

## 8 Responses to Comments on the Draft EIR

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This section includes comments received during the circulation of the Draft Environmental Impact Report prepared for the Alamitos Avenue “Complete Streets” Improvements Project (Project).

The Draft EIR was circulated for a 48-day public review period that began on April 19, 2017 and ended on June 5, 2017. The City of Long Beach received four comment letters on the Draft EIR. The commenters and the page number on which each commenter’s letter appear are listed below.

Letter No. and Commenter	Page No.
1 Scott Morgan, Director, State Clearinghouse and Planning Unit	48
2 Dianna Watson, Community Planning Branch Chief, Department of Transportation (Caltrans)	53
3 Michael Takeshita, Prevention Services Bureau Forestry Division Acting Chief, County of Los Angeles Fire Department	55
4 Christy Wong, Facilities Assistant Project Manager, Long Beach Unified School District	58

The comment letters and responses follow. The comment letters have been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1).

Any changes made to the text of the Draft EIR correcting information, data or intent, other than minor typographical corrections or minor working changes, are noted in the Final EIR as changes from the Draft EIR.

Letter 1



EDMUND G. BROWN JR.  
GOVERNOR

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



KEN ALEX  
DIRECTOR

June 5, 2017

Christopher Koontz  
City of Long Beach  
333 W. Ocean Boulevard  
5th Floor  
Long Beach, CA 90802

Subject: Alamitos Avenue "Complete Streets" Improvements Project  
SCH#: 2017011072

Dear Christopher Koontz:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 2, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Morgan".

Scott Morgan  
Director, State Clearinghouse

Enclosures

cc: Resources Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2017011072  
**Project Title** Alamitos Avenue "Complete Streets" Improvements Project  
**Lead Agency** Long Beach, City of

**Type** EIR Draft EIR

**Description** The proposed project involves a modification to Alamitos Ave. between 7th Street and Ocean Blvd. to a two-lane divided roadway with on-street bike lanes that would match the roadway section north of 7th Street. North of 7th Street, Alamitos Ave. has been restriped to provide a two-lane, divided roadway, separated by a two-way left-turn, with on-street parking and on-street bike lanes, as well as a buffer to separate bicycle traffic from vehicular traffic. Currently, most of the project site provides two-lanes in each direction separated by a two-way left-turn lane; south of 3rd St., only one Southbound through lane is provided too just past Broadway. Before restriping activities, the project would remove and recycle existing asphalt within the project site and resurface the roadway. The project site is approx. 3,400 ft. of road length and 4.7 ac.

**Lead Agency Contact**

**Name** Christopher Koontz  
**Agency** City of Long Beach  
**Phone** 562-570-6288 **Fax**  
**email**  
**Address** 333 W. Ocean Boulevard  
 5th Floor  
**City** Long Beach **State** CA **Zip** 90802

**Project Location**

**County** Los Angeles  
**City** Long Beach  
**Region**  
**Lat / Long** 33° 46' 33.49" N / 118° 10' 47.98" W  
**Cross Streets** Alamitos Ave between 7th Street and Ocean Blvd.

**Parcel No.**  

<b>Township</b>	<b>Range</b>	<b>Section</b>	<b>Base</b>

**Proximity to:**

**Highways** 710  
**Airports**  
**Railways** UPRR, Metrolink  
**Waterways** LA River  
**Schools** St. Anthony, Franklin  
**Land Use** Road/Downtown Planned Developemnt District (PD-30) / Urban High Density, Mixed Use Residential, Mixed Retail/ Residential

**Project Issues** Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Landuse; Cumulative Effects; Aesthetic/Visual; Growth Inducing

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; Public Utilities Commission

Document Details Report  
State Clearinghouse Data Base

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*Date Received* 04/19/2017      *Start of Review* 04/19/2017      *End of Review* 06/02/2017

DEPARTMENT OF TRANSPORTATION  
DISTRICT 7-OFFICE OF REGIONAL PLANNING  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-0067  
FAX (213) 897-1337  
www.dot.ca.gov



Making Conservation  
a California Way of Life.

