

CITY OF LONG BEACH

# DOWNTOWN PLAN

FINAL

PROGRAM ENVIRONMENTAL IMPACT REPORT

SCH No. 2009071006



City of Long Beach  
Development Services Department

November 2011

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**Downtown Plan**

*Final*

**Environmental Impact Report**

SCH # 2009071006

*Prepared by:*

**City of Long Beach**  
Development Services Department  
333 W. Ocean Boulevard, 5<sup>th</sup> Floor  
Long Beach, California 90802

*Prepared with the assistance of:*

**Rincon Consultants, Inc.**  
180 N. Ashwood Avenue  
Ventura, California 93003

*November 2011*

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## **Addenda Errata**

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**CITY OF LONG BEACH  
DOWNTOWN PLAN  
PROGRAM ENVIRONMENTAL IMPACT REPORT**

**ADDENDA ERRATA**

This Addenda Errata provides minor revisions and corrections to the Draft Program Environmental Impact Report (PEIR) for the City of Long Beach Downtown Plan. These minor revisions and corrections are in response to public comments received on the Draft PEIR. This Addenda Errata, combined with the Draft PEIR and the Response to Comments document constitute the Final Program EIR (Final PEIR) for the Downtown Plan.

This Errata Sheet is organized by issue area of the Draft PEIR. Deletions are noted by ~~strikeout~~ and insertions by underline. Those figures that required minor corrections are attached to this Addenda Errata where noted.

CEQA Guidelines §15088.5(a) states that when new information is provided on a project, a lead agency is not required to recirculate an EIR, "...unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement."

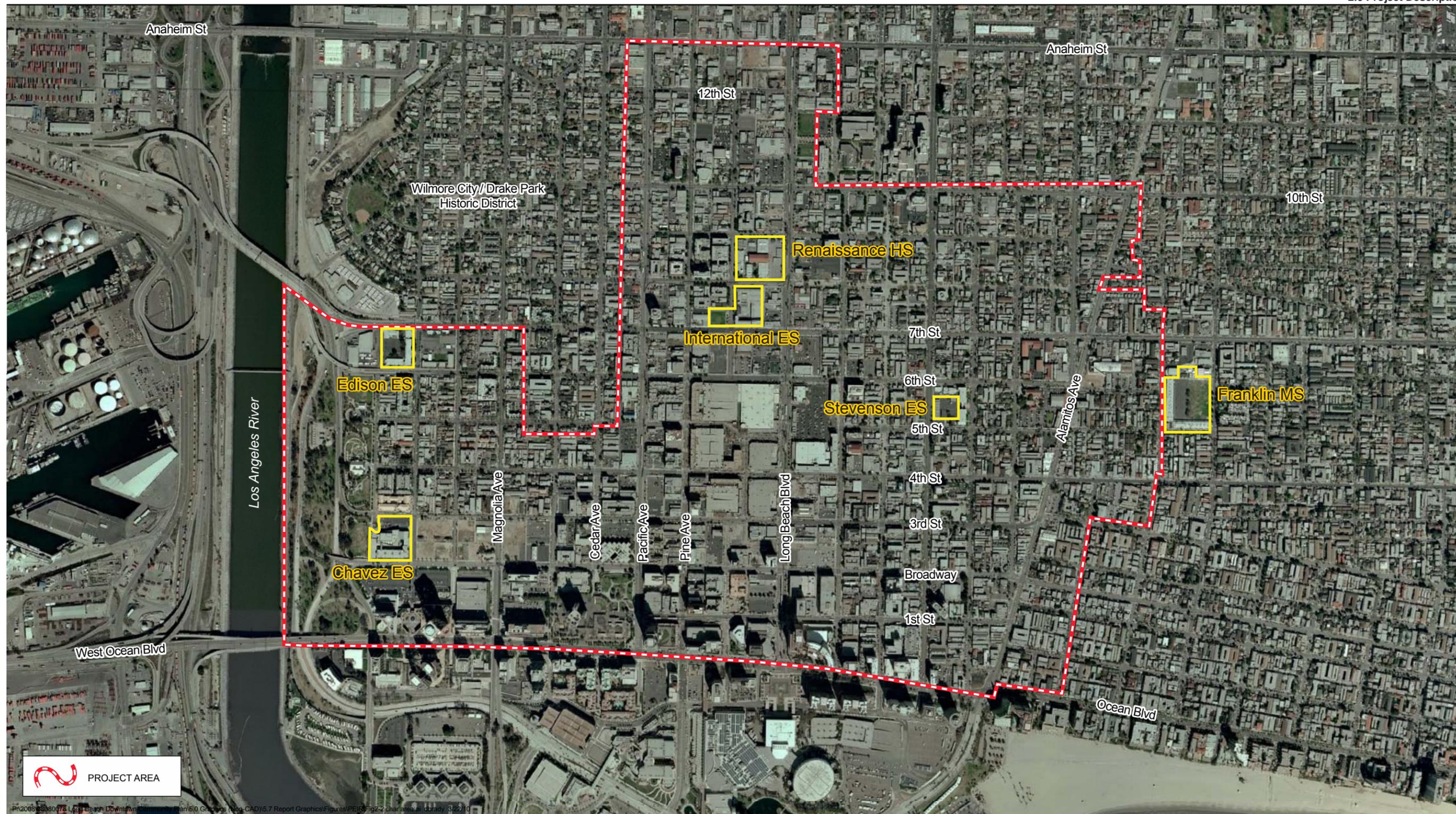
The changes incorporated into this PEIR involve clarifications resulting from comments received from the applicant, staff, and the public. The changes do not result in presentation of new substantial adverse environmental effects that cannot be mitigated by existing mitigation.

The minor corrections and clarifications to the Draft PEIR in response to public comments by section and page number are as follows:

**2.0 PROJECT DESCRIPTION:**

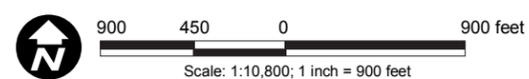
1. Figure 2-1, page 2-13, Aerial of Project Area and School Sites. Figure 2-1 is revised to show the correct location of Edison Elementary School, which is located one block farther north, between 6<sup>th</sup> and 7<sup>th</sup> Streets, than shown on the Figure 2-1 in the DEIR. The corrected Figure 2-1 is attached to this Errata Sheet.
2. Figure 2-6, page 2-19. Figure 2-6 is updated to indicate the following information:
  - a. Long Beach Transit and Other Bus Routes, received via FAX from Long Beach Transit (Comment Letter L-4), which indicate updated bus routes.
  - b. 6<sup>th</sup> Street is now shown as a key mobility street. In addition, bike routes are indicated as requested in Comment P.16-5.

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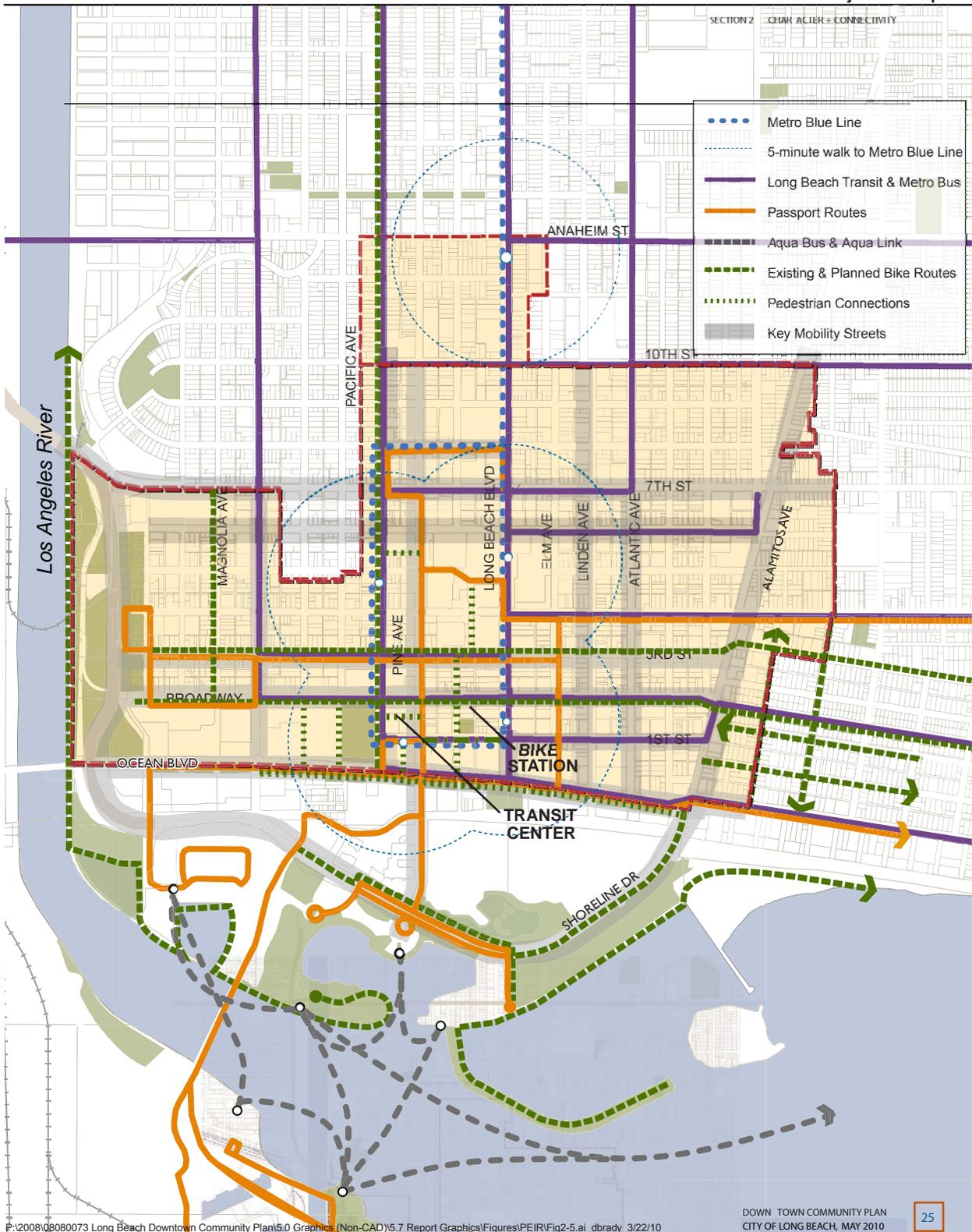
Source: ESRI 2008



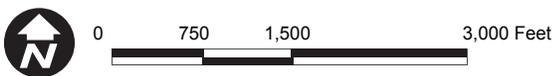
December 2010

**Figure 2-1**  
**Aerial of Project Area and School Sites**

City of Long Beach  
2-13



P:\2008\08080073 Long Beach Downtown Community Plan\5.0 Graphics (Non-CAD)\5.7 Report Graphics\Figures\PEIR\Fig2-5.ai dbrady 3/22/10  
Source: Long Beach Community Plan 2010



**Figure 2-6**  
**Mobility Network**

### 3.0 ENVIRONMENTAL SETTING

1. Page 3-1, Section 3.2, Project Area Setting. The second sentence is revised as follows:

“The north boundary generally follows portions of 7<sup>th</sup> and 10<sup>th</sup> streets and Anaheim Street, and the east boundary includes property land on both sides of Alamitos Avenue.”

### 4.1 AESTHETICS

1. Page 4.1-8, Mitigation AES-3 (and Measure AES-3 in Table ES-1). Measure AES-3 is revised to read as follows:

**Mitigation AES-3 Shadow Impacts.** Prior to the issuance of building permits for any structure exceeding 75 feet in height or any structure that is adjacent to a light sensitive use and exceeds 45 feet in height, the applicant shall submit a shading study that includes calculations of the extent of shadowing arches for winter and equinox conditions. If feasible, projects shall be designed to avoid shading of light sensitive uses in excess of the significance thresholds outlined in this EIR. If avoidance of shadows exceeding significance thresholds is determined to be infeasible, the shadow impact will be disclosed as part of a project environmental impact report (EIR).

### 4.2 AIR QUALITY

1. Page 4.2-14, Mitigation AQ-1(a), first introductory paragraph (and AQ-1(a) in Table ES-1). The first paragraph of Mitigation AQ-1(a) is revised as follows, with the remainder of the measure (the entirety of the three bullets following the first paragraph) to remain as currently written in the DEIR on pages 4.2-14 through 4.2-15:

“To reduce short-term construction emissions, the City shall require that all construction projects that would require use of heavy-duty (50 horsepower [hp] or more), off-road vehicles to be used during construction shall require their contractors to implement the Enhanced Exhaust Control Practices (listed below) or whatever mitigation ensures are recommended by SCAQMD at the time individual portions of the site undergo construction, including those specified in the mitigation recommendations in the SCAQMD CEQA Handbook or SCAQMD’s Mitigation Measures and Control Efficiencies recommendations located at the following url:  
[http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).”

2. Page 4.2-16, Mitigation AQ-1(c). The following mitigation measure AQ-1(c) has been added as recommended by the South Coast Air Quality Management District staff to further reduce significant adverse air quality construction impacts:

“Mitigation AG-1(c) Prior to issuance of a grading permit, the project plans shall include the following provisions to reduce construction-related air quality impacts:

- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- Reroute construction trucks away from congested streets or sensitive receptor areas;
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation;
- Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications;
- Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113;
- Construct or build with materials that do not require painting;
- Require the use of pre-painted construction materials if available;
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export);
- During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following:
  - Project Start, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

- Encourage construction contractors to apply for AQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for AQMD “SOON” funds. The “SOON” program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>”
2. Page 4.2-17, Mitigation AQ-2 (and Mitigation AQ-2 in Table ES-1). The third bullet of Mitigation AQ-2 is revised to read as follows:

“The proposed structures shall be designed to meet current Title 24 + 20 percent energy efficiency standards and shall include such measures as photovoltaic cells on the rooftops to achieve an additional 25 percent reduction in electricity use on an average sunny day”.

### 4.3 CULTURAL RESOURCES

1. Page 4.3-19, Table 4.3-3. Table 4.3-3 is amended to include 8 additional properties, as shown below. Pursuit of local designation has been recommended for the seven residential properties on this list in order to preserve the existing residential character. The one commercial property is recommended for adaptive reuse.

Address	APN	Desired Outcome	Survey Code*	Property Description and Architectural Style
50 Elm Avenue	7281-025-018	Pursue Local Designation	6Z	Minimal Traditional
82 Lime Avenue	7281-022-027	Pursue Local Designation	5S3	Minimal Traditional
234 W. 4th Street	7280-015-003	Pursue Local Designation	5S3	Colonial Revival (Neighborhood Overlay)
320 Maine Avenue	7278-022-016	Pursue Local Designation	5S3	Art Deco
322 Daisy Avenue	7278-022-034	Pursue Local Designation	5S3	Moderne
422 Lime Avenue	7281-006-028	Pursue Local Designation	5S3	Hipped Roof Cottage
701 Pine Avenue	7273-023-009	Adaptive Reuse Encouraged	5S3	Regency
938 Appleton Street	7275-002-022	Pursue Local Designation	5S3	Italian Renaissance Revival (Neighborhood Overlay)

2. Page 4.3-19, Table 4.3-3. The following property was demolished in September 2011, and is removed from Table 4.3-3.

Address	APN	Desired Outcome	Survey Code*	Property Description and Architectural Style
1085 Long Beach Blvd	7273-007-013	Pursue Local Designation	Not Surveyed	Flower Shop (demolished)

3. Page 4.3-12, Mitigation CR-1a. Mitigation CR-1a is revised to read as follows to reflect the above changes to Table 4.3-3:

**Mitigation CR-1a** The City shall encourage the designation as local landmarks of 20 ~~14~~ properties identified in Table 4.3-3 with the “Desired Outcome” of “Pursue Local Designation.” The City will encourage the on-going maintenance and appropriate adaptive reuse of all properties in Table 4.3-2 (existing landmarks), and Table 4.3-3 as historic resources.

#### 4.5 GREENHOUSE GAS EMISSIONS

1. Page 4.5-19 (and Table ES-1), Mitigation GHG-1(b). The first sentence of Mitigation GHG-1(b) is revised to read as follows:

“Implement Additional Measures to Control Construction-Generated GHG Emissions. To further reduce construction-generated GHG emissions, the project applicant(s) of all public and private developments shall implement all feasible measures for reducing GHG emissions associated with construction that are recommended by the City and/or SCAQMD at the time individual portions of the site undergo construction, including those specified in the mitigation recommendations in the SCAQMD CEQA Handbook or SCAQMD’s Mitigation Measures and Control Efficiencies recommendations located at the following url:  
[http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)”

2. Page 4.5-22, third paragraph, second sentence. The sentence is revised to read as follows:

At full buildout, the size of the residential population accommodated by the Project would be approximately ~~14,750~~ 14,500 residents, and the number of jobs supported by the Project would be approximately 5,200.”

3. P. 4.5-30, Table 4.5-2, column titled, “Residential Population Accommodated by Plan.” The table is revised to read 14,500 residents instead of 14,750 residents.

#### 4.6 HAZARDS AND HAZARDOUS MATERIALS

1. Page 4.6-5 (and in Table ES-1), Mitigation Haz-3(b). The first sentence, of Mitigation Haz-3(b) is revised to read as follows:

“If contaminants are detected, the results of the soil sampling shall be forwarded to the appropriate local regulatory agency (Long Beach/Signal Hill Certified Unified Program Agency [CUPA], LARWQCB, or the state DTSC).

#### 4.9 NOISE

1. Page 4.9-7, Impact Noise-1. The first sentence is revised to read as follows:

“Implementation of the proposed Downtown Plan would create noise from construction activities that would expose local residents sensitive land uses to temporary or periodic substantial noise level increases.”

2. Page 4.9-7, fourth paragraph under Impact Noise-1. The paragraph is revised to read as follows:

Residences are located within some portions of the Plan area and at its periphery to the north, east, and west. Commercial and governmental land uses, including schools, are located throughout the project area. Residences, schools, and businesses within, and in the vicinity of, the project area would be affected by construction noise during buildout of the Plan.

3. Page 4.9-9 (and in Table ES-1), Mitigation Noise-1(b), first sentence. The sentence is amended to read as follows:

“The City will require the following measures, where applicable based on noise level of source, proximity of receptors, and presence of intervening structures, to be incorporated into contract specifications for construction projects within ~~150~~ 300 feet of existing ~~residential~~ noise sensitive land uses (including, but not limited to residences, schools, hospitals/nursing homes, churches, and parks) implemented under the proposed Plan.”

4. Page 4.9-9 (and in Table ES-1), Mitigation Noise -1(a), last bullet, first sentence. The sentence is revised to read as follows:

“~~If a noise complaint(s) is~~ two or more noise complaints are registered, the liaison, or project representative, shall retain a City-approved consultant to conduct noise measurements at the locations that registered the complaints.”

5. Page 4.9-10, discussion under “Level of Significance after Mitigation.” The discussion is revised to read as follows:

**Level of Significance after Mitigation.** Implementation of Mitigation Measures Noise-1(a) and Noise-1(b) would limit construction activity to the hours allowed by the City’s Noise Ordinance and include additional methods to further reduce construction-related noise. Thus, these measures would reduce construction noise levels to *less than significant*.

6. Page 4.9-11, Mitigation Noise-2. Mitigation Noise-2 is re-numbered as Noise-2(a).

7. Page 4.9-11. The following mitigation measure is added:

**Mitigation Noise-2(b)** Any construction activity that generates vibration exceeding the “vibration perception threshold” as specified in Municipal

Code Section 8.80.200 at any school shall be scheduled at a time when school is not in session.

#### 4.10 POPULATION AND HOUSING

1. Page 4.10-1, Section 4.10.1(b), Regulatory Setting. The second sentence is revised as to read as follows:

“Existing zoning regulations, in particular the PD-29 and the PD-30 District regulations, implement the General Plan.”

