address weaving analyses at the time of future project-specific environmental analyses.

RESPONSE S-1-15

This comment suggests that the traffic analysis for freeway ramp terminal signalized intersections should be performed with actual traffic signal timing, not signal timing optimization.

Please refer to Response to Comment S-1-14. Appropriate methods will be coordinated at the time of future project-specific environmental analyses.

RESPONSE S-1-16

The comment suggests that managed lane segments be analyzed using the most current edition of the HCM and Caltrans' High Occupancy Vehicle (HOV) Guidelines when managed lanes are present.

Please refer to Response to Comment S-1-14. Appropriate methods will be coordinated at the time of future project-specific environmental analyses.

RESPONSE S-1-17

The comment reminds the City that the transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will need a Caltrans' transportation permit. The comment also recommends that large-size truck trips be limited to off-peak commute hours.

Please refer to Response to Comment S-1-14. Appropriate methods will be coordinated at the time of future project-specific environmental analyses.

RESPONSE S-1-18

This comment provides contact information for the project coordinator at Caltrans should the City have any questions regarding this comment letter.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. No further response is necessary.

2.2 LOCAL AGENCIES

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August 14, 2019

Ref. DOC 5192153

Ms. Alison Spindler, Project Manager
 Department of Development Services
 City of Long Beach
 333 West Ocean Boulevard, 5th Floor
 Long Beach, CA 90802

Dear Ms. Spindler:

**Recirculated DEIR Response for
 the General Plan Land Use and Urban Design Elements Project**

The Sanitation Districts of Los Angeles County (Districts) received a Recirculated Draft Environmental Impact Report (DEIR) for the subject project on June 17, 2019. The City of Long Beach (City) is located within the jurisdictional boundaries of Districts Nos. 1, 2, 3, 8 and 19. Previous comments submitted by the Districts in correspondence dated November 1, 2016 (copy enclosed), to Mr. Craig Chalfant of your agency, still apply to the subject project with the following comment and update:

L-1-1

1. **Table 3.D, Page 3-23, Anticipated General Plan Build-Out (2040) Housing Units and Non-Residential Square Footage** – Based on the Districts' average wastewater generation factors, the expected average wastewater flow from the project, described in the table as 1,274 single-family homes, 27,250 multi-family homes, 1,675,499 square-feet of commercial, 2,611,184 square-feet of office structure, and 8,416,327 square-feet of industrial use, is 5,859,422 gallons per day. As such, item No. 2 of the enclosed copy should be disregarded, as the project related increase in wastewater would represent a significant impact to the remaining capacity of Districts facilities.

L-1-2

2. **4.9.4.2 Wastewater, Page 4.9-5, first paragraph** – The Joint Water Pollution Control Plant currently produces an average flow of 261.1 million gallons per day (mgd).

L-1-3

3. **4.9.4.2 Wastewater, Page 4.9-5, first paragraph** – The Long Beach Water Reclamation Plant currently produces an average flow of 12.7 mgd.

L-1-4

All other information concerning Districts' facilities and sewerage service contained in the document is current. If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

L-1-5

Very truly yours,

Adriana Raza
 Customer Service Specialist
 Facilities Planning Department

AR:ar

Enclosure



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(562) 699-7411 • www.lacsd.org

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2. **4.9.4.2 Wastewater, Page 4.9-5, first paragraph** – The Joint Water Pollution Control Plant currently produces an average flow of 261.1 million gallons per day (mgd).
3. **4.9.4.2 Wastewater, Page 4.9-5, first paragraph** – The Long Beach Water Reclamation Plant currently produces an average flow of 12.7 mgd.

All other information concerning Districts’ facilities and sewerage service contained in the document is current. 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
Enclosure

L-1-6

SANITATION DISTRICTS OF LOS ANGELES COUNTY

LETTER CODE: L-1

DATE: August 14, 2019

RESPONSE L-1-1

This comment is introductory in nature and indicates that the Sanitation Districts of Los Angeles County (LACSD) received the Recirculated Draft Environmental Impact Report (EIR) in June 2019 and that the City of Long Beach (City) is located within the jurisdiction of LACSD. The comment goes on to note that the LACSD previously submitted comments to the City in response to the 2016 Draft EIR, and that the previously submitted comments are still applicable to the project with some exceptions, which are further outlined in Response to Comments L-1-2 through L-1-5.

This comment is introductory and does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. No further response is necessary.

RESPONSE L-1-2

This comment refers to buildout projections associated with the proposed project, which are included as Table 3.D in Chapter 3.0, Project Description, of the Recirculated Draft EIR. The comment notes that based on LACSD average wastewater generation factors, the expected average wastewater flow from the project (i.e., 1,274 single-family homes; 27,250 multi-family homes; and 1,675,499 square feet and of industrial uses) would be 5,859,422 gallons per day (gpd). As such, LACSD opines that the project-related increase in wastewater would result in a significant impact to the remaining capacity of LACSD facilities.

The comment goes on to note that this information is different from previous information provided by LACSD to the City in 2016, which had noted that the project-related increase in wastewater would result in a minimal percentage of the remaining capacity of LACSD facilities (refer to Item No. 2 in Attachment 1 of the letter).

Project-related impacts with respect to wastewater are disclosed in Section 4.9, Utilities, of the Recirculated Draft EIR. As outlined in Table 4.9.D, Wastewater Demand Current and Projected, the proposed project is anticipated to generate approximately 5,524,415 gpd of wastewater (approximately 5.5 million gallons per day [mgd]). The difference between the total wastewater projected in the Recirculated Draft EIR and the total projected in Comment L-1-2 may be due to LACSD assigning an Industrial, Commercial/Retail, or Office wastewater generation factor to the Public Facility/Institutional Wastewater uses that were included in Table 4.9.D (see below for reference). In contrast, the Recirculated Draft EIR used Commercial/Retail, Office, Industrial, and Public Facilities/Institutional factors for each non-residential use, consistent with Table 1, Loadings for Each Class of Land Use, established by LACSD in its Will Serve Program Instructions.

Table 4.9.D: Wastewater Demand – Current and Projected (gpd)

Land Use Type	Unit Type	Usage Factor	2012 Existing Units/ Square Footage	2040 Build-Out Units/ Square Footage	2012 Usage (gpd)	2040 Usage (gpd)	Project-Related Increase (gpd)
Single-Family Residential	gpd/unit	260	63,934 units	65,208 units	16,622,840	16,954,080	331,240
Multi-Family Residential	gpd/unit	156	99,860 units	127,110 units	15,578,160	19,829,160	4,251,000
Commercial/Retail	gpd/ksf	100	21,015,600 sf	22,691,099 sf	2,101,560	2,269,110	167,550
Office	gpd/ksf	200	7,984,400 sf	10,595,584 sf	1,596,880	2,119,117	522,237
Industrial	gpd/ksf	25	17,571,000 sf	25,987,327 sf	439,275	649,683	210,408
Public Facilities/ Institutional	gpd/ksf	50	21,474,000 sf	22,313,607 sf	1,073,700	1,115,680	41,980
Total	-	-	-	-	37,412,415	42,936,830	5,524,415

Source: Los Angeles County Sanitation District (LACSD), Table 1, in its Will Serve Program Instructions. Website: <http://www.lacsd.org/civicax/filebank/blobdload.aspx?blo bid=3531>.

gpd = gallons per day
 gpd/ksf = gallons per day per thousand square feet
 gpd/unit = gallons per day per unit
 sf = square foot/feet

As noted below in Responses to Comments L-2-3 and L-2-4, the Joint Water Pollution Control Plant (JWPCP) currently processes 261.1 mgd with a total capacity of 400 mgd (remaining capacity of 138.9 mgd) and the Long Beach Water Reclamation Plant (WRP) currently processes 12.7 mgd with a total capacity of 25 mgd (remaining capacity of 12.3 mgd). Therefore, the total remaining capacity of both facilities is 151.2 mgd. Using the LACSD’s conservative estimation of 5,859,422 gpd (5.9 mgd) of wastewater associated with project buildout, it is anticipated that the proposed project would represent 4 percent of the remaining capacity of these facilities.

Furthermore, future discretionary developments facilitated by the proposed project would be required to comply with any requirements in effect when the review is conducted, including sewer capacity considerations as part of the City development review and approval process. For example, projects would be required to pay Sewer Capacity Fees to fund the construction, reconstruction, maintenance, and operation of existing and future improvements to the sanitary sewer system. Improvements and upgrades to sewer lines would continue to be prioritized based on need and would occur throughout the planning period associated with the proposed project (i.e., 2019 through 2040).

The proposed project would not substantially or incrementally exceed the current or future scheduled capacity of the JWPCP or the Long Beach WRP by generating flows greater than those anticipated. The City would also require future project applicants to pay a Sewer Capacity Fee, which would further reduce potential impacts related to wastewater treatment. Therefore, project impacts related to wastewater treatment would be less than significant, and no mitigation would be required.

RESPONSE L-1-3

This comment indicates that the text on page 4.9-5 of Section 4.9, Utilities, of the Recirculated Draft EIR, should reflect the fact that the JWPCP processes an average flow of 261.1 mgd.

The text on page 4.9-5 of the Section 4.9, Utilities, of the Draft EIR, has been revised as follows:

Currently, the JWPCP treats approximately 261.1 ~~300~~ mgd and has a total permitted design capacity of 400 mgd.

This change will be incorporated in the Errata to the Final EIR and does not change the analysis or conclusions contained in the Draft EIR. It should be noted that the decreased amount of gallons processed per day, with the same permitted design capacity, results in an increased availability for processing.

RESPONSE L-1-4

This comment indicates that the text on page 4.9-5 of Section 4.9, Utilities, of the Recirculated Draft EIR, should reflect the fact that the Long Beach Water Reclamation Plant processes an average flow of 12.7 mgd.

The text on page 4.9-5 of the Section 4.9, Utilities, of the Draft EIR, has been revised as follows:

The Long Beach WRP treats an average of approximately 12.7 ~~13~~ mgd and has a total permitted capacity of 25 mgd.

This change will be incorporated in the Errata to the Final EIR and does not change the analysis or conclusions contained in the Recirculated Draft EIR. It should be noted that the decreased amount of gallons treated per day, with the same permitted capacity, results in an increased availability for treatment.

RESPONSE L-1-5

This comment states that all other information provided in the Recirculated Draft EIR is correct and provides contact information for a representative at LACSD.

This comment provides contact information and does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. No further response is necessary.

RESPONSE L-1-6

This attachment is the comment letter sent by the LACSD (November 1, 2016) in response to the 2016 Draft EIR.

The comment letter sent by the LACSD in response to the 2016 Draft EIR is included for reference purposes only and does not constitute new comments on the Recirculated Draft EIR. No further response is necessary.



South Coast Air Quality Management District

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

SENT VIA E-MAIL AND USPS:

August 16, 2019

LBDS-EIR-Comments@longbeach.gov

Alison Spindler, Project Manager
City of Long Beach, Development Services Department
333 W. Ocean Blvd., 5th Floor
Long Beach, California 90802

Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) for the Proposed General Plan Land Use and Urban Design Elements Project (SCH No.: 2015051054)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

L-2-1

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to update the City of Long Beach's (City) General Plan to guide growth and future development with a planning horizon year of 2040 (Proposed Project). The Proposed Project includes the approval of both the General Plan Land Use Element (LUE) and Urban Design Element. The Proposed Project anticipates a net growth of 18,230 new residents for a total of 484,485 by 2040; 28,524 new dwelling units for a total of 192,318 by 2040; and 28,511 new jobs for a total of 181,665 by 2040¹.

L-2-2

South Coast AQMD Staff's Summary of Air Quality Analysis and Mitigation Measures

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to South Coast AQMD's air quality CEQA significance thresholds. Due to the first-tier environmental analysis at a programmatic level, construction emissions were modeled based on an average annual level of development (e.g., 1,640 residential units within a one-year construction period) necessary to reach the build-out projection in 2040². The Lead Agency found that on average, the maximum construction emissions associated with the projected development activities allowed under the Proposed Project would not exceed South Coast AQMD's daily maximum thresholds for all criteria pollutants³. "However, because the scale and timing of construction activities has not been determined," the Lead Agency found that the Proposed Project's construction air quality impacts would be significant and unavoidable after the implementation of Mitigation Measures (MMs) AQ-1 and AQ-2 and compliance measure (CM) AQ-1⁴, which are summarized below.

L-2-3

- MM AQ-1 requires future, individual development projects subject to discretionary review under CEQA to conduct a construction air quality analysis and implement project-level mitigation measures such as Tier 4 or newer construction equipment and 2010 model year trucks that meet the California Air Resources Board's (CARB) 2010 engine emission standards at 0.01 grams per brake horsepower-hour (g/bhp-hr) of particulate (PM) and 0.20 g/bhp-hr of nitrogen oxides (NOX) emissions or newer, cleaner trucks, if project-level construction emissions exceed South Coast AQMD's air quality CEQA significance thresholds.

¹ Recirculated Draft EIR. Project Description. Page 3-19.

² *Ibid.* Page 4.2-31.

³ *Ibid.* Table 4.2.F. Page 4.2-32.

⁴ *Ibid.* Pages 1-14 through 1-20.

- MM AQ-2 requires future, individual development projects subject to discretionary review under CEQA to conduct an operational air quality analysis and implement project-level mitigation measures such as infrastructure for plug-in loading docks and electric vehicle charging stations and water-based or low volatile organic compound (VOC) cleaning products, if project-level operational emissions exceed South Coast AQMD’s air quality CEQA significance thresholds
- CM AQ-1 requires future, individual development projects to comply South Coast AQMD rules and provide best management practices such as limiting idling of equipment and trucks to a maximum of five minutes.

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L-2-3

The Lead Agency also quantified the Proposed Project’s operational emissions and compared these emissions to three types of baselines that are summarized below.

- Comparison A (the existing conditions baseline with 2040 emission factors): The Lead Agency compared the Proposed Project’s operational emissions at the expected buildout scenario (year 2040) to an adjusted existing conditions baseline (year 2018)⁵. The adjustments were based on “existing (2018) vehicle mile travel (VMT) and demographic data, with [future year 2040] emission factors and building standards for 2040⁶.” In this comparison, the Lead Agency found that Proposed Project would result in net increases in operational VOC and CO emissions and net decreases in operational NOx, SOx, PM10, and PM2.5 emissions⁷. This comparison was the basis for determining the significance level for the Proposed Project’s operational air quality impacts.
- Comparison B (the future conditions baseline): The Lead Agency compared the Proposed Project’s operational emissions at the expected buildout scenario (future conditions in year 2040 with the Proposed Project) to future conditions in year 2040 without the Proposed Project⁸. In this comparison, while SOx, PM10, and PM2.5 were below South Coast AQMD’s air quality CEQA significance thresholds, VOC, NOx, and CO emissions were found to be 381 pounds/day (lbs/day), 527 lbs/day, and 1,193 lbs/day, respectively, which would substantially exceed South Coast AQMD’s air quality CEQA significance thresholds for VOC (55 lbs/day), NOx (55 lbs/day), and CO (550 lbs/day). This comparison was included for CEQA disclosure purposes only and was not used for determining the significance level for the Proposed Project’s operational air quality impacts.
- Comparison C (the traditional CEQA existing conditions baseline): The Lead Agency compared the Proposed Project’s operational emissions at the expected buildout scenario (year 2040) to an existing conditions baseline (year 2018)⁹. The existing conditions include existing VMT data modeled with emission factors for 2018, current household units, and estimated commercial square footage within the City using current building efficiency standards¹⁰. In this comparison, emissions from VOC, NOx, CO, SOx, PM10, and PM2.5 were all found to be below South Coast AQMD’s air quality CEQA significance thresholds.

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L-2-4

During the implementation of the Proposed Project, the Lead Agency is committed to two land use policies and a mitigation measure for reducing health effects from criteria pollutants and toxic air contaminants as follows. While “CEQA does not generally require an agency to consider the effects of

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L-2-5

⁵ *Ibid.* Pages 4.2-33 through 35.
⁶ *Ibid.* Page 4.2-36.
⁷ *Ibid.* Table 4.2.H. Page 4.2-35.
⁸ *Ibid.* Table 4.2.H. Page 4.2-35.
⁹ *Ibid.*
¹⁰ *Ibid.* Page 4.2-33.

existing environmental conditions on a proposed project’s future users or residents¹¹,” the Lead Agency found that compliance with LU Policy 16-13, LU Policy 16-14, and MM AQ-3 would ensure the Proposed Project’s toxic air contaminants health risk impact associated with the operation of the Proposed Project would be less than significant¹².

- Land Use (LU) Policy 16-13: The Lead Agency requires that “sensitive land uses that are within the recommended buffer distances listed in the [California Air Resources Board] Handbook shall provide enhanced filtration units *or* submit a Health Risk Assessment (HRA) to the City (*emphasis added*). If the HRA shows that the project would exceed the applicable thresholds, mitigation measures capable of reducing potential impacts to an acceptable level must be identified and approved by the City¹³”.
- LU Policy 16-14: The Lead Agency requires the use of the discretionary review process to impose site plan and design features aimed at minimizing exposure to environmental pollution when residential or other sensitive land uses are proposed within proximity to freeways or the Port¹⁴.
- MM AQ-3: The Lead Agency requires that future industrial or warehouse projects conduct a HRA analysis in accordance with policies and procedures of the most current State Office of Environmental Health Hazard Assessment (OEHHA) and the South Coast AQMD’s guidance and use best available control technologies for toxics if the HRA shows that the incremental health risks exceed respective thresholds¹⁵.

L-2-5

South Coast AQMD Staff’s General Comments

The Proposed Project includes land use updates for West Long Beach. West Long Beach is disproportionately impacted by air pollution generated from sources, such as, heavy-duty diesel trucks, marine ports, and oil drilling and production facilities. As a result, West Long Beach is part of the South Coast AQMD Assembly Bill (AB) 617 Community Emission Reduction Program. Through this program the Wilmington, Carson, West Long Beach community has developed a Draft Community Emissions Reduction Plan that identifies air quality priorities and actions to reduce air pollution in the community¹⁶. South Coast AQMD staff recommends that the Lead Agency review the Draft Community Emissions Reduction Plan for measures to reduce air quality impacts from the Proposed Project.

L-2-6

Based on the use of a future conditions baseline, the Lead Agency disclosed that operation of the Proposed Project would exceed South Coast AQMD’s air quality CEQA significance thresholds for VOC, NOx and CO. However, this analysis was not used to determine the significance level for the Proposed Project’s operational air quality impacts. Using a future conditions baseline is reasonable and proper in some cases to determine a project’s CEQA significance level, and the air quality analysis has already shown that the Proposed Project will likely result in long-term, significant adverse air quality impacts on regional NOx emissions, additional air quality mitigation should be required. South Coast AQMD staff also recommends that the Lead Agency require future, individual sensitive land use projects that will be located within 500 feet of freeways or other sources of air pollution to conduct a HRA analysis in subsequent, project-level CEQA documents and install enhanced filtration system. This recommendation will facilitate the implementation of LU Policies 16-13 and 16-14, support CEQA goals and policies on

L-2-7

L-2-8

¹¹ *Ibid.* Page 4.2-43.

¹² *Ibid.* Page 4.2-44.

¹³ *Ibid.* Page 4.2-26.

¹⁴ *Ibid.* Page 4.2-26.

¹⁵ *Ibid.* Page 4.2-48.

¹⁶ The South Coast AQMD Governing Board is scheduled to consider approval of the AB 617 Draft Final Community Emissions Reduction Plans for the Year 1 Communities on September 6, 2019.

public disclosure of useful information about potential health risks from living near freeways or other sources of air pollution, and maximize protection against exposures to toxic air contaminants such as diesel particulate matter. Please see the attachment for more information.