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Governor's Office of Planning & Research

MAY 04 2017

STATE CLEARINGHOUSE

May 3, 2017

Mr. Christopher Koontz  
City of Long Beach  
333 W. Ocean Boulevard, 5<sup>th</sup> Floor  
Long Beach, CA, 90802

RE: Alamitos Avenue Complete Streets  
Draft Environmental Impact Report  
SCH# 2017011072  
GTS#07-LA-2017-00885

Dear Mr. Koontz:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Alamitos Avenue "Complete Streets" improvement involves roadway modifications to Alamitos Avenue between 7<sup>th</sup> Street and Ocean Boulevard. This entails reducing the street to a two-lane divided roadway with on-street bike lanes that would match the roadway section north of 7<sup>th</sup> Street.

Based on the information received in the Draft Environmental Impact Report, Caltrans has the following comments:

We would like to reiterate that we do not expect project approval to result in adverse impacts on nearby State facilities. Caltrans supports the implementation of complete streets and active transportation safety improvements because they are integral in assisting the state achieve climate change and transportation safety related policy goals and initiatives.

If you have any questions or concerns regarding these comments, please contact project coordinator, Severin Martinez at (213) 897-0067 or [severin.martinez@dot.ca.gov](mailto:severin.martinez@dot.ca.gov) and refer to GTS# 07-LA-2017-00885.

Sincerely,

DIANNA WATSON  
Branch Chief, Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

## Letter 1

**COMMENTER:** Scott Morgan, Director, State Clearinghouse and Planning Unit

**DATE:** June 5, 2017

The commenter states that the State Clearinghouse submitted the Draft EIR to applicable state agencies and acknowledges that the City has complied with CEQA environmental review requirements. The State Clearinghouse letter attached forwarded letters from Caltrans, which is addressed under Letter 2. No response is warranted.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7-OFFICE OF REGIONAL PLANNING

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 897-0067

FAX (213) 897-1337

www.dot.ca.gov

Letter 2

*Making Conservation  
a California Way of Life.*

May 3, 2017

Mr. Christopher Koontz  
City of Long Beach  
333 W. Ocean Boulevard, 5<sup>th</sup> Floor  
Long Beach, CA, 90802

RE: Alamitos Avenue Complete Streets  
Draft Environmental Impact Report  
SCH# 2017011072  
GTS#07-LA-2017-00885

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Sincerely,

A handwritten signature in blue ink that reads "Dianna Watson" with a stylized flourish at the end.

DIANNA WATSON

Branch Chief, Community Planning &amp; LD IGR Review

cc: Scott Morgan, State Clearinghouse

## Letter 2

**COMMENTER:** Dianna Watson, Community Planning Branch Chief, Department of Transportation

**DATE:** May 3, 2017

The commenter states that they do not expect the proposed project to adversely impact nearby State facilities. The commenter also supports implementation of complete streets because they are integral in assisting the state achieve climate change and transportation safety related policy goals and initiatives. No response is warranted.



# COUNTY OF LOS ANGELES

## FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294

Letter 3

DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

May 16, 2017

Christopher Koontz, Planner  
City of Long Beach  
Development Services Department  
333 West Ocean Boulevard  
Long Beach, CA 90802

Dear Mr. Koontz:

**NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT,  
"ALAMITOS AVENUE COMPLETE STREETS IMPROVEMENTS PROJECT,"  
INVOLVES A MODIFICATION TO ALAMITOS AVENUE BETWEEN 7TH STREET  
AND OCEAN BOULEVARD TO A TWO-LANE DIVIDED ROADWAY WITH ON-  
STREET BIKE LANES THAT WOULD MATCH THE ROADWAY SECTION NORTH  
OF 7TH STREET, LONG BEACH, FFER 201700052**