2. Page 4.10-3, Impact Pop-1. The second sentence is revised to read as follows:

“Although the area is presently zoned to permit densities of up to and exceeding 138 dwelling units per acre under the existing PD-29 and PD-30 zones, the impact of this growth would be Class I, *significant and unavoidable.*”

3. Page 4.10-3, third paragraph, second sentence. The sentence is revised as follows:

“Based on the City average of 2.90 persons per household (California Department of Finance, 2009) the proposed 5,000 dwelling units would generate a net increase of approximately ~~13,500~~ 14,500 new residents.”

#### 4.11 PUBLIC SERVICES

1. Page 4.11-2, Fire Protection Services. The discussion under “Fire Protection Services” is revised as follows:

The Long Beach Fire Department (LBFD) provides fire protection service throughout the City. It maintains ~~23~~ 24 fire stations in addition to its headquarters near Long Beach Airport and its beach operations facilities. The fire stations in or near the Project area are Station 1, located at 237 Magnolia Avenue; Station 2, located at 1645 East 3rd Street; ~~and~~ Station 3, located at 1222 Daisy Avenue; ~~and Station 10, located at 1417 Peterson Avenue.~~ Station 1 maintains a staff of ~~11~~ 14 fire fighters, Station 2 maintains a staff of six fire fighters, and Station 3 maintains a staff of ~~four~~ three fire fighters, ~~and Station 10 maintains a staff of six firefighters.~~ The LBFD employs a total of ~~364~~ 505 fire fighters, with ~~118~~ 133 suppression fire fighters on duty at all times.

Based on a total population of 492,682 persons for Long Beach (California Department of Finance 2009), there are approximately ~~0.74~~ 1.03 firefighters per 1,000 residents. Structural fire suppression in the Project area would receive response from four stations and approximately 27 firefighters (LBFD 2011 ~~06~~). The standard established by the National Fire Protection Association (NFPA) for response to emergency calls is ~~6~~ 4 minutes from call initiation to arrival on-scene of the first appropriate unit ~~90 percent of the time for the first engine and 8 minutes for all other units.~~ The LBFD currently meets these standards (LBFD 2011 ~~06~~).

2. Page 4.11-5, first paragraph under Impact PS-2. The first sentence is revised to read as follows:

The current LBFD ratio of the number of firefighters to population is approximately 0.74 ~~1.03~~ firefighters per 1,000 residents.

3. Page 4.11-7, first full paragraph under Impact PS-4. The first sentence is revised to read as follows:

“Based on the City average of 2.90 persons per household (California Department of Finance, 2009), the proposed 5,000 dwelling units would generate a net increase of approximately ~~13,500~~ 14,500 new residents.”

4. Page 4.11-8, first full paragraph. The first sentence is revised to read as follows:

“The 5,000 residential units allowed under maximum buildout of the Downtown Plan would generate a population increase of approximately ~~13,500~~ 14,500 new residents.”

#### 4.12 TRANSPORTATION AND TRAFFIC

1. Page 4.12-1, Section 4.12.1 Setting. The second sentence is revised to read as follows:

“The boundaries are roughly I-710 to the west, Ocean Boulevard to the south, Alamitos Avenue to the east, and a jogged northern boundary comprising 7<sup>th</sup> Street, 10<sup>th</sup> Street and Anaheim Street”.

2. Page 4.12-9, Figure 4.12-2. Figure 4.12-2 is revised to show the correct northern project boundary, which includes the added area between 10<sup>th</sup> Street and Anaheim Street.

3. Page 4.12-14, Section 4.12.2 Impact Analysis. The following mitigation measures are added:

**Traf-1(e)** Currently, due to on-street parking, there is only one lane of travel on Alamitos Avenue in the southbound direction between 3<sup>rd</sup> Street and Broadway. Parking spaces on the west side of Alamitos Avenue will be removed, the street will be restriped and reconstructed, a bike lane will be added in each direction of travel, and the street will provide for two travel lanes in each direction plus exclusive left turn lanes from 7<sup>th</sup> Street to Ocean Boulevard. Traffic signal enhancements to implement the Alamitos Avenue improvements shall also be implemented as needed.

**Traf-1(f)** Developments in the project area will be required to coordinate with area transit providers to accommodate and encourage transit use by residents and patrons. For non-residential sites, appropriate programs and facilities will be included to encourage car and van pooling, provide information on transportation alternatives, and encourage trip reduction strategies in accordance with the City’s TDM policies for non-residential development.



**Figure 4.12-2**  
**Location of Study Intersections**

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**Environmental Impact Report  
Response to Comments**

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## CITY OF LONG BEACH DOWNTOWN PLAN

### ENVIRONMENTAL IMPACT REPORT (EIR) RESPONSE TO COMMENTS

#### I. Introduction and CEQA Requirements

In accordance with the California State CEQA Guidelines (Sections 15120-15132 and Section 15161), the City of Long Beach prepared a Program EIR (PEIR) for the Downtown Plan (SCH #2009071006). The Draft Program EIR (Draft PEIR) was circulated for review and comment to the public, responsible and trustee agencies, and interested organizations. The Draft PEIR was circulated to State agencies for review through the State Clearinghouse, Office of Planning and Research. The 115-day public review period ran from December 10, 2010, to April 4, 2011. During the public review period, the City received 33 written comments on the Draft PEIR.

This Response to Comments document includes a copy of all comments received on the Downtown Plan Draft PEIR and responses to those comments. Changes that were made to the Draft PEIR in response to comments are outlined in the Addenda Errata.

The Final PEIR is comprised of the Response to Comments document, combined with the Draft PEIR, as amended by the Addenda Errata. In accordance with CEQA Guidelines Section 15132, the FEIR shall consist of the following:

- (a) *The draft EIR or a version of the draft.*
- (b) *Comments and recommendations received on the draft EIR either verbatim or in summary.*
- (c) *A list of persons, organizations and public agencies commenting on the draft EIR.*
- (d) *The responses of the Lead Agency to significant environmental points raised in the review and consultation process.*
- (e) *Any other information added by the Lead Agency.*

The Final PEIR allows the public and Lead Agency an opportunity to review corrections to the Draft PEIR and the responses to comments on the Draft EIR prior to approval of the project. The Final PEIR serves as the environmental document to support a decision on the proposed project.

After completing the Final PEIR, and before approving the project, the Lead Agency must make the following three findings as required by Section 15090 of the CEQA Guidelines:

1. *The Final PEIR has been completed in compliance with CEQA;*
2. *The Final PEIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information contained in the FEIR prior to approving the project; and*
3. *The Final PEIR reflects the lead agency's independent judgment and analysis.*

Additionally, pursuant to Section 15093(b) of the CEQA Guidelines, when a Lead Agency approves a project that would result in significant, unavoidable impacts that are disclosed in the Final PEIR, the agency must first adopt a Statement of Overriding Considerations. A Statement of Overriding Considerations is the lead agency's determination and findings on the ultimate balancing of the merits of approving a project despite its environmental damage, and reflects the lead agency's determinations regarding balancing competing public objectives (including environmental, legal, technical, social, and economic factors). The Statement of Overriding Considerations is required to be supported by substantial information in the record, which includes the Final PEIR. Because the Downtown Plan would result in significant, unavoidable impacts as discussed and disclosed in the Draft PEIR, the Lead Agency will be required to adopt a Statement of Overriding Considerations if it approves the proposed Downtown Plan. The Lead Agency's Findings of Fact and the Statement of Overriding Considerations will be included in a separate Findings document. Both the Final PEIR and the Findings will be submitted to the Lead Agency for consideration of the proposed project.

## II. Written Comment Letters

The following comment letters were received during the public review period for the Downtown Plan Draft PEIR. Where duplicate comment letters from the same party were submitted to multiple City departments, or where duplicate comment letters from the same individual were sent via multiple modes (e.g., email or letter), only one comment letter has been responded to. In addition, comments received after the close of the public comment period were not responded to except as noted by an \* in the table below. One letter from Cliff Ratkovich, requesting a lower minimum residential unit size be allowed in the Downtown Plan, was received on April 6, 2011, and, as a comment on the content of the Plan itself, was not responded to.

Letter Reference Number	Type of Organization or Individual	Commenter
S1	State Agency	State Office of Planning and Research (OPR) Clearinghouse
S2	State Agency	Department of Toxic Substances Control (DTSC)
S3	State Agency	Department of Transportation (CalTrans) District 7
S4	State Agency	Public Utilities Commission (PUC)
L1	Local Agency/Utility	Los Angeles County Sanitation Districts
L2	Local Agency/Utility	Southern California Edison
L3	Local Agency	Long Beach Unified School District
L4	Local Agency	Long Beach Transit
L5	Local Agency	South Coast Air Quality Management District (AQMD)*
P1	Public	Long Beach Heritage
P2	Public	Health Impact Partners
P3	Public	Legal Aide, NRDC and Housing Long Beach

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<b>Letter Reference Number</b>	<b>Type of Organization or Individual</b>	<b>Commenter</b>
P4	Public	Downtown Long Beach Associates
P5	Public	Downtown Residential Council (DRC)
P6	Public	Promenade Area Residents Association (PARA)
P7	Public	North Pine Neighborhood Alliance (NPNA)
P8	Public	East Village Association (EVA)
P9	Public	Willmore City Heritage Association (WCHA)
P10	Public	Park Bixby Tower Long Beach Coalition for Good Jobs and a Healthy Community
P11	Public	Irene Alavarez (Alray Trust Apartments)
P12	Public	Carol Blackmon
P13	Public	Miriam Casuso
P14	Public	Christine Jacoy (CSULB Geography Prof)
P15	Public	Robert Ladd, ASLA
P16	Public	Maureen Neeley
P17	Public	Virginia Quinn
P18	Public	Gary Shelton
P19	Public	Katherine Sripiatana
P20	Public	Joe Stearns
P21	Public	Catherine Tuck
P22	Public	George Tuck
P23	Public	Kerrie Aley*
P24	Public	

### III. Topical Responses

A number of comments were received on a few key but similar or related subjects. To avoid redundancy and provide a more thorough response on these central issues, detailed topical responses to these issues are provided on the following topics listed below. Responses to some of the comments received during the public review process in individual letters will refer to some of these Topical Responses, with their corresponding number below:

1. Displacement of existing residents/loss of affordable housing and likely development sites
2. Provision of community benefits through the Downtown Plan
3. Subsequent environmental review of individual projects and monitoring of development during the life of the Plan
4. Sufficient parking and access to Downtown
5. Support for the Downtown Plan and integration of development projects with capital improvements.

#### **Topical Response #1: Displacement of Existing Residents/Loss of Affordable Housing and Likely Development Sites**

This topical response addresses the following issues:

- Likely development sites
- Loss of Available and Affordable Housing, Single-Family Housing, and Relocation Issues
- Incremental Impacts from future development projects

#### **Likely Development Sites**

The Downtown Plan encompasses approximately 725 acres. The Plan includes the following figures and policies to shape development within the Plan project area:

- Character Areas (Figure 2-1, Page 25)
- Downtown Neighborhood Overlay (Figure 3-1, Page 39), which includes main and secondary pedestrian-oriented streets, and
- Height Districts (Figure 3-2, Page 47)

In addition, the Historic Preservation policies in Section 7 of the Plan (Pages 113-118) incorporate the historical properties survey completed for the Draft PEIR, and include previous historic properties surveys conducted in the Downtown Plan area (see Response to Comment P-1.2). Section 7 of the Plan provides policies to protect 63 properties (in addition to the 58 designated landmarks) through local landmark designation or adaptive reuse. All of these policies are intended to shape where development is encouraged or most likely to occur within Downtown.

Beyond these policies, it is worth noting that development decisions are driven by economic considerations, including cost of land, demolition, the return on investment based on expected

rents or sales prices, and other related factors. Because of this, the most readily developable sites in Downtown include properties owned by the City or Redevelopment Agency, surface parking lots, or other underdeveloped sites. A map showing the locations of 29 likely development sites is provided as part of this response.

These 29 sites are the most likely to develop in the future. The estimated development potential from these sites is provided in the table below. The development potential of these sites with future projects of the type and intensity assumed in the table below would theoretically be allowed under the urban design and development standards of the Downtown Plan.

Table 4 of the Traffic Analysis (Appendix F of the Draft PEIR) estimates future development by Traffic Analysis Zone (TAZ) in order to provide an estimate of future trips for distribution within the traffic analysis. The locations of the TAZs are shown in Figure 4.12-2 of the PEIR.

#### Loss of Affordable Housing/Loss of Single Family/Relocation

A number of comment letters express concern about the loss of housing within the Downtown Plan project area, particularly the loss of affordable housing. This issue is addressed in Impact Pop-2 in Section 4.10 of the Draft PEIR, which concludes that the impact of implementing the Downtown Plan would cause significant and unavoidable adverse environmental impacts in terms of loss or displacement of existing housing units. The impact is considered significant and unavoidable because the City cannot guarantee that displacement of existing housing units would not happen even though nothing in the Downtown Plan prescribes the removal of affordable housing.

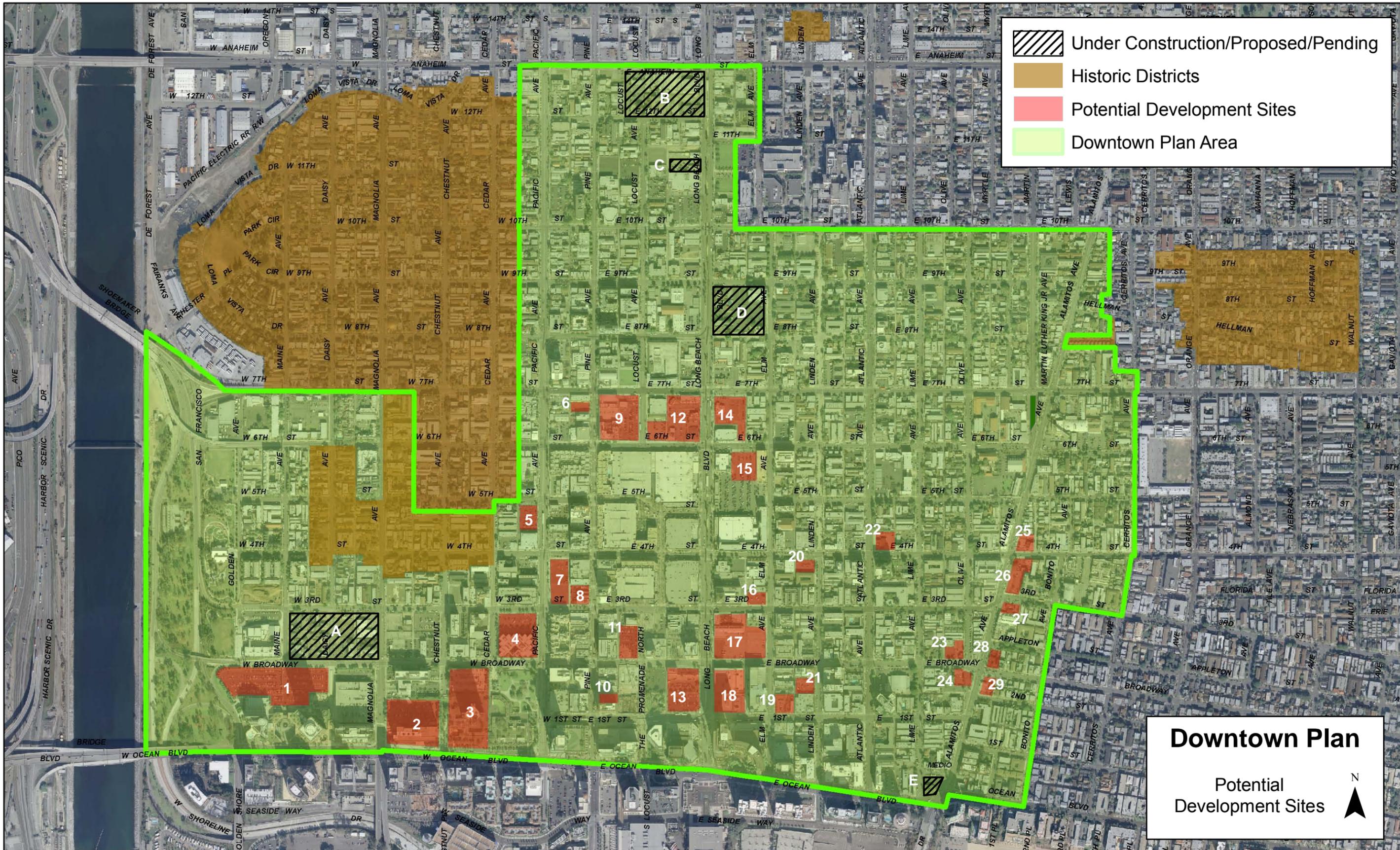
The Downtown Plan does not establish an inclusionary housing provision. It was made clear during the visioning phase by the participating community representatives that the purpose of the Downtown Plan is to encourage new development. It was determined that, if inclusionary housing requirements were to be established, they would be on a citywide basis. This would not put the Downtown at a cost disadvantage over developing in other areas of the City. It was also expressed by the community members that Downtown provides more than its proportion of affordable housing compared to other neighborhoods of Long Beach and the greater region. For these reasons, an inclusionary housing provision was not incorporated into the Downtown Plan.

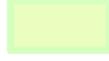
As discussed above, it is anticipated that the most likely project area development would occur on sites that are underdeveloped with surface parking lots or small commercial structures, not residential uses. Nevertheless, while the overall intent of the Downtown Plan is to provide more dwelling units within the project area over time, it is possible that some existing units could be lost when new development projects are built. However, during the last 10 years, the amount of affordable housing produced, 301 dwelling units, has exceeded the number of affordable units demolished or removed, 230 dwelling units. Of these removed units, 119 (51.7%) were from the three blocks that comprise the West Gateway sites. These three blocks are the site of the Lyon 321 rental development project that is now occupied, and the Superior Courthouse project, which is under construction. See the attached table for more detailed information on the affordable housing supply.