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L-2-8

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

L-2-9

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

L-2-10

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
JW:LS/DG:BB
LAC190619-06
Control Number

ATTACHMENT

CEQA Baseline

1. Notwithstanding the general rule, the Lead Agency has the discretion to define the existing physical conditions, supported by substantial evidence. To facilitate an EIR’s role as an informational document, the use of future baseline is proper in some cases. “Thus an agency may forego analysis of a project’s impacts on existing environmental conditions if such an analysis would be uninformative or misleading to decision makers and the public.” (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439) (See also CEQA Guidelines Section 15125(a)(2)). Consideration of future conditions in determining whether a project’s impacts may be significant is consistent with CEQA’s rules regarding baseline, especially when the project has a long-term buildout schedule. “[N]othing in CEQA law precludes an agency ... from considering both types of baseline—existing and future conditions—in its primary analysis of the project’s significant adverse effects.” (*Neighbors for Smart Rail, supra*, 57 Cal.4th 439). “Even when a project is intended and expected to improve conditions in the long term—20 or 30 years after an EIR is prepared—decision makers and members of the public are entitled under CEQA to know the short- and medium-term environmental costs of achieving that desirable improvement. ... [¶] ... The public and decision makers are entitled to the most accurate information on project impacts practically possible, and the choice of a baseline must reflect that goal.” (See also *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310).

The Lead Agency calculated the Proposed Project’s operational emissions and made three comparisons (Comparisons A, B, and C). In Comparison A, the Proposed Project’s operational emissions at the expected buildout scenario (year 2040) were compared to an existing conditions baseline (year 2018) with 2040 emission factors. The Lead Agency found that the Proposed Project would result in long-term significant adverse air quality impacts from VOC and CO, but not NOx. The Lead Agency used the results from Comparison A to determine the significance level for the Proposed Project’s operational air quality impacts. However, when a future conditions baseline was used (Comparison B), the Proposed Project would result in long-term significant adverse air quality impacts from NOx, in addition to VOC and CO. The Lead Agency included the results from Comparison B for a disclosure purpose only and did not use them to determine the significance level for the Proposed Project’s operational air quality impacts.

Using future conditions is reasonable and proper to determine the significance level for the Proposed Project’s operational air quality impacts when the Proposed Project has a long planning horizon of 20 years. Since the air quality analysis in the Recirculated Draft EIR has already shown that the Proposed Project will result in long-term, significant adverse air quality impacts on regional NOx emissions based on a future conditions baseline (Comparison B), the Lead Agency should identify additional measures in the Final EIR to mitigate the impacts, if feasible, or the Lead Agency should provide an explanation on the rationale for selecting the existing conditions baseline with 2040 emission factors (Comparison A) for a CEQA significance determination purpose but not selecting the future conditions baseline (Comparison B) when it showed the Proposed Project will be have greater impact on regional NOx emissions.

Health Risk Assessment (HRA) Analysis and Health Risk Reduction Strategies

2. LU Policies 16-13 requires new sensitive land uses such as residences, schools, and daycare centers avoid being located within the CARB’s recommended buffer distances, and provide enhanced filtration units or submit a HRA to the Lead Agency (*emphasis added*). If the HRA shows that the project would exceed the applicable thresholds, mitigation measures capable of reducing potential

L-2-11

L-2-12

impacts to an acceptable level must be identified and approved by the Lead Agency¹⁷. LU Policy 16-14 requires the use of the discretionary review process to impose site plan and design features aimed at minimizing exposure to environmental pollution when residential or other sensitive land uses are proposed within proximity to freeways or the Port¹⁸

Notwithstanding the court rulings, South Coast AQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of South Coast AQMD staff's concern about the potential public health impacts of siting sensitive populations within close proximity of freeways or other sources of air pollution, South Coast AQMD staff recommends that, prior to approving the project, Lead Agencies consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.

L-2-12

To facilitate the implementation of LU Policies 16-13 and 16-14, South Coast AQMD staff recommends that the Lead Agency require future individual sensitive land use projects that will be located within 500 feet of freeways or other sources of air pollution to conduct project-specific health risk assessment (HRA) analysis¹⁹ to disclose the potential health risks in the subsequent, project-level CEQA documents²⁰. This requirement will facilitate the purpose and goal of CEQA on public disclosure at the project level, and enable decision-makers with meaningful information to make an informed decision on subsequent project approval. It will also foster informed public participation by providing the public with information that is needed to understand the potential health risks from living in close proximity to freeways or other sources of air pollution.

In addition to requiring future individual sensitive land use projects that will be located within 500 feet of freeways or other sources of air pollution to conduct a HRA analysis in subsequent, project-level CEQA documents, the Lead Agency should consider high efficiency or enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better for these projects. Enhanced filtration units are capable of reducing exposures. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.

L-2-13

Enhanced filtration systems have limitations. In a study that South Coast AQMD conducted to investigate filters²¹, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter. The initial start-up cost could substantially increase if an HVAC system needs to be installed. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the residents. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. Moreover, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration

L-2-14

¹⁷ *Ibid.* Page 4.2-26.

¹⁸ *Ibid.* Page 4.2-26.

¹⁹ South Coast AQMD. "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis." Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

²⁰ South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

²¹ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.

units should be carefully evaluated in more detail and disclosed to prospective residences prior to assuming that they will sufficiently alleviate health risk exposures to toxic air emissions.

↑ L-2-14

Because of the limitations, South Coast AQMD staff recommends that the Lead Agency provide additional details regarding the ongoing, regular maintenance of filters in the Final EIR as guidance to future, individual sensitive land use development projects. To facilitate a good faith effort at full disclosure and provide useful information to future sensitive receptors who will live and/or work in proximity to freeways or other sources of air pollution, the Lead Agency should require the following information be included, at a minimum, in the subsequent, project-level CEQA documents:

- Disclosure potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open and/or when residents are outdoors (e.g., in the common usable open space areas);
- Identify the responsible implementing and enforcement agency, such as the Lead Agency, to ensure that enhanced filtration units are installed on-site at the Proposed Project before a permit of occupancy is issued;
- Identify the responsible implementing and enforcement agency such as the Lead Agency, to ensure that enhanced filtration units are inspected and maintained regularly;
- Disclose the potential increase in energy costs for running the HVAC system to prospective residents;
- Provide information to residents on where MERV filters can be purchased;
- Provide recommended schedules (e.g., every year or every six months) for replacing the enhanced filtration units;
- Identify the responsible entity such as future residents themselves, Homeowner's Association (HOA), or property management for ensuring enhanced filtration units are replaced on time, if appropriate and feasible (if residents should be responsible for the periodic and regular purchase and replacement of the enhanced filtration units, the Lead Agency should include this information in the disclosure form);
- Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units;
- Set City-wide criteria for assessing progress in installing and replacing the enhanced filtration units; and
- Develop a City-wide process for evaluating the effectiveness of the enhanced filtration units.

L-2-15

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

LETTER CODE: L-2

DATE: August 16, 2019

RESPONSE L-2-1

This comment is introductory in nature and thanks the City of Long Beach (City) for the opportunity to comment on the proposed project.

This comment does not address the adequacy or completeness of the Recirculated Draft Environmental Impact Report (EIR); does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*.

RESPONSE L-2-2

This comment is a summary description of the proposed project.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. No further response is necessary.

RESPONSE L-2-3

This comment summarizes the conclusions of the Air Quality Impact Analysis and Air Quality Section of the Recirculated Draft EIR. The comment also summarizes mitigation measures outlined in the Recirculated Draft EIR.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*.

RESPONSE L-2-4

This comment is a summary description of the emissions inventory and conclusions of the Air Quality Impact Analysis and Air Quality Section of the Recirculated Draft EIR.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*.

RESPONSE L-2-5

This comment is a summary description of the land use policies and mitigation measures that the City would implement to reduce the proposed project's toxic air contaminants health risk impact as outlined in the Air Quality Impact Analysis and Air Quality Section of the Recirculated Draft EIR.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*.

RESPONSE L-2-6

This comment suggests that the proposed project includes land use updates for West Long Beach. The comment notes that this area of the City is disproportionately impacted by air pollution. The comment also notes that West Long Beach is part of the South Coast Air Quality Management District (SCAQMD) Assembly Bill (AB) 617 Community Emission Reduction project, which has recently adopted an emissions reduction plan to reduce air pollution in the community. The comment concludes by requesting that staff review the draft plan for measures to reduce air quality impacts resulting from the proposed project.

As suggested in this comment, the City has reviewed the draft document and actions contained in the *Draft Community Emissions Reduction Plan*. The City has found that the proposed actions are not specifically applicable to the proposed project. Instead, the actions are related to steps that the SCAQMD will take to reduce air pollution at refineries, marine ports, and railyards; and are not specifically applicable to land use planning in the City of Long Beach.

Pages 4.2-18 through 4.2-23 of Section 4.2, Air Quality, in the Recirculated Draft EIR list the City's General Plan goals, strategies, policies, and actions related to air quality. Mitigation measures to reduce the air quality impacts associated with implementation of the proposed project are identified on pages 4.2-46 through 4.2-49 of the Recirculated Draft EIR. As stated on page 4.2-50 of the Recirculated Draft EIR, Mitigation Measures MMs AQ-1, AQ-2, and AQ-3 would significantly reduce criteria air pollutant emissions generated during construction activities, operational activities, and the emission of toxic air contaminants (TACs). While implementation of MMs AQ-1, AQ-2, and AQ-3 would reduce criteria pollutant emissions and emissions of TACs, there currently is not enough information available to quantify emissions during operation of future project-specific development that may occur under the proposed project. Therefore, as concluded in the Recirculated Draft EIR, air quality impacts are considered significant and unavoidable. Additional measures are not required.

RESPONSE L-2-7

This comment notes that the City disclosed that operation of the proposed project would exceed SCAQMD CEQA significance thresholds for volatile organic compounds (VOCs), nitrogen oxides (NO_x), and carbon monoxide (CO). The comment asserts that a future baseline would have been reasonable and proper to determine the project's CEQA significance level and that mitigation should be required to address regional NO_x emissions.

As shown in Table 4.2.H of Section 4.2, Air Quality, of the Recirculated Draft EIR, the change in emissions for year 2040 with proposed project conditions would decrease from Existing Year 2018. Therefore, despite the additional population and employment growth in the City, citywide emissions would also decrease.

Section 15125, subdivision (a) of the *State CEQA Guidelines*, states: “An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.” (Cal.Code Regs., Title 14, § 15125, subd. (a) (*State CEQA Guidelines* Section 15125(a)). In *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, the California Supreme Court held that a lead agency has discretion to omit existing conditions analyses by substituting a baseline consisting of environmental conditions projected to exist solely in the future, but to do so the agency must justify its decision by showing an existing conditions analysis would be *misleading or without informational value* (emphasis added). There is no evidence that using an existing conditions baseline is “misleading or without informational value.” Therefore, the City of Long Beach, as Lead Agency for the project, used an existing conditions baseline consistent with Section 15125 of the CEQA Guidelines.”

As the Lead Agency, the City defined the existing baseline conditions consistently throughout the Recirculated Draft EIR as the existing physical conditions. Vehicle emission factors substantially decrease in future years; therefore, in order to provide a “normalized” comparison of the proposed project to existing conditions, the analysis presented in Table 4.2.H of the Recirculated Draft EIR uses the existing (baseline) land use conditions with future emission factors to compare impacts of the proposed project. The Recirculated Draft EIR includes a number of scenarios for the purposes of informing decision-makers on all potential impacts of the project. The analysis also included an evaluation of the future year 2040 with and without project and buildout of the project compared to existing conditions. The “plan to plan” analysis (Project Comparison to Future Year 2040 No Project) was provided for disclosure purposes only and per the requirements of CEQA was not used as the basis for the significance conclusions.

As shown in Table 4.2.H of the Recirculated Draft EIR, the results indicate that regional emissions of VOC and CO associated with anticipated buildout resulting from project implementation would exceed the SCAQMD project-level VOC and CO emission thresholds. However, as stated on page 4.2-36 of the Recirculated Draft EIR, since the scale of individual project-level emissions associated with future projects occurring under the proposed Land Use Element (LUE) has not been determined, the air quality impacts (e.g., for all emissions, not just those associated with VOC and CO) associated with the future operation of individual projects are assumed to be potentially significant when measured against daily regional thresholds. Therefore, MM AQ-2 requires the preparation of project-specific technical assessments evaluating operational-related air quality impacts to ensure that operational-related emissions (including NOx) are reduced to the maximum extent feasible for projects that require environmental evaluation under CEQA. Page 4.2-37 of the Recirculated Draft EIR notes that despite implementation of MM AQ-2, and in an abundance of

caution, the potential regional criteria pollutant emissions impact associated with the operation of the proposed project would remain significant and unavoidable.

As stated on page 4.2-36 of the Draft EIR, implementation of the proposed LUE policies would help to reduce air pollutant emissions (including NO_x), as many of the policies included in the plan promote an increase in concepts and designs that would increase walking, bicycling, and use of public transit that would contribute to reduced vehicle miles traveled (VMT) (e.g., Policies AQ 2.1.1, 2.1.2, 2.3.1, and 2.4.1). In addition, Policy 2.6.2 of the Air Quality Element encourages the installation of alternative fueling facilities such as electric chargers for vehicles. Furthermore, Policy Mobility of People (MOP) 5-2 of the Mobility Element calls for the continued active enforcement of the City's trip reduction through alternative modes of transportation and Transportation Demand Management, which would reduce NO_x emissions associated with the proposed project. As listed in Section 4.2.7.1 of the Recirculated Draft EIR, the proposed LUE also includes the following Strategies and Policies that would result in a reduction in air emissions (including NO_x): Strategy No. 1, LU Policies 1-1 through 1-7 which would support sustainable urban development patterns; and Strategy No. 11, LU Policies 11-2 and 11-5, which would create healthy and sustainable neighborhoods. These strategies would encourage alternate modes of transportation, require electric vehicle charging stations, and would reduce the heat island effect. These strategies and policies are consistent with the SCAQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (May 2005), and no additional emission reduction measures are necessary.

RESPONSE L-2-8

This comment recommends that the City require future individual sensitive land use projects within 500 feet of freeways or other sources of pollution to conduct a Health Risk Assessment (HRA) in subsequent, project-level CEQA documents and install enhanced filtration systems. As such, this comment suggests that the City require both filtration and an HRA. The comment notes that this recommendation will be consistent with several land use policies included in the proposed LUE, and will support CEQA goals on public disclosure of potential health risks from living near sources of pollution.

Land Use Policy 16-13 would require future proposed sensitive land use projects that are located within 500 feet of freeways or other sources of pollution to install enhanced air filtration systems or conduct a site-specific HRA (*emphasis added*). Revisions to LU Policy 16-13 to require both filtration and an HRA are not included as part of the project because the project and the Recirculated Draft EIR have been prepared at the programmatic level. At the time future projects are proposed, site-specific conditions would dictate whether emission reduction measures would be warranted. Additionally, the City would like to be able to consider technological innovations over the life of the proposed project, which would be allowed on a project-specific basis as currently proposed. Advancements in technology may include other emission reduction measures that are more effective than enhanced filtration systems. Therefore, given the programmatic nature of the project, a requirement to provide enhanced filtration without the option to consider alternatives is not appropriate at this time. Instead, this would be considered during the preparation of a site-specific HRA for future projects, as currently proposed in LU Policy 16-13. Project level CEQA documents would support CEQA goals and policies on public disclosure of information about health risks from living near sources of air contaminants.

Furthermore, however, lead agencies are not required to analyze whether existing environmental conditions may impact a proposed project's future users or residents. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal. 4th 369) While the impacts of the existing environment on future uses are not required under CEQA, such impacts are a policy consideration. As such, the City has incorporated several policies in the LUE that are aimed at improving existing environmental conditions to promote the health and safety of future users and residents in the City. For example, LU Policy 16-4 encourages interagency collaboration to improve air quality around the ports and LU Policy 16-13 aims to locate sensitive land uses to avoid incompatibilities with high-emitting uses. Where locating sensitive land uses away from incompatible uses is not possible, LU Policy 16-13 requires the preparation of an HRA or the provision of enhanced filtration. In addition, LU Policy 18-4 aims to increase the number of trees in the City to improve air quality. As such, the LUE considers both the existing and future air quality setting in tandem with the proposed PlaceTypes.

RESPONSE L-2-9

This comment requests a written response to all comments in accordance with the *State CEQA Guidelines*.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, it should be noted that the City intends to abide by all applicable CEQA regulations, including the requirement to distribute responses to agencies who have commented on the Recirculated Draft EIR at least 10 days prior to the hearing on the project.

RESPONSE L-2-10

This comment indicates that SCAQMD staff is available to work with the City to address any questions on the comment letter. The comment also provides contact information for an individual at SCAQMD to whom the City may direct their questions.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*.

RESPONSE L-2-11

This comment relates to the use of a future conditions baseline.

Please see Response to Comment L-2-7.

RESPONSE L-2-12

This comment suggests that Land Use Policy 16-13 should require enhanced filtration units for all future sensitive receptors proposed within 500 feet of a freeway or other source of emissions.

Please see Response to Comment L-2-8.

RESPONSE L-2-13

This comment suggests that Minimum Efficiency Reporting Value (MERV) 13 or better filtration should be installed in future sensitive land use projects within 500 feet of freeways.

As described in Response to Comment L-2-8, the proposed project is a programmatic policy document that will guide land use decisions over a 20-year period. Under LU Policy 16-13, the City will require filtration units or a site-specific HRA for projects located within 500 feet of freeways or pollution sources so that measures to minimize the exposure of future residents can be customized based on specific site conditions and the latest available technology.

RESPONSE L-2-14

This comment summarizes the limitations of air filtration systems.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*.

RESPONSE L-2-15

This comment provides information on ongoing, regular maintenance requirements of filtration systems.

As noted above, the proposed project is a programmatic General Plan Land Use and Urban Design Element document. Therefore, details such as those provided in this comment would only be applicable to certain future development projects proposed under the General Plan. The City will consider the suggested information in future project-level CEQA documents and/or as project conditions of approval when applicable. No specific changes to the Recirculated Draft EIR are required at this time.



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August 16, 2019

Ms. Alison Spindler
Department of Development Services
City of Long Beach
333 West Ocean Blvd., 5th Floor
Long Beach, CA 90802

**Subject: General Plan Land Use and Urban Design Elements Project
Recirculated Draft Environmental Impact Report (SCH No.
2015051054)**

Dear Ms. Spindler:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Recirculated Draft Environmental Impact Report (DEIR) for the General Plan Land Use and Urban Design Elements Project. The following comments are provided for your consideration:

- Page 4.8-3, Figure 4.8.1 ("Study Area Intersections"):
 - The figure identifies the 1st Street/Marina Drive intersection as within the City of Long Beach. This intersection is within the City of Seal Beach. Please revise. L-3-2
 - The figure identifies the Los Alamitos Boulevard/Katella Avenue intersection as within the City of Garden Grove. This intersection is within the City of Los Alamitos. Please review the intersections to determine if each is accurately located in the identified jurisdiction, and revise if needed. L-3-3
 - The corresponding list is not consistent with that of Appendix G (Traffic Impact Analysis [TIA]) Figure 6 ("Study Area Intersections"). Please review and revise. L-3-4
 - The figure does not accurately reflect the listed intersections below and above the figure. It appears that Figure 6 of the TIA and its corresponding list present the same information as Figure 4.8.1. If the TIA accurately reflects the study area intersections, please update the list in the DEIR (pages 4.8-2 through 4.8-5). If the list in the DEIR is correct, please amend the TIA. Some of the inconsistencies include: L-3-5

Study Intersection #	List	Map/Appendix G, TIA
101	West Campus Drive/7th Street (Long Beach)	1 st Street/Marina Drive (Seal Beach)
111	I-605 NB Ramps/Carson Street (Caltrans)	Studebaker Road/2nd Street (Long Beach)
114	Los Alamitos Boulevard/Katella Avenue (Garden Grove)	Norwalk Boulevard/Carson Street (Hawaiian Gardens)
115	Seal Beach Boulevard/Westminster Road (Seal Beach)	Norwalk Boulevard/Cerritos Avenue (Los Alamitos)
116	Atlantic Avenue/I-405 WB Ramps (Caltrans)	Los Alamitos Boulevard/Katella Avenue (Los Alamitos)
117	I-710/Anaheim St Cloverleaf WB (Caltrans)	Seal Beach Boulevard/Westminster Boulevard (Seal Beach)



L-3-5

- Appendix G, TIA does not address impacts to Congestion Management Program (CMP) intersections within Orange County. Please consider impacts to Orange County's CMP highway system.
 - Guidance for the 2017 CMP can be found at: <http://www.octa.net/Projects-and-Programs/Plans-and-Studies/Congestion-Management-Program/Overview/>

L-3-6

- OCTA has provided support via promotion and awareness of the OC Loop project. The OC Loop is a vision for 66 miles of seamless connections and an opportunity for people to bike, walk, and connect to some of California's most scenic beaches and inland reaches. About 80% of the OC Loop is already in place and is used by thousands of people. Currently, nearly 54 miles use existing off-street trails along the San Gabriel River, Coyote Creek, Santa Ana River, and the Coastal/Beach Trail. The OC Loop travels along the Coyote Creek/San Gabriel River adjacent the City of Long Beach.