The Notice of Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

**PLANNING DIVISION:**

The subject property is entirely within the City of Long Beach, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- |              |           |                  |                      |           |                      |                       |                 |
|--------------|-----------|------------------|----------------------|-----------|----------------------|-----------------------|-----------------|
| AGOURA HILLS | BRADBURY  | CUDAHY           | HAWTHORNE            | LA HABRA  | LYNWOOD              | PICO RIVERA           | SIGNAL HILL     |
| ARTESIA      | CALABASAS | DIAMOND BAR      | HIDDEN HILLS         | LA MIRADA | MALIBU               | POMONA                | SOUTH EL MONTE  |
| AZUSA        | CARSON    | DUARTE           | HUNTINGTON PARK      | LA PUENTE | MAYWOOD              | RANCHO PALOS VERDES   | SOUTH GATE      |
| BALDWIN PARK | CERRITOS  | EL MONTE         | INDUSTRY             | LAKEWOOD  | NORWALK              | ROLLING HILLS         | TEMPLE CITY     |
| BELL         | CLAREMONT | GARDENA          | INGLEWOOD            | LANCASTER | PALMDALE             | ROLLING HILLS ESTATES | WALNUT          |
| BELL GARDENS | COMMERCE  | GLENDDORA        | IRVINDALE            | LAWNDALE  | PALOS VERDES ESTATES | ROSEMEAD              | WEST HOLLYWOOD  |
| BELLFLOWER   | COVINA    | HAWAIIAN GARDENS | LA CANADA-FLINTRIDGE | LOMITA    | PARAMOUNT            | SAN DIMAS             | WESTLAKE VILLAG |
|              |           |                  |                      |           |                      | SANTA CLARITA         | WHITTIER        |

Christopher Koontz, Planner  
May 16, 2017  
Page 2

**LAND DEVELOPMENT UNIT:**

This project is located entirely in the City of Long Beach. Therefore, the City of Long Beach Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the Los Angeles County Fire Department. However, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the Los Angeles County Fire Department.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment on this project.

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

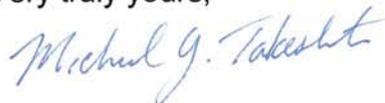
The Los Angeles County Fire Department's Forestry Division has no further comments regarding this project.

**HEALTH HAZARDOUS MATERIALS DIVISION:**

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments for the project. The City of Long Beach Certified Unified Program Agency has local jurisdiction for environmental issues.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

MYT:ac

## Letter 3

**COMMENTER:** Michael Takeshita, Prevention Services Bureau Forestry Division Acting Chief,  
County of Los Angeles Fire Department

**DATE:** May 16, 2017

The commenter states that potential impacts related to erosion control, watershed management, rare and endangered species, vegetation, fuel modification, archaeological and cultural resources, and the County Oak Tree Ordinance should be addressed in the Draft EIR. The commenter has no other comments from the Department's Planning Division, Land Development Unit, or Health Hazardous Materials Division.

Project impacts related to erosion and biological resources are discussed in Section VI, Geology and Soils, and Section IV, Biological Resources, of the Initial Study (Appendix A of the Draft EIR). The project involves modification to and resurfacing of an existing road in an urban area and would not impact watershed management, rare and endangered species, vegetation, fuel modification, or oak trees.



BUSINESS DEPARTMENT – Facilities Development & Planning  
2425 Webster Avenue, Long Beach, CA 90810  
(562) 997-7550 Fax (562) 595-8644

June 2, 2017

Mr. Christopher Koontz  
Planning Bureau, Development Services Department  
City of Long Beach  
333 West Ocean Boulevard, 5<sup>th</sup> Floor  
Long Beach, California 90802

Transmitted via email: [Christopher.Koontz@longbeach.gov](mailto:Christopher.Koontz@longbeach.gov)

**Re: Comments on the Draft Environmental Impact Report for the Alamitos Avenue "Complete Streets" Improvements Project (SCH# 2017011072). Long Beach, California**

Dear Mr. Koontz:

The Long Beach Unified School District (LBUSD) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Alamitos Avenue "Complete Streets" Improvements Project (Project). We understand the City of Long Beach is the lead agency for the Project under the California Environmental Quality Act (CEQA).

### **Introduction**

In addition to establishing high standards of academic excellence for its students, LBUSD is committed to providing a safe environment and school facilities for its students and employees. Thus, our primary concern in reviewing the DEIR is to ensure that potential environmental impacts to schools are appropriately identified, evaluated and mitigated.

The project involves a modification to Alamitos Avenue between 7<sup>th</sup> Street and Ocean Boulevard to a two-lane divided roadway with on-street bike lanes that would match the roadway section north of 7<sup>th</sup> Street. North of 7<sup>th</sup> Street, Alamitos Avenue has been restriped to provide a two-lane, divided roadway, separated by a two-way left-turn, with on-street parking and on-street bike lanes, as well as a buffer to separate bicycle traffic from vehicular traffic. Currently, most of the project site provides two-lanes in each direction separated by a two-way left-turn lane; south of 3<sup>rd</sup> Street, only one southbound through lane is provided to just past Broadway.