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Ref #	Site Name	Location	Parcel Size (sf)	Parcel Size (ac)	Development Potential					Ht District	Existing DU's	Net New Parking Spaces	FAR Estimate
					Residential (Dus) 900 sf/du	Office/Civic (ksf)	Retail (ksf)	Restaurant (ksf)	Hotel (Rms) 500 gsf/rm				
<b>Downtown Plan Total</b>			<b>31,599,295</b>	<b>725.42</b>	<b>5,000</b>	<b>1,500</b>	<b>384</b>	<b>96</b>	<b>800</b>		<b>13500</b>		
<b>Total</b>			<b>1,824,665</b>	<b>41.89</b>	<b>5,513</b>	<b>1,370</b>	<b>401</b>	<b>104</b>	<b>420</b>		<b>36</b>	<b>420</b>	<b>4.1985</b>
<b>Percentage</b>			<b>5.77%</b>	<b>5.77%</b>	<b>110%</b>	<b>91%</b>	<b>104%</b>	<b>108%</b>	<b>53%</b>		<b>0.267%</b>		
1	World Trade Center	S/O Broadway and Maine	216,929	4.98	800	320	40	12		Ht Incentive	0	175	5.03
2	Old Superior Courthouse site	NEC Magonlia and Ocean	155,945	3.58	440		20			Ht Incentive	0	75	2.67
3	City Hall and Broadway Garage site	S/O Broadway between Cedar and Chestnut	207,346	4.76	620		12	4		Ht Incentive	0	-	2.77
4	Former State Building and parking lot site	N/O Broadway between Cedar and Pacific	109,771	2.52	600	320	12	6		Ht Incentive	0	75	8.00
5	Top Value market site	SWC Pacific and 5th St	29,621	0.68	140		30	6		80 feet	0	50	5.47
6	Dolphin site	7th and Pine	11,286	0.26	46					Ht Incentive	0		3.67
7	3rd, 4th, and Pacific	E/O of Pacific between 3rd and 4th	20,038	0.46	65		3	8	140	Ht Incentive	0	-	6.96
8	Parking lot and building	NWC of Pine and 3rd	22,501	0.52	105		10	4		Ht Incentive			4.82
9	Press Telegram site	NEC of Pine and 6th	115,434	2.65	720	80	12	6		Ht Incentive	0		6.46
10	Securities Exchange parking lot	E/O Pine, north of 110 Pine Building	11,326	0.26		50	8	4		Ht Incentive	0	45	5.47
11	Parking lot	NWC of Promenade and Broadway	38,424	0.88	170		14	4		Ht Incentive			4.45
12	Firestone/El Pollo Loco/Denny's	NWC of Long Beach Blvd and 6th	125,453	2.88	140		24	12		Ht Incentive	4		1.29
13	MTA West site	NWC of Long Beach Blvd and 1st	90,169	2.07	320	200	24	2		Ht Incentive	0		5.70
14	McDonald's/WalGreens site	SEC of Long Beach Blvd and 7th	65,776	1.51	92		16	8		Ht Incentive	32		1.62
15	Albertson's Parking lot (northern portion)	E/O of Long Beach Blvd S/O 6th	159,865	3.67	160		82	8		Ht Incentive	0		1.46
16	Parking Lot	317 Elm (NWC w/ 3rd)	15,032	0.35	18		3	1		Ht Incentive			1.34
17	Broadway Lot/Acres of Books site	E/O Long Beach Bl between Broadway and 3rd	132,858	3.05	120	240	24	4	160	Ht Incentive	0		3.43
18	MTA East/City Hall East site	NEC of Long Beach Blvd and 1st	86,684	1.99	100	160	12	6	120	Ht Incentive	0		3.78
19	EV Parking Lot	NEC of Elm and 1st	22,583	0.52	64		4			Ht Incentive	0		2.73
20	Parking Lot	434 Linden (SWC w/ 4th)	15,042	0.35	22		4	2		80 feet			1.72
21	Parking Lot	446 Linden (S/O Broadlind)	17,772	0.41	64		3	1		Ht Incentive			3.47
22	Former Gas Station	NEC of Atlantic and 4th	22,668	0.52	80		12			80 feet	0		3.71

Ref #	Site Name	Location	Parcel Size (sf)	Parcel Size (ac)	Development Potential					Ht District	Existing DU's	Net New Parking Spaces	FAR Estimate
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<b>Downtown Plan Total</b>			<b>31,599,295</b>	<b>725.42</b>	<b>5,000</b>	<b>1,500</b>	<b>384</b>	<b>96</b>	<b>800</b>		<b>13500</b>		
<b>Total</b>			<b>1,824,665</b>	<b>41.89</b>	<b>5,513</b>	<b>1,370</b>	<b>401</b>	<b>104</b>	<b>420</b>		<b>36</b>	<b>420</b>	<b>4.1985</b>
<b>Percentage</b>			<b>5.77%</b>	<b>5.77%</b>	<b>110%</b>	<b>91%</b>	<b>104%</b>	<b>108%</b>	<b>53%</b>		<b>0.267%</b>		
23	Parking lots (2 properties)	733 Broadway (Roscoe's)	18,777	0.43	32		3			Ht Incentive			1.69
24	Restaurant site	SWC of Alamitos and Broadway	17,451	0.40	205		16	6		Ht Incentive			11.83
25	Tire Shop site	NEC of Alamitos and 4th	18,254	0.42	38		2			80 feet			1.98
26	Parking lot, billboard lot and building	East of Alamitos btw 4th and 3rd	36,210	0.83	72		6			80 feet			1.96
27	Alamitos & 3rd Parking Lot	SEC of Alamitos and 3rd	12,972	0.30	60		2			80 feet	0		4.32
28	Alamitos Car Wash	NEC of Broadway and Alamitos	13,485	0.31	80					80 feet	0		5.34
29	Alamitos Chevron	SEC of Alamitos and Broadway	14,995	0.34	140		3			80 feet	0		8.60
Under previous or would require separate CEQA (no tiering)	A -- New Courthouse (under construction)	Broadway	235,224	5.40		531				Ht Incentive			2.26
	B -- Meta (under construction)	200 E. Anaheim St	197,100	4.52	600		24	8		150 feet	0		2.90
	C -- Flowershop Site (pending)	1081 Long Beach Blvd	12,650	0.29	120					150 feet			
	D -- Scottish Rite block (onsite landmarks, not entitled)	LLB and 8th Street	202,500	4.65	800	24	18	8		150 feet	12		3.80
	E -- Shoreline Gateway (entitled)	NWC of Alamitos and Ocean	16,734	0.38	200					Ht Incentive	20		10.76
<b>Total Pending Projects</b>			<b>664,208</b>	<b>15.25</b>	<b>1,720</b>	<b>555</b>	<b>42</b>	<b>16</b>	<b>-</b>		<b>32</b>		



-  Under Construction/Proposed/Pending
-  Historic Districts
-  Potential Development Sites
-  Downtown Plan Area

**Downtown Plan**

Potential  
Development Sites

N  
▲



Eventually, new projects may be proposed on sites where existing residential uses are located. The Downtown Plan reduces development potential within the residential neighborhood overlay zone by limiting the allowable and conditionally allowable uses (See Table 3-1 of the Plan, beginning on Page 40). In addition, these areas generally have lower height limits in the Plan (See Figure 2-4, Page 2-17 of the Draft PEIR), as compared to what is currently allowed under existing regulations.

The Downtown Plan (Section 7) and Draft PEIR (Section 4.3) provide for protection of historic resources, including single-family and multiple family dwelling units. The list of historic properties has been augmented based on input from Long Beach Heritage, per the response to Comment P-1.2. Maintenance or adaptive reuse of historic structures is the first choice within the Downtown Plan project area, both to maintain the architectural character and to reduce environmental impacts associated with construction activity (dust, noise, traffic, solid waste generation).

The City has provisions for relocation assistance in the municipal code, as referenced in the Draft PEIR on Page 4.10-2. These provisions are applicable citywide. The City does not intend to provide any additional requirements exclusively applicable in the Downtown Plan project area. If new or additional requirements for relocation assistance are adopted, they will be applicable citywide, including in the Downtown Plan project area. It should also be noted that relocation assistance for residences displaced by redevelopment agency activities is covered under the California Health & Safety Code.

Even with these expectations and provisions, the Draft PEIR concludes that displacement of existing residential dwelling units is possible, and would be a significant adverse environmental impact that cannot be mitigated to a less than significant level.

#### Incremental Impacts from Future Development Projects

Several comment letters have noted that while the impact of any individual future development project may not induce significant impacts, the cumulative or aggregate total of these projects will result in significant environmental impacts. It has been noted that the development potential described in the project description includes substantial development totals. To reiterate, the Program EIR includes future development of the following within the project area:

- Approximately 5,000 new residential dwelling units
- 1.5 million square feet of new office, civic, cultural, and similar uses
- 384,000 square feet of new retail
- 96,000 square feet of restaurants, and
- 800 new hotel rooms.

In order to create a vibrant urban neighborhood and to meet the goals of both the City's General Plan Housing Element and the Downtown Plan, new development is needed in Downtown. This will include more medium and high density residential, which has been successfully built in Downtown for the last decade along Ocean Boulevard and along the Promenade. To make the Downtown a truly urban neighborhood, more employment and activity centers are needed, including office, retail, restaurant, and updated civic facilities that

## DOWNTOWN HOUSING REMOVED AND PRODUCED

HOUSING REMOVED - 2000 to Present																					
RHP	Demolition	Project Name	Area	Very Low Income					Low Income					Moderate Income					Total Units		
				Bedroom Size					Bedroom Size					Bedroom Size							
				0	1	2	3	4	0	1	2	3	4	0	1	2	3	4	5		
<b>Demolished/Removed</b>																					
11/26/01	2002	224 E. Broadway - Mark James	D	30																30	
11/26/01		248 E. Broadway - American Hotel	D	23																23	
6/9/03	2004	328-338 Pacific Ave	D	16	5	0			1	1				1						24	
9/27/04	2004	West Gateway Sites 9, 10, 11	C		86	5	3	1	15		5	1			3	0				119	
3/19/07	2008	645 E. Ocean	D	22	3				4	1					1					31	
11/5/07		Broadway Block - E. Village Art Exchange	D			1														1	
10/6/08		120 East 3rd St.	D								1									1	
9/16/09	2010	652 Alamos Ave	C			1														1	
<b>TOTAL REMOVED</b>				<b>91</b>	<b>94</b>	<b>7</b>	<b>3</b>	<b>1</b>	<b>20</b>	<b>2</b>	<b>5</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>230</b>	
HOUSING PRODUCED - 2000 to Present																					
<b>Completed</b>																					
<b>Housing Services - LBHDC/HOME</b>																					
8/26/10		67 Alamos							10											10	
3/19/09		320 Lime Ave									1									1	
9/1/10		375 Atlantic #4 Ave									1									1	
9/29/94		408 Elm Ave							12	13										25	
3/2/11		421 W. Broadway Gallery 421							15	11										26	
6/26/97		435 E. 7th St						1												1	
6/26/97		437 E. 7th St						1												1	
3/27/09		442 Cedar Ave							18	3	1									22	
12/14/99		525 Daisy Ave										1								1	
12/14/99		527 Daisy Ave										1								1	
12/14/99		529 Daisy Ave										1								1	
3/16/09		530 Elm Ave - Elm Ave Apts							16											16	
8/8/00		535-555 E. 3rd St - Live/Work								2										2	
7/27/09		555 Maine Ave													2					2	
5/21/09		633 W. 5th St								5	1									6	
2/6/09		720 W. 4th St								2										2	
8/1/87		745 Alamos Ave - Seabreeze							5	30	9									44	
9/9/05		745 W. 3rd St - Puerto Del Sol				36	16	11												63	
8/22/00		811 E. 7th St													4					4	
5/7/93		814 Atlantic Ave - Atlantic Apts								13										13	
9/1/04		834 E. 4th St - Lofts on 4th													8					8	
4/20/09		835 Locust Ave								1					1					2	
12/24/02		854 Martin Luther King								16										16	
3/17/09		901 Elm Ave																	1	1	
1/28/09		941 Elm Ave									1									1	
6/17/09		1054 E. 5th St									1									1	
TBD		Senior Artisit Colony LBB/15th			18					180										198	
<i>Housing Services Sub-Total</i>				0	18	36	16	13	49	279	38	4	0	0	13	2	0	1	0	469	
<b>City - Density Bonus</b>																					
11/1/83		425 E. 3rd St								73	20									93	
9/7/89		518 E. 4th St							4	24										28	
6/1/86		926 Locust Ave								70	16	4								90	
12/9/85		956 Locust Ave								15										15	
<i>City - Density Bonus Sub-Total</i>				0	0	0	0	0	4	182	36	4	0	0	0	0	0	0	0	0	226
<b>Federal - HUD 202/236</b>																					
1976		1011 Pine		200																200	
1984		475 W. 5th St - Beachwood Apts								18	3									21	
1984		505 W. 6th St - Beechwood Apts								20	3									23	
1984		600 E. 4th St - Sycamore Terrace		100																100	
1974		714 Pacific Ave. - Park Pacific Towers		183																183	
1980		851 Martin Luther King - Casitas Del Mar			2															2	
<i>Federal - HUD 202/236 Sub-Total</i>				483	2	0	0	0	0	38	6	0	0	0	0	0	0	0	0	0	529
<b>TOTAL PRODUCED</b>				<b>483</b>	<b>20</b>	<b>36</b>	<b>16</b>	<b>13</b>	<b>53</b>	<b>499</b>	<b>80</b>	<b>8</b>	<b>0</b>	<b>0</b>	<b>13</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1224</b>	

are a hallmark of any City's downtown. Thus, the Downtown Plan establishes the design strategies for such potential future development.

As discussed above, there are sites within Downtown that are likely to develop in the near future. Refer to the response below (Topical Response #3) for a discussion of on-going monitoring of development during the planning horizon of the Downtown Plan.

### **Topical Response #2: Provision of Community Benefits through the Downtown Plan**

The City received a number of comments regarding the provision of other community benefits, such as living wage and social equity issues, as part of the Downtown Plan. These types of benefits are generally not considered environmental issues subject to CEQA unless the economic impacts of a project result in measurable or demonstrable physical impacts on the environment, such as urban blight.

Specifically, economic impacts are not normally the subject of EIRs, which are required by CEQA to focus on a project's environmental effects. Section 15131(a) of the CEQA Guidelines specifically states that "economic or social effects of a project shall not be treated as significant effects on the environment." The focus of any discussion of social or economic effects is to be on any physical changes to the environment resulting from an economic or social change.

However, since these issues have been raised as comments on the Draft PEIR and Downtown Plan itself, responses are provided below.

#### **Community Benefits in the Downtown Plan**

The Downtown Plan is an enhanced zoning document that provides urban design and development standards intended to help shape the type of development that occurs within the Downtown project area. The Downtown Plan differs from a Specific Plan. Specific plans are prepared in accordance with Government Code Sections 65450-65457 and include financing mechanisms for public improvements such as infrastructure enhancements. Because the Downtown Plan is not a Specific Plan, it is thus not required to include these types of provisions or mechanisms.

The Downtown Plan is also not a Master Development Plan in that it allows a variety of uses on all parcels, and does not have a master developer responsible for all the development that occurs in master-planned communities, nor does it include a development agreement or other mechanism to ensure certain types of development, such as in the case of Douglas Park north of the Long Beach Airport.

Rather, the Downtown Plan, as an enhanced zoning document, focuses on urban design and development standards, and includes streetscape, signage and historic preservation policies to support those standards. Hence, the Downtown Plan does not establish policies in any other area, including the provision of community benefits.

The broader policy issues regarding community benefits will be presented to the decision makers via the comment letters and responses on the Downtown Plan Draft PEIR. City decision-makers may decide to update the City's General Plan or City ordinance with new policies for these types of community benefits either citywide or in certain areas of the city. If this occurs, such provisions would be applicable, if designated as such, in the Downtown Plan project area.

The comments related to community benefits suggest that one particular set of community benefits is appropriate for Downtown. The comments reiterate in several places that the following benefits should be included in the Downtown Plan as they would mitigate impacts on population and housing:

- Mixed Income Housing Requirement for Construction of New Rental Projects in the Downtown Plan
- Mixed Income Housing Requirement for Construction of New Condominium Projects in the Downtown Plan
- Linkage Fee on New Office Development in the Downtown Plan
- Linkage Fee on New Retail Development in the Downtown Plan
- Linkage Fee on New Hotel Development in the Downtown Plan
- Local hiring/living wages for both construction and permanent jobs

It should be noted that community benefits programs can be provided in a variety of forms, including provision of open space, public facilities, infrastructure, or amenities, such as drainage facilities, libraries or schools, or programs such as job training programs, subsidizing business improvement districts, or public art requirements.

Currently, projects in the City, including Downtown are subject to certain fees, including trip mitigation fees, school fees, park fees, entitlement fees, and other costs. Whether new development in Downtown can afford additional fees is the subject of the David Rosen and Associates study attached to Comment Letter P-3. These are economic issues that are outside the scope of the PEIR, which in accordance with CEQA focuses on analysis and mitigation of the Downtown Plan's environmental impacts.

The Downtown Long Beach Market Study (Final Report, April 17, 2009), conducted for the Long Beach Redevelopment Agency by Strategic Economics provided a snapshot during the early stages of the current economic downturn about the prospects for new development of residential, retail, office, and hotel uses in Downtown. The conclusions are that demand for such new development is limited by the ability of new residents to support retail and restaurant, and that workers are only willing to regularly walk approximately 3 blocks to services. Beyond that distance, the utilization of available services diminishes quickly. One issue for decision-makers to consider is whether the inclusion of community benefits/additional fees exclusively for the Downtown Plan project area would be a detriment to encouraging the new development in an area the City is trying to revitalize. If community benefits are required in Downtown, and not in adjacent areas, then developers may be unwilling to bear the additional costs and could avoid Downtown in lieu of other areas not subject to community benefits/additional fees. If City policymakers decide to establish a program for community benefits, then the program could be considered citywide for projects

meeting certain size or composition requirements. Decision-makers will need to consider whether requiring community benefits or any other type of supplemental fees for projects exclusively in the Downtown Plan area would negate or override the goals and incentives of the Downtown Plan, since the intent of the Downtown Plan is to encourage and shape a vibrant urban neighborhood.

As stated above, the issue regarding community benefits as they relate to linkage fees, etc. is not a CEQA issue, but is a worthwhile issue to consider as it relates to the Downtown Plan itself. The comments and concerns regarding this issue will be brought forward to the decision-makers for consideration while considering whether to adopt the Downtown Plan and certify the Final PEIR.

### **Topical Response #3: Subsequent Environmental Review of Individual Projects and Monitoring of Development during the Life of the Plan.**

#### Impacts from Development

A number of comments related to concerns that may arise during the lifespan of the plan. These issues express concern that over time, as new development is built in Downtown, residents, employees, and visitors to Downtown will experience a range of cumulative environmental impacts.

The Draft PEIR evaluates the environmental impacts of all of the development occurring in Downtown, including cumulative impacts, as required by CEQA. However, it is possible and, in fact, very likely that full Plan buildout will not be achieved within the planning horizon, especially given the recent economic slowdown.

#### CEQA Analysis for Future Development Projects

It should be noted that all future development projects proposed within the Downtown Plan project area will require some type of subsequent CEQA environmental review to determine whether all of the potential environmental impacts of that particular project were 'adequately addressed' in the Downtown Plan Draft PEIR.

The CEQA Guidelines, Section 15152(f)(3) provides that significant environmental effects have been 'adequately addressed' in a previous program EIR if the lead agency determines that such effects:

*Have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project."*

Therefore, after a program EIR is certified, any individual development project within that program area (i.e., the Downtown Plan 725-acre area) that could result in any of the following conditions would require some type of new CEQA environmental documentation: new

environmental impacts not identified in the Program EIR; a substantial severity in the increase of impacts identified in the Program EIR; or if conditions have changed substantially from those expected in the Downtown Plan EIR. If any of these conditions are present, then subsequent environmental impact analysis and any required mitigation for the future development project must be prepared in compliance with CEQA.

### Construction Impacts

Short-term construction-related impacts, such as noise or dust and air emissions, are temporary but are considered significant in the Draft PEIR, as required by CEQA. Measures and standard conditions of approval that help to mitigate such impacts are required by State law and local ordinances. Nevertheless, significant environmental impacts from construction are expected from future development, particularly if more than one project is under construction in a localized area at the same time.

The Downtown Plan Draft PEIR evaluates the cumulative impacts of all development potential in Downtown. This is a reasonable worst-case scenario. It is unlikely that all of this development will occur; however, it is likely that waves of development during peak economic cycles will occur. During these times, it is likely that more than one major development project will be under construction within the Downtown Plan project area. Whether these projects would be in close proximity to each other cannot be determined at this time. However, as stated above, the analysis in the Draft PEIR assumes the reasonable worst-case scenario of construction impacts, as required by CEQA.

### Composition of Downtown

Several comments raised the issue of how development will be monitored with respect to the composition of Downtown. Issues raised related to the ratio of retail uses and other considerations that are critical to Downtown becoming the “vibrant urban neighborhood” anticipated in the Downtown Plan. Having the proper mix of uses that create this type of synergy is a delicate balance. For instance, an overabundance of restaurants might be appropriate for a strictly entertainment area, but would not be conducive for residents or employees. Too much retail or office development could result in an area that is inactive in the evening hours.

The monitoring of what uses are missing or underrepresented in Downtown has been on-going for years. The most recent wave of development over the last decade or so has introduced large numbers of new residents to Downtown. The new mid- and high-rise units along Ocean, the Promenade and other areas of Downtown are now largely built and occupied. These new residents have formed homeowners associations. Most of these newly formed groups commented on the Downtown Draft PEIR and are supportive of the Downtown Plan.

Now that the residential population has grown, local area residents are seeking more services and amenities for their urban neighborhood. This implies that more retail options catering to these residents are needed.