L-3-7

Ms. Alison Spindler
August 16, 2019
Page 3

- Orange County Parks published the OC Loop Gap Feasibility Study in March 2015, which envisions improved connections in the City of Seal Beach which align with improvements identified in the DEIR Figure 4.8.4. We look forward to continued collaboration and discussion with the City of Long Beach to enhance local and regional connections including the OC Loop project.

L-3-8

Throughout the development of this project, we encourage communication with OCTA on any matters discussed herein. If you have any questions or comments, please contact me at (714) 560-5907 or at dphu@octa.net.

L-3-9

Sincerely,



Dan Phu
Manager, Environmental Programs

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ORANGE COUNTY TRANSPORTATION AUTHORITY

LETTER CODE: L-3

DATE: August 16, 2019

RESPONSE L-3-1

This comment is introductory in nature and thanks the City of Long Beach (City) for the opportunity to comment on the proposed project.

This comment does not address the adequacy or completeness of the Recirculated Draft Environmental Impact Report (EIR); does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. No further response is necessary.

RESPONSE L-3-2

This comment requests that Figure 4.8.1, Study Area Intersections, of the Recirculated Draft EIR be revised to show the 1st Street/Marina Drive intersection as within the City of Seal Beach rather than within the City of Long Beach.

Figure 4.8.1 correctly showed the 1st Street/Marina Drive intersection outside of the City of Long Beach boundaries in the City of Seal Beach. However, the list of study area intersections on page 4.8.5 is corrected to the following, which is consistent with the figures, tables, and subsequent lists provided in the Recirculated Draft EIR:

1. Avalon Boulevard/ Pacific Coast Hwy (Caltrans)
2. Avalon Boulevard/Anaheim Street (Carson)
3. Wilmington Avenue/Sepulveda Boulevard (Carson)
4. Wilmington Avenue/223rd Street (Carson)
5. Terminal Island Freeway/Willow Street (Long Beach)
6. Santa Fe Avenue/Wardlow Road (Long Beach)
7. Santa Fe Avenue/Willow Street (Long Beach)
8. Santa Fe Ave/Pacific Coast Hwy (Caltrans, CMP)
9. Santa Fe Avenue/Anaheim Street (Long Beach)
10. I-710/Pacific Coast Hwy Cloverleaf WB (Long Beach)
11. I-710/Pacific Coast Hwy Cloverleaf EB (Long Beach)
12. Magnolia Avenue/Ocean Boulevard (Long Beach)
13. Pacific Avenue/ Pacific Coast Hwy (Caltrans)
14. Pacific Avenue/Anaheim Street (Long Beach)
15. Pacific Avenue/7th Street (Long Beach)
16. Pacific Avenue/6th Street (Long Beach)
17. Pacific Avenue/3rd Street (Long Beach)
18. Pacific Avenue/Broadway (Long Beach)
61. Cherry Avenue/Del Amo Boulevard (Long Beach/ Lakewood)
62. Cherry Avenue/Carson Street (Long Beach)
63. Cherry Avenue/Wardlow Road (Long Beach)
64. Cherry Avenue/Willow Street (Signal Hill)
65. Cherry Avenue/ Pacific Coast Hwy (Caltrans)
66. Cherry Avenue/7th Street (Long Beach)
67. Paramount Boulevard/Artesia Boulevard (Long Beach)
68. Paramount Boulevard/South Street (Long Beach)
69. Paramount Boulevard/Del Amo Boulevard (Lakewood)
70. Paramount Boulevard/Carson Street (Lakewood)
71. Downey Avenue/Alondra Boulevard (Paramount)
72. Redondo Avenue/Spring Street (Long Beach)
73. Redondo Avenue/Willow Street (Long Beach)
74. Redondo Avenue/Pacific Coast Hwy (Caltrans)
75. Redondo Avenue/Anaheim Street (Long Beach)
76. Redondo Avenue/7th Street (Long Beach)
77. Redondo Avenue/3rd Street (Long Beach)
78. Redondo Avenue/Ocean Boulevard (Long Beach)
79. Lakewood Boulevard/Del Amo Boulevard (Long Beach)

19. Pacific Avenue/Ocean Boulevard (Long Beach)
20. Long Beach Boulevard/Alondra Boulevard (Compton)
21. Long Beach Boulevard/Artesia Boulevard (Long Beach)
22. Long Beach Boulevard/Market Street (Long Beach)
23. Long Beach Boulevard/Del Amo Boulevard (Long Beach)
24. Long Beach Boulevard/San Antonio Drive (Long Beach)
25. Long Beach Boulevard/Wardlow Road (Long Beach)
26. Long Beach Boulevard/Spring Street (Long Beach)
27. Long Beach Boulevard/Willow Street (Long Beach)
28. Long Beach Boulevard/Pacific Coast Hwy (Caltrans)
29. Long Beach Boulevard/Anaheim Street (Long Beach)
30. Long Beach Boulevard/7th Street (Long Beach)
31. Long Beach Boulevard/6th Street (Long Beach)
32. Long Beach Boulevard/3rd Street (Long Beach)
33. Long Beach Boulevard/Broadway (Long Beach)
34. Long Beach Boulevard/Ocean Boulevard (Long Beach)
35. Atlantic Avenue/Alondra Boulevard (Compton)
36. Atlantic Avenue/SR-91 WB Ramps (Long Beach)
37. Atlantic Avenue/SR-91 EB Ramps (Long Beach)
38. Atlantic Avenue/Artesia Boulevard (Long Beach)
39. Atlantic Avenue/South Street (Long Beach)
40. Atlantic Avenue/Del Amo Boulevard (Long Beach)
41. Atlantic Avenue/33rd Street (Caltrans)
42. Atlantic Avenue/I-405 EB Ramps (Caltrans)
43. Atlantic Avenue/Willow Street (Long Beach)
44. Atlantic Avenue/Pacific Coast Hwy (Caltrans)
45. Atlantic Avenue/Anaheim Street (Long Beach)
46. Atlantic Avenue/7th Street (Long Beach)
47. Atlantic Avenue/6th Street (Long Beach)
48. Atlantic Avenue/3rd Street (Long Beach)
49. Atlantic Avenue/Broadway (Long Beach)
50. Atlantic Avenue/Shoreline Avenue-Ocean Boulevard (Long Beach)
51. Orange Avenue/Wardlow Road (Long Beach)
52. Orange Avenue/ Pacific Coast Hwy (Caltrans, CMP)
53. Alamitos Avenue/Anaheim Street (Long Beach)
54. Alamitos Avenue/7th Street (Long Beach, CMP)
55. Alamitos Avenue/6th Street (Long Beach)
56. Alamitos Avenue/3rd Street (Long Beach)
57. Alamitos Avenue/Broadway (Long Beach)
58. Alamitos Avenue/ Shoreline Avenue-Ocean Boulevard (Long Beach, CMP)
59. Cherry Avenue/Artesia Boulevard (Long Beach)
80. Lakewood Boulevard/Carson Street (Long Beach/Lakewood, CMP)
81. Lakewood Boulevard/Spring Street (Long Beach)
82. Lakewood Boulevard/I-405 WB Ramps (Caltrans)
83. Lakewood Boulevard/I-405 EB Ramps (Caltrans)
84. Lakewood Boulevard/Willow Street (Long Beach, CMP)
85. Ximeno Avenue/Pacific Coast Hwy (Caltrans, CMP)
86. Ximeno Avenue/7th Street (Long Beach)
87. Ximeno Avenue/4th Street (Long Beach)
88. Park Avenue/7th Street (Long Beach)
89. Park Avenue/4th Street (Long Beach)
90. Livingston Drive/2nd Street (Long Beach)
91. Pacific Coast Hwy/Anaheim Street (Caltrans)
92. Pacific Coast Hwy/7th Street (Caltrans, CMP)
93. Bellflower Boulevard/Del Amo Boulevard (Long Beach/Lakewood)
94. Bellflower Boulevard/Carson Street (Long Beach/Lakewood)
95. Bellflower Boulevard/Spring Street (Long Beach)
96. Bellflower Boulevard/Los Coyotes Diagonal (Long Beach)
97. Bellflower Boulevard/Atherton Street (Long Beach)
98. Bellflower Boulevard/7th Street (Long Beach)
99. Bellflower Boulevard/Pacific Coast Hwy (Caltrans)
100. Pacific Coast Hwy/2nd Street (Caltrans, CMP)
101. 1st Street/Marina Drive (~~Long Beach~~ Seal Beach)
102. Los Coyotes Diagonal/Spring Street (Long Beach)
103. West Campus Drive/7th Street (Long Beach)
104. East Campus Road/7th Street (Long Beach)
105. Palo Verde Avenue/Wardlow Road (Long Beach)
106. Palo Verde Avenue/Anaheim Street (Long Beach)
107. Los Coyotes Diagonal/Carson Street (Long Beach/Lakewood)
108. Studebaker Road/Spring Street (Long Beach)
109. Studebaker Road/Willow Street (Long Beach)
110. 7th Street/College Park Drive (Long Beach)
111. Studebaker Road/2nd Street (Long Beach)
112. I-605 SB Ramps/Carson Street (Caltrans)
113. I-605 NB Ramps/Carson Street (Caltrans)
114. Norwalk Boulevard/Carson Street (Hawaiian Gardens)
115. Norwalk Boulevard/Cerritos Avenue (Los Alamitos)
116. Los Alamitos Boulevard/Katella Avenue (~~Garden Grove~~ Los Alamitos)
117. Seal Beach Boulevard/Westminster Road (Seal Beach)
118. Atlantic Avenue/I-405 WB Ramps (Caltrans)
119. I-710/Anaheim St Cloverleaf WB (Caltrans)
120. I-710/Anaheim St Cloverleaf EB (Caltrans)

60. Cherry Avenue/Market Street (Long Beach)

RESPONSE L-3-3

This comment requests that Figure 4.8.1, Study Area Intersections, of the Recirculated Draft EIR be revised to show the Los Alamitos Boulevard/Katella Avenue intersection as within the City of Los Alamitos rather than within the City of Garden Grove.

Figure 4.8.1 correctly showed the Los Alamitos Boulevard/Katella Avenue intersection outside of the City of Long Beach boundaries in the City of Los Alamitos. However, the list of study area intersections on page 4.8.5 is corrected as identified in Response to Comment L-3-2. With the proposed revisions to the list of study area intersections, both Figure 4.8.1 and the list of intersections are consistent with the analysis in the Traffic Impact Analysis (TIA) for the proposed project (June 2019).

RESPONSE L-3-4

This comment notes that the list of intersections that corresponds to Figure 4.8.1, Study Area Intersections, of the Recirculated Draft EIR is inconsistent with Figure 6 included in the TIA (June 2019) for the proposed project. The comment asks that this figure be revised.

Figures identifying study area intersection locations were consistent between the TIA and Section 4.8. The list of study area intersections on page 4.8.5 has been corrected as identified in Response to Comment L-3-2 to be consistent with Figure 4.8.1 and Figure 6 in the TIA.

RESPONSE L-3-5

This comment opines that Figure 4.8.1, Study Area Intersections, of the Recirculated Draft EIR does not accurately reflect the listed intersections below and above the figure. The comment notes that Figure 6 of the TIA and its corresponding list of intersections also reflect the same information as Figure 4.8.1. As such, the comment notes that if the TIA accurately reflects the study area intersections, then the list of intersections in the Recirculated Draft EIR (included on pages 4.8-2 through 4.8-5) must also be updated. The comment notes the following inconsistencies:

- Study Intersection No. 101: List identifies this as West Campus Drive/7th Street (Long Beach), but the map and the TIA identify this as 1st Street/Marina Drive (Seal Beach).
- Study Intersection No. 111: List identifies this as I-605 NB Ramps/Carson Street (Caltrans), but the map and TIA identify this as Studebaker Road/2nd Street (Long Beach).
- Study Intersection No. 114: List identifies this as Los Alamitos Boulevard/Katella Avenue (Garden Grove), but the map and TIA identify this as Norwalk Boulevard/Carson Street (Hawaiian Gardens).
- Study Intersection No. 115: List identifies this as Seal Beach Boulevard/Westminster Road (Seal Beach), but the map and TIA identify this as Norwalk Boulevard/Carson Street (Hawaiian Gardens).

- Study Intersection No. 116: List identifies this as Atlantic Avenue/I-405 WB Ramps (Caltrans), but the map and TIA identify this as Los Alamitos Boulevard/Katella Avenue (Los Alamitos).
- Study Intersection No. 117: List identifies this as I-710/Anaheim Street Cloverleaf WB (Caltrans), but the map and TIA identify this as Seal Beach Boulevard/Westminster Boulevard (Seal Beach).

Figures identifying study area intersection locations were consistent between the TIA and Section 4.8. The list of study area intersections on page 4.8.5 has been corrected as identified in Response to Comment L-3-2 to be consistent with Figure 4.8.1 and Figure 6 in the TIA.

RESPONSE L-3-6

This comment notes that the TIA for the proposed project does not address impacts to the Congestion Management Program (CMP) intersections within Orange County. The comment asks the TIA to consider such impacts and provides a link to the 2017 CMP.

The Recirculated Draft EIR states that urbanized areas with population of 50,000 or more are required to adopt a CMP. The analysis of potential traffic impacts included an identification of study area intersections that are monitored by a CMP. While none of the study area intersections are monitored locations in the Orange County CMP, expanding the study area beyond the Caltrans facilities and 120 intersections included in the analysis is not likely to change the conclusion of the analysis. The conclusion of the Recirculated Draft EIR that the Land Use and Urban Design Elements have the potential to significantly impact vehicle level of service (including CMP facilities) and that physical mitigation to maintain vehicle level of service may not be feasible would also apply to facilities monitored by the Orange County CMP. Future project-level analysis would include facilities (including Orange County CMP facilities) meeting the criteria for inclusion established at the time the project-level analysis is prepared and would analyze the potential impacts to those facilities according to standards adopted at the time of the analysis, including Orange County CMP criteria.

RESPONSE L-3-7

This comment notes that the Orange County Transportation Authority (OCTA) has provided support to promote awareness of the OC Loop Project, which is a vision for 66 miles of connections and an opportunity for people to bike, walk, and connect to beaches and inland areas. The comment notes that approximately 80 percent of the OC Loop is in place and provides examples of where the loop has been implemented, including along Coyote Creek and the San Gabriel River adjacent to the City of Long Beach.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, it should be noted that the bike path along Coyote Creek and the San Gabriel River is included in Figure 4.8.4 in the Recirculated Draft EIR.

RESPONSE L-3-8

This comment notes that the Orange County Parks published the OC Loop Gap Feasibility Study in March 2015, which envisions improved connections in the City of Seal Beach, which align with the

improvements identified in Figure 4.8.4 of the Recirculated Draft EIR. The comment concludes by noting that OCTA is looking forward to collaborating with the City to enhance local and regional connections, including the OC Loop Project.

The City's Bicycle Master Plan includes spot improvements enhancing connections to the Coyote Creek and San Gabriel River bike paths. The City looks forward to collaborating when specific projects are proposed.

RESPONSE L-3-9

This comment encourages the City to continue to communicate with OCTA throughout the development of the proposed project, and provides contact information for an individual at OCTA to whom the City can address questions or comments.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. No further response is necessary.

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2.3 INTERESTED PARTIES

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From: [Alison Spindler](#)
To: [Alyssa Helper](#)
Subject: FW: Revised Program EIR for the Land Use Element & Urban Design Element Now Available for Public Review
Date: Monday, June 24, 2019 7:57:10 AM

From: Christopher Koontz
Sent: Friday, June 21, 2019 8:23 AM
To: LBDS-EIR-Comments <LBDS-EIR-Comments@longbeach.gov>
Cc: Alison Spindler <Alison.Spindler@longbeach.gov>
Subject: FW: Revised Program EIR for the Land Use Element & Urban Design Element Now Available for Public Review

From: Jean Steele <jsteele04@verizon.net>
Sent: Friday, June 21, 2019 12:59 AM
To: Linda Tatum <Linda.Tatum@longbeach.gov>
Cc: supernaw@verizon.net; Oscar Orci <Oscar.Orci@longbeach.gov>; David Khorram <David.Khorram@longbeach.gov>; Karl Wiegelman <Karl.Wiegelman@longbeach.gov>; Patrick Ure <Patrick.Ure@longbeach.gov>; Christopher Koontz <Christopher.Koontz@longbeach.gov>
Subject: Revised Program EIR for the Land Use Element & Urban Design Element Now Available for Public Review

Linda Tatum,

This report that I received via email is too overwhelming to have to read through. However, I have one thing to say: JUST STOP! Long Beach does not need more apartments. Long Beach does not need more bike lanes. Long Beach could use adequate parking that is affordable, but it doesn't need most of these expensive projects that we tax payers will cough up for with no benefit. We do need good police and fire services, but we do not need to protect illegal aliens who crowd our cities; bringing diseases that were basically eradicated; bringing crime and social problems; abuse our social services systems, and refuse to integrate into America society. We do not need higher taxes and more expensive fuel, water and electricity. And on and on...

I-1-1

I-1-2

What Long Beach does need is basic infrastructure repairs. It took three years to get my dead park strip tree removed, and now I'll wait as long to have the stump removed and a new tree planted. I drive down streets that are badly cracked and have dangerous potholes, and yet you people want to create more crowding and problems instead of taking care of basic business that helps residents. We need the homeless situation resolved or we will be just like L.A. And, no, I'm not paying for any of this as my property taxes keep going up and are under siege by Sacramento to take down Prop 13.

I-1-3

I-1-4

The majority of the bicycle lanes that have been created are underused, dangerous.

I-1-5



The bike lanes recently completed on Bellflower Blvd. have caused a much needed lane to be removed creating traffic problems, and in the months since the lanes were completed, I don't think I have seen more than two bikers. Additionally, I, personally, am not going to ride a bicycle as I would be a danger to myself and possibly to others. You tout the benefits of bicycling, but I sit on my front porch and watch bikers from Cal State as well as from my neighborhood riding up and down my street and in my neighborhood. Most of these bike riders completely ignore the stop signs and breeze through 4-way stops. I had an incident a while ago when I had the right-of-way, and a biker ignored a stop and then was shocked when her breaking the law nearly got her hit...because she had no idea of road rules for bike riders! The other thing I witness from my porch is the speeding on my street which is a through street between Atherton and Stearns. Most of the drivers ignore the 25 mph limit and think the sign says, "as fast as you can go" between the cross street stop signs that they also ignore. These are problems you should be addressing!

I-1-5

I just read that Cal State has an enormous surplus of funds. I would expect that that money, and not more of my taxes, be used for any campus projects/improvements. Yet the report mentions improvements to the CSULB campus. Put some of that money towards reducing parking costs for the students so that they no longer park in my neighborhood...even though they are told not to park here. My block has severe parking restrictions as a result and is a problem for my family and friends who come to visit me and risk getting a citation if they stay too long. The traffic on the main streets in my neighborhood is already terrible from Cal State drivers. I can just imagine how bad it would be if additional apartment housing is created here with inadequate parking per unit because people drive to and from work rather than riding bikes as the committee and state seem to expect. Most people are not going to bike for miles to get to their jobs or classes. The traffic back up to get on the southbound 405 at Stearns is several blocks long in the afternoons!

I-1-6

I-1-7

Following any edicts from Sacramento is a mistake. My beautiful state is already a mess with harmful regulations and laws most of which make no sense and only hurt the citizens, especially the middle class. Between Brown and Newsom and their cronies, my native state is on the downside of a roller coaster, and it seems the leftist politicians in Long Beach are moving right along with that program.