As the largest employer in the City of Long Beach, LBUSD (the District) appreciates the potential benefits of the Project, including consistency with the Long Beach Mobility Element and the Bicycle Master Plan. We also note that the project will result in significant traffic impacts at various intersections along Alamitos Avenue. As a result, the District is concerned that the proposed project may have the potential to cause significant adverse traffic impacts to LBUSD schools, in particular Franklin Classical Middle School (540 Cerritos Avenue; approximately 900 feet east of Alamitos Avenue and 6<sup>th</sup> Street) and Stevenson Elementary School (515 Lime Street; approximately 850 feet west of Alamitos Avenue and 5<sup>th</sup> Street).

The District's Facility Master Plan has identified the need for additional school development, including expansion and modernization of existing schools, within the City. Among our concerns are potential impacts to schools from traffic.

1,  
cont'd

### General Comment

The District requests that the EIR (and proposed Project) include – and provide additional clarification regarding – protections, policies and programs to preserve an environment conducive to safety and learning at our neighborhood schools. In particular, the District requests that the EIR include mitigation measures that protect schools from operational and construction traffic.

2

### Specific Comments

#### Background

We reviewed: (1) the traffic section in the EIR for the Alamitos Avenue Complete Streets Improvements Project, and the (2) Traffic Impact Analysis for the Alamitos Avenue Complete Streets Corridor Improvements Project, dated December 12, 2016, prepared by LLG Engineers, and referred in this comment letter as "TIA".

Traffic impacts were evaluated at nine intersections in the study area along Alamitos Avenue between 7<sup>th</sup> Street and Ocean Avenue. Specifically, existing weekday peak hour traffic volumes for the nine (9) key study intersections were evaluated. Traffic counts were conducted in May 2016 and September 2016 while schools were in session.

The DEIR concluded that the project would reduce vehicular capacity on Alamitos Avenue resulting in exceedances of the level of service (LOS) standard of "D" at several intersections. Impacts are considered significant if (1) the project causes an intersection to deteriorate from LOS D to LOS E or LOS F, or (2) if a project increases traffic demand by 2 percent of capacity causing or worsening LOS E or F when an intersection is operating LOS E or F in the baseline condition.

3

The following intersections would be significantly impacted using either the ICU or the HCM metric:

- Alamitos Avenue at 7<sup>th</sup> Street (Existing Plus Project, PM; and 2020 Plus Project, PM)
- Alamitos Avenue at 6<sup>th</sup> Street (2020 Plus Project, PM)
- Alamitos Avenue at 4<sup>th</sup> Street (Existing Plus Project, PM; and 2020 Plus Project, AM and PM)
- Alamitos Avenue at 3<sup>rd</sup> Street (2020 Plus Project, AM and PM)
- Alamitos Avenue at Broadway (Existing Plus Project, PM; and 2020 Plus Project PM)

The DEIR states that there are no feasible mitigation measures that would mitigate the project's impact.

The Long Beach Unified School District operates two schools in the vicinity of Alamitos Avenue: ↗

- Stevenson Elementary School is located at 515 Lime Avenue approximately 850 feet west of the site between E 6<sup>th</sup> Street and E 5<sup>th</sup> Street.
- Franklin Classical Middle School is located at 540 Cerritos Avenue approximately 900 feet east of the site between E 7<sup>th</sup> Street and E 5<sup>th</sup> Street

The following comments address traffic issues related to the schools discussed above.

#### Comment 1

Given the attendance boundaries for Franklin Classical Middle School and for Stevenson Elementary School, students come from an area generally comprised between Ocean Boulevard, Pacific Coast Highway, Long Beach Boulevard and Cherry Avenue. Alamitos Avenue is an important road that is in the travel path of most students attending these schools. The reduction in vehicular capacity and delays at intersections along Alamitos Avenue would not directly affect school operations such as vehicular access driveways and the student drop-off and pick-up areas. However, this Project would result in additional travel time and discomfort for staff, parents and students that use automobiles.