As long as the uses are allowed within the PD-30 and PD-29, Subarea 5 zones now, or in the Downtown Plan if adopted, and other requirements are met, the new businesses are allowed to operate. There is a conditional use permit (CUP) process for certain types of uses in the PD-30 and PD-29 zones to regulate certain types/ concentrations of businesses. Table 3-1 on pages 40-45 of the Downtown Plan specifies conditionally allowed uses within the project area.

The effort to assure that the mix of uses within Downtown remains vital and attractive to businesses and residents alike is a multi-faceted issue. The proposed Downtown Plan is intended to address the zoning and design guidelines for such development and is considered a piece of the overall effort to enhance the area. Ongoing efforts to shape Downtown will be needed during the life of the Plan.

#### **Topical Response #4: Sufficient Parking and Access to Downtown**

Several comments expressed a perception that as new development projects are built, lack of sufficient parking or congestion in getting to the Downtown area would be impediments to success of those new projects.

Most visitors to Downtown currently are able to find parking. A number of parking utilization surveys conducted by the DLBA over the past several years have indicated that many of the available parking lots are not operating near capacity. Surveys conducted in 2001, 2002, 2004, and 2006 all indicate overall parking occupancy rates of less than 50 percent at most Downtown locations. The issue that has arisen during these reviews is that some of the parking is difficult to find either because it is underground, accessed by one-way streets or alleys that confuse less frequent visitors, or otherwise not convenient or hidden. Some of these issues can be resolved with parking management techniques such as improved signage and parking availability kiosks. These types of measures will improve the utilization of the parking structures, but cannot ensure complete mitigation.

The parking standards in the Downtown Plan have been adjusted from those that exist in PD-29 and PD-30 for a few reasons. The first is that economic analysis of development projects in Downtown, along Long Beach Boulevard north of the Downtown project area, and in similar areas elsewhere in Southern California, have repeatedly shown that parking requirements are the primary disincentive that has prevented proposed development projects from moving forward. The Downtown Plan addresses this concern by establishing lower parking minimums, and allowing market forces to dictate whether additional parking is required for any particular development project.

The second reason is that large parking garages and surface parking lots cause gaps in the urban fabric by introducing “dead zones”, where little activity occurs and where people feel less safe. The concept of creating a vibrant urban experience includes the notion of reducing visible parking and using a “park once” approach that encourages walking within the Downtown. This idea is not applied uniformly within the Downtown, but is concentrated on pedestrian “main” and “secondary” streets within the Downtown (see Figure 3-1, Page 39 of the Downtown Plan) for designated street segments).

Access to Downtown is expected to change substantially during the life of the Plan. This is primarily due to changes that are expected to occur along the I-710 Freeway corridor, which could alter which streets have connections to the freeway. These types of changes were studied in the I-710 EIR/EIS ([www.metro.net/I170\\_Corridor/](http://www.metro.net/I170_Corridor/)). Detailed engineering studies are being conducted now, and will be finalized in the next few years. The possibilities for streets that are now one-way to be reconfigured to two-way streets, new ramps and connections, and other similar changes are not a part of the Downtown Plan and, if proposed in the future, would be subject to their own CEQA environmental review.

**Topical Response #5: Support for the Downtown Plan and integration of development projects with capital improvements.**

A number of comments, primarily from Downtown residential associations and several individuals, expressed support for the adoption of the Downtown Plan and for future development projects in the project area in compliance with the Downtown Plan. These comments do not request that additional information or clarification be included in the Final PEIR, but do reflect community support from these associations and the residents they represent.

However, several of these letters submitted include a comment that recommends that that spending budgeted through the Capital Improvement Program (CIP) reflect priority improvements in the Downtown Plan. The CIP is reviewed annually by the City Council. Priorities within the CIP are not controlled by the Downtown Plan and no proposed or adopted policies call for this type of linkage. Therefore, while this is an important aspect of bringing the Downtown Plan vision to fruition, it is beyond the scope of the Downtown Plan or its proposed adoption.

Mailed transcript



JERRY BROWN  
GOVERNOR

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



RECEIVED  
APR 08 2011  
PLANNING BUREAU

April 5, 2011

Steve Gerhardt  
City of Long Beach Development Services  
333 West Ocean Boulevard, 5th Floor  
Long Beach, CA 90802

S-1

Subject: Downtown Long Beach Community Plan (EIR-04-08)  
SCH#: 2009071006

Dear Steve Gerhardt:

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 April 4, 2011, 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,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2009071006  
**Project Title** Downtown Long Beach Community Plan (EIR-04-08)  
**Lead Agency** Long Beach, City of

**Type** EIR Draft EIR  
**Description** Note: Review per lead

The proposed Project is the adoption and implementation of the Long Beach Downtown Plan to replace the existing zoning, and planned development districts with the Downtown Plan becoming the land use and design document for all future development. The Downtown Plan incorporates zoning, development standards, and design guidelines. Full implementation of the Downtown Plan is intended to increase the density and intensity of existing Downtown land uses by allowing compatible additional development over the next 25 years.

**Lead Agency Contact**

**Name** Steve Gerhardt  
**Agency** City of Long Beach Development Services  
**Phone** 562-570-6288 **Fax**  
**email**  
**Address** 333 West Ocean Boulevard, 5th Floor  
**City** Long Beach **State** CA **Zip** 90802

**Project Location**

**County** Los Angeles  
**City** Long Beach  
**Region**  
**Lat / Long** 33° 46' 23" N / 118° 11' 22" W  
**Cross Streets** Ocean Boulevard North to Anaheim Street, West of Alamitos Avenue  
**Parcel No.**  

Township	Range	Section	Base

**Proximity to:**

**Highways** I-710  
**Airports** LGB  
**Railways** Alameda Corridor  
**Waterways** Los Angeles River, Pacific Ocean  
**Schools** LBUSD, CSULB, LBCC  
**Land Use** Downtown/PD-30/Mixed Use Development (LUD #7)

**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Economics/Jobs; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Solid Waste; Toxic/Hazardous; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Other Issues

**Reviewing Agencies** Resources Agency; California Coastal Commission; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 1; Caltrans, Division of Transportation Planning; Department of Housing and Community Development; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

**Date Received** 12/09/2010      **Start of Review** 12/10/2010      **End of Review** 04/04/2011



JERRY BROWN  
GOVERNOR

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



RECEIVED

JAN 28 2011

PLANNING BUREAU

January 25, 2011

Steve Gerhardt  
City of Long Beach Development Services  
333 West Ocean Boulevard, 5th Floor  
Long Beach, CA 90802

Subject: Downtown Long Beach Community Plan (EIR-04-08)  
SCH#: 2009071006

Dear Steve Gerhardt:

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 January 24, 2011, 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,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2009071006  
**Project Title** Downtown Long Beach Community Plan (EIR-04-08)  
**Lead Agency** Long Beach, City of

**Type** EIR Draft EIR  
**Description** Note: Review per lead

The proposed Project is the adoption and implementation of the Long Beach Downtown Plan to replace the existing zoning, and planned development districts with the Downtown Plan becoming the land use and design document for all future development. The Downtown Plan incorporates zoning, development standards, and design guidelines. Full implementation of the Downtown Plan is intended to increase the density and intensity of existing Downtown land uses by allowing compatible additional development over the next 25 years.

**Lead Agency Contact**

**Name** Steve Gerhardt  
**Agency** City of Long Beach Development Services  
**Phone** 562-570-6288 **Fax**  
**email**  
**Address** 333 West Ocean Boulevard, 5th Floor  
**City** Long Beach **State** CA **Zip** 90802

**Project Location**

**County** Los Angeles  
**City** Long Beach  
**Region**  
**Lat / Long** 33° 46' 23" N / 118° 11' 22" W  
**Cross Streets** Ocean Boulevard North to Anaheim Street, West of Alamitos Avenue  
**Parcel No.**  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** I-710  
**Airports** LGB  
**Railways** Alameda Corridor  
**Waterways** Los Angeles River, Pacific Ocean  
**Schools** LBUSD, CSULB, LBCC  
**Land Use** Downtown/PD-30/Mixed Use Development (LUD #7)

**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Economics/Jobs; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Solid Waste; Toxic/Hazardous; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Other Issues

**Reviewing Agencies** Resources Agency; California Coastal Commission; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 1; Caltrans, Division of Transportation Planning; Department of Housing and Community Development; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

**Date Received** 12/10/2010 **Start of Review** 12/10/2010 **End of Review** 01/24/2011

**Letter S-1: Comment from State Office of Planning and Research, April 5, 2011**

Response to Comment S-1.1: The comment is noted regarding successful compliance with the public review process per Section 21104(c) of the California Public Resources Code, and completion of circulation of Draft PEIR to selected state agencies noted. The letter also forwarded letters from DTSC (Letter S-2) and CalTrans District 7 (Letter S-3), which are responded to below. The Draft PEIR public review comment period was extended to 115 days per direction of the Long Beach City Council November 2010, prior to release of the Draft PEIR.

JAN 18 2011

PLANNING BUREAU



*Linda S. Adams*  
Acting Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Maziar Movassaghi  
Acting Director  
5796 Corporate Avenue  
Cypress, California 90630



*Edmund G. Brown Jr.*  
Governor

January 11, 2011

Mr. Steve Gerhardt, AICP  
City of Long Beach  
Department of Development Services  
333 W. Ocean Boulevard, 5th Floor  
Long Beach, California 90802

NOTICE OF AVAILABILITY OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT  
REPORT FOR THE CITY OF LONG BEACH DOWNTOWN PLAN PROJECT,  
(SCH#2009071006) , LOS ANGELES COUNTY

Dear Mr. Gerhardt:

The Department of Toxic Substances Control (DTSC) has received your submitted Draft Program Environmental Impact Report (PEIR) for the above-mentioned project. The following project description is stated in your document: "The proposed Project is the adoption and implementation of the Long Beach Downtown Plan that would replace the existing land use, zoning, and planned development districts as the land use and design document for all future development in the proposed Downtown Plan Project area. The Downtown Plan incorporates zoning, development standards, and design guidelines to be followed in implementing the Plan. The proposed Downtown Plan would encompass an area of approximately 719 acres bounded by the Los Angeles River on the west and Ocean Boulevard on the south. The north boundary generally follows portions of 7<sup>th</sup>, Anaheim, and 10<sup>th</sup> streets; and the east boundary includes land on both sides of Alamitos Avenues. The Project area contains a variety of commercial, residential, civic, and cultural uses that exist within six unique "Character Areas". The most common existing General Plan Land Use District (LUD) within the Project area is LUD 7 Mixed-Use, and the most common zones are Planned Development (PD)-30 and PD-29".

Based on the review of the submitted document DTSC has the following comments:

- 1) The PEIR should evaluate whether conditions within the Project area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:
  - National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
  - EnviroStor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
  - Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
  - Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
  - Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
  - GeoTracker: A List that is maintained by Regional Water Quality Control Boards.
  - Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
  - The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).
- 2) The PEIR should identify the mechanism to initiate any required investigation and/or remediation for any site within the proposed Project area that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents.
- 3) Any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment

S-2.1

S-2.2

S-2.3

Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the PEIR.

- |  |       |
|--|-------|
| 4) If buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.   | S-2.4 |
| 5) Future project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.   | S-2.5 |
| 6) Human health and the environment of sensitive receptors should be protected during any construction or demolition activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.  | S-2.6 |
| 7) If the site was used for agricultural, livestock or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.  | S-2.7 |
| 8) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local | S-2.8 |

Mr. Steve Gerhardt  
January 11, 2011  
Page 4

Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

- 9) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see [www.dtsc.ca.gov/SiteCleanup/Brownfields](http://www.dtsc.ca.gov/SiteCleanup/Brownfields), or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.

S-2.9

If you have any questions regarding this letter, please contact Rafiq Ahmed, Project Manager, at [rahmed@dtsc.ca.gov](mailto:rahmed@dtsc.ca.gov), or by phone at (714) 484-5491.

Sincerely,



Greg Holmes  
Unit Chief  
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov).

CEQA Tracking Center  
Department of Toxic Substances Control  
Office of Environmental Planning and Analysis  
P.O. Box 806  
Sacramento, California 95812  
[ADelacr1@dtsc.ca.gov](mailto:ADelacr1@dtsc.ca.gov)

CEQA # 3095

---

**Letter S-2: Comment Letter from Department of Toxic Substances Control (DTSC), January 11, 2011**

Comment S-2.1: This comment requests that the Downtown Plan area be evaluated for conditions that pose a threat to human health or the environment, and lists databases for some of the regulatory agencies.

Response to Comment S-2.1: The Downtown Plan area has been screened through the listed databases numerous times during the past few years for individual development projects and addressed as appropriate in those individual project EIRs. Potential threats to human health or the environment are discussed in general terms in Section 4.6, *Hazards and Hazardous Materials*, of the Draft PEIR, consistent with the level of detail appropriate for a Program EIR.

The State of California maintains an inventory of hazardous waste sites. The Water Board website lists a number of sites within the project area. The map and list provided below are from the state website (<https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=90802>). In addition, the City's Health and Human Services Department, Environmental Health Bureau, takes this information and tracks the progress of remediation and provides current information to the Fire Department and other emergency responders. These hazardous waste locations can include any operation that has hazardous materials, including operations that most people come across frequently in daily life, such as emergency generators, cellphone sites, medical and dental offices, grocery stores and car repair businesses, which are often located in close proximity to neighborhoods, particularly in neighborhoods in the greater Downtown. This is a health and safety concern that will be mitigated by remediation activities and future reuse that replaces hazardous sites with new development.

These locations will continue to be monitored citywide in the coming decades. Since the Downtown Plan provides guidance for development equally within the Downtown Plan by using a uniform land use table for all of the areas, with more restrictive land uses allowed within the Downtown Neighborhood Overlay, the number of residents and other sensitive receptors exposed to hazardous materials is expected to decrease during the planning horizon of the Downtown Plan.

No special provisions are required for the Downtown Plan, and no additional mitigation measures beyond those provided in the Draft PEIR are required.

Please also refer to Response to Comment S-2.2 below.

Comment S-2.2: The commenter requests identification of the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, as well as regulatory oversight.

Response to Comment S-2.2: Please refer to Mitigation Measures Haz-3(a) through 3(d), which provide requirements for future development projects to comply with regulations during construction and demolition activities, including reporting discovered contamination to DTSC.

Site	GEOTRACKER ID	SITE NAME	CLEANUP STATUS	ADDRESS	
	1	DOD100273600	LONG BEACH SCHROEDER HALL USAR - LONG BEACH SCHROEDER HALL USAR - SITE 1	COMPLETED - CASE CLOSED	
	2	DOD100273700	LONG BEACH SCHROEDER HALL USAR - LONG BEACH SCHROEDER HALL USAR - SITE 1	COMPLETED - CASE CLOSED	
	3	SL0603787568	UNKNOWN	COMPLETED - CASE CLOSED	444 E ANAHEIM ST
	4	SL2048H2365	UPRC BULK TERMINAL (FORMER)	OPEN - REMEDIATION	960 DE FOREST AVENUE
	5	SLT43580578	GLENN E. THOMAS AUTO (FORMER)	COMPLETED - CASE CLOSED	340 E. ANAHEIM ST
	6	T0603700027	WAYNE PERRY CONSTRUCTION, INC	COMPLETED - CASE CLOSED	200 ALAMITOS AVE
	7	T0603700109	SOUTHERN CA EDISON CO	COMPLETED - CASE CLOSED	134 ELM ST
	8	T0603700221	SANTA FE PACIFIC PIPELINE	COMPLETED - CASE CLOSED	DE FOREST AVE
	9	T0603701692	LONG BEACH PRESS TELEGRAM	COMPLETED - CASE CLOSED	604 PINE AVE
	10	T0603701693	GTE	COMPLETED - CASE CLOSED	200 OCEAN BLVD W
	11	T0603701695	SOUTHERN CA EDISON CO	COMPLETED - CASE CLOSED	125 ELM AVE
	12	T0603701700	CHEVRON #9-5649 (FORMER)	COMPLETED - CASE CLOSED	300 OCEAN BLVD W
	13	T0603701705	76 PRODUCTS STATION #2999	COMPLETED - CASE CLOSED	805 OCEAN BLVD E
	14	T0603701707	MOBIL	OPEN - REMEDIATION	402 ATLANTIC AVE
	15	T0603701709	CHR CORPORATION PROPERTY	COMPLETED - CASE CLOSED	210 ALAMITOS AVE
	16	T0603701710	LA CO COURT BUILDING	COMPLETED - CASE CLOSED	415 OCEAN BLVD W
	17	T0603701711	GSA FEDERAL OFFICE BLDG	COMPLETED - CASE CLOSED	495 OCEAN BLVD W
	18	T0603701927	HARBOR DIESEL & EQUIPMENT INC	COMPLETED - CASE CLOSED	537 ANAHEIM ST W
	19	T0603701930	ARATEX SERVICES (ARAMARK)	OPEN - REMEDIATION	702 ANAHEIM ST W
	20	T0603701939	WEST COAST CHOPPERS	OPEN - SITE ASSESSMENT	718 ANAHEIM ST W
	21	T0603701943	THRIFTY #005	OPEN - REMEDIATION	998 ANAHEIM ST E
	22	T0603701947	USA PETROLEUM #235	OPEN - REMEDIATION	907 007TH ST E
	23	T0603701951	SHELL #204-4482-6109	OPEN - SITE ASSESSMENT	598 ANAHEIM ST E
	24	T0603701958	ANAHEIM STREET PROPERTY	COMPLETED - CASE CLOSED	132 ANAHEIM ST W
	25	T0603701964	SEABREEZE SENIOR APTS	COMPLETED - CASE CLOSED	745 ALAMITOS AVE
	26	T0603701967	COAST CONTRACTORS	COMPLETED - CASE CLOSED	130 ANAHEIM ST W
	27	T0603701969	VINH HAO SUPERMARKET	COMPLETED - CASE CLOSED	1145 LONG BEACH BLVD
	28	T0603701970	FOUR CORNERS PIPELINE CO	COMPLETED - CASE CLOSED	1600 09TH ST W
	29	T0603701972	RAPID GAS #18	OPEN - REMEDIATION	501 007TH ST W
	30	T0603720962	ANDREWS AUTOMOTIVE	OPEN - INACTIVE	222 E 10TH ST
	31	T0603737401	CITY OF LONG BEACH REDEVELOPMENT AGENCY	OPEN - INACTIVE	620 SAN FRANCISCO AVENUE
	32	T0603744316	LANDMARK SQUARE	COMPLETED - CASE CLOSED	125 W OCEAN BLVD
	33	T0603745944	LAFD - FIRE STATION 80	OPEN - VERIFICATION MONITORING	6911 W WORLD WY WY
	34	T0603753257	CITY OF LONG BEACH REDEVELOPMENT AGENCY	COMPLETED - CASE CLOSED	225 LONG BEACH BLVD
	35	T0603757536	SHELL #204-4482-7503	OPEN - SITE ASSESSMENT	500 ANAHEIM ST.
	36	T0603757656	MTA DIV. 12	OPEN - SITE ASSESSMENT	970 CHESTER PL W.
	37	T0603758737	LONG BEACH NAVAL COMPLEX - BLDG 101 - GAS STATION	OPEN - VERIFICATION MONITORING	BLDG 101 GASOLINE SERVICE STATION
	38	T0603762833	LONG BEACH SCHROEDER HALL USAR - LONG BEACH SCHROEDER HALL USAR	COMPLETED - CASE CLOSED	
	39	T0603777984	JULIAN SHIP SUPPLIES	COMPLETED - CASE CLOSED	505 W BROADWAY
	40	T0603792915	FORMER UNOCAL / 76 STATION #2999	COMPLETED - CASE CLOSED	805 OCEAN BLVD E
	41	T0603799308	VACANT LOT	COMPLETED - CASE CLOSED	243 CHESTNUT AVE.
	42	WDR100000160	CHR CORPORATION PROPERTY	HISTORICAL - WDR	210 ALAMITOS AVENUE
	43	WDR100000806	L.B.HARBOR 5 YR MAINT	ACTIVE - WDR	PORT OF LONG BEACH
	44	WDR100000807	L.B.HARBOR 5 YR MAINT	HISTORICAL - WDR	PORT OF LONG BEACH
	45	WDR100000808	L.B.HARBOR 5 YR MAINT	HISTORICAL - WDR	PORT OF LONG BEACH
	46	WDR100000809	L.B.HARBOR 5 YR MAINT	HISTORICAL - WDR	PORT OF LONG BEACH