I-1-8

I'm too old to sell up and try to start over in another state, but I hate what the politicians/bureaucrats are doing to California. My family is all here as well as my friends, doctors and activities. California is the laughing stock of the rest of the country and a prime example of what not to do to a state's residents.

I-1-9

I am over 70 and on a fixed income. My income is not going up at all while you politicians keep hitting us up for more and more for your ridiculous projects.

So, just cease and desist!

Jean Steele
90815

JEAN STEELE

LETTER CODE: I-1

DATE: June 21, 2019

RESPONSE I-1-1

This comment opines the Recirculated Draft Environmental Impact Report (EIR) is overwhelming and that the City of Long Beach (City) should not continue with additional development of apartments or bike lanes. The comment goes on to opine that the City could use more affordable parking. The comment also takes issue with expensive projects in the City that cost the taxpayers money.

This comment expresses opposition to more development and does not contain any specific comments or questions about the Recirculated Draft EIR or analysis therein. However, in response to the comment on bicycle lanes, it should be noted that the addition of bicycle lanes throughout the City is consistent with goals, strategies, and plans outlined in the adopted General Plan Mobility Element (2013). This comment will be forwarded to City decision-makers for their review and consideration. No further response is necessary.

RESPONSE I-1-2

This comment opines that the City needs good police and fire services, but that the City does not need to extend such services to undocumented individuals. The comment concludes with the assertion that the community does not need higher taxes and expensive fuel, water, and electricity.

The comment is an opinion and does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, it should be noted that the analysis and conclusions in the Recirculated Draft EIR determined that project implementation would result in less than significant impacts to police and fire services and facilities. In addition, future development occurring in the City as a result of project approval would be required to pay Development Impact Fees, a portion of which would specifically fund police and fire services to ensure the adequate provision of emergency services for the community. This comment will be forwarded to City decision-makers for their review and consideration. No further response is necessary.

RESPONSE I-1-3

This comment suggests that the City needs basic infrastructure repairs, and provides specific examples of trees and stumps that need to be removed and badly cracked roadways in their neighborhood.

This comment is a statement to the existing condition of public parkways and streets. The comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, it should be noted that the proposed Land Use Element (LUE)

includes a number of goals and strategies aimed at prioritizing infrastructure investments throughout the City. For example, LU Policy 6-6 aims to prioritize infrastructure investments to ensure that funding resources are allocated to the City's most critical needs. In addition, tree removal and trimming activities would continue to be handled by the City's Public Works Department and are not a part of the proposed project. This comment will be forwarded to City decision-makers for their review and consideration. No further response is necessary.

RESPONSE I-1-4

This comment opines that the homeless situation needs to be resolved in the City. The commenter further states that they are unwilling to pay to resolve the issue.

This comment is an opinion and does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, the proposed project aims to allow for increased densities in targeted areas of the City in an effort to provide more housing needed to meet the demand for both existing residents in overcrowded conditions as well as future residents. This is intended to help meet affordable housing requirements established by the State, thereby providing additional housing options for members of the community. The City's Health Department runs a Homeless Services Bureau, which leads City efforts to provide services for people experiencing homelessness in the City. This comment will be forwarded to City decision-makers for their review and consideration. No further response is necessary.

RESPONSE I-1-5

This comment suggests that the majority of bicycle lanes in the City are underused and dangerous. The comment also suggests that the bicycle lanes on Bellflower Boulevard have created traffic congestion and are underutilized. The commenter indicates that they would not personally ride bicycles in the City due to safety concerns, and goes on to provide several examples of many cyclists she sees on her own street; she notes many of them ignore stop signs and speed. The comment concludes by requesting that the City address these issues.

This comment is an opinion regarding the use of bike lanes and does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, it should be noted that bicycle lanes on Bellflower Boulevard have been implemented in a manner that is consistent with plans, policies, and strategies outlined in the City's adopted General Plan Mobility Element (2013). This comment will be forwarded to City decision-makers for their review and consideration. No further response is necessary.

RESPONSE I-1-6

This comment indicates that the proposed project would include improvements to the California State University, Long Beach (CSULB) campus, and suggests that these improvements be funded by the California State University System rather than from taxes paid by citizens of Long Beach. The

commenter goes on to state that improvements to the campus should include solutions to reduce parking costs on-campus so that students do not park in the commenter's neighborhood.

Improvements to, and development on, the CSULB campus are guided by the University's Campus Master Plan. As such, all campus improvements would be funded by the University through its various funding mechanisms. Improvements to the campus are not contemplated under the proposed LUE or Urban Design Element (UDE) and would not be funded by taxpayers in the community of Long Beach as part of this project.

While physical improvements to CSULB's campus are not contemplated as part of the proposed project, the proposed LUE would establish the Regional-Serving Facility PlaceType in areas adjacent to the CSULB campus. The establishment of the Regional-Serving Facility PlaceType in this area is intended to improve connectivity with the CSULB campus and to ensure that new development is consistent with and supports the direction provided in the CSULB Master Plan. The proposed LUE also includes several policies aimed at integrating the CSULB campus with the City as a whole. For example, LU Policy 5-4 requires employment and upper education campuses to transition to walkable and bikeable environments with easy accessibility to alternative modes of transportation. LU Policy 5-5 aims to connect the CSULB campus with major employment and education centers via transit. Implementation of these policies would serve to reduce traffic congestion and the demand for parking associated with the CSULB campus by improving access to alternative modes of transportation. Overall, the proposed project would improve connectivity between the CSULB campus and the City as a whole.

RESPONSE I-1-7

This comment suggests that traffic in the commenter's neighborhood is terrible, and that it would increase because of additional housing developed as part of the project. The commenter also indicates that the traffic congestion would worsen despite the expectation that people may bike to work instead of drive. The comment concludes by stating that traffic backs up for several blocks south of Interstate 405 near Stearns Street.

As previously stated, the proposed project does not contemplate physical improvements associated with the CSULB campus that would generate additional traffic. However, the proposed project does contemplate new development within the vicinity of the CSULB campus that could result in increased traffic. Traffic impacts associated with future development contemplated as part of the project were analyzed in the Traffic Impact Analysis (TIA) (June 2019). As detailed in the TIA, implementation of the proposed project would result in significant unavoidable impacts at 48 intersections within the City.

While the proposed project would result in significant unavoidable impacts related to vehicular congestion, the Mobility Element presents a number of Implementation Measures designed to promote mobility by supporting all modes of travel, thereby reducing the number of automobile trips on the roadway network. Consistent with Implementation Measures outlined in the Mobility Element, the City is currently engaged in updating the Transportation Impact Fee Program to provide for improved mobility (including pedestrian and bicycle infrastructure) and otherwise manage travel demand. However, the timing and effectiveness of improvements funded through the Transportation Impact Fee Program are not known at this time. Therefore, although these

measures would contribute to reduced congestion, their effects cannot be quantified and they cannot be considered mitigation for the impacted freeway facilities and intersections for the purposes of California Environmental Quality Act (CEQA).

RESPONSE I-1-8

This comment opines that following edicts from the State would be a mistake. The comment also includes a statement from the commenter that they cannot afford to pay for more projects in the City.

The City intends to abide by all State laws. The General Plan is written to comply with local, regional, and State laws, including State laws pertaining to affordable housing (Senate Bill [SB] 35) and reducing vehicle miles traveled (SB 743).

Overall, the City also intends to comply with the assigned Regional Housing Needs Assessment (RHNA) growth target, which is currently a requirement for 7,048 new units by the year 2021. Further, the City intends to comply with the United States Department of Housing, Assessment of Fair Housing (AFH) recommendation to provide an additional 21,476 housing units to address housing needs due to overcrowding of existing housing units in the City documented in the AFH.

RESPONSE I-1-9

This comment indicates that the commenter is limited in their ability to move to another state, but expresses frustration with recent legislation passed by the State. The comment also notes that the commenter is living on a fixed income and cannot afford to pay for more ridiculous projects in the City.

This comment is an opinion and does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. This comment will be forwarded to City decision-makers for their review and consideration. No further response is necessary.

From: [Alison Spindler](#)
To: [Alyssa Helper](#); [Ashley Davis](#)
Cc: [Patricia Diefenderfer](#)
Subject: FW: Limit density and population in Long Beach
Date: Monday, June 24, 2019 11:15:04 AM

-----Original Message-----

From: Janice Furman <j.furman1@verizon.net>
Sent: Sunday, June 23, 2019 11:19 AM
To: LBDS-EIR-Comments <LBDS-EIR-Comments@longbeach.gov>
Subject: Limit density and population in Long Beach

I believe our city has the right and responsibility to protect our size and not kowtow to the state on these issues. Long Beach traffic has increased dramatically in the past few years. The elimination of traffic lanes on Bellflower and Broadway have greatly contributed to the problem. At least on Bellflower that I travel daily, I almost never see a bike in the new lanes. On sidewalks, yes occasionally. Yesterday I saw one biker on the outside of the parking spaces. Many of the green "protective" markers have been damaged and if I were a biker I would not think bike lanes were safe at all.

| I-2-1
| I-2-2

The opening of the 2nd and PCH mall will greatly increase the traffic on PCH and 2nd. Then later more residences on PCH will compound the problem with not hope of more traffic lanes. We know these are problems why do we not use our city planning department to address these issues?

| I-2-3

I do appreciate the reduction of some building heights on the East side. Is the new CSULB proposed dormitory going to restrict residents to having no cars? Parking there is already maxed out.

| I-2-4

Let's maximize our city's power to protect our fine city.

| I-2-5

Thank you

Resident of Park Estates for 48 years

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JANICE FURMAN

LETTER CODE: I-2

DATE: June 23, 2019

RESPONSE I-2-1

This commenter opines that the City of Long Beach (City) has the right and responsibility to protect its size and not to kowtow to the State.

This comment is an opinion and does not address the adequacy or completeness of the Recirculated Draft Environmental Impact Report (EIR); does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, it should be noted that the City intends to abide by all State laws. This comment will be forwarded to City decision-makers for their review and consideration. No additional response is necessary.

RESPONSE I-2-2

This commenter suggest that traffic has dramatically increased in the City, which has in part, been because of the removal of traffic lanes on Bellflower and Broadway. The comment further states that the new bicycle lanes in the City are not being utilized, which the commenter indicates is partially because protective markers on the lanes are damaged causing the lanes to be unsafe.

This comment opines about traffic but does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, it should be noted that the adopted Mobility Element (2013) of the City's General Plan includes a number of mobility improvements aimed at improving access to alternative modes of transportation, including bicycle lanes. Where determined appropriate, the City has reduced the vehicular capacity of certain roadways in order to add protected bicycle lanes in alignment with not only the Mobility Element, but also in alignment with State goals and requirements for greenhouse gas reduction, state complete streets legislation, and the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

RESPONSE I-2-3

This comment opines that the opening of a mall on 2nd Street and Pacific Coast Highway (PCH) will greatly increase traffic in the area, which will worsen with the introduction of more residential units in the future. The commenter asks what the City's Planning Department is doing to address these issues.

This comment refers to the 2nd Street and PCH project that was approved by the City in 2017. This does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of

the *State CEQA Guidelines*. However, it should be noted that a Traffic Impact Study was prepared as part of a separate environmental review process for the 2nd Street and PCH project to which the commenter is referring. A copy of this study can be found at the following location: <http://www.longbeach.gov/lbds/planning/environmental/reports/>.

Refer to Response to Comment I-1-7 for a description of project-related traffic impacts associated with the future implementation of new development envisioned under the proposed Land Use Element (LUE) through year 2040.

RESPONSE I-2-4

This comment expresses appreciation to the City for reducing heights in the eastern area of the City, and goes on to ask if the newly proposed California State University, Long Beach (CSULB) dormitory will restrict residences to having no cars. The commenter notes that parking in that area of the City is already a problem.

Growth on the CSULB campus is guided by the Campus Master Plan and is undertaken by the University, which is a separate and independent entity from the City of Long Beach. As such, the proposed CSULB student housing project is not a part of the LUE and Urban Design Element (UDE) project. However, LU Policy 5-4 requires employment and upper education campuses to transition to walkable and bikeable environments with easy accessibility to alternative modes of transportation. As such, the proposed project aims to reduce traffic congestion and the demand for parking associated with the CSULB campus by improving access to alternative modes of transportation.

RESPONSE I-2-5

This comment concludes by suggesting that the City should maximize its power to protect itself.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. Therefore, no additional response is necessary.

From: [LBDS-EIR-Comments](#)
To: [Ashley Davis](#); [Alyssa Helper](#)
Subject: FW: LUE
Date: Friday, August 16, 2019 4:19:34 PM

From: Anne Proffit <anne.proffit@gmail.com>
Sent: Friday, August 16, 2019 4:17 PM
To: LBDS-EIR-Comments <LBDS-EIR-Comments@longbeach.gov>; LBDS-EIR-Comments <LBDS-EIR-Comments@longbeach.gov>
Cc: Alison Spindler <Alison.Spindler@longbeach.gov>
Subject: LUE

Attn LBDS:

As you continue to disintegrate any semblance of character in the city of Long Beach, you will be known for killing this corrupt town.

I-3-1

From one end to the other, your insistence on sky-high tenements (and therefore rents) causes many that are stakeholders to pull up those stakes and leave.

While this opens the door for those developers that line your pockets, it also makes Long Beach into just another overwhelmed beach city with too many multi-family dwellings with a paucity of green space and a dearth of livability.

I-3-2

I have lived here almost 45 years and have watched as Alamitos Beach turned into cracker boxes with the appeal of a toothbrush, as downtown becomes a paean to the mayor's desire for cracker box high-rises with zero parking and as Belmont Shore businesses leave in droves.

I-3-3

Sure you'll make money with these horrible plans you've put together that benefit zero single stakeholders.

I-3-4

You will be reviled for these choices for a century to come.

Anne Proffit
140 Linden Avenue
90802

I agree totally with Janet West's email:

I-3-5

I oppose promoting high-density residential and mixed use development along transit corridors. Per state law, the definition of transit corridors includes planned transportation and doesn't limit the designation to existing transportation. SCAG has a massive transportation plan that has a cost of over \$600 BILLION. The funding has not been provided.

Attachment
1

I oppose the undefined and vague terms of "neighborhood hubs," "re-invent commercial corridors," "poor land

utilization," "specific corridors," and "focused locations (areas of change and target areas)."

I oppose the inaccuracy of the map which designates two areas along Bellflower Blvd. as mixed-use in contradiction to the Long Beach City Council's vote. I have brought this to the attention of Christopher Koontz and Daryl Supernaw but the errors have not been corrected.

I oppose approval until there's been a thorough analysis of the impacts throughout the city in relation to new and existing State Housing Laws and new and existing State Funding mechanisms. Among those new laws is AB 101 which contains many housing policies and funding mechanisms for which the public was not given adequate time to analyze, and communicate concerns to legislators. The text was added (6/20/19), the passage by the State Senate (7/1/19), the passage by the State Assembly (7/5/19), and being signed by Governor Newsom a few days later.
Hide or report this

Attachment
1

ANNE PROFFIT

LETTER CODE: I-3

DATE: August 16, 2019

RESPONSE I-3-1

This comment opines that the City of Long Beach (City) has, and will continue to, disintegrate the visual character of the City through the continued implementation of high-rise developments.

This comment is an opinion about the character of development and does not address the adequacy or completeness of the Recirculated Draft Environmental Impact Report (EIR); does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, it should be noted that project-related impacts with respect to visual character are addressed in Section 4.1, Aesthetics, of the Recirculated Draft EIR. Future development facilitated by the proposed project would change the visual character of the planning area, specifically within the Major Areas of Change, as compared to existing conditions. However, the site design, landscaping, and architectural design of future projects would be required to be consistent with goals, policies, strategies, and development standards established by the proposed Urban Design Element (UDE), which are intended to avoid, reduce, offset, or otherwise minimize identified potential adverse impacts of the proposed project or provide significant benefits to the community and/or to the physical environment. Furthermore, development envisioned by the proposed project is intended to improve the overall visual character of the City through new development projects that would shape the urban environment of the City, while preserving existing development that defines its unique aesthetic character. Impacts to visual resources were determined to be less than significant.

RESPONSE I-3-2

This comment opines that recently proposed high-rise projects line the pockets of City officials and overwhelm the City with too many multi-family units, which ultimately reduces livability in the City.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, it should be noted that the proposed Land Use Element (LUE) was not created for, or by, developers. The plan's development was directed by the City Council with City staff support and through an extensive public engagement process. The plan is intended to help meet the need for housing for both existing residents impacted by overcrowding and rental cost burden due to the housing shortage, as well as the need for housing for future residents. The plan is also intended to create distinct residential neighborhoods, employment centers, open spaces and other areas. Development of an updated LUE helps the City comply with State law. Developers wishing to invest in the City's future will be subject to the regulations and requirements applicable at the time they submit plans for development.

RESPONSE I-3-3

This comment indicates that the commenter has lived in the community for almost 45 years and has witnessed the Alamitos Beach area turn into an area with crackerbox development. The commenter also opines that new high-rise developments are not being developed with parking, which causes neighborhood businesses to leave the Belmont Shores area.

The proposed project would allow for height and density increases within the Alamitos Beach and Belmont Shores area; however, the proposed project is a long-range planning document intended to guide future development through year 2040 and would not result in immediate changes to these areas. As described in the proposed LUE, larger-scale development envisioned under the project would be required to transition to existing smaller-scale development. New development of greater massing must also be sensitive to smaller buildings in this area. Furthermore, the proposed UDE establishes goals and policies with which new development would be required to comply to ensure new buildings are compatible with existing uses. Therefore, the proposed project would aim to improve the urban fabric of the City, including the Alamitos Beach and Belmont Shores areas, by establishing goals, policies, and strategies that would allow for future higher-density development that would be compatible with and would transition to existing surrounding lower-density development. No “crackerbox” development, often defined as cheaply constructed box-like housing, is envisioned under the proposed project.

In addition, the proposed LUE will adhere to all parking requirements established by the City and will not specifically change any parking regulations. All new developments must provide parking that will be in accordance with zoning requirements. In most cases, new developments are required to provide considerably more off-street parking than was required for buildings built in the 1920s, 1930s, and 1940s (since Long Beach did not have any parking requirements until 1953).

RESPONSE I-3-4

This comment opines that the City will make money off the proposed project, despite the fact that it will not benefit its stakeholders.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, as previously stated, the proposed LUE was not created for, or by, developers. The plan’s development was directed by the City Council with City staff and is intended to accommodate both the existing and projected need for housing and jobs, while also creating distinct residential neighborhoods, employment centers, open spaces, and other areas. Developers wishing to invest in the City’s future will be subject to the regulations and requirements applicable at the time they submit plans for development. Although the proposed LUE allows for future construction of additional housing and commercial uses, it does not contain any specific incentives for developers.

In addition, development impact fees are posted on the City’s website and are collected by the Long Beach Development Services Department to cover the cost of upgrading roads, police, fire, storm

water, and school facilities. These fees fund the related service providers and do not fund the Long Beach Development Services Department, which is a City department.

RESPONSE I-3-5

This comment expresses agreement with the comments outlined in the comment letter authored by Janet West. The letter from Janet West is included as Attachment 1.

Please refer to Responses to Comments I-6-1 through I-6-4, which respond specifically to comments made by Janet West that have been incorporated as Attachment 1 to this letter.