3,  
cont'd

The Project would result in improved bicycle and pedestrian circulation along Alamitos Avenue. However, given that the vast majority of students and staff live at distances over ½ mile from each school, most school related trips are via automobile. Therefore, both schools operated by Long Beach Unified School District would be negatively affected due to reduced vehicular capacity with implementation of the Project.

#### Comment 2

The TIA and DEIR included a queuing evaluation performed for the right and left turn lanes for the northbound and southbound directions. The peak hour factor (PHF) is the hourly volume during the maximum-volume hour of the day divided by the peak 15-minute flow rate within the peak hour. It is a measure of traffic demand fluctuations within the peak hour. The HCM methodology for level of service is based on the peak 15-minute flow, so normally the PHF is used to calculate LOS. A review of the HCM calculations in the traffic study indicates that a peak hour factor of 1.00 was used to calculate the delays at study intersections.

However, the traffic counts show that peak hour factors at some approaches are much lower than 1.0. For example, the PHF for the eastbound and westbound approaches at the intersection of Alamitos Avenue at 5th Street in the AM peak hour is 0.613 and 0.710, respectively. Peak hour factors below normal are often observed around schools, because of short term peak demands that occur during student drop-off and pick-up periods. Because the TIA assumed a “default” PHF of 1.0 that is representative of traffic outside school areas, the resulting levels of service and queues may have been underestimated.

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It is recommended that the simulation analysis and queuing evaluation to determine the recommended storage lengths (Tables 8 and 12) be revised to account for peak traffic that occurs within the peak hour as a result of student drop-off and pick-up. Because Alamitos Avenue would have one thru lane at intersections, when left and right turn pockets reach capacity, the portion of ↘

the queue that cannot be accommodated in the storage left or right turn lane would block thru traffic, resulting in excessive delays and a potential safety hazard.

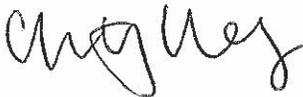
4,  
cont'd

**Conclusion**

The District appreciates the opportunity to participate in the environmental review process. We look forward to working with the City in a continuing review and assessment of impacts from buildout of the Project, and the development and implementation of effective mitigation measures.

If you have any questions please contact Christy Wong at LBUSD at (562) 997-7550.

Sincerely,



Christy Wong  
Facilities Assistant Project Manager  
Long Beach Unified School District  
cawong@lbschools.net

FS/KR:cw

cc: Alan Reising, Executive Director, LBUSD Facility Development & Planning  
PlaceWorks

## Letter 4

**COMMENTER:** Christy Wong, Facilities Assistant Project Manager, Long Beach Unified School District (LBUSD)

**DATE:** June 2, 2017

### Response 4.1

The commenter states concern that the project would cause significant adverse traffic impacts to LBUSD schools, in particular Franklin Classical Middle School and Stevenson Elementary School.

The Draft EIR identifies a significant and unavoidable traffic impact because the project would restrict travel lanes, thereby reducing capacity for vehicle traffic and slowing traffic flow at intersections along Alamitos Avenue. Based on additional analysis prepared by Linscott, Law, and Greenspan, Engineers (LLG) using Synchro 10.0, travel times along Alamitos Avenue would be extended by no more than 76.6 seconds (about 1.3 minutes) during the AM peak hour (see Appendix E of the Final EIR). The proposed project would increase travel times by 222.2 seconds (about 4 minutes) during the PM peak hour, however, the PM peak hour does not coincide with the school dismissal period. During the midday dismissal period, overall traffic volumes would be substantially lower, and the project would have a proportionally lower impact to travel delays. Table 14 below presents the difference in travel times for Year 2020 with and without the proposed project.

**Table 14 Change in Delay on Alamitos Avenue (between 7th Street and Ocean Boulevard)**

Time Period	Year 2020 Cumulative		Year 2020 Cumulative Plus Project		Net Difference	
	Northbound Travel Time (sec)	Southbound Travel Time (sec)	Northbound Travel Time (sec)	Southbound Travel Time (sec)	Northbound Travel Time (sec)	Southbound Travel Time (sec)
AM	248.7	362.6	261.4	439.2	12.7	76.6
PM	194.2	281.8	416.4	349.9	222.2	68.1

Note: The values presented here include the existing peak hour factors calculated in the memorandum prepared by LLG; see Appendix E.