# GEOTRACKER

## LAYERS

SIGNIFIES A CLOSED SITE

Leaking Underground Tank (LUST) Cleanup Sites

Other Cleanup Sites

Land Disposal Sites

Military Sites

WDR Sites

Permitted Underground Storage Tank (UST) Facilities

Monitoring Wells\*

\* ZOOM IN TO SEE MWS

DTSC Cleanup Sites

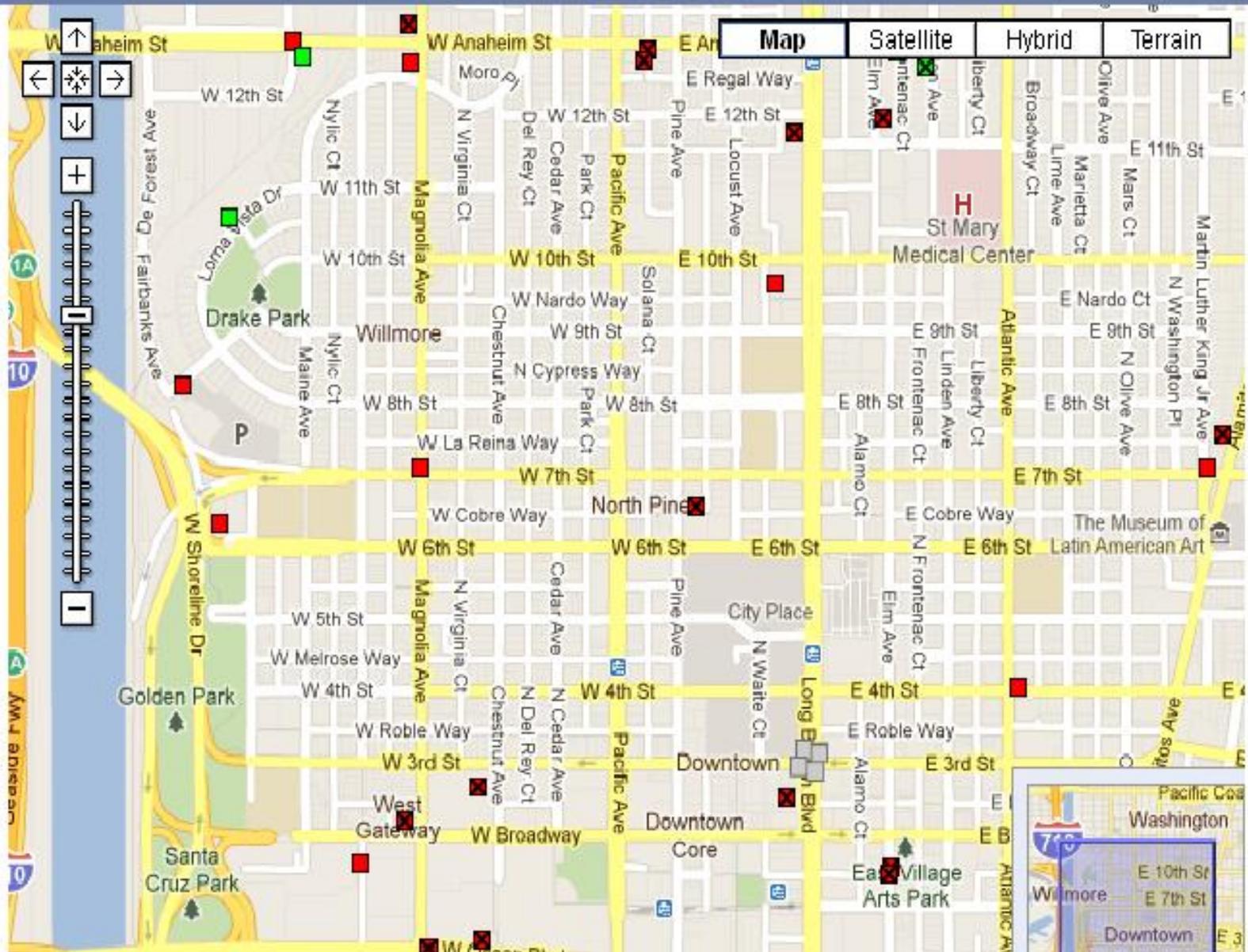
DTSC Haz Waste Permit

## MAP SIZE

640x480

## OPTIONS

Site List - [EXPORT TO EXCEL](#)



Haz-3(a) addresses potential impacts related to potential contamination from historic activities within the project area. Because this EIR is a Program EIR, individual Phase I reports are not available for each parcel. However, Measures Haz-3(a) through 3(d) provide a program that requires assessment and, as necessary, remediation of potential soil and groundwater contamination hazards in conjunction with individual projects as they are proposed. Implementation of the prescribed mitigation program, which also identifies the potential oversight agencies for future remediation activities, will address potential contamination issues on a case-by-case basis. If potentially significant issues that cannot be mitigated in accordance with the prescribed program are identified, subsequent environmental review under CEQA may be required. In the long term, assessment and remediation of contamination on individual properties would be expected to improve health and safety conditions by removing existing contamination hazards.

Comment S-2.3: The commenter states that environmental investigations, etc. for a site should be conducted under a Workplan approved and overseen by a regulatory agency with jurisdiction. The commenter also states that findings of Phase I or II Environmental Site Assessments, as well as closure approval reports, etc. should be summarized in the document.

Response to Comment S-2.3: Please refer to the responses to Comments S-2.1 and S-2.2 above.

Comment S-2.4: The commenter states an investigation and precautions should be provided regarding hazardous materials from demolished structures.

Response to Comment S-2.4: This issue is addressed in Impact Haz-1 and mitigation measures are provided in Haz-1(a) through Haz-1(c), and Haz-3(a) through Haz 3(d).

Comment S-2.5: The commenter states future project construction may require soil excavation/filling and sampling may be required, and discusses proper disposal.

Response to Comment S-2.5: Potential soil or groundwater contamination is addressed in Impact Haz-3 and Mitigation Haz-3(a) though Haz-3(c).

Comment S-2.6: The commenter states that human health and sensitive receptors should be protected during construction/demolition activities and, if necessary, a health risk assessment should be conducted.

Response to Comment S-2.6: This issue is addressed in Impacts Haz-1 through Haz-3 and associated mitigation measures. In addition, toxic air contaminants are addressed in the Air Quality section under Impact AQ-4.

Comment S-2.7: The commenter states sites used for agricultural or related activities should have proper investigation/remedial actions with oversight of government agency prior to project area construction.

Response to Comment S-2.7: Mitigation measures have been added to address this potential impact. Please refer to Response to Comment S-2.2 above.

Comment S-2.8: The commenter states that if it is determined that hazardous wastes are/will be generated by the proposed operations, the wastes must be managed in accordance with specific regulations/permits, as detailed in the comment.

Response to Comment S-2.8: The Downtown Plan would not facilitate heavy industrial uses or related activities that would typically involve the use of large volumes of hazardous materials or generate high volumes of hazardous wastes. Rather, the Plan would primarily facilitate the development of residential and service-oriented non-residential uses. Any facilities within the project area that utilize large volumes of hazardous materials are subject to regulations of the California Health & Safety Code as enforced by the City per Title 8 of the Municipal Code. State regulations provide specific requirements pertaining to the handling, use, and transport of hazardous materials and are specifically intended to protect health and safety. Given that the Downtown Plan would not facilitate development that would present any unusual hazards, it is anticipated that compliance with existing regulations would reduce any potential impacts related to use of hazardous materials to a less than significant level.

Comment S-2.9: Commenter provides information regarding DTSC cleanup oversight.

Response to Comment S-2.9: This comment is noted.

**DEPARTMENT OF TRANSPORTATION**  
 DISTRICT 7, REGIONAL PLANNING  
 IGR/CEQA BRANCH  
 100 MAIN STREET, MS # 16  
 LOS ANGELES, CA 90012-3606  
 PHONE: (213) 897-9140  
 FAX: (213) 897-1337

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 Be energy efficient!*

S-3

March 23, 2011

IGR/CEQA No. 101213AL-DEIR  
 Long Beach Downtown Plan  
 Vic. LA-710, LA-01, LA-405  
 SCH # 2009071006

Mr. Steve Gerhardt  
 Development Services Department  
 City of Long Beach  
 333 West Ocean Boulevard, 5<sup>th</sup> Floor  
 Long Beach, CA 90802

Dear Mr. Gerhardt:

Thank you for including the California Department of Transportation (Department) in the environmental review process for the above referenced project. The proposed Project is the adoption and implementation of the Long Beach Downtown Plan. It will replace the existing zoning, and planned development districts with the Downtown Plan, becoming the land use and design document for all future development. Full implementation of the Downtown Plan is intended to increase the density and intensity of existing Downtown land uses by allowing compatible additional development over the next 25 years.

According to Table 3 and 4 of the EIR Traffic Impact Analysis dated February 4, 2010, the Downtown Plan will generate 91,439 daily trips, 5,338 AM peak hour trips and 6,273 PM peak hour trips. In addition, the cumulative projects will generate 38,994 daily trips, 2,419 AM peak hour trips and 2,716 PM peak hour trips, resulting in total additional trips of 130,433 daily trips, 7,757 AM peak hour trips and 9,034 PM peak hour trips. Many of these trips will utilize I-710, SR-01, and SR-405.

Currently, many State facilities are operating at or above capacity. For example, the I-710 at 3<sup>rd</sup> Street and Broadway are operating at Level of Service, LOS "F". Thus, potential significant traffic impact would occur if no traffic mitigation is proposed on the State facilities.

However, we acknowledge that the I-710 Major Corridor Study is investigating significant changes and improvements to the I-710 freeway. The freeway is the major gateway to Downtown Long Beach. As noted in the traffic study, approximately 40 to 50 percent of all added traffic flow into and out of Downtown will occur via the freeway. In addition, the bridge connection Downtown to the freeway and the adjacent park will undergo reconfiguration. There is a need for improvement to the freeway access to and from Downtown via the east west arterial roadways of Ocean Boulevard, 6<sup>th</sup> Street, and 7<sup>th</sup> Street. The mitigation measure will result in strategic improvement to all of the freeway access streets and may include signalization

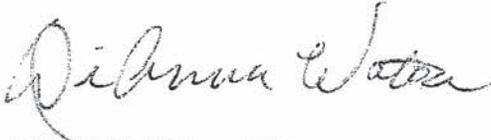
S-3.1

enhancements, capacity enhancements, changes to directional flow, and other elements as required. We would like the City to clarify the details of the corridor study.

In the spirit of mutual cooperation and the conclusion of a telephone conversation between yourself and Mr. Alan Lin on March 10, 2011, we would like to invite the lead agency, City of Long Beach, to the Caltrans office to discuss project and cumulative project generated traffic impacts on the State facilities and mitigation measures that could alleviate traffic congestion in the future. We would also like to discuss possible transportation solutions for future projects. Please contact this office at your earliest convenience to schedule a meeting in the near future.

If you have any questions, please feel free to contact me at (213) 897-9140 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 101213AL.

Sincerely,



DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

**Letter S-3: Comment Letter from Department of Transportation (CalTrans) District 7, March 23, 2011**

Comment S-3.1: The commenter notes significant traffic impacts will result from future development projects within the Downtown Plan project area, and that the I-710 Freeway project will alter regional traffic flows along State Highways. The comment letter also requests meetings between CalTrans and City of Long Beach staff.

Response to Comment S-3.1: The traffic situation in Downtown Long Beach will change significantly during the coming decades as the Desmond Bridge, Middle Harbor, and I-710 Freeway projects are completed. All of these projects are outside of the Downtown Plan project area, but will alter traffic patterns within the Downtown Plan project area. Communications with CalTrans is an on-going effort, primarily for Public Works/Engineer staff. These communications will continue.

## PUBLIC UTILITIES COMMISSION

320 WEST 4<sup>TH</sup> STREET, SUITE 500  
LOS ANGELES, CA 90013

S-4



March 28, 2011

Steve Gerhardt  
City of Long Beach, Department of Planning and Building  
333 W. Ocean Boulevard, 5<sup>th</sup> Floor  
Long Beach, CA 90802

Dear Mr. Gerhardt:

Re: SCH# 2009071006; Downtown Plan (Long Beach EIR-04-08)

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings. The Commission's Rail Crossings Engineering Section (RCES) is in receipt of the *Notice of Completion & Environmental Document Transmittal-Draft EIR* from the State Clearinghouse for the City of Long Beach's (City) proposed Downtown Plan.

Part of the five proposed mitigated measures for the Downtown Plan includes the implementation of traffic control system improvements at selected arterials which includes "transit signal priority for Long Beach Boulevard and upgrade traffic signal system equipment and operations along Blue Line light rail route."

Commission General Order (GO) 88-B requires staff approval for the alteration of existing public crossings. Modifications to the traffic signal control systems at METRO Blue Line crossings fall under the scope of GO 88-B. The City should contact RCES staff to arrange a diagnostic meeting with us and METRO. A diagnostic is required to evaluate the impacts of the new signaling system proposed. The diagnostic meeting represents the first step in the GO 88-B process; more information can be found at: <http://www.cpuc.ca.gov/PUC/transportation/crossings/Filing+Procedures/>.

If you have any questions in this matter, please contact Jose Pereyra, Utilities Engineer at 213-576-7083, [jfp@cpuc.ca.gov](mailto:jfp@cpuc.ca.gov) or myself at (213) 576-7078 or at [rxm@cpuc.ca.gov](mailto:rxm@cpuc.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to be "Rosa Muñoz".

Rosa Muñoz, PE  
Senior Utilities Engineer  
Rail Crossings Engineering Section  
Consumer Protection & Safety Division

C: Vijay Khawani, METRO

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S-4.1

**Letter S-4: Comment Letter from the Public Utilities Commission, March 28, 2011**

Comment S-4.1: The commenter notes that the CPUC has jurisdiction over the safety of highway-rail crossings. These comments relate to signal control and synchronization projects proposed as mitigation that involve Blueline light rail crossings, and state that General Order (GO) 88-B requires State staff approval for the alteration of existing public crossings. The commenter also requests the City contact PUC agency staff to arrange a diagnostic meeting in conjunction with Metro transit operations staff who operate the Blueline.

Response to Comment S-4.1: City staff has included CPUC staff in meetings with Metro in conformance with GO 88-B and will continue to do so.



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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

STEPHEN R. MAGUIN  
Chief Engineer and General Manager

March 28, 2011

File No: 03-00.04-00

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Mr. Steve Gerhardt, AICP  
Department of Development Services  
City of Long Beach  
333 West Ocean Boulevard, 5<sup>th</sup> Floor  
Long Beach, CA 90802

Dear Mr. Gerhardt:

### City of Long Beach Downtown Plan

This is in reply to your notice of availability of a Draft Environmental Impact Report, which was received by the County Sanitation Districts of Los Angeles County (Districts) on December 14, 2010. The proposed development is located within the jurisdictional boundaries of District No. 3. We offer the following comments regarding sewerage service:

- 1. The Districts own, operate, and maintain only the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the City of Long Beach except to state that presently no deficiencies exist in Districts' facilities that serve the City. For information on deficiencies in the City sewerage system you should contact the City Department of Public Works and/or the Los Angeles County Department of Public Works. L-1.1
- 2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 mgd, currently processes an average flow of 279.7 mgd, and has a service area covering approximately 820 square miles, or the Long Beach Water Reclamation Plant (WRP), which has a design capacity of 25 mgd and currently processes an average flow of 19.0 mgd. L-1.2
- 3. The Districts would appreciate the opportunity to review individual developments within the City in order to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project. L-1.3
- 4. Based on the District's average wastewater generation factors, an additional 5,000 residential units, 1.5 million square feet of new office, etc. uses, 384,000 square feet of retail, 96,000 square feet of restaurants, and 800 new hotel rooms over a 25-year time period would increase average wastewater flow from the City by approximately 1,834,400 gallons per day. For a copy of the Districts' average wastewater generation factors, go to [www.lacsd.org](http://www.lacsd.org), Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2. L-1.4

5. The Districts are authorized by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://www.lacsd.org), Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727. L-1.5
6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities. L-1.6

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

Very truly yours,

Stephen R. Maguin



Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar

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**Letter L-1: Comment Letter from County Sanitation Districts of Los Angeles County, March 28, 2011**

Comment L-1.1: The commenter provides background on the region's wastewater conveyance and treatment systems.

Response to Comment L-1.1: The additional information provided in the comments regarding impacts on wastewater from the proposed project is hereby incorporated by reference into Section 4.13 of the Draft PEIR.

Comment L-1.2: The commenter provides background on the design capacity of the Joint Water Pollution Control Plant where the project wastewater will be treated.

Response to Comment L-1.2: The additional information provided in the comments regarding impacts on wastewater from the proposed project is hereby incorporated by reference into Section 4.13 of the Draft PEIR.

Comment L-1.3: The commenter states the District would like to review individual developments to determine whether sufficient capacity exists.

Response to Comment L-1.3: The County Sanitation Districts will be notified of larger future development projects as requested as part of the City's normal development review process.

Comment L-1.4: The commenter states that Plan buildout would increase average wastewater flow by approximately 1.834 million gallons/day (mgd) for information purposes.

Response to Comment L-1.4: Table 4.13-8 on page 4.13-12 of the Draft PEIR calculates that the project would generate an estimated 2.55 mgd at peak flow, which is greater than the estimate provided by the County Sanitation Districts. Therefore, the assessment provided within the Draft PEIR has analyzed a worst-case analysis, which still resulted in a less than significant impact.

Comment L-1.5: The commenter provides information regarding connection fees.

Response to Comment L-1.5: This information is noted. Payment of fees is standard permitting practice and such fees are collected at time of permit issuance.

Comment L-1.6: The commenter states that expansion of District facilities must be sized and service-phased in a manner that is consistent with SCAG regional growth forecasts.

Response to Comment L-1.6: This information is noted. As stated on page 4.10-3 (project impact) and page 4.10-4 (cumulative impacts), the population and employment growth anticipated under the proposed Downtown Plan is consistent with the regional population projects developed by SCAG.

March 22, 2011

Long Beach Development Services  
333 W. Ocean Blvd., 4th Floor  
Long Beach, CA 90802

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RE: DEIR Long Beach Downtown Plaza

To Whom It May Concern:

Southern California Edison (SCE) appreciates the opportunity to provide comment on the above referenced project.

SCE Company right-of-ways and fee-owned properties are purchased for the exclusive use of SCE to operate and maintain its present and future facilities. Any proposed use will be reviewed on a case-by-case basis by SCE's Operating Department. Approvals or denials will be in writing based upon review of the maps provided and compatibility with SCE right-of-way constraints and rights. In the event the project impacts SCE facilities or its land related rights, please forward six (6) sets of plans depicting SCE's facilities and associated land rights to the following location:

Real Properties Department  
Southern California Edison Company  
2131 Walnut Grove Avenue  
G.O.3 – Second Floor  
Rosemead, CA 91770

Please be advised if development plans result in the need to build new or relocate existing SCE electrical facilities that operate at or above 50 kV, the SCE construction may have environmental consequences subject to CEQA review as required by the California Public Utilities Commission (CPUC). If those environmental consequences are identified and addressed by the local agency in the CEQA process for the larger project, SCE may not be required to pursue a later, separate, mandatory CEQA review through the CPUC's General Order 131-D (GO 131-D) process. If the SCE facilities are not adequately addressed in the CEQA review for the larger project, and the new facilities could result in significant environmental impacts, the required additional CEQA review at the CPUC could delay approval of the SCE power line portion of the project for two years or longer.

L-2.1



Once again, we appreciate the opportunity to comment on the project. If you have any questions regarding this letter, do not hesitate to contact me at 562-981-8215.