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From: corlisslee@aol.com
To: [Alison Spindler](mailto:Alison.Spindler@longbeach.gov); toLBDS-EIR-Comments@longbeach.gov; [LBDS-EIR-Comments](mailto:LBDS-EIR-Comments@longbeach.gov)
Cc: renee_matt@live.com; lcholl2011@gmail.com
Subject: LUE Program/EIR concerns/comments due Friday, August 16, 2019 deadline
Date: Friday, August 16, 2019 2:50:50 PM

Alison,
 My comments and concerns about the program EIR for the LUE are as follows:

1) Noise impacts need serious consideration and should not be listed as *"oh well, nothing we can do about that."* At each project site, there should be a plan on how to monitor sound and minimize the impact of noise. There should be equipment to monitor the intensity, regular reporting on the calculated impact and a list of actions that direct developers and contractors on how-to reduce the problem. I have endured noisy neighbors in the past that blasted loud music for hours on end on a daily basis and I can attest to the misery of those conditions. A sustained high level of noise is a psychological torment that is debilitating. The people I know that endure noise from the big events on the beach deal with this situation and can give you more information on what would help. *Please contact Linda Scholl lscholl2011@gmail.com 714 420 3196 for more extensive information on this issue.*

I-4-1

2) The equestrian overlays need to be included on the maps. Without that protection, this community will not survive the development that is planned along the LA River. Just as bicycles are a transportation mode, horses are another option. Those that participate in the equestrian lifestyle in our city are reducing traffic. The long history of equestrian zoning and protection is threatened if we do not make a concerted effort to preserve it. *For more information on what is needed in the EIR to preserve the equestrian lifestyle, please contact Renee Lawler renee_matt@live.com or call 562 900 9416.*

I-4-2

In general I am concerned about **program level EIRs** (PEIRs) as they tend to be generic. "One size fits all" rarely fits anybody. The *project level EIRs* are far better suited to ensure that we attend to development such that it fits into the situation and location with intelligent consideration of the surroundings, traffic situation and negative impacts to neighborhoods. Please ensure that PEIRs do not obviate project level EIRs.

I-4-3

The City should not favor the convenience of developers and contractors over quality of life for residents and business owners that are the mainstay of our city.

I-4-4

Please protect quality of life in Long Beach by including the above topics in the PEIR for the LUE.

Respectfully,

Corliss Lee
 (714 401 7063)
 3072 Knoxville Ave.
 Long Beach, Ca 90808

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CORLISS LEE

LETTER CODE: I-4

DATE: August 16, 2019

RESPONSE I-4-1

This comment opines that noise impacts need to be given serious consideration and should not be written off without regard to further consideration of how impacts can be reduced. The comment also suggests that developers should be required to follow a list of actions aimed at reducing noise. The comment notes that exposure to excessive noise can be debilitating and concludes with contact information to an individual with the City of Long Beach (City) that can be contacted should a resident choose to inquire about this matter.

Noise impacts associated with the proposed project are analyzed in depth in the *Noise and Vibration Impact Analysis* (June 2019) and are summarized in Section 4.5, Noise, of the Recirculated Draft Environmental Impact Report (EIR).

As described in the *Noise and Vibration Impact Analysis* and Section 4.5, Noise, the proposed project would result in significant unavoidable construction-related impacts because of the unknown extent and timing of construction of future projects. Construction activities associated with development anticipated under the project would be subject to compliance with the City's Noise Ordinance to ensure that noise impacts from construction sources are reduced. Some projects may have unusual or extremely loud construction activities (e.g., pile driving, nighttime construction work, or unusually long construction duration, etc.). Therefore, construction projects may result in a substantial increase in ambient noise levels, and mitigation would be required. Mitigation Measure MM NOI-1 would require future construction projects to implement construction best management practices to reduce potential construction noise impacts for nearby sensitive receptors. Although Mitigation Measure MM NOI-1 would reduce construction noise associated with future projects, because the location, the proximity to sensitive receptors, and the type of construction equipment associated with new construction projects are all unknown at this time, construction noise impacts are considered significant and unavoidable. Therefore, construction impacts were not written off without consideration as to what measures could be implemented to reduce such impacts to a level below significance. Rather, impacts were identified as significant and unavoidable in an abundance of caution due to the unknown nature of future projects at this time.

As described in the Noise and Vibration Assessment and Section 4.5, Noise, future projects shall be required to implement Mitigation Measure MM NOI-1, which requires the following best management practices during construction:

- Schedule high-noise and vibration-producing activities to a shorter window of time during the day outside early morning hours to minimize disruption to sensitive uses.
- Grading and construction contractors shall use equipment that generates lower noise and vibration levels, such as rubber-tired equipment rather than metal-tracked equipment.

- Construction haul trucks and materials delivery traffic shall avoid residential areas whenever feasible.
- The construction contractor shall place noise- and vibration-generating construction equipment and locate construction staging areas away from sensitive uses whenever feasible.
- Locate equipment staging in areas that would create the greatest possible distance between construction-related noise sources and noise-sensitive receptors nearest the active project site during all project construction.
- Prohibit extended idling time of internal combustion engines.
- Ensure that all general construction related activities are restricted to 7:00 a.m. and 7:00 p.m. on weekdays and federal holidays, and between 9:00 a.m. and 6:00 p.m. on Saturdays. No construction would be permitted on Sundays. Construction activities occurring outside of these hours may be permitted with authorization by the Building Official and/or permit issued by the Noise Control Officer.
- All residential units located within 500 feet of a construction site shall be sent a notice regarding the construction schedule. A sign legible at a distance of 50 feet shall also be posted at the construction site. All notices and the signs shall indicate the dates and durations of construction activities, as well as provide a telephone number for a “noise disturbance coordinator.”
- A “noise disturbance coordinator” shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early or bad muffler, etc.) and shall be required to implement reasonable measures to reduce noise levels.
- For all projects determined to have unusual or extremely loud construction activities (e.g., pile driving, nighttime construction work, or unusually long construction duration, etc.) that would generate noise levels over 90 dBA L_{eq} at nearby sensitive receptors, temporary noise control blanket barriers shall be installed in a manner to shield sensitive receptors land uses.

Operational noise impacts were also evaluated in the *Noise and Vibration Impact Analysis* that was prepared for the project, and were summarized in Section 4.5, Noise, of the Recirculated Draft EIR. As noted in the technical report and the EIR section, the proposed project would not create a cumulatively considerable contribution to regional noise conditions. Specifically, implementation of the proposed project would not result in a 3 A-weighted decibel (dBA) increase in traffic noise levels in the City and would not generate a significant impact under cumulative noise conditions.

RESPONSE I-4-2

This comment requests that the equestrian overlay needs to be included on the proposed Land Use Element (LUE) maps. The comment states that long history of equestrian zoning and protection is threatened if there is not an effort to preserve it.

The current Zoning Code includes a Horse Overlay District that allows for equestrian uses within Residential zoning districts. The proposed LUE would not change or remove the Horse Overlay District from the zoning code and would allow for horse trails within the Open Space PlaceType, particularly in areas along the Los Angeles River. The City also included Land Use Strategy No. 11 for the Wrigley area in the proposed LUE, which aims to respect and maintain equestrian uses within the Wrigley Heights area and promote shared use and maintenance of the area trail system. The addition of this strategy was incorporated in response to public comments on the 2016 Draft EIR and is reflected in the updated LUE. Furthermore, the proposed project is a long-range planning document aimed at guiding future development through year 2040 and does not include any physical improvements that would result in impacts to existing equestrian facilities. Future individual projects requiring discretionary actions would also be subject to separate environmental review on a project-specific basis, in accordance with the provisions of the California Environmental Quality Act (CEQA) and the *State CEQA Guidelines*. Therefore, project approval would not result in significant adverse impacts to existing equestrian facilities in the City.

RESPONSE I-4-3

This comment expresses concern over the use of a Program EIR verses a Project EIR because a Program EIR is too generic. The comment asks the City to ensure that Program EIRs do not obviate Project EIRs.

Unlike a Project EIR, which addresses the environmental impacts of a specific development project, a Program EIR addresses the potential impacts of a series of actions that can be characterized as one large project. Because there is no specific development project being proposed at this time, a Project EIR cannot be prepared; no specific project-level details are available. The proposed General Plan LUE and Urban Design Element (UDE) are part of a planning document that outlines the type of future development projects that are allowed by PlaceType. Therefore, preparation of a Program EIR for the LUE and UDE project is appropriate, and required, as the General Plan Elements are one large project that are related, as described in *State CEQA Guidelines* Section 15168 either:

- 1) Geographically
- 2) A logical parts in the chain of contemplated actions,
- 3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
- 4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

The use of a Program EIR provides an occasion for a more exhaustive consideration of effects and alternatives than otherwise would be practical under a Project EIR. However, future discretionary projects facilitated by certification of a Program EIR must be further evaluated in light of the Program EIR to determine whether or not an additional environmental document must be prepared. Therefore, the City will determine whether future projects require the preparation of a new Initial Study, Mitigated Negative Declaration, or new EIR. Under CEQA, environmental documentation is

required on all discretionary actions, which includes the adoption of the proposed LUE and UDE. The purpose of the CEQA process is to disclose environmental impacts of a proposed project to the general public, who then have the ability to have their comments considered by decision-makers.

The proposed project includes the adoption of the proposed LUE and UDE, which are intended to guide the future development patterns and the aesthetic character of the City through the implementation of goals, policies, and implementation strategies. The proposed project would be implemented over the next 21 years, through year 2040. This Recirculated Draft EIR has been prepared as a Program EIR for the following reasons:

- The proposed project would be implemented over a 21-year period.
- The proposed project would be implemented over a large geographic area, which is defined as the total area within the City limits (approximately 50 square miles).
- Development plans and details have not been developed for new projects that could be facilitated by project approval.

Therefore, the use of a Program EIR is appropriate in evaluating project-related environmental impacts resulting from implementation of the proposed project.

RESPONSE I-4-4

This comment opines that the City should not favor the convenience of developers over the quality of life for residents and businesses in the City. The comment concludes by asking the City to protect the quality of life for people in the City, including those outlined in the Program EIR for the City.

This comment is an opinion and does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, it should be noted that the proposed LUE includes several strategies aimed at improving the quality of life of residents in the City (e.g., LU-M-54 and Westside and Wrigley Strategy No. 10).

From: [Glennis Dolce](#)
To: [LBDS-EIR-Comments](#)
Subject: Recirculated Draft EIR Public Review Period: 6/18/19-8/16/19
Date: Friday, August 16, 2019 4:07:01 PM

My comments regarding the Draft EIR concern the desire on the part of the city to make EIRs generic. **I support keeping EIRs specific** for their obvious ability to look at each project on an individual basis, addressing the individual needs and concerns to each unique development. Yes, it may take more time, you may have to interact more with the public, and we may have some VERY VALID concerns to raise. Plus the public is a valuable resource of great and free ideas! Use them!

I-5-1

ALSO

Please also include noise issues as a significant impact! It is! I live under the airport runways and know for a FACT how noise issues impact quality of life and the ability to use my property as desired. Noise as a result of development, uses, and construction all take a toll on neighborhoods and the environment, and wildlife.

I-5-2

AND

Horse overlay zones need to be added into the PEIR as promised! I am not a horse enthusiast but when my kids were young we had the opportunity to introduce neighborhood children to the equestrian lifestyle via the local stables here in Long Beach. *Preserve the equestrian horse overlay zones for the future children of Long Beach!*

I-5-3

Thank you!

Glennis Dolce

District 7

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GLENNIS DOLCE

LETTER CODE: I-5

DATE: August 16, 2019

RESPONSE I-5-1

This comment expresses concern over the use of a Program Environmental Impact Report (EIR) for the project and expresses support for Project EIRs.

Refer to Response to Comment I-4-3 for further discussion related to the use of a Program EIR for the proposed project. In accordance with the California Environmental Quality Act (CEQA), preparation of a Project EIR would be required if the City of Long Beach (City) determines that a future discretionary project may have a significant effect on the environment.

RESPONSE I-5-2

This comment opines that noise should be identified as a significant impact because existing noise currently affects the community.

Refer to Response to Comment I-4-1 for further discussion related to the proposed project's impacts with respect to construction noise. As discussed in this response, construction noise impacts were identified as significant and unavoidable despite the implementation of applicable mitigation measures due to the unknown timing and extent of construction of future projects.

Operational noise impacts were also evaluated in the *Noise and Vibration Impact Analysis* (June 2019) that was prepared for the project, and were summarized in Section 4.5, Noise, of the Recirculated Draft EIR. As noted in the technical report and the EIR section, the proposed project would not create a cumulatively considerable contribution to regional noise conditions. Specifically, implementation of the proposed project would not result in a 3 dBA increase in traffic noise levels in the City and would not generate a significant impact under cumulative noise conditions.

Additionally, implementation of the proposed Land Use Element (LUE) and Urban Design Element (UDE) policies and land use strategies would require the City to consider noise and land use compatibility issues when evaluating future individual development proposals. For example, Policy UD 26-2 requires new development projects to incorporate site planning and project design strategies to separate or buffer neighborhoods from incompatible activities or land uses and LU Policy 16-8 requires that all new developments in areas with noise levels greater than 60 dBA CNEL prepare an acoustical analysis. LU Policy 16-8 also requires new residential land uses to be designed to maintain a standard of 45 dBA L_{dn} (the day-night average level) or less in building interiors. Any new noise-generating sources would also be subject to compliance with Chapter 8.80, Noise, of the City's Municipal Code, which sets exterior noise standards for the various land uses within the City. Therefore, implementation of the proposed project would result in a less than significant cumulative impact under long-term cumulative noise conditions, and no mitigation would be required.

RESPONSE I-5-3

This comment opines that the project should include horse overlay zones as promised by the City.

The current Zoning Code includes a Horse Overlay District that allows for equestrian uses within Residential zoning districts. The proposed LUE would not change or remove the Horse Overlay District from the zoning code and would allow for horse trails within the Open Space PlaceType, particularly in areas along the Los Angeles River. The City also included Land Use Strategy No. 11 for the Wrigley area in the proposed LUE, which aims to respect and maintain equestrian uses within the Wrigley Heights area and promote shared use and maintenance of the area trail system. The addition of this strategy was incorporated in response to public comments on the 2016 Draft EIR and is reflected in the updated LUE. Furthermore, the proposed project is a long-range planning document aimed at guiding future development through year 2040 and does not include any physical improvements that would result in impacts to existing equestrian facilities. Future individual projects requiring discretionary actions would also be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, project approval would not result in significant adverse impacts to existing equestrian facilities in the City.

From: [Janet West](#)
To: [LBDS-EIR-Comments](#)
Subject: Recirculated Draft EIR Public Review Period: 6/18/19-8/16/19
Date: Friday, August 16, 2019 3:29:58 PM

I oppose promoting high-density residential and mixed use development along transit corridors. Per state law, the definition of transit corridors includes planned transportation and doesn't limit the designation to existing transportation. SCAG has a massive transportation plan that has a cost of over \$600 BILLION. The funding has not been provided.

I-6-1

I oppose the undefined and vague terms of "neighborhood hubs," "re-invent commercial corridors," "poor land utilization," "specific corridors," and "focused locations (areas of change and target areas)."

I-6-2

I oppose the inaccuracy of the map which designates two areas along Bellflower Blvd. as mixed-use in contradiction to the Long Beach City Council's vote. I have brought this to the attention of Christopher Koontz and Daryl Supernaw but the errors have not been corrected.

I-6-3

I oppose approval until there's been a thorough analysis of the impacts throughout the city in relation to new and existing State Housing Laws and new and existing State Funding mechanisms. Among those new laws is AB 101 which contains many housing policies and funding mechanisms for which the public was not given adequate time to analyze, and communicate concerns to legislators, before the text was added (6/20/19), the passage by the State Senate (7/1/19), the passage by the State Assembly (7/5/19), and being signed by Governor Newsom a few days later.

I-6-4

Janet West
 2051 Palo Verde Ave.
 Long Beach, CA 90815
jayjay76511@gmail.com

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JANET WEST

LETTER CODE: I-6

DATE: August 16, 2019

RESPONSE I-6-1

This comment expresses opposition to high-density residential and mixed-use development along transit corridors. The comment goes on to note that State law requires new development to be located on existing or planned transit routes. The commenter opines that because the Southern California Association of Governments (SCAG) does not have funding to implement planned transit improvements in the City of Long Beach (City), development in these areas should not occur.

The comment does not address the adequacy or completeness of the Recirculated Draft Environmental Impact Report (EIR); does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*.

The commenter is correct in asserting that State law encourages new development to occur in areas served by existing or planned transit infrastructure, as evidenced by the recent enactment of Senate Bill (SB) 743. SB 743 facilitated removal of the level of service (LOS) method when evaluating traffic impacts under the California Environmental Quality Act (CEQA) and instead focused on vehicle miles travelled (VMT), or other measures that promote reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a multitude of land uses.

In addition to complying with State objectives aimed at locating new development near transit routes, the City intends on complying with State mandates with respect to housing. As such, the project would provide for future development opportunities that would alleviate overcrowding documented in the City's Assessment of Fair Housing (AFH) (21,476 units) and would accommodate projected growth established in the 2016–2040 SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (18,230 new residents and employment growth of 28,511 new jobs in Long Beach by 2040). The proposed project would also provide for future development opportunities consistent with housing needs established by the California Department of Housing and Economic Development in the Regional Housing Needs Assessment (RHNA) (7,048 new dwelling unit). In total, 28,524 housing units are required to accommodate the housing needs of projected population (7,048 housing units needed) and existing (21,476 housing units needed to address overcrowding). It is this number of units, which complies with both the State and federal assessments that must be accommodated in City planning documents such as the proposed project.

In order to comply with State objectives aimed at promoting development near transit routes and State mandates with respect to housing needs, the project includes the Transit-Oriented Development PlaceType, which targets new development along the Metro Blue Line along Long Beach Boulevard and the City's Downtown area. The Neighborhood Serving Corridor (NSC) PlaceType has also been put in place along transit corridors throughout the City, furthering the goal of focusing density near transit.

RESPONSE I-6-2

This comment expresses opposition to the use of "neighborhood hubs," "re-invent commercial corridors," "poor land utilization," "specific corridors," and "focused locations (areas of change and target areas)" in the proposed Land Use Element (LUE) and Urban Design Element (UDE).

This comment expresses opposition to certain terms in the proposed LUE, but does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. Therefore, no additional response is necessary.

RESPONSE I-6-3

This comment expresses concern about the accuracy of the PlaceTypes Map, which designates two areas along Bellflower Boulevard as mixed-use, which the commenter opines is in direct contradiction to the City Council vote to change the maps in 2016. The commenter notes that they have brought this to the attention of City staff.

There are three PlaceTypes along the Bellflower Boulevard corridor. The Community Commercial PlaceType is a commercial only PlaceType. The Founding and Contemporary Neighborhood PlaceType is a low-density residential PlaceType that contemplates a small amount of potential neighborhood serving retail. The multi-family PlaceType allows residential only. Therefore, no mixed-use PlaceTypes are found along the Bellflower Boulevard corridor. There is no NSC PlaceType along the Bellflower Boulevard corridor. On older versions of the LUE maps, there were some NSC PlaceType designations along Bellflower Boulevard, but those were amended by the City Council in March 2018 as reflected in this updated project.

RESPONSE I-6-4

This comment recommends that the City Council deny approval of the project until it has been through an analysis of impacts throughout the City in relation to new and existing State Housing laws and State funding mechanisms. The comment notes that Assembly Bill (AB) 101 was recently passed, without time for the public to review.

The City is obligated to comply with State law, including State laws pertaining to housing. The revised LUE addresses both projected housing needs, as identified as part of the RHNA (enforceable by the State Housing Accountability Act), and the number of housing units needed to alleviate documented overcrowding (consistent with the United States Department of Housing Assessment of Fair Housing for the City). The City's assigned Regional Housing Needs Assessment (RHNA) growth target is 7,048 new units by year 2021. Based on the United States Department of Housing AFH for the City, a total of 21,476 additional housing units are recommended to address housing needs due to overcrowding of existing housing units in the City. Furthermore, the proposed LUE and UDE are long-range planning documents that would guide future development projects through year 2040. Future projects facilitated by approval of the LUE and UDE that would require discretionary actions would be required to conduct a CEQA analysis of the environmental impacts, which would include an analysis of the project's consistency with applicable local, regional, State and federal regulations.

AB 101 was passed by the California Legislature and approved by Governor Gavin Newsom on July 31, 2019. AB 101 provides approximately \$2.5 billion in funding to local governments to address the State's housing and homelessness crisis and establishes incentives to encourage local governments to increase housing production. Additionally, AB 101 allows the State to impose penalties upon failure of local governments to comply with State Housing Law and the RHNA process (as discussed in Response to Comment I-6-1). As such, if the City's General Plan does not substantially comply with State Housing Law, courts may impose monthly fines on the City until the General Plan is brought into compliance with such laws. Further, if the City's General Plan did not comply with State law, the City would not be eligible for incentives, such as grant opportunities, funding, and tax credits, provided by the State to address the housing and homelessness crisis.