In addition, City of Long Beach decision makers would need to adopt a Statement of Overriding Considerations setting forth why the project’s benefits outweigh this impact, if the project is to be approved. Neither the Draft EIR nor the Initial Study prepared for the project identifies any other significant impacts and none have been identified by the commenter.

### Response 4.2

The commenter requests that the Draft EIR include mitigation measures that protect schools from operation and construction traffic.

As discussed in Section 4.1, Transportation and Traffic, of the Draft EIR, the project would result in a significant and unavoidable traffic impact and no mitigation is available to reduce impacts to a less than significant level. Section 6, Alternatives, of the Draft EIR identifies three alternatives that would reduce traffic-related impacts in comparison to the proposed project; however, only Alternative 1, the No Project Alternative, would eliminate the significant and unavoidable traffic impact. In

addition, the No Project Alternative would not meet the project objectives, and Alternatives 2 and 3, which would reduce bike lane widths and remove on-street parking on either the southbound or northbound direction, would meet project objectives to a proportionally lesser degree than the proposed project.

The project would not result in significant construction-related traffic impacts because construction traffic would be temporary and similar to that associated with existing maintenance and resurfacing roadwork that the City currently completes periodically on roadways throughout Long Beach. In addition, the City's Public Works Department will coordinate the construction schedule with LBUSD to reduce construction-related delays for parents dropping off students at school to the extent feasible. If possible, all or part of the construction would occur during winter break when school is out of session.

### Response 4.3

The commenter states that project would not directly affect school operations, such as vehicular access driveways and student drop-off and pick-up areas, but that the project would reduce vehicular capacity and result in delays at intersections along Alamitos Avenue that would result in additional travel time and discomfort for staff, parents, and students. The commenter also states that while the project would improve bicycle and pedestrian circulation along Alamitos Avenue, the majority of students and staff access the school via automobiles and would be negatively affected.

Please see Response 4.1. Although increased delays may occur during project construction, such impacts would be temporary and would be similar to the delays associated with existing maintenance and resurfacing roadwork that the City currently completes periodically on roadways throughout Long Beach, and to the extent feasible, the Public Works Department will coordinate the construction schedule with LBUSD. In addition, as discussed under Impact T-2 in the Draft EIR, the proposed bicycle and pedestrian improvements are designed to improve overall safety along Alamitos Avenue. By providing a designated lane, the project would reduce conflicts between bicyclists, pedestrians, and vehicles, providing a beneficial impact to all users of Alamitos Avenue, including parents, students, and staff going to local schools.

### Response 4.4

The commenter states that the traffic counts show that the peak hour factors (PHF) at some approaches are lower than the factor used in the Draft EIR (1.00), potentially resulting in underestimated impacts to levels of service and queueing. The commenter recommends that a simulation analysis and queueing evaluation be revised to account for peak traffic that occurs within the peak hour as a result of student drop-off and pick-up periods. The commenter states that when left and right turn pockets reach capacity, the portion of the queue that cannot be accommodated in the storage lane would block traffic, resulting in excessive delays and a potential safety hazard.

As noted in Response 4.1, the Draft EIR identifies a significant and unavoidable traffic impact and City of Long Beach decision makers would need to adopt a Statement of Overriding Considerations setting forth why the project's benefits outweigh this impact, if the project is to be approved. Based on City of Long Beach requirements, significant impacts are determined based on the Intersection Capacity Utilization (ICU) methodology for signalized intersections. The Highway Capacity Manual (HCM) methodology for signalized intersections was provided for informational purposes to help with the final design for each turn pocket. Additionally, the Los Angeles County 2010 Congestion Management Program (LA CMP) states that a PHF of 1.0 should be used. As such, the HCM

calculations as presented in the Traffic Impact Analysis (TIA; Appendix D of the Draft EIR) are accurate and in conformance with City of Long Beach and LA CMP criteria. Although some queue lengths exceed their storage capacity, the queuing evaluation is not used to determine significant impacts and is provided merely for informational purposes.

The HCM LOS analysis and queuing evaluation has been updated to reflect the existing PHF at the intersections in a memorandum prepared by LLG (see Appendix E of the Final EIR). As demonstrated in the memorandum, the level of service and queuing results are similar to those presented in the TIA. As identified in the Draft EIR, project impacts related to level of service would remain significant and unavoidable.