Sincerely,

A handwritten signature in cursive script that reads 'Larry Labrado'.

Larry Labrado  
Local Public Affairs Region Manager  
Southern California Edison Company

**Letter L-2: Comment Letter from Southern California Edison, March 22, 2011**

Comment L-2.1: The commenter discusses SCE's jurisdiction over transmission rights-of-way and other fee-owned property and states that development plans need to be submitted for review on a case-by-case basis by SCE. It clarifies that a development plan resulting in the need to build new or relocate existing SCE facilities that are 50 kilovolt or more may need additional CEQA review. SCE requests information about future development projects as it becomes available to ensure that network reliability can be maintained.

Response to Comment L-2.1: The additional information provided in the comments regarding impacts on the power system from the proposed project is hereby incorporated by reference. SCE will be notified of larger future development projects and major network facilities as requested as part of the City's normal development review process.



**BUSINESS DEPARTMENT - Business Services**  
**Facilities Development & Planning Branch**  
 Donald K. Allen Building Services Facility  
 2425 Webster Ave., Long Beach, CA 90810  
 (562) 997-7550 Fax (562) 595-8644

L-3

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April 4, 2011

Via US Mail, Fax, & Email  
 Fax- (562) 570-6068

Email- dtcommunityplan@longbeach.gov

Steve Gerhardt, AICP  
 Senior Planner, Advance Planning  
 Long Beach Development Services  
 City of Long Beach  
 333 West Ocean Boulevard, 5<sup>th</sup> floor  
 Long Beach, California 90802

**Re: Comments on the Draft Program Environmental Impact Report for the Proposed City of Long Beach Downtown Plan**

Dear Mr. Gerhardt:

The Long Beach Unified School District (LBUSD or District) appreciates the opportunity to comment on the Draft Program Environmental Impact Report (DPEIR), dated December 2010, for the proposed City of Long Beach Downtown Plan (Project), dated November 2010. The District previously submitted written comments on the Initial Study (IS) and Notice of Preparation (NOP) of a DPEIR for the draft Downtown Community Plan (June 2009).

**GENERAL COMMENT**

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 DPEIR is to ensure that potential environmental impacts to schools are appropriately identified, evaluated and mitigated.

LBUSD is the largest employer in the City of Long Beach. As such, the District appreciates the potential benefits of a plan to develop a vibrant and "active" mixed-use downtown environment. However, the proposed increase in density and intensity of development in the Downtown Community Plan area has the potential to cause significant adverse environmental impacts to six LBUSD schools that are within or adjacent to the plan area. In addition, as noted in the DPEIR, the District's Facility Master Plan has identified the need for an additional elementary school within the Poly Planning Area -- a portion of which falls within the proposed Downtown Community Plan area -- although the location of the school has not yet been identified. We are particularly concerned about potential impacts from increased building height limits and reduced building setback requirements, associated shade and shadow effects, traffic, noise,

L-3.1

Mary Stanton District 1 Member	Felton Williams District 2 President	John McGinnis District 3 Member	Jon Meyer District 4 Member	David Barton District 5 Vice President
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construction activity, and incompatible land uses such as alcohol sales and other adult-oriented activities proximate to schools.

The DPEIR states "The Downtown Plan includes protections for established neighborhoods through the designation of those areas as Downtown Neighborhood Overlay zones." Similarly, the IS/NOP stated "The Downtown Community Plan will provide policies and programs for the preservation of neighborhood character."

**General Comment:** *The District requests that the Downtown Plan include protections, policies and programs to preserve an environment conducive to safety and learning at our downtown neighborhood schools. In addition, the District requests that the PEIR and the Mitigation Monitoring and Reporting Program (MMRP) accompanying the PEIR include mitigation measures that protect schools from shade/shadow impacts that would be incorporated in future development project documents. The Press Telegram Lofts and the Superior Courthouse are recent examples of projects within the Downtown Plan Area that will have potential shade/shadow impacts to District schools. The District is concerned that such impacts from future projects will not be fully evaluated and mitigated with the attempt to streamline the CEQA process through the Downtown Community Plan PEIR. It is vitally important to the existing and planned schools in the Downtown Plan Area that the schools are included in the shade/shadow analyses and that any impacts to schools are avoided, and alternatives or mitigation measures are identified and included in the MMRP. See our later specific comment for further detail.*

## SPECIFIC COMMENTS

### Proximity to Schools

Five LBUSD schools are located within the 719-acre Plan Area:

Chavez Elementary School (ES); 730 W. Third Street.

Edison ES; 625 Maine Avenue.

Stevenson ES; 515 Lime Avenue.

International ES; 700 Locust Avenue.

Renaissance High School (HS); 235 E. 8th Street.

One additional LBUSD school is located adjacent to the Plan Area boundary:

Franklin Middle School (MS); 540 Cerritos Avenue.

The six school properties listed above would be directly affected by the Project. The IS/NOP and the Draft Downtown Community Plan (June 18, 2009) did not mention any of these schools by name and the school locations were not represented on any graphics or figures in either document. In the District's written comments on the NOP/IS we requested that the PEIR discuss the schools, evaluate impacts to schools, and show school locations on figures showing proposed building height limits, set backs, zoning standards, etc. The District appreciates that the City has included in the draft PEIR additional reference to the schools and a figure (Figure 2-1) showing the six school locations.

**Comment:** *The District requests that the City consider including the locations of these schools on other relevant figures in the PEIR and Downtown Plan, including on base*

L-3.1

cont'd

L-3.2

maps of figures used to show proposed overlay and land use sub-areas, as well as proposed height limits and setback requirements. We also request that the PEIR evaluate potential impacts and propose mitigation measures applicable to each of these schools individually.

L-3.2  
cont'd

### **Maximum Building Heights**

The proposed Project increases the height limits for buildings on property adjacent to each of the referenced six schools compared with existing height limits. As one example, the height limit for the entire area around Stevenson ES increases from 28 feet to 80 feet. In addition, the setback requirement for the property surrounding Stevenson ES decreases from 10 feet to 6 feet.

***Comment:** The District requests that the PEIR (and Downtown Plan) address and analyze potential impacts of the Project's maximum building height limits on each affected school property. Where increased height limits are proposed near schools, the EIR should take into account the sensitive nature of these critical public facilities and all efforts should be made to avoid impacts to schools and mitigation measures identified if needed; including Project alternatives, Plan policies and programs, zoning, and alternative development standards and design guidelines.*

### **Building Setback Limits**

The proposed Project reduces the required setback for buildings on property adjacent to each of the six schools compared with existing setback requirements. For example, the setback requirement for the property east from Chavez ES (and directly across Maine Avenue) is reduced from 10 feet to zero feet. In addition, the height limit for this Chavez-adjacent property increases from 80 feet to 240 feet (or 500 feet, with incentives)

***Comment:** The District requests that the PEIR (and Downtown Plan) address and analyze potential impacts of the Project's building setback requirements on each affected school property. We also request that mitigation be identified that would lessen any such impacts. Where decreased setbacks are proposed near schools, the EIR should take into account the sensitive nature of these critical public facilities and all efforts should be made to avoid impacts to schools and mitigation measures identified if needed; including Project alternatives, Plan policies and programs, zoning, and alternative development standards and design guidelines.*

### **Shade and Shadow Impacts**

Shade and shadow impacts caused by increased height limits and reduced setbacks proposed for buildings adjacent to schools have the potential to cause significant adverse impacts to District schools. This Project as presently described could significantly impact students at each of the identified six schools.

### **Daylighting**

Schools and associated grass fields and play areas are light-sensitive land uses. Outside play areas and play time with daylight are a critical component to a child's learning. The shadows that would be cast across school property from adjacent tall buildings will saddle a school with significant shadow impacts. This would have a negative impact to our students and our schools. The District has expended funds to design and construct energy-efficient schools that maximize passive solar features and the benefits of daylighting. Several of the schools have been specifically designed to make use of natural light to minimize energy use. Research has consistently shown that

there is a valid and predictable positive effect of daylighting in schools on student performance as referenced in the following study; "Daylighting in Schools – an Investigation into the Relationship Between Daylighting and Human Performance," California Board for Energy Efficiency, August 20, 1999. Any new shade/shadow effects would interfere with the District's mandate under State law relative to the learning environment. Such effects would also interfere with the District's efforts to utilize natural light and minimize energy use.

L-3.2  
cont'd

### **Significance Threshold**

The DPEIR states "Shadow impacts are considered significant if shadow-sensitive uses would be shaded by proposed structures for more than 3 hours between late October and early April (including Winter Solstice), or for more than 4 hours between early April and late October (including Summer Solstice)." The DPEIR further states "This significance criterion has been used in EIRs prepared for other projects in Downtown Long Beach in recent years and has become the standard by which shadow impacts are determined." The District is aware the referenced threshold is prescribed for the City of Los Angeles (City of L.A. CEQA Thresholds Guide, 2006). The District is also aware that the CEQA analysis recently completed for the proposed new courthouse in downtown Long Beach used a different threshold whereby a less than significant determination was based on less than one hour of shade impacts to any part of the adjacent school (Long Beach Superior Courthouse MND/Initial Study, August 6, 2009). Therefore, the significance threshold prescribed in the DPEIR is inadequate to determine significant impacts to schools and does not represent "the standard by which shadow impacts are determined" in Long Beach.

L-3.3

In accordance with CEQA, all feasible mitigation measures must be considered and implemented to reduce or avoid such impacts. Examples of feasible mitigation measures include Project alternatives, Plan policies and programs, zoning, and alternative development standards and design guidelines. Again, the PEIR should treat area schools as the critical public facilities that they are. As the Downtown Area builds up, it will be increasingly important for schools to maintain access to sunlight.

**Comment:** *The District requests that the PEIR (and Downtown Plan) address and analyze the potential shade and shadow impacts of the Project on each affected school property. Even though no specific buildings are proposed at this time, the District requests that the PEIR include a shade/shadow analysis based on the building massing and height limits proposed in the Plan.*

**Comment:** *The PEIR should also evaluate the long-term implications of adopting the aforementioned significance threshold, especially as it would increase energy consumption, air pollution and GHG emissions for the schools in the area and potentially have negative impacts on student performance.*

- *Is this threshold consistent with other mitigation measures and City policies related to energy consumption?*
- *If the City intends to employ this significance threshold citywide then what are its cumulative impacts?*
- *What are the long-term impacts associated with this threshold?*

## Alcohol Sales

The District understands that the California Business and Professions Code 23789(b) conveys to the Department of Alcohol Beverage Control (ABC) is the entity to issue licenses and regulate alcohol sales. The ABC is authorized to refuse the issuance of retail licenses for premises located within six hundred (600 feet) of schools. The ABC's decision process generally considers whether the issuance of the license would be contrary to the public welfare. We further understand that the City of Long Beach Zoning Code Section 21.52.201 provides that all alcoholic beverage sales use requiring a conditional use permit (CUP) shall not be located within five hundred feet (500 feet) of a public school except for (1) locations in the greater downtown area; or (2) stores of more than twenty thousand (20,000) square feet of floor area and also providing fresh fruit, vegetables, and meat in addition to canned goods (Ord. C-7032 § 42, 1992; Ord. C-6533 § 1 (part), 1988).

The proposed Project would reduce the requirements for alcohol sales by permitting on-site alcohol sales and consumption to be "by right" in the designated "height incentive areas" of the Plan Area. Premises where alcohol sales are established "by right" would not be required to obtain a CUP. As presently configured, the height incentive areas of the Plan are directly adjacent to several schools. Thus, the Plan calls for a change in the process for obtaining city approval for certain on-site sales of alcohol (ie., without the control afforded by a CUP). In particular, "by right" alcohol sales are proposed for the property directly south and east from Chavez ES, and the property directly south from International ES. The District is concerned about increasing the number of allowable by right alcohol associated permits and their impacts without regard to protecting, or preventing further potential impacts to schools.

**Comment:** *The District requests clarification regarding whether the Downtown Plan in effect expands the "greater downtown area" referenced in code section 21.52.20 and, thereby, expands the zoning area in which alcohol sales requiring a CUP are not precluded within 500 feet of a public school.*

**Comment:** *The District requests that the PEIR and Downtown Plan fully evaluate the potential for the Project to expand the zoning area that allows alcohol sales within 500 feet of schools, potential adverse impacts from such an expansion, alternatives for avoidance of those impacts, and appropriate mitigation measures.*

**Comment:** *The District requests that all premises adjacent to, or near by schools, continue to be required to obtain a CUP for alcohol sales and on-site consumption. The District believes that the City should adhere to the City's existing zoning code.*

## Adult Entertainment Businesses

Table 3-1, Permitted Land Uses, references that adult entertainment businesses will be permitted in the Downtown General District, in accordance with existing City code Section 21.45.110.

**Comment:** *The District requests that the City confirm that the existing City code, Special Development Standards, Section 21.45.110 will continue to apply to any proposed adult entertainment businesses and that the draft Plan does not propose any change to that section of the City code.*

L-3.4

### Massage Establishment

Table 3-1, Permitted Land Uses, lists "Massage establishment (not adult entertainment)" as a permitted use requiring a Conditional Use Permit in the Neighborhood Overlay Zone, and an Administrative Permit in the General Downtown Zone. In addition, Table 3-1 indicates Massage Establishments are among a mix of "pedestrian-oriented" land uses *required* to make up 60% of ground floor street fronts on designated "Secondary Streets." Moreover, the Downtown Plan (Figure 2-3) proposes designating some pedestrian-oriented Secondary Streets adjacent to schools (e.g. Stevenson ES). The Plan is not clear as to what kind of "Massage establishment" is "not adult entertainment." City code, section 5.58.101, includes a definition for massage establishment including any business or activity that derives over fifty percent of its gross revenues from adult entertainment.

**Comment:** *The Downtown Plan must either provide a definition of the massage establishments that are permitted uses in Table 3-1, or, treat such businesses as adult entertainment businesses and incorporate the same Special Development Standards that apply as specified in code section 21.45.110.*

### Expanded Project Plan Area

The Downtown Plan Project area has expanded – from 631 acres to 719 acres – since the release of the NOP. The expansion area is primarily to the north and northeast -- adding the area toward Alamitos Avenue and 10th Street, and Anaheim Street between Pacific Avenue and Long Beach Boulevard – from the original Plan area proposed in June 2009. The DPEIR states the height and zoning designations for the expansion area "are being maintained by the proposed Downtown Plan to conform to the existing development potential, so no additional development beyond what would be allowed by existing zoning will occur" (Page 2-2). The expansion area includes two additional District schools: International Elementary School (ES) and Renaissance High School (HS). Existing zoning in the expansion area – west of Renaissance HS and northwest of International ES -- includes R-4-N and R-4-U. These existing zoning designations have height limits ranging from 38 feet to 65 feet, and setback limits ranging from 10 – 15 feet. The proposed expanded Plan area would change this existing zoning to allow for building heights of 150 feet and zero setback. Thus, the expansion area *would* allow for additional development beyond what would be allowed by existing zoning.

**Comment:** *The PEIR must analyze any impacts to schools and school children related to the alteration of existing zoning in the expansion area, as well as in the original Plan area. As stated above, the Project would allow for additional development and the DPEIR should be corrected accordingly. The District is concerned that by expanding the Project Plan Area after the issuance of the NOP that not enough time and consideration have been given the environmental impacts of this change. If significant changes are required to correct the DPEIR, the document should be recirculated to allow the District sufficient time to review.*

### Future Land Use Development Intensity

The DPEIR states "The exact type, pace, and intensity of new development cannot be assured through the adoption of the Plan, as the level of activity will be determined

L-3.4  
cont'd

L-3.5

L-3.6

largely by private investment in Downtown and the state of the local economy.” (Page 2-5)

**Comment:** *The Downtown Plan should include provisions to ensure that the type, pace and intensity of any future development activity does not increase or cause new impacts to schools.*

### General Land Use Issues

The DPEIR states that “The Downtown Plan proposes to establish two land use districts, Downtown-General District and Downtown Neighborhood Overlay, with the intent of providing additional housing, employment, shopping, and entertainment opportunities while preserving intact residential neighborhoods that provide a wide mix of historic and more recent housing type” (Page 2-5). The DPEIR further states “These two districts would be supplemented by designating certain main and secondary streets shown in Figure 2-3, where pedestrian-oriented uses are required to be located on ground-floor street fronts. The DPEIR – as reflected in these and other statements in the document--does not address the character of existing (and future) downtown area schools and the neighborhoods around the schools.

**Comment:** *The PEIR must analyze any impacts to schools and school children related to the alteration of existing street patterns and neighborhoods around schools.*

### Subsequent Development

The DPEIR states one of its purposes is to streamline environmental review of all subsequent future projects. It further states, pursuant to Section 15183 of the State CEQA Guidelines, future “projects that are consistent with the development density or intensity of the plan shall not be subject to additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site” (Page 1-2). This standard does not fully incorporate CEQA tests for determining whether or not a new or supplemental EIR is required.

**Comment:** *The PEIR and the Downtown Plan should reference CEQA standards for subsequent projects pursuant to a PEIR, including CEQA section 21166 and CEQA Guidelines section 15162. Due to the size of the Project Plan area and the amount of development that is contemplated in the Plan, it is critical that the City establish mechanisms for tracking the amount of traffic and evaluating future projects to ensure that all feasible mitigation measures have been implemented and that no additional impacts will occur based on adjustments between planned land uses, changes in proposed subsequent projects and changes in circumstances. The PEIR should explain the mechanisms the City will use to ensure that the impact levels in the PEIR are not exceeded with subsequent projects. Since no specific projects are proposed, the City will need to make assumptions and calculations based on the Downtown Plan in order to assess the potential impacts of the project. The PEIR should provide details of the assumptions made in order to assess impacts so that future projects can be evaluated appropriately. The District is especially concerned that the PEIR does not address the potential impacts on area schools sufficiently and must insist on reviewing future CEQA documentation to ensure its schools and schoolchildren are protected.*

L-3.6  
cont'd

## Noise and Vibration

According to the DPEIR, construction noise could range up to 95-100 dBA at 50 feet from the noise source, vibration impacts would be significant, and operational noise would exceed established exterior and interior noise limits at International Elementary School, Renaissance High School, and Stevenson Elementary School. The City's Noise Ordinance establishes interior and exterior noise limits of 45 dBA and an exterior limit of 50 dBA, respectively at schools. The continuation and constancy of the excessive noise and vibration, although short-term in nature, would be a nuisance as well as a distraction to effective outdoor and indoor instruction.

The two mitigation measures that have been provided to mitigate construction noise are inadequate.

- Mitigation Noise-1(a) provides a list of measures to be applied to individual projects that are determined to have potential noise impacts from the removal of existing pavement and structures, site grading and excavation, pile driving, building framing, and concrete pours and paving. Will all projects that require any of these construction activities automatically be required to comply with the entire list of measures specified in Mitigation Noise-1(a)?
- Mitigation Noise-1(b), as it is currently written, is applicable to just residential uses. Please update this measure to reflect its application to all sensitive land uses, including schools since they are also a sensitive receptor.

Furthermore, both Mitigation Noise-1(a) and Mitigation Noise-1(b) mention an arbitrary distance of 150 feet.

- Under Mitigation Noise-1(a), noticing should be provided to all noise-sensitive land uses that would be directly affected by construction noise, not just those properties within 150 feet of the noise source. Noticing should be provided to all properties if construction noise exceeds acceptable noise standards at that property. A project-level noise study may be required to determine the extent of impact to identify the distance for notification. Furthermore, if exceedance of noise levels occurs at a school, we request that the City and/or project applicant coordinate with the LBSD's Facilities Branch to avoid construction activities on important test dates.
- Mitigation Noise-1(b) identifies a list of measures to be incorporated in construction contracts where residential uses are within 150 feet of the construction site. (1) As requested above, please amend the mitigation measure to include all sensitive land uses, including schools, (2) please revise the arbitrary distance of 150 feet to include all affected sensitive land uses whereby construction noise levels would exceed the established acceptable noise standards at that noise-sensitive property. A project-level noise study may be required to determine the extent of impact in order to identify the distance for notification.