The proposed project complies with local, regional, and State laws including all housing laws, AB 101, and the assigned RHNA growth target. The City intends to abide by all State laws and to comply with the assigned RHNA growth target, which requires the City to plan for 7,048 new dwelling units to accommodate future population growth.

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From: [jeovalle](#)
To: [Alison Spindler](#)
Subject: LUE Concerns and Comments
Date: Friday, August 16, 2019 5:00:28 PM
Importance: High

Alison,

My comments and concerns about the LUE are as follows:

To realize the benefit of greater density Open Space must play an integral part. As an eight-district resident of west Long Beach, I object to the fact that the LUE proposes higher density without contrasting it with greater open space. Children and elderly should not have to cross major streets like Long Beach Blvd or Atlantic or Del Amo Blvd to enjoy a park or a community center.

I-7-1

Higher density must also follow a pattern based on a master plan of infrastructure as it relates to mobility and again green place types, work centers etc. in order for it to be successful, not the other way around. The LUE must also take into consideration community justice and focus density LUE plans based on overall need and future goals for all for all residents to enjoy. I hope that the City will have competent employees that will bring the LUE to fruition. However, I have my concerns that the City just as it has done with so many other ill planned programs such as the bicycle lanes in particular Broadway, but also Long Beach Blvd in NLB and many others, will take the approach of working on the cheap and at the end we the tax payers end up paying more in the long run or living with half-baked ideas. Rather, the City should take a slow approach at development and do it right the first time. There are many positive examples of that in other communities and countries throughout the world I suggest your staff study and make revisions as needed.

I-7-2

I-7-3

I-7-4

The City should not favor the convenience of developers and special interest groups over our environment, quality of life for residents and small business owners that are the mainstay of our city. Furthermore, the City should again take the time to listen, share, educate, and work with all residents of Long Beach. The LUE is a plan for the future and we the residents are all stakeholders.

I-7-5

Please protect and improve the quality of life in Long Beach for all residents.

I-7-6

Respectfully,

Juan E. Ovalle
 Eight District Resident of Long Beach

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JUAN E. OVALLE

LETTER CODE: I-7

DATE: August 16, 2019

RESPONSE I-7-1

This comment expresses opposition to increased densities included as part of the project, as the commenter opines that an increase in density should be accompanied by an increase in open space.

The primary objective of increasing density is to meet existing and future housing needs in the City of Long Beach (City). Pursuant to State law, the General Plan must accommodate the projected population growth, which the State of California estimates for each local jurisdiction or city. The City's obligations to create housing are detailed in the City's State-approved General Plan Housing Element (2014). The proposed Land Use Element (LUE) is legally required to be consistent with the Housing Element since both elements provide the residential uses and density range for housing development in the City.

One major purpose of the proposed LUE is to allow flexibility and a mix of compatible land uses. Allowing higher densities in specific locations expands the City's housing stock and creates diverse distinct neighborhoods. All new development will continue to have requirements to provide on-site open space. Despite the fact that the majority of new housing units contemplated in this plan are intended to serve existing Long Beach residents impacted by overcrowding, all new development will continue to be required to pay park impact fees, which are used to pay for additional park space to accommodate the needs of additional residents. The proposed LUE also aims to preserve existing open space resources throughout the City through the establishment of the Open Space PlaceType and supporting goals and policies. For example, Goal No. 8 in the proposed LUE aims to create, restore, and preserve more open space in the City. This goal was established in recognition that the City needs a wide variety of parks and open space within certain neighborhoods. Strategy No. 18 aims to increase open space in urban areas of the City, and LU Policies 18-1 through 18-11 aim to prioritize the creation and integration of open space in established neighborhoods. In addition, LU Policy 11-5 also aims to ensure that neighborhoods have access to open spaces, parks, trails, and recreational programs. Therefore, the proposed project would retain and create open space areas located throughout the City, while also allowing for increased density within transit-rich areas of the City.

RESPONSE I-7-2

This comment opines that higher density must follow a pattern based on a master plan of infrastructure as it relates to mobility, open space areas, and businesses.

Refer to Response to Comment I-7-1 for further discussion regarding the increased densities proposed as part of the project and the associated impact of the project on open space in the City.

The proposed LUE and Urban Design Element (UDE) are long-range planning documents that aim to shape the pattern of physical development and visual character of the City through year 2040. The proposed LUE and UDE also establish goals, policies, and strategies aimed at identifying

development opportunities throughout the City, while also managing the transportation network and infrastructure systems.

Land use patterns outlined in the proposed LUE were established with consideration of the existing and future transportation network and the reliability of infrastructure systems to accommodate growth anticipated under the proposed LUE. For example, LU Policy 6-6 aims to continue capital improvement planning and prioritizing infrastructure investments to ensure that adequate funding is available for infrastructure improvements. Strategy No. 17 also aims to improve public infrastructure to serve new and existing neighborhoods. LU Policy 17-1 recognizes that new development envisioned under the proposed LUE must occur in a manner that is consistent with available infrastructure. Specifically, LU Policy 17-1 aims to coordinate land use development plans with infrastructure investments. Therefore, the proposed project has also been developed with consideration of the infrastructure network.

RESPONSE I-7-3

This comment opines that the proposed LUE should consider community justice and focus density based on the overall need for such density.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, it should be noted that the proposed project includes several policies aimed at supporting development patterns that promote environmental and community justice. For example, the project aims to promote public infrastructure improvements and investments in disadvantaged communities that specifically address health risks by limiting air pollutant exposure, providing health care infrastructure, improve active living and transportation options, and promote access to healthy food and recreation options (LU Policy 14-7 and LU Policy 14-8). The proposed LUE also includes LU Policy 14-7, which aims to address environmental justice by evaluating land uses in a manner that is conscious of the cumulative impacts of pollutants and the history of pollutant-burden and public underinvestment in disadvantaged communities. Additionally LU Policy 16-11 aims to identify opportunities to clean up neighborhoods that are already overburdened by adverse environmental conditions. LU Policy LU 16-7 also aims to address environmental justice through public infrastructure investments in disadvantaged communities. Therefore, the proposed LUE has been developed with consideration of environmental and community justice issues.

RESPONSE I-7-4

This comment expresses concern that the City will be able to effectively implement the proposed LUE and suggests that the City consider other similar example projects that have been successfully implemented elsewhere before trying to implement the proposed project.

This comment does not address the adequacy or completeness of the Recirculated Draft Environmental Impact Report (EIR); does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. Therefore, no additional response is necessary.

RESPONSE I-7-5

This comment asserts that the City should not favor the convenience of developers over the environment or quality of life of residents and small business owners. The comment notes that the City should take time to work with community members to understand their concerns, as the project affects all residents in the area.

In accordance with state law, which requires that every city have an up to date general plan that identifies a proposed general distribution and general location and extent of uses of the land for housing, business, industry, open space, public buildings and more, the plan's development was directed by the City Council with City staff support. The LUE was last updated in 1989 and this update is intended to create distinct residential neighborhoods, employment centers, open spaces and other areas. In addition, the proposed LUE reflects the City's compliance with State laws pertaining to housing. Specifically, the revised LUE addresses both projected housing needs, as identified as part of the Regional Housing Needs Assessment (RHNA) (enforceable by the State Housing Accountability Act), and the number of housing units needed to alleviate documented overcrowding (consistent with the United States Department of Housing Assessment of Fair Housing for the City).

Developers wishing to invest in the City's future will be subject to the regulations and requirements applicable at the time they submit plans for development.

Development impact fees are posted on the City's website and are collected by the Long Beach Development Services Department to cover the cost of upgrading roads, police, fire, storm water, and school facilities. These fees fund the respective services and do not fund the Long Beach Development Services Department, which is a City department.

The City has worked extensively with community members and has conducted over 150 community outreach events regarding the proposed LUE since the LUE update process commenced in 2004. The City's methods of public engagement are intended to include the voices of many stakeholders throughout the City. Thus, the community outreach process has been varied because of the City's belief in the value of hearing diverse voices. Community outreach has included traditional Question and Answer formats, surveys, pop-up events, focus groups, tabling at existing community events, and drop-in open house workshops.

RESPONSE I-7-6

This comment opines that the City should protect and improve the quality of life for the residents in Long Beach.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, it should be noted that the proposed LUE includes several strategies aimed at improving the quality of life of residents in the City (e.g., LU-M-54 and Westside and Wrigley Strategy No. 10). No additional response is necessary.

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From: [Seiff, Kenneth](#)
To: [LBDS-EIR-Comments](#)
Subject: comments; Revised Program Environmental Impact Report (PEIR) for the General Plan Land Use Element (LUE) and Urban Design Element (UDE)
Date: Friday, August 16, 2019 2:19:30 PM

8/14/19

Department of Development Services
 Attn.: Alison Spindler, Project Manager
 333 W. Ocean Blvd., 5th Floor
 Long Beach, CA 90802
 (email: LBDS-EIR-Comments@longbeach.gov)

Dear Sirs:

Thank you for the opportunity to submit these comments regarding the Revised Program Environmental Impact Report (PEIR) for the General Plan Land Use Element (LUE) and Urban Design Element (UDE). I have submitted multiple previous comments over the years in particular related to proposed development in the Southeast area specifically, previously known as "SEADIP" and now "SEASP". **My comments relate to my opinion as to necessity and types of improvements for the area in the SEASP proposed project, specifically the greater SR-22 Freeway/7th St./Studebaker Road interchange.** The General Plan Land Use Element August 2016 and DEIR in the implementation section for the Southeast Area under Land Use Strategies, #9 on Page 159, stated, "Implement Mobility Element capital improvements for the Southeast area including (among others): "Improvements in SR-22 freeway ramps at Studebaker Road". You indicate that the DEIR requires recirculation when significant new information is added for the purposes of CEQA review and disclosure and further that in the current situation included re-modeling existing and future condition for 88 intersections throughout the City, ...and conferring with other agencies, such as CalTRANS, to gain consensus on these methodologies. In reviewing the revised PEIR, it does not appear in my view that significant substantive changes were made related to the previous document with specifically related to my area of comment, again the area and roadways at the greater SR-22 Fwy/7th Street/Studebaker Road Interchange, including east- and west- on and off-ramp roadway areas and related property both north and south (by the AES generating facility) and the Studebaker Bridge over 22 Fwy-7th St. In the SEASP Conceptual Draft, it is indicated that this area is included and labeled as "ROW/CalTRANS Open Space" (Fig. 4-4). Also, it is noted that the Plan identifies this roadway area as a "Gateway" (pg. 39, Fig. 4-2), "Public View Shed" (pg. 43, Fig. 4-3), and a "Corridor View" (pg. 40, 43, Fig.4-2). A "Gateway" is an arrival point "defined as serving a visual clue that one has entered a special community." "Corridors" are defined as serving purposes for mobility (traffic) and significant view

I-8-1

I-8-2

I-8-3



opportunities for community enhancement. “Corridor Views” are defined as roadway areas providing special distinguishing features for the area. “Public View Sheds” are described as “a significant factor defining the community character of the area.” On pg. 55, 4.3.13, it is stated, “CalTRANS also oversees the functionality and improvements made to rights-of-way at the SR-22 interchange. As modifications are made to the interchange over time, specialized landscape treatments will be required to create an identifiable and attractive entry into the city.”

I-8-3

My basic premise regarding the area I am referencing relates in particular to the degraded and deteriorating condition and safety of the infrastructure in the area, including roadways, signage, drainage, lighting, shoulder conditions, bridge, visibility, and landscaping. The traffic and mobility situation is certainly and obviously related but I made the point that the traffic and related studies made did not necessarily take into account the direct infrastructure aspect even if traffic flow and mobility was deemed by studies not to be impacted. As per CEQA, the condition and nature of the roadway and related infrastructure, including future impact assessment, should on its own be fully evaluated in any EIR and this was not done prior and still has not been accomplished in the current PEIR as revised in my opinion.

I-8-4

To my interpretation, this has still not been done in this revised PEIR, even with the added study and remodeling that was done. In particular, it does not appear significant changes were made to the original basic findings and assessments and thus I believe my comments in particular from 10/11/16 are still valid. I would also cite my previous comments to the draft EIR during the 2016 comment period (4/28/16 and 8/11/16). Some improvements to the area have been made in the interim via CalTRANS (for example, long overdue re-paving of the on- and off- ramps) but for the most part the infrastructure overall continues significantly degraded in multiple ways.

My approach here then would be follow up responses to the original responses to my 10/11/16 Comments (Letter Code I-6) and I appreciate the opportunity to do so. I would request your reference to your responses to my original comments utilizing your own referencing system which I use in my follow up comments below.

I-8-5

Your Response I-6-1:

You indicate that my comment does not contain any substantive comments or questions about the Draft EIR or analysis therein and that the comment would be forwarded as stated. Also, no further response was necessary.

My Follow Up Comment:

I did not “express concern how the proposed SEASP project would impact the area; I commented upon the current status of the area and the infrastructure and that Land Use Strategy #9 validated that the there were mentioned Mobility Element capital improvements that were to be implemented. Your response did not address this even though the documents did, as laid out. You could have responded that I was correct and some implications possibly (or that I was not correct if that would be your response you could support.) You avoided addressing the directly the points I made with a somewhat arrogant statement that the

I-8-6

comment did not contain any questions related to the DEIR. It does not take much imagination to see that this is not correct and your response basically dodged a direct reply to comment.

I-8-6

Your Response I-6-2:

You recounted my comment by stating that my comment begins by asserting that the commenter is concerned with the area and roadways at the SR-22 Freeway/7th Street/Studebaker Road Interchange. The commenter notes that gateway, view, and landscaping improvements (as outlined in the Mobility Element of the General Plan) are important at this interchange and that infrastructure at this intersection is degraded. The commenter also notes that mobility in this area is poor and conditions are unsafe. As such, the commenter opines that the City needs to cooperate with the California Department of Transportation (Caltrans), the City of Seal Beach, and the Orange County Transportation Authority (OCTA) to implement improvements at this intersection. You went on to reply that Traffic Impact Analysis prepared for the proposed project did not identify any impacted intersections with the vicinity of this intersection. You stated that therefore, the proposed project is not anticipated to exacerbate the existing conditions at this intersection. Additionally, the proposed LUE aims to implement the goals of the Mobility Element, including those for this interchange. You also noted that the City indicated it would continue to coordinate with CalTRANS to implement improvements top CalTRANS facilities throughout the City and continuously work with other local agencies and nearby jurisdictions to improve mobility throughout the City.

I-8-7

My Follow Up Comment:

Once again, in my opinion your response misses the points I was trying to make. Once again, my emphasis is upon the actual infrastructure itself, not the traffic impact necessarily specifically (although the 2 can be and usually are related). Lack of Traffic Impact Analysis study demonstration of a lack of impact does not necessarily that the infrastructure, already in bad shape as direct visual inspection alone can easily reveal, will not deteriorate further and ultimately adversely impact traffic, congestion, and safety. CEQA requires analysis of the infrastructure on its own as well as the traffic impact. The fact that the DEIR had to be re-worked, including traffic impact at multiple sites, indicates that in addition your methodology for evaluation of potential traffic impact on its own was flawed and you had to confer and gain consensus on the methodology with CalTRANS and other agencies. Further, despite language in the document that the City would continuously work with other agencies and other jurisdictions to improve mobility, that is not the issue I raised; I am focusing upon the infrastructure specifically at that area (related to the mobility aspect but also an important issue in its own right). Also, letters referenced from CalTRANS and City of Seal Beach in fact raised many important issues about the project which were basically ignored yet you defer to CalTRANS for example and do not appear to have developed or implemented a plan to present to them regarding the area collaborative working together to develop approach mutually agreed upon to solve the problems at the interchange. **I would continue to maintain that**

utilizing Traffic Impact Analysis and related studies as a substitute to represent the condition, status, and possible predicted response of already severely impacted infrastructure is flawed and not necessarily as directly linked as you appear to imply even still in this Revised PEIR. Despite your statement, I see no specific approach to implement the goals of the Mobility Element specifically targeted for this area nor details on how the City will continuously coordinate with CalTRANS with other agencies and jurisdictions.

I-8-7

Your Response I-6-3:

You incorrectly note that I gave definitions and assertions that in fact came directly from the various documents. You again indicated that my comment did not contain any substantive comments or questions about the DEIR or analysis thereof and you go on to again recount the goals for the UDE and related policies.

My Follow Up Comment:

Again you miss the point I am obviously making and should be easily able to discern and honestly respond to if this was a true evaluation and discussion of my concerns. It is almost as if your responses are looking for technical ways to actually not respond the commenter's concerns with a very unimaginative view at broader implications of the commenter's points. Obviously, I was reviewing your own documents here to support my opinion that these specifically also support my view that the project should more robustly and specifically address the issues I am noting, in particular the condition current and future of the infrastructure and general nature of that area. Your facile dismissal of my comment is disrespectful as is your statement that "no additional response is necessary." I strongly disagree. In addition, if this comment was forwarded to other decision-makers, I would request what the ultimate response was to my concerns.

I-8-8

Your Response I-6-4:

You refer to your previous responses regarding your view of discussion related to project impacts with respect to traffic conditions and planned improvements in the vicinity. Again, you avoid direct response or discussion regarding the very specific concerns I have laid out.

My Follow Up Comment:

Again, I consider your response that my comment did not contain any substantive comments or questions with no additional response necessary to be dismissive, disrespectful, and rude. Rather trying to specifically respond to the obvious concerns I lay out and try to support from wording in your own documents, you responses are inaccurate, evasive, vague, and unclear. An honest attempt to deal with the comments rather than looking for ways to note that there are not particular questions related to the EIR and then arrogantly opine that no further response is necessary would have been much more appreciated.

I-8-9

Your Response I-6-5 and My Follow Up Comment:

Your pattern in response to my comments and concerns continues. Instead of making a good faith and collaborative effort to at least try to understand and more directly respond to my

I-8-10

concerns, you again refer back to a previous inadequate and disrespectful response, including again that my concerns are not really substantive and are not worthy of additional response. I believe ALL my comments are substantive and raise important issues directly related to DEIR and analysis and continue to deserve to be appropriately answered by you.

↑
I-8-10

Your Response I-6-6 and My Follow Up Comment:

Again, you refer to a previous response and make no effort to actually attempt a real effort to address my concerns that really are not that complex. You again dismiss the worthiness of my comments and concerns (which I would wish to have the opportunity to dispute but actually are amazingly self-evident) including that they deserve no additional response.

I-8-11

Your Response I-6-7 and My Follow Up Comment:

You mention that the comment provides background information upon the commenter as if this would not be appropriate, as I read it, yet you do not offer any analysis of the validity of my comments, whatever your analysis would be. Again, you avoid direct answer or addressing my comments and refer to previous response as well as again most disrespectfully offer your opinion that my comments are not substantive and that no additional response would be necessary.

I-8-12

In Conclusion:

I believe all of my original comments regarding major concerns with respect to serious infrastructure issues at the specific area I denote are still valid. Some improvements there have been made by CalTRANS since my previous comments, but I believe SEASP, the LUE and UDE, the previous DEIR and the current PEIR as recirculated continue to avoid denoting specific approaches to these issues I previously and continue to raise. I would formally request your response to these comments once again in the current setting. And this time I truly hope the response will not inaccurately mischaracterize and/or misrepresent what I am concerned about without further clarification and that your comments will not be dismissive, sarcastic, arrogant, demeaning, disrespectful, evasive, vague, and/or condescending but rather more clear and direct. Whether intended or not, this is how interpreted your prior responses. I am hoping for better this time and look forward to and appreciate your further efforts to improve our local areas for all of us.

I-8-13

Thank you again for this opportunity. Please feel free to contact me personally if I may clarify or possibly offer anything further as I have always noted in all my previous communications.

I-8-14

Sincerely,
Ken Seiff
Seal Beach, CA

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KENNETH SEIFF

LETTER CODE: I-8

DATE: August 16, 2019

RESPONSE I-8-1

This comment thanks the City of Long Beach (City) for the opportunity to comment on the Recirculated Draft Environmental Impact Report (EIR). The comment also notes that the commenter has previously submitted comments regarding the Southeast area of the City. The comment concludes with the assertion that the Southeast Area Specific Plan (SEASP) needs infrastructure improvements, particularly the area adjacent to the State Route 22 (SR-22)/7th Street/Studebaker Road interchange.

The City acknowledges receipt of the original comment letter submitted by the commenter in response to the 2016 Draft EIR. The City also acknowledges the commenter's assertion that infrastructure improvements are needed in the area adjacent to the SR-22/7th Street/Studebaker interchange.

RESPONSE I-8-2

This comment notes that the Recirculated Draft EIR references Southeast Area Land Use Strategy No. 9, which aims to implement capital improvements identified in the City's Mobility Element (2013) to SR-22 freeway ramps at Studebaker Road. The commenter indicates that the 2016 Draft EIR was recirculated because significant new information has been added for the purposes of the California Environmental Quality Act (CEQA). The comment also notes that the Recirculated Draft EIR reevaluates 88 study area intersections with respect to traffic impacts and includes a new methodology based on conference with other agencies, such as the California Department of Transportation (Caltrans).

The commenter is correct in asserting that the LUE incorporates Southeast Area Land Use Strategy No. 9, which aims to implement capital improvements outlined in the Mobility Element of the City's General Plan, including improvements to SR-22 ramps at Studebaker Road. The commenter is also correct in asserting that the Draft EIR for the proposed project has been recirculated in response to significant new information. In this particular case, significant new information requiring recirculation of the Draft EIR is related to PlaceType Map revisions in response to direction provided by the City Council and community input, not because of anything related to the traffic analysis. The Traffic Impact Analysis (TIA) (June 2019) has been revised as part of the Recirculated Draft EIR to reflect the revised project and to reflect a revised methodology that was developed in coordination with City staff and Caltrans.

RESPONSE I-8-3

This comment opines that substantive changes were not made to the revised Land Use Element (LUE) and Recirculated Draft EIR with respect to the area surrounding the SR-22/7th Street/Studebaker Road interchange. The comment goes on to note that the Draft SEASP document labeled this area as Right-of-Way/Caltrans Open Space and identified it as a Gateway area, Public

Viewshed, and an area with a Corridor View. The comment also indicates that Caltrans oversees the functionality and improvements made to the rights-of-way areas at the SR-22 interchange.

This comment summarizes specific references to the interchange area that were included in the SEASP document. The proposed LUE integrates the SEASP document into its land use plan and incorporates policies aimed at ensuring the successful implementation of the SEASP document; the proposed LUE does not identify specific action items regarding infrastructure improvements at the interchange area or any other area in the City. Rather, infrastructure improvements are more appropriately addressed in the City's Mobility Element and Capital Improvement Program and are not contemplated as part of the proposed project.

RESPONSE I-8-4

This comment notes the degraded and deteriorating condition of infrastructure near the SR-22/7th Street/Studebaker Road interchange, including the roadways, signage, drainage, and lighting. The commenter notes that the degraded condition of the interchange would affect mobility in this area, even if the TIA identified less than significant traffic impacts in this area. As such, the commenter opines that the California Environmental Quality Act (CEQA) requires that the condition of roadways and infrastructure be considered when analyzing traffic impacts. The comment concludes by citing the commenter's previous letter on the 2016 Draft EIR (i.e., Comment I-6 in the 2016 Final EIR). The comment concludes by noting that Caltrans has recently made improvements to the on-and off-ramps at the interchange, but that the infrastructure remains significantly degraded.

While CEQA requires an analysis of a project's physical impact on the environment, CEQA does not require an analysis of the existing environment's impact on a project. As such, an analysis of how existing infrastructure conditions would affect mobility at the above-referenced interchange is not required under CEQA and was not included as part of the TIA for the proposed project. Nevertheless, the City acknowledges the commenter's concern related to the condition of existing infrastructure near the SR-22/7th Street/Studebaker Road interchange. Please note that specific plans to address aging infrastructure in this area have not been developed at this time and are not included as part of a long-range planning document, such as the proposed LUE and Urban Design Element (UDE). It should be noted that the City's 2019 Capital Improvement Plan earmarks \$12,000,000 to improve infrastructure along major and secondary highway arterials in the City. While no specific plans have been generated to improve the above-referenced intersection, these funds may be used to improve the interchange area in coordination with funding and planning efforts from Caltrans.

RESPONSE I-8-5

This comment indicates that the commenter wishes to follow up on the original comment letter they submitted in response to the 2016 Draft EIR, which is referenced as Comment I-6 in the 2016 Final EIR.

Please refer to Responses to Comments I-8-6 through I-8-14 for further discussion related to the commenter's concerns regarding the previously submitted comment letter.

RESPONSE I-8-6

This comment references Comment I-6-1 included in the original Final EIR, which the commenter indicates was intended to document the status of the SR-22/7th Street/Studebaker Road interchange. The comment also notes that Strategy No. 9 in the Mobility Element, which aims to implement infrastructure improvements at the SR-22 freeway ramps, validates the commenter's assertion that infrastructure near the SR-22/7th Street/Studebaker Road interchange is in need of repair. The comment concludes by asserting that the previous Response to Comment I-6-1 did not directly address the commenter's concern.

The commenter is correct in asserting that the Mobility Element, along with the proposed LUE, identify the above-referenced interchange as an area in need of infrastructure improvements. The City acknowledges this assertion and has responded to these concerns in Responses to Comments I-8-7 through I-8-14, below.

RESPONSE I-8-7

This comment references Comment I-6-2 included in the original Final EIR and takes issue with the original response that was provided. The comment provides clarification on the original comment by stating that the comment was intended to take issue with the infrastructure in the area near the SR-22/7th Street/Studebaker Road interchange rather than the conclusions in the traffic study. For example, while the 2016 and 2019 TIA identified less than significant impacts in this area, the commenter opines that the deteriorating condition of existing infrastructure would be exacerbated by the addition of vehicles in the area. The comment also opines that recent revisions to the TIA are an indication that the original study was flawed. The comment concludes with the assertion that the commenter would like the City to present a specific approach to implement the goals of the Mobility Element, which target infrastructure improvements near the SR-22 freeway ramps.

Refer to Response to Comment I-8-2, above. The revised TIA was prepared to analyze project-related impacts as a result of changes to the PlaceTypes Map included in the proposed LUE resulting from City Council action and not because the original TIA analysis was flawed.

As noted in Response to Comment I-8-4, above, CEQA does not require an analysis of the existing environment's impact on a project. As such, an analysis of how existing infrastructure conditions would affect mobility at the above-referenced interchange is not required under CEQA and was not included as part of the TIA for the proposed project. Nevertheless, the City acknowledges the commenter's concern related to the condition of existing infrastructure near the SR-22/7th Street/Studebaker Road interchange. Future projects requiring discretionary actions would be required to undergo a project-level CEQA analysis, which would consider project-level infrastructure improvements.

RESPONSE I-8-8

This comment references Comment I-6-3 included in the original Final EIR and takes issue with the original response that was provided. The comment provides clarification on the original comment by stating that the commenter intended to call attention to the current and future conditions of infrastructure in the area near the SR-22/7th Street/Studebaker Road interchange. The comment

also questions if there were any direct responses from decision-makers when this comment was shared with such individuals.

As noted in Response to Comment I-8-4, above, CEQA does not require an analysis of the existing environment's impact on a project. As such, an analysis of how existing infrastructure conditions would affect mobility at the above-referenced interchange is not required under CEQA and was not included as part of the TIA for the proposed project. Nevertheless, the City acknowledges the commenter's concern related to the condition of existing infrastructure near the SR-22/7th Street/Studebaker Road interchange. Future projects requiring discretionary actions would be required to undergo a project-level CEQA analysis, which would consider project-level infrastructure improvements. In addition, it should be noted that all comments and responses included in the Final EIR for the original LUE and UDE were most recently shared with the Long Beach City Council on March 6, 2018 for review and consideration. Responses from these decision-makers regarding the contents of the Final PlaceType and Height Maps were provided at City Council meetings held to consider the previously proposed project. A complete list of the documents, figures, and public comments reviewed and considered at the City Council Meeting on March 6, 2018, can be found at the following location: <http://longbeach.legistar.com/LegislationDetail.aspx?ID=3355947&GUID=019C333F-0FCE-4066-97A4-04C753ADEBC6>.

RESPONSE I-8-9

This comment references Comment I-6-4 included in the original Final EIR, which emphasized the fact that the SEASP document should include efforts to improve the SR-22/7th Street/Studebaker Road interchange. The comment also notes that degrading infrastructure near this interchange renders this area unsafe and includes a summary of degraded infrastructure in the area. The comment concludes by requesting that the City attempt to deal with improvements to this area rather than opining no further response is necessary. This comment will be forwarded to City decision-makers for their review and consideration.

Please refer to Response to Comment I-8-4 for further discussion related to infrastructure improvements at the SR-22/7th Street/Studebaker Road interchange.

RESPONSE I-8-10

This comment references Comment I-6-5 included in the original Final EIR and takes issue with the original response that was provided. The original comment provided recommendations regarding how improvements could be implemented to the SR-22 Freeway/7th Street/Studebaker Road interchange. The original comment also noted that the commenter was available to provide additional information to the City, and provided an example of successful infrastructure improvement projects.

Please refer to Response to Comment I-8-4 for further discussion related to infrastructure improvements at the SR-22/7th Street/Studebaker Road interchange.

RESPONSE I-8-11

This comment references Comment I-6-6 included in the original Final EIR and takes issue with the original response that was provided. The original comment questioned why improvements were not made to the 22 Freeway/7th Street/Studebaker Road interchange, and suggested that Caltrans be made aware of the current state of infrastructure near this interchange.

Please refer to Response to Comment I-8-4 for further discussion related to infrastructure improvements at the SR-22/7th Street/Studebaker Road interchange.

RESPONSE I-8-12

This comment references Comment I-6-7 included in the original Final EIR and takes issue with the original response that was provided. The original comment asserted that the City should improve the 22 Freeway/7th Street/Studebaker Road interchange because this area is a significant access point into the City.

Please refer to Response to Comment I-8-4 for further discussion related to infrastructure improvements at the SR-22/7th Street/Studebaker Road interchange.

RESPONSE I-8-13

This comment begins by asserting that all of the original comments submitted by the commenter in response to the 2016 Draft EIR remain valid with respect to concerns over infrastructure issues in the area near the SR-22 Freeway/7th Street/Studebaker Road interchange. The comment also notes that while Caltrans has implemented some improvements to this area since the original comment letter was submitted to the City in 2016, there continues to be a need for a specific infrastructure solution within this area. The comment concludes by asserting that the commenter hopes the City will provide a thoughtful response to address the above-referenced comments.

Please refer to Response to Comment I-8-4 for further discussion related to infrastructure improvements at the SR-22/7th Street/Studebaker Road interchange.

RESPONSE I-8-14

This comment thanks the City for the opportunity to comment on the Recirculated Draft EIR and indicates that the commenter is available to respond to any questions from the City regarding the contents of this letter.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. Therefore, no additional response is necessary

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From: [Lynette Ferenczy](#)
To: [LBDS-EIR-Comments](#)
Subject: Comment on EIR for LUE
Date: Thursday, August 15, 2019 10:56:16 PM

The LUE map does not match the motion passed by city council for council district 6. Please correct the maps to comply with the two motions approved by the council in 2018 and published by the Department of Development Services.

I-9-1

The density listed in the LUE urban design element for TOD-Low and TOD moderate is incorrect. The density is two to three times greater than what is shown as permitted in units per acre. This change in density effects the traffic, population and public service numbers for the EIR.

I-9-2

Lynette Ferenczy

Sent from my iPhone

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LYNETTE FERENCZY (1 OF 2)

LETTER CODE: I-9

DATE: August 15, 2019

RESPONSE I-9-1

The comment states that the maps reflected in the Environmental Impact Report (EIR) do not align with the motion that was approved by the City of Long Beach (City) Council.

A public hearing was held by the Long Beach City Council on March 6, 2018, at which a final set of Land Use Element (LUE) maps were approved. These final maps are reflected in the revised plan and Recirculated EIR. The commenter's feedback will be forwarded to the decision-makers.

RESPONSE I-9-2

This comment opines that the density listed in the proposed LUE and the Urban Design Element (UDE) for the Transit-Oriented Development PlaceType (both Low and Moderate) is incorrect, and suggests that the density is two to three times greater than what is shown as permitted in units per acre. The comment concludes that the change in density affects traffic, population, and public service numbers for the EIR.

The commenter appears to have concerns with descriptions on page 86 of the LUE plan, which refer to typical maximum population densities per acre for the Transit-Oriented Development (TOD) PlaceTypes. These descriptions reflect a maximum potential contemplated density for the TOD PlaceType, but density will be limited by other development standards based on the constraints of each individual site.

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From: [Lynette Ferenczy](#)
To: [LBDS-EIR-Comments](#)
Subject: EIR comments -Alison
Date: Friday, August 16, 2019 8:46:29 AM

Comments on EIR for LUE

The maps for council district 6 do not match the motion approved by city council or the director of development services published changes.

| I-10-1

The design guidelines density per acre for TOD low and moderate categories are incorrect. The densities allowed (unlimited) in TOD general plan areas are 2-3 times higher than those listed. The permitted densities are near 100 units an acre.

| I-10-2

Lynette Ferenczy

Sent from my iPhone

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LYNETTE FERENCZY (2 of 2)

LETTER CODE: I-10

DATE: August 16, 2019

RESPONSE I-10-1

This comment reiterates the comments expressed in Comment I-9-1. Refer to Response to Comment I-9-1.

RESPONSE I-10-2

This comment opines that the design guidelines density per acre for the Transit-Oriented Development-Low and -Moderate PlaceTypes are incorrect, and opines that the allowable densities in this PlaceType are two to three times higher than shown in the proposed Land Use Element (LUE). The comment concludes by asserting that the permitted densities are near 100 units per one acre.

Refer to Response to Comment I-9-2.

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From: [Melinda Cotton](#)
To: [Alison Spindler](#)
Subject: LUE Program/EIR concerns/comments due Friday, August 16, 2019 deadline
Date: Friday, August 16, 2019 3:46:07 PM

Dear Alison,

Please include my concerns about the LUE. I have two major areas of concern:

1. Noise impacts have been and continue to be a major concern, especially those related to Special Events. Residents and business owners need to be protected from the large types of events which disrupt their lives.

I-11-1

In Belmont Shore, we have tried to work with the Special Events Department, but that has been frustrating and unrewarding. We need solid City rules, noise limits and enforcement. Currently downtown residents are suffering excessively from Special Event noise. With all the new development in downtown Long Beach, the City should be protecting current and future residents if we hope to have a stable population in this part of the city. (I'm copying below e-mails I have received in the last hour referencing an event that began last night in downtown and apparently is being allowed all weekend.)

The LUE needs to deal with leaf blower noise, there needs to be enforcement of illegally modified motorcycles. We know that If the *noise* is 100 decibels, it only takes 15 minutes for hearing damage to occur. But hearing damage is not the only adverse effect excessively loud *motorcycles* have on the public. The excessive *noise* of many illegally modified *motorcycles* can be heard for miles.

I-11-2

Banner airplanes with their noisy engines are another disturbance in beach and neighboring commercial areas, these airplanes with their old noisy, air polluting engines should not be allowed over residential areas.

I-11-3

Noise impacts are significant. **Post-traumatic stress disorder (PTSD)** is a mental health condition that's triggered by a terrifying event — either experiencing it or witnessing it. Symptoms may include flashbacks, nightmares and severe anxiety, as well as uncontrollable thoughts about the event. The noise triggers PTSD and should be considered. The right to peace and quality of life has become increasingly abused in the City. The relentless noise harms people that work/conduct business at home, children are very sensitive to noise so are pets and the wildlife. Noise is significant and needs serious attention.

I-11-4

2. Horse Overlay Zones need to be included in the Program EIR and are still not on the maps. The equestrian community is getting methodically squeezed out. This is not right. The equestrian community is part of Long Beach heritage, a way of life for some and needs protection to maintain that unique element in Long Beach diversity. The horse overlay zones are not being shown and must be included in the map. A project must be compliant with both the underlying and overlay zoning. For instance: revitalizing the LA River should be inclusive of pathways for pedestrians, horses and bike riders.

I-11-5

The above items need to be part of the LUE. Quality of life for the residents and citizens of Long Beach needs to be respected and protected. Event Promoters and Developers have been given way too much leeway at the loss and suffering of the people of the City.

I-11-6

Thank you for including my concerns. Please include the comments below sent to me today regarding the INSOMNIAC Event.

Melinda Cotton
Belmont Shore resident
PO Box 3310
Long Beach, CA 90803

Noise re Event Notification - Insomniac- August 17, 2019

***The testing for this event just kicked off and the DBa levels at my house are already reading 75! I work from home and this is unacceptable! I cannot hear my business associates when the music is playing. Keep in mind that my reader does NOT include the bass. This is not a good start.

Aqua Resident

I-11-7

***Hi neighbors- When you combine 87 dB event noise practice with construction sound spikes from Shoreline Gateway, the noise really is disruptive.

***I just ran the dB , recorded peak of 87 dB and averaged 75 at the 20th floor of the international tower 700E Ocean

This is insufferable, I had three long Coast Guard duty days this week, so my afternoon rest is out of the question here

***It is 2:10pm and my plantation shutters are rattling due to the music. And this isn't even the scheduled event. Also, I have triple glass windows. I have called and complained and only got the recording.

MELINDA COTTON

LETTER CODE: I-11

DATE: August 16, 2019

RESPONSE I-11-1

This comment expresses concern related to noise, particularly related to noise generated from special events. The commenter opines that the City of Long Beach (City) should be protecting existing and future residents in the City from noise. The comment concludes by noting that the commenter has attached emails they have received in regards to noise complaints from a special event in the Downtown area.

The Recirculated Draft Environmental Impact Report (EIR) for the proposed project addresses noise impacts associated with new development envisioned under the proposed Land Use Element (LUE). The proposed LUE and Urban Design Element (UDE) do not specifically address existing noise characteristics in the City and/or proposed noise policies and regulations. However, the City is currently in the process of updating the existing General Plan Noise Element and recently released a Draft Noise Element (May 2019) on the City's website for review by the public. Special event noise is addressed in the Draft Noise Element as one of many sources of noise that exist in the built environment. Please refer to page 24 of the Draft Noise Element, which is available at the following location: http://www.longbeach.gov/globalassets/lbds/media-library/documents/orphans/noise-element/pr-draft-060419_new-logo_reduced_kw. In addition, the City has also prepared a separate Special Events Noise Study, which examines best practices in other cities and how the City can improve community transparency and consider other best practices to reduce noise from special events.

For more information about the Noise Element update, go to: <http://www.longbeach.gov/lbds/planning/advance/general-plan/noise-element/> or contact Jennifer Ly, Planner, at Jennifer.Ly@LongBeach.gov or (562) 570-6368.

The proposed LUE as analyzed in the Recirculated Draft EIR is a planning document and does not address noise policies and regulations, nor does the LUE address noise violations. Rather, the role of the proposed LUE is to allow for the orderly development of land through year 2040, which considers how new development would affect existing and future noise-sensitive land uses (e.g., schools, hospitals, residences, and parks). Therefore, no additional response is necessary.

RESPONSE I-11-2

This comment opines that the proposed LUE needs to deal with noise generated by leaf blowers and that the City needs to also regulate noise from illegally modified motorcycles. The commenter notes that noise generated up to a level of 100 decibels only takes 15 minutes to damage hearing, and causes additional impacts on the public. The comment concludes by stating that noise from illegally modified motorcycles can be heard for miles.

Noise generated by leaf blowers and motorcycles is not addressed in either the proposed LUE or UDE, but is more appropriately addressed by noise limitations as established in the City's Noise Ordinance (Section 8.80 of the City's Municipal Code). In addition, the Draft Noise Element includes Policy N 16-6, which aims to regularly evaluate and update strategies for managing noise nuisances, including noise generated by leaf blowers. The Draft Noise Element also includes Policy N 6-7, which aims to enforce regulations addressing motorcycle noise and aims to create awareness to ensure compliance with such regulations.

This comment will be forwarded to City decision-makers for their review and consideration. Therefore, no additional response is necessary.