**Comment:** Two types of short-term noise impacts could occur during construction: (1) mobile noise from transport of workers and material deliveries and (2) stationary construction noise from use of onsite construction equipment. The DPEIR addresses the

L-3.7

*latter type, but not mobile noise. Impacts associated with construction-related mobile noise needs to be analyzed.*

The DPEIR concludes that with the application of both Mitigation Noise-1(a) and Mitigation Noise-1(b), construction noise impacts would be mitigated to insignificance. We respectfully disagree that all construction noise impacts would be reduced to a level of insignificance, as it is possible that construction-related noise may not meet the City's Municipal Code Section 8.80.160, which establishes requirements for exterior noise levels. The determination of the significance level associated with construction noise could be significant, and will need to be based on a project-specific noise study.

***Comment:*** *The District requests that if vibration-generating levels exceed established thresholds on school properties, that these types of construction activities occur during hours when school is not in session.*

Noise levels after implementation of the Downtown Plan would increase, and according to Tables 4.9-11 and 4.9-12, future with project modeled noise levels would exceed established exterior and interior noise limits at International Elementary School, Renaissance High School, and Stevenson Elementary School. Exterior noise levels at these schools would exceed the city's exterior limit of 50 dBA and possibly exceed the interior limit of 45 dBA, depending on where the classrooms are situated on the campus. The DPEIR proposes mitigation for new residential development. However, it does not identify mitigation measures to reduce the operational noise impacts to existing sensitive land uses, such as schools.

***Comment:*** *The District requests that the City and/or project applicant mitigate excessive operational noise to levels below significance at both project-level and cumulative bases.*

### **School Impact**

The Downtown Plan projects the generation of an estimated 670 new students at build out of all of the 5,000 residential units. This is the size of a new elementary school. The DPEIR states that mitigation under the provisions of SB 50 is deemed to be full and complete mitigation.

Mitigating school impacts is not simply a matter of constructing just classrooms. It also requires space for physical education, and appurtenant structures and space. It has been extremely difficult and trying for the District to identify suitable school sites to accommodate new growth.

***Comment:*** *With the projection of 670 students from the proposed Plan area, the District respectfully requests that the City assist the District in identifying appropriate land for the development of future new schools and/or expansion of existing schools within the planning area.*

### **CONCLUSION**

The LBUSD appreciates the opportunity to participate in the environmental review process for the Downtown Community Plan. We trust that you share our goal of ensuring there are no significant impacts to our schools from the overall changes in land uses that

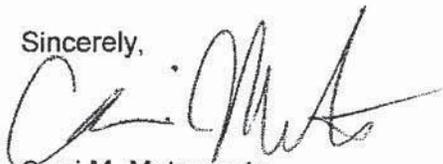
L-3.7  
cont'd

L-3.8

would occur in compliance with the proposed development standards and design guidelines of the Plan. We would welcome the opportunity to discuss our concerns and work with you as you develop/modify the Long Beach Downtown Plan.

Please feel free to contact me at 562-997-7550 if you have any questions regarding the LBUSD comments.

Sincerely,



Carri M. Matsumoto  
Executive Director  
Facilities Development & Planning Branch  
Long Beach Unified School District

KHR:sa

cc: Chris Steinhauser – LBUSD Superintendent of Schools  
Office of LBUSD Chief Business & Financial Officer  
Karl Rodenbaugh – The Planning Center

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**Letter L-3: Comment Letter from Long Beach Unified School District, April 4, 2011**

Comment L-3.1: The commenter (District) notes the need for an additional school to serve Downtown Long Beach. The comment also requests that the Downtown Plan include protections for Downtown neighborhood schools. The District expresses concern that the impacts of future projects may not be fully evaluated and mitigated.

Response to Comment L-3.1: The need for an additional elementary school to serve Downtown Long Beach is noted in the Draft PEIR, beginning on Page 4.11-1. State mandated school impact fees provide funds for the development of needed new school facilities and, per State law, mitigate impacts related to school capacity to a less than significant level.

No LBUSD schools are within the proposed height incentive area (which allows buildings up to 500 feet), although Chavez Elementary is within an 80-foot height area and adjacent to the height incentive area. International Elementary, Renaissance High, and New City Charter schools are within the proposed 150-foot height area.

The District's specific concerns about the impacts of the Plan on area schools are addressed in the responses to Comments L-3.2 through L-3.8.

Comment L-3.2: The District requests the Downtown Plan include policies and programs to protect the learning environment at schools. The commenter is also concerned that shade/shadow impacts from future projects will not be fully evaluated and mitigated with the attempt to streamline the CEQA process through the Downtown Community Plan PEIR. The District notes that shadow impacts on existing schools would be a significant impact. The District requests that the EIR and Plan address and analyze potential impacts of the project's maximum increased building height limits, reduced building setback requirements, and daylighting on each affected school property, including the associated grass fields and play areas, many of which have been designed to maximize passive solar features and the benefits of daylighting.

The District also requests that the City consider including the locations of these schools on relevant figures in the Draft PEIR and Plan.

Response to Comment L-3.2: Preparation of site-specific analysis of impacts to individual schools is beyond this scope of this Program EIR, particularly insofar as no specific development projects are proposed at this time. However, Section 4.1, Aesthetics, of the Draft PEIR acknowledges that development facilitated by the Downtown Plan could have significant and unavoidable impacts shade/shadow impacts to LBUSD schools. The City would need to adopt a Statement of Overriding Considerations for this impact if the Plan is approved.

Existing City procedures include notification of surrounding property owners of pending development projects, and this practice will continue regardless of whether the proposed Downtown Plan is adopted. The notification radius is sufficient to include properties that would be shadowed by future development projects. However, as noted in Section 4.1 of the Draft PEIR, the creation of a more urbanized neighborhood with taller buildings includes the

possibility of additional shadow impacts. Impact AES-3 specifically notes that schools could be shaded, particularly during wintertime, and that this is a significant and unavoidable impact. The mitigation measure for Impact AES-3 requires a project-specific shadow analysis for any projects over 75 feet tall or per the revision described below, for any project over 45 feet that is adjacent to a light sensitive use (including schools). Nevertheless, shadow impacts may not be mitigable, and could remain significant and unavoidable on schools, as noted in the Draft PEIR.

In response to this comment, Mitigation Measure AES-3 has been revised to read as follows:

**Mitigation AES-3 Shadow Impacts.** Prior to the issuance of building permits for any structure exceeding 75 feet in height or any structure that is adjacent to a light sensitive use and exceeds 45 feet in height, the applicant shall submit a shading study that includes calculations of the extent of shadowing arches for winter and equinox conditions. If feasible, projects shall be designed to avoid shading of light sensitive uses in excess of the significance thresholds outlined in this EIR. If avoidance of shadows exceeding significance thresholds is determined to be infeasible, the shadow impact will be disclosed as part of a project environmental impact report (EIR).

The revision to the mitigation measure will provide additional protection for LBUSD schools by requiring shadow studies for projects over 45 feet in height that are adjacent to schools.

The reduced setback requirements would be expected to have little, if any impact upon District schools. As the commenter notes, the setback requirement across from Chavez Elementary would be reduced from 10 feet to 0 feet; however, this change in itself would have no direct impact on schools with respect to shadows.

The District's concerns will be brought forward to the decision-makers when considering the EIR and proposed Plan and will need to be considered when they make Findings on the project, including a Statement of Overriding Considerations if they decide to approve the project despite its unavoidably significant impacts.

When any future school site is identified by the District, the City will be informed and will note the site on long-range land use plans to avoid shadowing and other impacts to the greatest extent possible.

Comment L-3.3: The District notes that the Draft PEIR significance threshold of 3-4 hours of shadow is different than the CEQA threshold used for the new courthouse in downtown Long Beach IS/MND (Aug. 2009), which used a threshold of one hour of shade impacts to any part of the adjacent school. The District states the Draft PEIR threshold does not represent "the standard by which shadow impacts are determined" in Long Beach and suggests that the City should examine the long-term implications of adopting the significance threshold used in the Draft PEIR.

Response to Comment L-3.3: The courthouse IS/MND referenced by the commenter was prepared by the State of California. Lead agencies are free to adopt their own significance

thresholds under CEQA. As such, different agencies often use different thresholds. The threshold used in the Draft PEIR is consistent with what has been used in other CEQA environmental documents for which the City is acting as lead agency (the recent 2<sup>nd</sup> + PCH EIR, for example). As such, the threshold does not represent a change from past City practice with respect to shade/shadow impacts and would not result in any long-term change with respect to City policy regarding shade/shadow conditions.

Comment L-3.4: The commenter states that uses such as alcohol sales, adult entertainment businesses, and massage establishments in proximity to schools would not be conducive to a positive learning environment. The commenter also requests clarification regarding how these uses will be regulated.

Response to Comment L-3.4: These uses are regulated by zoning and requirements for conditional use permits and consider adjacency to schools and other sensitive receptors, as well as other factors, in their location and operation. This process will continue for these types of uses. Please see Table 3-1 in the Downtown Plan for additional information.

Comment L-3.5: The commenter notes that the Downtown Plan project area was expanded after issuance of the notice of preparation and that new zoning regulations would be applicable to this expanded area.

Response to Comment L-3.5: The District is correct in stating that the new zoning regulations would be applicable to this expanded area. In some locations, the new zoning regulations would allow for additional height beyond what is allowed under the current zoning. However, although the project area boundary has been expanded, please note that the overall development potential noted in Section 2, Project Description, was reduced from the numbers provided in the NOP (see Page 2-1 of the Draft PEIR). The Draft PEIR analyzed the larger project area and reduced development potential. In addition, the Draft PEIR was circulated for 115 days, well beyond the required 45 days, which provided sufficient time for review and consideration of the environmental impacts of the proposed project.

Comment L-3.6: The commenter states that the Downtown Plan should include provisions to ensure that the type, pace, and intensity of development does not cause new impacts to schools and that the EIR needs to address impacts related to alteration of existing street patterns and neighborhoods around schools.

Response to Comment L-3.6: One purpose of the Downtown Plan is to encourage new compatible development within the project area. Nevertheless, new development will introduce increased environmental impacts, including significant unavoidable adverse impacts, as noted in the Draft PEIR for a number of issue areas. As required by CEQA, the lead agency is required to identify potentially significant environmental impacts of the proposed project and mitigate such impacts to the greatest extent possible. Please see Topical Response #3 for discussion of subsequent environmental review for individual projects within the Downtown Plan area and monitoring of development in the future.

The Downtown Plan would control the type and intensity of development within the Downtown area, though the pace of development would be controlled in part by market forces.

The Draft PEIR includes feasible mitigation to address the impacts of individual projects as they are proposed, including measures related to minimizing the effects of changes in traffic conditions. Please see Draft PEIR Section 4.12, Transportation and Traffic, which includes specific measures intended to maintain acceptable traffic flow as well as measures aimed at maintaining or improving safety for pedestrians and bicyclists.

Comment L-3.7: The commenter states the two mitigation measures for noise in Section 4.9 of the Draft PEIR are inadequate and asks for specific clarification of measures Noise 1(a) and 1(b). The District also requests expansion of the 150 foot noticing requirement to include all noise-sensitive land uses that would be directly affected by construction noise, not just those within 150 feet of the noise source. The commenter also requests coordination of noise generating construction activities with important test dates. The commenter disagrees with the conclusion in the Draft PEIR that all construction noise impacts would be reduced to a level of insignificance. The commenter also requests that if vibration-generating levels exceed established thresholds on school properties, these types of construction activities occur when school is not in session.

Response to Comment L-3.7: The Impact statement for Impact Noise-1 has been amended to replace the word, “residents” with the term “sensitive land uses” to include schools. All applicable mitigation measures from Mitigation Noise 1(a) will be applied to construction projects. Mitigation Noise 1(b) has been amended to include schools and other sensitive receptors as requested and to extend the noticing requirement contained in that measure to noise-sensitive land uses within 300 feet of the construction site. Please refer to the Addenda Errata.

The conclusion regarding the significance of construction-related impacts relies on the fact that the City’s Noise Ordinance prohibits construction activity between the hours of 7:00 p.m. and 7:00 a.m. the following day on weekdays as well as on weekends and the fact that Measure Noise-1(a) specifies compliance with these timing restrictions. This has been clarified in the “Level of Significance after Mitigation” discussion (please see the Addenda Errata).

In response to the request for scheduling of vibration-generating construction activity that would affect schools during times when school is not in session, Measure Noise-2 has been re-numbered as Measure Noise-2(a) and a new measure specifying scheduling of construction activity that generates vibration exceeding the “vibration perception threshold” as defined in the Municipal Code during hours when school is not in session has been added (please see the Addenda Errata).

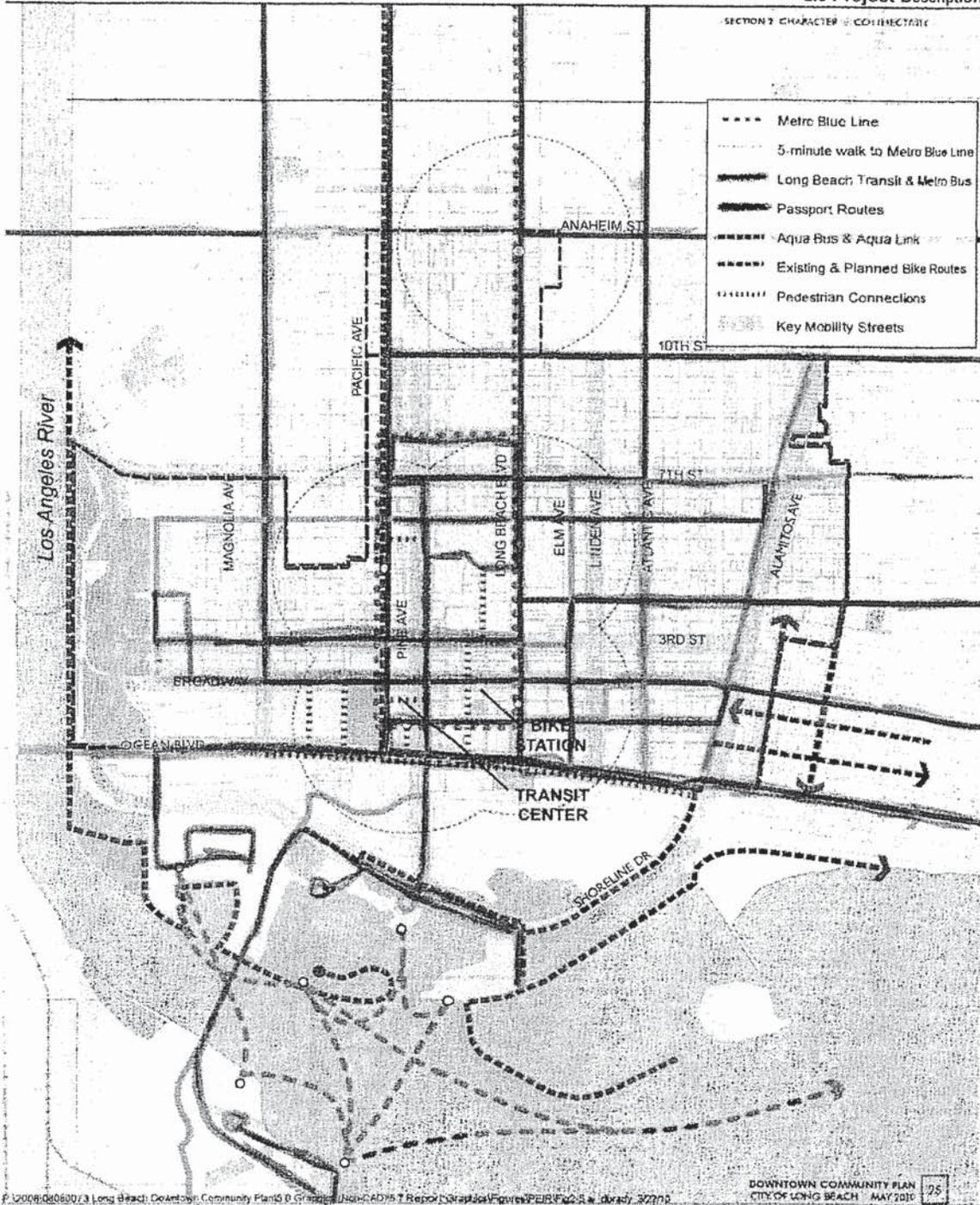
Comment L-3.8: The commenter requests that the City assist the District in identifying appropriate land for the development of a future new school and/or expansion of existing schools within the planning area.

Response to Comment L-3.8: The Draft PEIR notes the need for a new school in Section 4.11. Until the site for this new facility is identified by the District, no additional specific provisions or mitigation measures can be formulated. The City will continue to work with the District to minimize impacts on schools from adjacent land uses and assist where possible in identifying appropriate sites for new schools or expansion of existing schools. The City appreciates the

District's involvement in reducing impacts from schools within neighborhoods, particularly traffic related to student drop-off and pick-up.

Long Beach Downtown Plan PEIR  
2.0 Project Description

SECTION 2 CHARACTER & CONNECTIVITY



F:\2008\040600\23 Long Beach Downtown Community Plan\0\_Graphics\MapCAD\77 Report\Graphics\Figures\PEIR\Fig 2-6 - Draft\_3/27/10  
Source: Long Beach Community Plan 2010

DOWNTOWN COMMUNITY PLAN  
CITY OF LONG BEACH MAY 2010 25

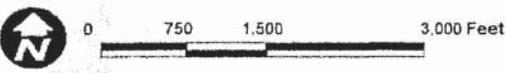


Figure 2-6  
Mobility Network

December 2010

City of Long Beach  
2-19

Long Beach Transit and other Bus Routes  
Effective February 14, 2011

RTC-57

I-710 is a north/south Freeway and provides access to the Plan area from the communities to the north, as well as the regional Interstate Highway system. In the Project area, access to and from I-710 is provided at Shoreline Drive, at 7th Street for northbound traffic, and from 6th Street for southbound traffic. North of the Project area, Anaheim Street provides a full interchange with I-710. South of the Shoreline Drive interchange, I-710 becomes Harbor Scenic Drive and serves harbor and port traffic. North of the Project area, I-710 is part of the Los Angeles County Congestion Management Program's regional freeway system.

### **Existing Traffic Conditions**

Table 4.12-1 shows existing intersection level of service (LOS) within the Plan area. These volumes were taken from recent traffic counts conducted for Downtown Long Beach. Of the 53 intersections studied, new turning movement traffic counts were collected at 28 intersections during the morning (7 to 9 a.m.) and afternoon (4 to 6 p.m.) peak periods during a typical weekday in October 2009. For the remaining 25 intersections studied, traffic counts were obtained from counts collected in July 2008. These counts have been determined to be a valid representation of current traffic conditions in the Project area due to the fact that no substantial new development has occurred within the Downtown Plan Project area. Due to the recent downturn in the economy, new development has stalled and commercial activity has been reduced in the Project area.

A summary of the existing AM and PM intersection traffic volumes and LOS are illustrated in Figures 4.12-6, 4.12-7, and 4.12-8. The AM and PM peak-hour LOS analyses for the 53 study intersections indicate that four of the 53 study intersections are currently operating at LOS E or F during either the AM or PM peak hour or both. The remaining 49 intersections currently operate at LOS D or better. The intersections that currently operate at LOS E or worse are:

- Alamitos Avenue and Anaheim Street (#41)
- Alamitos Avenue and 7th Street (#43)
- Alamitos Avenue and Broadway (#47)
- Alamitos Avenue/Shoreline Drive and Ocean Boulevard (#48)

### **Alternative Transportation**

The City of Long Beach offers a variety of alternative forms of transportation, such as the free Passport shuttle west of Alamitos Avenue to all of the Downtown and Shoreline attractions. The Passport provides convenient travel to local destinations such as the Queen Mary, Belmont Shore, Shoreline Village, Bixby Knolls, Long Beach City College and Cal State Long Beach. Moreover, the Metro Blue Line train system and the Long Beach Transit bus system provide convenient travel to more distant destinations.