RESPONSE I-11-3

This comment notes that banner airplanes are another source of noise in the City, and as such, cause disturbances to people at the beach or visiting local areas. The comment concludes by asserting that these planes emit air pollutants and should not be allowed over residential areas.

Noise generated by aircraft is not directly addressed in either the proposed LUE or UDE, but is more appropriately addressed in the Draft General Plan Noise Element (May 2019) and would be enforced by the City's Noise Ordinance (Section 8.80 of the City's Municipal Code). At this time, the Draft Noise Element includes Strategy No. 10 and Policies N 10- through 10-6, which aim to regulate aircraft noise to reduce noise impacts in the City. It should also be noted that the City has limited jurisdiction over air space, which is not actively enforced by the City's Noise Ordinance but rather through the Airport Noise Compatibility Ordinance and by federal regulations. Specifically, aircraft and other noise resulting from the operations of the airport and industry at the Long Beach Airport is regulated by a special 1995 Airport Noise Compatibility Ordinance, which still governs today. Airport operations and noise are largely regulated by federal and State agencies. For more information related to airport noise, please visit: http://www.lgb.org/information/noise_abatement/frequently_asked_questions.asp.

This comment will be forwarded to City decision-makers for their review and consideration. Therefore, no additional response is necessary.

RESPONSE I-11-4

This comment opines that noise impacts are significant and notes how post-traumatic stress disorder (PTSD) can be triggered by excessive noise. The comment concludes with the assertion that community members have a right to peace and a high quality of life that is free from relentless noise.

Refer to Response to Comment I-11-3, above. The proposed LUE and UDE do not directly address noise impacts with respect to health effects on the public as they relate to PTSD. Health effects associated with noise are more directly addressed in the Draft General Plan Noise Element (May 2019), which includes several policies aimed at reducing health impacts related to noise (e.g., Policy N 14-1).

This comment will be forwarded to City decision-makers for their review and consideration. Therefore, no additional response is necessary.

RESPONSE I-11-5

This comment opines that the project should include horse overlay zones and expresses frustration that the overlay zone is not reflected on the PlaceType Maps. The comment goes on to note that the equestrian community is a large part of the City's heritage, and as such, should be reflected on the PlaceType Maps.

The current Zoning Code includes a Horse Overlay District that allows for equestrian uses within Residential zoning districts. The proposed LUE would not change or remove the Horse Overlay District from the zoning code and would allow for horse trails within the Open Space PlaceType, particularly in areas along the Los Angeles River. The City also added Land Use Strategy No. 11 for the Wrigley area in the revised draft LUE, which aims to respect and maintain equestrian uses within the Wrigley Heights area and promote shared use and maintenance of the area trail system. The addition of this strategy has been incorporated in response to public comments on the 2016 Draft EIR and is reflected in the updated LUE. Furthermore, the proposed project is a long-range planning document aimed at guiding future development through year 2040 and does not include any physical improvements that would result in impacts to existing equestrian facilities. Future individual projects requiring discretionary actions would also be subject to separate environmental review on a project-specific basis, in accordance with the provisions of the California Environmental Quality Act (CEQA) and the *State CEQA Guidelines*. Therefore, project approval would not result in significant adverse impacts to existing equestrian facilities in the City.

RESPONSE I-11-6

This comment indicates that the items listed in Comments I-11-1 through I-11-6 should be part of the LUE. The comment also asserts that the quality of life for residents and citizens in the City must be protected and respected. The comment concludes by stating that event promoters and developers have been given too much leeway, which has resulted in negative impacts to community members.

Refer to Responses to Comments I-11-1 through I-11-6.

RESPONSE I-11-7

This comment thanks the City for the opportunity to comment on the project, and refers to an email the commenter received regarding noise complaints from a recent event in the Downtown area.

This comment does not address the adequacy or completeness of the Recirculated Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*. However, it should be noted that the City has a Noise Control Program that was established by the Long Beach Department of Health and Human Services in the Environmental Health Bureau, which is responsible for enforcing the City's Noise Control Ordinance. Noise complaints should be directed to the Environmental Health Bureau and a formal Noise Complaint may be filled out to document such noise. For additional information, please see City of

Long Beach Municipal Code Chapter 8.80 for the City of Long Beach Noise Ordinance and/or contact the City's Environmental Health Bureau at (562) 570-4132.

This comment will be forwarded to City decision-makers for their review and consideration. Therefore, no additional response is necessary.

From: [rfoxent](#)
To: [LBDS-EIR-Comments](#)
Subject: I object to the inclusion of vision zero into this document. This is an unproven, horribly wrong template
Date: Friday, August 16, 2019 2:43:11 PM

We have an historic city. Road diets don't work here. We must not include the vision zero into this document. Let's do a full traffic element first. Robert Fox 2815 east broadway, long beach .ca 90803 808 256 1071

I-12-1

Sent from my T-Mobile 4G LTE Device

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ROBERT FOX

LETTER CODE: I-12

DATE: August 16, 2019

RESPONSE I-12-1

This comment notes that the City of Long Beach (City) is historic and expresses opposition to road diets. The comment also expresses opposition to the inclusion of Vision Zero into the document, and opines that the City should prepare a full traffic element first.

“Vision zero” refers to a multi-national road safety project that aims to achieve a roadway system that would result in no fatalities or serious injuries as a result of road traffic. While the City aims to maximize safety within its circulation network, Vision Zero is not incorporated into the proposed Land Use Element (LUE) or Urban Design Element (UDE). Furthermore, road diets are not proposed as part of this project, but rather are contemplated as part of the City’s adopted General Plan Mobility Element (2013). Goals, policies, and land use patterns outlined in the proposed LUE and UDE build on the multi-modal transportation network envisioned in the adopted Mobility Element.

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From: [SUSAN MILLER](#)
To: [LBDS-EIR-Comments](#)
Subject: LUE Program/EIR concerns/comments due Friday, August 16, 2019 deadline
Date: Friday, August 16, 2019 1:58:19 PM

Note - making sure my comments are included. See below.

From: SUSAN MILLER
Sent: Friday, August 16, 2019 1:52 PM
To: Alison Spindler <Alison.Spindler@longbeach.gov>
Subject: LUE Program/EIR concerns/comments due Friday, August 16, 2019 deadline

Dear Alison,

Please include my concerns about the LUE. I have two major areas of concern:

1. **Noise** impacts are significant. *Post-traumatic stress disorder (PTSD)* is a mental health condition that's triggered by a terrifying event — either experiencing it or witnessing it. Symptoms may include flashbacks, nightmares and severe anxiety, as well as uncontrollable thoughts about the event. The noise triggers PTSD and should be considered. The right to peace and quality of life has become increasingly abused in the City. The relentless noise harms people that work/conduct business at home, children are very sensitive to noise so are pets and the wildlife. The noise element is a negative impact. Noise is significant and needs serious attention.

I-13-1

2. The equestrian community is getting methodically squeezed out. This is not right. The equestrian community is part of Long Beach heritage, a way of life for some and needs protection to maintain that unique element in Long Beach diversity. The **horse overlay zones** are not being shown and must be included in the map. A project must be compliant with both the underlying and overlay zoning. For instance: revitalizing the LA River should be inclusive of pathways for pedestrians, horses and bike riders.

I-13-2

Both of the above items need to be part of the LUE. Quality of life for the residents and citizens of Long Beach needs to be held in high esteem and protected. Developers have been given way too much leeway at the loss and suffering of the people of the City.

I-13-3

Thank you for including my concerns,
 Susan Miller
 4217 East Ocean Blvd.
 Long Beach, CA

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SUSAN MILLER

LETTER CODE: I-13

DATE: August 16, 2019

RESPONSE I-13-1

This comment opines that noise impacts are significant and notes how post-traumatic stress disorder (PTSD) can be triggered by excessive noise. The comment concludes with the assertion that community members have a right to peace and a high quality of life that is free from relentless noise.

Refer to Response to Comment I-11-4, above. The proposed Land Use Element (LUE) and Urban Design Element (UDE) do not directly address noise impacts with respect to health effects on the public as they relate to PTSD. Health effects associated with noise are more directly addressed in the Draft General Plan Noise Element (May 2019), which includes several policies aimed at reducing health impacts related to noise (e.g., Policy N 14-1).

This comment will be forwarded to City of Long Beach (City) decision-makers for their review and consideration. Therefore, no additional response is necessary.

RESPONSE I-13-2

This comment opines that the project should include horse overlay zones and expresses frustration that the overlay zone is not reflected on the PlaceType Maps. The comment goes on to note that the equestrian community is a large part of the City's heritage, and as such, should be reflected on the PlaceType Maps.

The current Zoning Code includes a Horse Overlay District that allows for equestrian uses within Residential zoning districts. The proposed LUE would not change or remove the Horse Overlay District from the zoning code and would allow for horse trails within the Open Space PlaceType, particularly in areas along the Los Angeles River. The City also added Land Use Strategy No. 11 for the Wrigley area in the proposed LUE, which aims to respect and maintain equestrian uses within the Wrigley Heights area and promote shared use and maintenance of the area trail system. The addition of this strategy has been incorporated in response to public comments on the 2016 Draft EIR and is reflected in the updated LUE. Furthermore, the proposed project is a long-range planning document aimed at guiding future development through year 2040 and does not include any physical improvements that would result in impacts to existing equestrian facilities. Future individual projects requiring discretionary actions would also be subject to separate environmental review on a project-specific basis, in accordance with the provisions of the California Environmental Quality Act (CEQA) and the *State CEQA Guidelines*. Therefore, project approval would not result in significant adverse impacts to existing equestrian facilities in the City.

RESPONSE I-13-3

This comment indicates that the items listed in Comments I-13-1 and I-11-2 should be part of the proposed LUE. The comment also asserts that the quality of life for residents and citizens in the City

must be protected and respected. The comment concludes by stating that event promoters and developers have been given too much leeway, which has resulted in negative impacts to community members.

Refer to Responses to Comments I-13-1 and I-11-2. Please also note that the proposed LUE was not created for, or by, developers, but instead was directed by the City Council with City staff support. Developers wishing to invest in the City's future will be subject to the regulations and requirements applicable at the time they submit plans for development.

3.0 ERRATA

This section of the Final Environmental Impact Report (EIR) provides changes to the Recirculated Draft EIR that have been made to clarify, correct, or add to the environmental impact analysis for the proposed General Plan Land Use and Urban Design Elements project (proposed project). Such changes are a result of public review comments and/or further review of the Recirculated Draft EIR. The changes described in this section are generally minor changes that do not constitute significant new information that alter the outcome of the environmental analysis or require recirculation of the document (*State California Environmental Quality Act [State CEQA] Guidelines* Section 15088.5).

All revisions and corrections to the Recirculated Draft EIR are indicated in this section under the appropriate Recirculated Draft EIR section. With the exception of changes to tables and figures, deletions are shown with ~~striketrough~~ and additions are shown with underline.

3.1 SECTION 4.8, TRAFFIC

- 1) The list of study area intersections on page 4.8.5 has corrected to the following, which is consistent with the figures, tables, and subsequent lists provided in the Recirculated Draft EIR:

- | | |
|---|---|
| 1. Avalon Boulevard/ Pacific Coast Hwy (Caltrans) | 62. Cherry Avenue/Carson Street (Long Beach) |
| 2. Avalon Boulevard/Anaheim Street (Carson) | 63. Cherry Avenue/Wardlow Road (Long Beach) |
| 3. Wilmington Avenue/Sepulveda Boulevard (Carson) | 64. Cherry Avenue/Willow Street (Signal Hill) |
| 4. Wilmington Avenue/223rd Street (Carson) | 65. Cherry Avenue/ Pacific Coast Hwy (Caltrans) |
| 5. Terminal Island Freeway/Willow Street (Long Beach) | 66. Cherry Avenue/7th Street (Long Beach) |
| 6. Santa Fe Avenue/Wardlow Road (Long Beach) | 67. Paramount Boulevard/Artesia Boulevard (Long Beach) |
| 7. Santa Fe Avenue/Willow Street (Long Beach) | 68. Paramount Boulevard/South Street (Long Beach) |
| 8. Santa Fe Ave/Pacific Coast Hwy (Caltrans, CMP) | 69. Paramount Boulevard/Del Amo Boulevard (Lakewood) |
| 9. Santa Fe Avenue/Anaheim Street (Long Beach) | 70. Paramount Boulevard/Carson Street (Lakewood) |
| 10. I-710/Pacific Coast Hwy Cloverleaf WB (Long Beach) | 71. Downey Avenue/Alondra Boulevard (Paramount) |
| 11. I-710/Pacific Coast Hwy Cloverleaf EB (Long Beach) | 72. Redondo Avenue/Spring Street (Long Beach) |
| 12. Magnolia Avenue/Ocean Boulevard (Long Beach) | 73. Redondo Avenue/Willow Street (Long Beach) |
| 13. Pacific Avenue/ Pacific Coast Hwy (Caltrans) | 74. Redondo Avenue/Pacific Coast Hwy (Caltrans) |
| 14. Pacific Avenue/Anaheim Street (Long Beach) | 75. Redondo Avenue/Anaheim Street (Long Beach) |
| 15. Pacific Avenue/7th Street (Long Beach) | 76. Redondo Avenue/7th Street (Long Beach) |
| 16. Pacific Avenue/6th Street (Long Beach) | 77. Redondo Avenue/3rd Street (Long Beach) |
| 17. Pacific Avenue/3rd Street (Long Beach) | 78. Redondo Avenue/Ocean Boulevard (Long Beach) |
| 18. Pacific Avenue/Broadway (Long Beach) | 79. Lakewood Boulevard/Del Amo Boulevard (Long Beach/Lakewood) |
| 19. Pacific Avenue/Ocean Boulevard (Long Beach) | 80. Lakewood Boulevard/Carson Street (Long Beach/Lakewood, CMP) |
| 20. Long Beach Boulevard/Alondra Boulevard (Compton) | 81. Lakewood Boulevard/Spring Street (Long Beach) |
| 21. Long Beach Boulevard/Artesia Boulevard (Long Beach) | 82. Lakewood Boulevard/I-405 WB Ramps (Caltrans) |
| 22. Long Beach Boulevard/Market Street (Long Beach) | 83. Lakewood Boulevard/I-405 EB Ramps (Caltrans) |
| 23. Long Beach Boulevard/Del Amo Boulevard (Long Beach) | 84. Lakewood Boulevard/Willow Street (Long Beach, CMP) |
| 24. Long Beach Boulevard/San Antonio Drive (Long | 85. Ximeno Avenue/Pacific Coast Hwy (Caltrans, CMP) |

- Beach)
25. Long Beach Boulevard/Wardlow Road (Long Beach)
 26. Long Beach Boulevard/Spring Street (Long Beach)
 27. Long Beach Boulevard/Willow Street (Long Beach)
 28. Long Beach Boulevard/Pacific Coast Hwy (Caltrans)
 29. Long Beach Boulevard/Anaheim Street (Long Beach)
 30. Long Beach Boulevard/7th Street (Long Beach)
 31. Long Beach Boulevard/6th Street (Long Beach)
 32. Long Beach Boulevard/3rd Street (Long Beach)
 33. Long Beach Boulevard/Broadway (Long Beach)
 34. Long Beach Boulevard/Ocean Boulevard (Long Beach)
 35. Atlantic Avenue/Alondra Boulevard (Compton)
 36. Atlantic Avenue/SR-91 WB Ramps (Long Beach)
 37. Atlantic Avenue/SR-91 EB Ramps (Long Beach)
 38. Atlantic Avenue/Artesia Boulevard (Long Beach)
 39. Atlantic Avenue/South Street (Long Beach)
 40. Atlantic Avenue/Del Amo Boulevard (Long Beach)
 41. Atlantic Avenue/33rd Street (Caltrans)
 42. Atlantic Avenue/I-405 EB Ramps (Caltrans)
 43. Atlantic Avenue/Willow Street (Long Beach)
 44. Atlantic Avenue/Pacific Coast Hwy (Caltrans)
 45. Atlantic Avenue/Anaheim Street (Long Beach)
 46. Atlantic Avenue/7th Street (Long Beach)
 47. Atlantic Avenue/6th Street (Long Beach)
 48. Atlantic Avenue/3rd Street (Long Beach)
 49. Atlantic Avenue/Broadway (Long Beach)
 50. Atlantic Avenue/Shoreline Avenue-Ocean Boulevard (Long Beach)
 51. Orange Avenue/Wardlow Road (Long Beach)
 52. Orange Avenue/ Pacific Coast Hwy (Caltrans, CMP)
 53. Alamitos Avenue/Anaheim Street (Long Beach)
 54. Alamitos Avenue/7th Street (Long Beach, CMP)
 55. Alamitos Avenue/6th Street (Long Beach)
 56. Alamitos Avenue/3rd Street (Long Beach)
 57. Alamitos Avenue/Broadway (Long Beach)
 58. Alamitos Avenue/ Shoreline Avenue-Ocean Boulevard (Long Beach, CMP)
 59. Cherry Avenue/Artesia Boulevard (Long Beach)
 60. Cherry Avenue/Market Street (Long Beach)
 61. Cherry Avenue/Del Amo Boulevard (Long Beach/Lakewood)
 86. Ximeno Avenue/7th Street (Long Beach)
 87. Ximeno Avenue/4th Street (Long Beach)
 88. Park Avenue/7th Street (Long Beach)
 89. Park Avenue/4th Street (Long Beach)
 90. Livingston Drive/2nd Street (Long Beach)
 91. Pacific Coast Hwy/Anaheim Street (Caltrans)
 92. Pacific Coast Hwy/7th Street (Caltrans, CMP)
 93. Bellflower Boulevard/Del Amo Boulevard (Long Beach/Lakewood)
 94. Bellflower Boulevard/Carson Street (Long Beach/Lakewood)
 95. Bellflower Boulevard/Spring Street (Long Beach)
 96. Bellflower Boulevard/Los Coyotes Diagonal (Long Beach)
 97. Bellflower Boulevard/Atherton Street (Long Beach)
 98. Bellflower Boulevard/7th Street (Long Beach)
 99. Bellflower Boulevard/Pacific Coast Hwy (Caltrans)
 100. Pacific Coast Hwy/2nd Street (Caltrans, CMP)
 101. 1st Street/Marina Drive (~~Long Beach~~ Seal Beach)
 102. Los Coyotes Diagonal/Spring Street (Long Beach)
 103. West Campus Drive/7th Street (Long Beach)
 104. East Campus Road/7th Street (Long Beach)
 105. Palo Verde Avenue/Wardlow Road (Long Beach)
 106. Palo Verde Avenue/Anaheim Street (Long Beach)
 107. Los Coyotes Diagonal/Carson Street (Long Beach/Lakewood)
 108. Studebaker Road/Spring Street (Long Beach)
 109. Studebaker Road/Willow Street (Long Beach)
 110. 7th Street/College Park Drive (Long Beach)
 111. Studebaker Road/2nd Street (Long Beach)
 112. I-605 SB Ramps/Carson Street (Caltrans)
 113. I-605 NB Ramps/Carson Street (Caltrans)
 114. Norwalk Boulevard/Carson Street (Hawaiian Gardens)
 115. Norwalk Boulevard/Cerritos Avenue (Los Alamitos)
 116. Los Alamitos Boulevard/Katella Avenue (~~Garden Grove~~ Los Alamitos)
 117. Seal Beach Boulevard/Westminster Road (Seal Beach)
 118. Atlantic Avenue/I-405 WB Ramps (Caltrans)
 119. I-710/Anaheim St Cloverleaf WB (Caltrans)
 120. I-710/Anaheim St Cloverleaf EB (Caltrans)

3.2 SECTION 4.9, UTILITIES

- 1) Based on a comment letter received from the County Sanitation Districts of Los Angeles County, page 4.9-5 has been revised as follows to provide the most current accurate data:

Currently, the JWPCP treats approximately 261.1 ~~300~~ mgd and has a total permitted design capacity of 400 mgd.

- 2) Based on a comment letter received from the County Sanitation Districts of Los Angeles County, page 4.9-5 of Section 4.9, Utilities, has been revised as follows to provide the most current accurate data:

The Long Beach WRP treats an average of approximately 12.7 ~~13~~ mgd and has a total permitted capacity of 25 mgd.

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