The four transit agencies that provide service to Downtown Long Beach are Metro, Long Beach Transit (LBT), Los Angeles Department of Transportation (LADOT) and Torrance Transit (TT). Together, the four transit agencies run bus routes and a rail line within and adjacent to the boundaries of the Plan area, as described below:

#### **Metro Bus Service**

**Letter L-4: Comments from Long Beach Transit, February 14, 2011 provided via fax**

Comment L-4.1: Long Beach Transit changed several bus routes in their system on February 14, 2011, during the Draft PEIR review and comment period, and requested that the route information they sent via FAX be updated in the Plan and Final PEIR.

Response to Comment L-4.1: The updated information on these routes has been included on Figure 2-6, Mobility Network, and is provided as an attachment to the Addenda Errata.



South Coast  
Air Quality Management District  
21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

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PLANNING BUREAU

E-Mailed: April 6, 2011  
dtcommunityplan@longbeach.gov

April 6, 2011

Mr. Steve Gerhardt  
City of Long Beach  
Department of Development Services  
333 W. Ocean Blvd, 5<sup>th</sup> Floor  
Long Beach, CA 90802

**Review of the Draft Environmental Impact Report (Draft EIR)  
for the Proposed Downtown Plan Project**

The South Coast Air Quality Management District (AQMD) 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 Environmental Impact Report (final EIR) as appropriate.

The AQMD staff is concerned about the significant construction-related air quality impacts from the proposed project. Therefore, the lead agency should incorporate additional mitigation measures to reduce these significant impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Further, AQMD staff recommends that the lead agency include feasibility standards in the final EIR that are applicable to the project's operational mitigation measures to ensure that the operational air quality impacts from the project are minimized. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan

L-5.1

Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

SN:IM:DG

LAC101209-03  
Control Number

- ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:  
[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).

#### Mitigation Measures for Operational Air Quality Impacts

3. The lead agency's air quality analysis demonstrates significant air quality impacts from all criteria pollutant emissions including NO<sub>x</sub>, SO<sub>x</sub>, CO, VOC, PM<sub>10</sub> and PM<sub>2.5</sub> emissions. As a result, the lead agency includes Mitigation Measure AQ-2 to minimize the project's operational air quality impacts. However, the AQMD staff is concerned about the effectiveness of Mitigation Measure AQ-2 given that the implementation of this measure is contingent on a feasibility demonstration by the project applicant. Therefore, the lead agency should ensure that the the project's air quality impacts are minimized by incorporating feasibility standards in the final EIR similar to those required for the project's greenhouse gas mitigation measures in section 4.5 (pages 4.5-24 and 4.5-25) of the draft EIR.

**Letter L-5: Comment Letter from South Coast Air Quality Management District, April 6, 2011**

Although this comment letter was received after the close of the public comment period and, therefore, does not require a response, the City has chosen to include the comment and provide a response.

Comment L-5.1: The commenter notes concerns about the significant construction-related air quality impacts identified in the Draft PEIR (Section 4.2, Pages 4.2-1 through 4.2-27) and states that the lead agency should incorporate additional mitigation measures (provided in an attachment) to reduce these significant impacts in accordance with CEQA requirements. The commenter also recommends inclusion of feasibility standards in the Final PEIR to ensure that operational air quality impacts are minimized.

Response to Comment L-5.1: The Draft PEIR provides a comprehensive listing of all SCAQMD and Air Resources Board mitigation measures, and includes language requiring that future development projects comply with regulations and mitigation measures in place when development occurs. This language is to ensure that mitigation includes best management practices as they are expected to evolve in the future.

Project-specific measures that SCAQMD has attached to the comments, including those noted mitigation measures that go into effect in the future for off-road diesel-powered construction equipment, will be incorporated into the Final PEIR. These measures are provided in the Addenda Errata for the Final PEIR.



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APR 04 2011  
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April 1, 2011

Steve Gerhardt, AICP  
Long Beach Development Services  
333 W. Ocean Blvd., 5<sup>th</sup> Floor  
Long Beach, CA 90802

Subject: **Long Beach Heritage Response to Downtown Plan  
Program Environmental Impact Report / December 2010**

Long Beach Heritage would like to thank the Department of Development Services staff and the Planning Commissioners for reviewing our comments on the PEIR for the Downtown Plan.

For over 25 years Long Beach Heritage has advocated for consistent planning and city support of historic preservation. Using our historic character we can achieve needed growth which integrates our contributing historic structures with innovative architecture. Appropriate tools have always been adaptive re-use and complementary in-fill development.

Overall, Long Beach Heritage approves of the major steps the City of Long Beach has taken in recent years:

- Integrating the Historic Preservation Element into the General Plan
- Developing a Downtown Plan
- Taking a Historic Resources Inventory – Jones & Stokes
- Writing a Context Statement - Sapphos

We would like to applaud the City and Department of Development Services for encouraging the Downtown Visioning Committee and other groups to help develop the Downtown Community Plan.

First off, we would like to note that the Downtown Plan is often referred to as the Downtown Community Plan. Long Beach Heritage wholly supports the use of this enriched terminology, as it brings recognition to the fact that Downtown is indeed a community of residents and businesses. Calling this the Downtown Community Plan also distinguishes this 2011 plan from the many prior Downtown plans.

That being said, we do have some questions and concerns about the Plan and its attention to historic preservation.

- 1) **"Form-based code" (Downtown Plan, Section 1, Vision + Introduction, p. 9 / Section 7, Historic Preservation, pp. 113-115)**  
As we read it, the Downtown plan's overarching vision allows for proactive planning which encourages development through a "form-based code." Please clarify that this means that the city will utilize more flexible code structures

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when allowing for the adaptation of an older building into a contemporary use. For example, according to the State Historical Building Code, parking regulations and structural codes may be revised to be more in line with National Trust guidelines for historic structures, versus our city's current strict adherence to zoning codes. LBH supports this concept, though we want to confirm that there will still be a "due process" or public comment period in which to review adaptive development of our historic structures. There is a danger that a demolition or an insensitive remodel might fall under the streamlined process. To avoid losing significant structures we request assurance that CEQA reviews for Cultural Resources are still required for any structures over 45 years of age when threatened with demolition or severe remodeling.

Additionally, how do the new building codes that have been put into place as of January 2011 affect our historically significant structures?

P-1.1  
cont'd

**2) Significant Resources – Non-Landmark Buildings (Downtown Plan, Section 7, Historic Preservation, p. 115-117 including maps / Downtown Plan PEIR Section 4.3, pp. 17-22)**

There are scores of buildings in the Downtown area which are historically significant, but not necessarily of "landmark" quality. Many, but by no means, all, of these are listed in the Historic Resources Inventory (Jones & Stokes, 2009). Long Beach Heritage is concerned that this Inventory will be the only guiding document used when planning development in the Downtown area.

P-1.2

Section 7 of the Downtown Plan, along with Section 4.3 (Cultural Resources) of the PEIR are confusing and must be clarified before certification. For example, Development Services staff have implied that specific buildings in the Historic Districts (Willmore City, Drake Park, Central) were not identified by address because they are implicitly covered by Historic District statutes. However, the map (DP, p 116-117) and table (PEIR, 4.3-3, 4.3-4) list some but not all buildings located in these very districts that are supposedly covered by the HD surveys. Nowhere, in either the Downtown Plan nor the PEIR, does it state that these Historic Districts Surveys will guide future development.

Therefore, we ask that the Downtown Plan include an updated and integrated map using all the surveys of the greater Downtown area conducted over the years. In other words, augment the Historic Resources Inventory with specific identification of the surveys completed over the years as follows:

- Drake Park History District, Community Development, Planning / Cultural Heritage Committee, 1979
- Long Beach Cultural Heritage Survey Phase I Inventory of Downtown and Bluff Park, 1980
- Historic Preservation, Nature, Theory, History and Survey of Drake Park in Long Beach, California, 1979
- Willmore City neighborhood development strategy / Community and Environmental Planning Division, Department of Planning and Building, 1982.
- Expanded Downtown Long Beach Historic Survey / Johnson Heumann Research Associates and LB Preservation Officer, 1987
- Earthquake Hazards Abatement Program / Long Beach Bureau of Building & Safety, 1989
- Historical Survey of Buildings subject to seismic correction, 1990
- Central Long Beach Design Guidelines / LB Redevelopment Agency, 2005

This request is important in that the Downtown Community Plan is an all-encompassing plan which will guide the city for years to come. A complete survey recognizing all of our historically significant structures is imperative to Long Beach Heritage's support of the Plan.

In addition, there are specific buildings not listed in the Jones and Stokes Survey and not within an historic district. We ask that these properties be included in the map:

- 325 W. 3<sup>rd</sup> St., Californian Apartments, 1923 / architect Joseph H. Roberts.
- 321 Chestnut Ave., Crest Apartments, 1922-23 / architect F. L. Lindsay
- 100 Long Beach Boulevard, Southern California Edison Building, 1950 / Architect Kenneth Wing

**3) Civic Center Area (Downtown Plan PEIR Section 2.0, p. 2-2)**

The Civic Center project area is identified in the PEIR with boundaries running from Shoreline Drive to Pacific. LBH requests that the "Civic Center Area" include ONLY civic buildings and parks. We ask that a separate moniker be utilized to distinguish structures adjacent to our civic buildings.

Long Beach's historic civic center is a crucial component to the city's growth and development. It can foster civic pride and provide vibrancy to the downtown area. Diluting the role of civic buildings by grouping them in with other commercial structures opens the door to changing Long Beach's pattern of development.

Our Civic Center buildings and Lincoln Park – City Hall, Main Library, Public Safety Building, and Courthouse - were excluded from the Historic Inventory. Long Beach Heritage believes it is critical to include them. Our Civic Center structures were part of a master plan which focused on modern architecture and urban planning envisioned by a stable of local architects who gained international prominence during their careers: Kenneth Wing, Francis Heusel, Hugh Gibbs, Frank Homolka and Edward Killingsworth. Long Beach Heritage requests that these architectural landmarks be included in the inventory of historic resources.

**4) Oversight of Historic Resources**

Given that the city no longer has an Historic Preservation Officer on staff, what assurances can Long Beach Heritage be given that the trained Development Services planners, along with an Historic Preservation consultant (on retainer with the city), and the Cultural Heritage Commission will be able to work together to enforce the Downtown Plan in relation to historic resources? Please clearly state in the Downtown Community Plan the process by which these entities will work together to protect our historic resources.

Commissioners and Development Services staff, we appreciate your reviewing these comments and concerns at the March 17<sup>th</sup>, 2011 Study Session. We look forward having our comments addressed in the revised PEIR.

Submitted by

  
Nancy Latimer  
Advisor

  
Maureen Neeley  
Board Member



March 11, 2011

Steve Gerhardt, AICP  
Long Beach Development Services  
333 W. Ocean Blvd., 5<sup>th</sup> Floor  
Long Beach, CA 90802

Submitted for review at Planning Commission Study Session, March 17,  
2011  
Points of Discussion

Subject: **Draft of Comments on Downtown Plan  
Program Environmental Impact Report / December  
2010**

Long Beach Heritage would like to thank the Department of  
Development Services staff and the Planning Commissioners for  
reviewing our comments on the PEIR for the Downtown Plan.

For over 25 years Long Beach Heritage has advocated for consistent  
planning and city support of historic preservation. Using our historic  
character we can achieve needed growth which integrates our  
contributing historic structures with innovative architecture. Appropriate  
tools have always been adaptive re-use and complementary in-fill  
development.

Overall, Long Beach Heritage approves of the major steps the City of  
Long Beach has taken in recent years:

- Integrating the Historic Preservation Element into the General Plan
- Developing a Downtown Plan
- Taking a Historic Resources Inventory – Jones & Stokes
- Writing a Context Statement - Sapphos

We would like to applaud the City and Department of Development  
Services for encouraging the Downtown Visioning Committee and other  
groups to help develop the Downtown Community Plan.

First off, we would like to note that the Downtown Plan is often referred to  
as the Downtown Community Plan. Long Beach Heritage wholly  
supports the use of this enriched terminology, as it brings recognition to

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the fact that Downtown is indeed a community of residents and businesses. Calling this the Downtown Community Plan also distinguishes this 2011 plan from the many prior Downtown plans.

That being said, we do have some questions and concerns about the Plan and its attention to historic preservation.

#### THE DOWNTOWN PLAN - CLARIFICATION REQUESTED

1) "Form-based code" (Downtown Plan, Section 1, Vision + Introduction, p. 9 / Section 7, Historic Preservation, pp. 113-115)

As we read it, the Downtown plan's overarching vision allows for proactive planning which encourages development through a "form-based code." Please clarify that this means that the city will utilize more flexible code structures when allowing for the adaptation of an older building into a contemporary use. For example, according to the State Historical Building Code, parking regulations and structural codes may be revised to be more in line with National Trust guidelines for historic structures, versus our city's current strict adherence to zoning codes. LBH supports this concept, though we want to ascertain that there will still be a "due process" or public comment period in which to review adaptive development of our historic structures. There is a danger that a demolition or an insensitive remodel might fall under the streamlined process. To avoid losing significant structures we request assurance that CEQA reviews for Cultural Resources are still required for any structures over 45 years of age when threatened with demolition or severe remodeling.

Additionally, how do the new building codes that have been put into place as of January 2011 affect our historically significant structures?

2) Significant Resources - Non-Landmark Buildings (Downtown Plan, Section 7, Historic Preservation, p. 115-117 including maps / Downtown Plan PEIR Section 4.3, pp. 17-22)

There are scores of buildings in the Downtown area which are historically significant, but not necessarily of "landmark" quality. Many, but by no means, all, of these are listed in the Historic Resources Inventory (Jones & Stokes, 2009). Long Beach Heritage is concerned that this Inventory will be the only guiding document used when planning development in the Downtown area. In addition to those structures listed in the Jones & Stokes Survey report, there are many homes and commercial properties that contribute to the character of the surrounding neighborhood and that are included in adjacent Historic Districts.

We would ask that the Downtown Plan include an updated and integrated map using all the surveys of the greater Downtown area conducted over the years. In other words, augment the Historic Resources Inventory with:

- a) Local historic district surveys (Drake Park, Downtown & Bluff Park, etc) previously conducted; as well as,
- b) The surveys commissioned and completed over the years for the city, such as the Expanded Downtown Long Beach Historic Survey by Johnson and Heumann Research Associates, and various seismic lists.

This request is important in that the Downtown Community Plan is an all-encompassing plan which will guide the city for years to come. A complete survey recognizing all of our historically significant structures is imperative to Long Beach Heritage's support of the Plan.

3) Civic Center Area (Downtown Plan PEIR Section 2.0, p. 2-2)

The Civic Center project area is identified in the PEIR with boundaries running from Shoreline Drive to Pacific. LBH requests that the "Civic Center Area" include ONLY civic buildings and parks. We ask that a separate moniker be utilized to distinguish structures adjacent to our civic buildings.

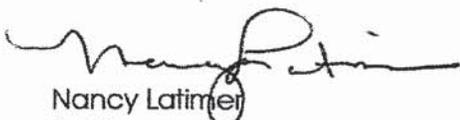
A civic center historically acts as a crucial component to fostering civic pride in a downtown area. Diluting the role of civic buildings by grouping them in with other commercial structures opens the door to changing Long Beach's pattern of development.

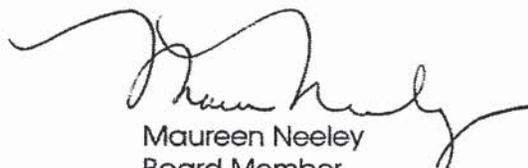
4) Oversight of Historic Resources

Given that the city no longer has a Historic Preservation Officer, what assurances can Long Beach Heritage be given that the trained Development Services planners, along with an Historic Preservation consultant (on retainer with the city), and the Cultural Heritage Commission will be able to work together to enforce the Downtown Plan in relation to historic resources? What will be the process for monitoring new development and notification to the public?

Commissioners and Development Services staff, we appreciate your reviewing these comments and concerns at the Study Session, taking place on March 17. We look forward to a discussion on these points and will incorporate our complete comments into the April 4<sup>th</sup> response to the Long Beach Downtown Plan PEIR.

Submitted by

  
Nancy Latimer  
Advisor

  
Maureen Neeley  
Board Member

---

**Letter P-1: Comment Letter from Long Beach Heritage, April 1, 2011, and comment provided at Planning Commission study session on March 11, 2011**

Comment P-1.1: The commenter requests clarification regarding “form-based code” orientation of Downtown Plan, and review procedures for adaptive reuse of historic structures.

Response to Comment P-1.1: Section 7 of the Downtown Plan and Section 4.3 of the Draft PEIR provide detailed information about review and approval procedures for historic structures within the Downtown Plan project area. The orientation is for preservation and adaptive reuse of historic structures as the first option. These provisions provide stronger protection for identified historic resources than currently exist in the PD-30 and PD-29, Subarea 5 zones or other current City zoning and land use regulations.

Comment P-1.2: The commenter states that Section 4.3 (Cultural Resources) of the Draft PEIR is confusing regarding incorporation of previous historic survey results. The commenter notes several historic property surveys that have been conducted for projects in or near the Downtown project area, and requests that the Downtown Plan include specific buildings with maps from these previous surveys.

Response to Comment P-1.2: Previous historic surveys conducted in Downtown Long Beach include:

- Long Beach Cultural Heritage Survey, Phase I Inventory of Downtown and Bluff Park, City of Long Beach Department of Building and Planning, September 1980
- Long Beach Cultural Heritage Survey, Drake Park Historic District, City of Long Beach Department of Building and Planning, September 1979
- Expanded Downtown Long Beach Historic Survey, Johnson Heumann Research Associates, July 1988
- Historic Resources Assessment Report for 1085 Long Beach Boulevard, Peter Moruzzi, March 2006
- 315 and 625 Pine Avenue Historic Resources Assessment Report, Jones and Stokes, June 2006

In response to this comment, City staff coordinated with Long Beach Heritage to identify additional properties that may need to be considered as potential historic resources. As a result of this coordination, the list of historic properties in Table 4.3-3 has been augmented with eight additional properties, including seven residential properties and one commercial property. Pursuit of local historic designation is recommended for the residential properties while the commercial property is recommended for adaptive reuse. Please see the Addenda Errata for a list of these properties.

Comment P-1.3: The commenter requests that the civic center and its governmental structures be included in the historic property inventory provided in the Draft PEIR.

Response to Comment P-1.3: These structures are government facilities located on government-owned property. If the buildings are sold, demolished or modified in any significant way using

public moneys, they would be subject to extensive public review and discussion. These structures were primarily built in the 1970s and early 1980s. Thus, some segments of the community do not value them as highly as some older more traditional structures, such as those built from the before the 1920s through the early 1940s, and those in local historic districts.

Nevertheless, the referenced structures are considered iconic and excellent examples of period architecture. For example, the City Hall, public library and civic center plaza were designed by a team of locally significant architects, including Kenneth E. Wing, Edward Killingsworth, Hugh Gibbs, and Donald Gibbs. The complex received a design award from the local American Institute of Architects chapter in 1978. This makes the City Hall structure architecturally significant, even though it is not 45 years old, which is the common age requirement for historic structures. Unless and until these structures and similar governmental structures are designated as local landmarks, they will not be considered historic for preservation purposes.

Comment P-1.4: Commenter requests that the Downtown Plan clearly state the process by which the various entities responsible for oversight of historic resources will work together to protect such resources.

Response to Comment P-1.4: This comment relates to the Downtown Plan and is not about the Draft PEIR analysis or conclusions. However, the following response is provided for informational purposes:

During the last few years, the City has made significant strides in historic preservation. The Historic Preservation Element was added to the City's General Plan in 2010. This policy document was based upon the Historic Context Statement completed in 2009, and the existing historic preservation ordinance provisions contained within the Municipal Code. While the Historic Preservation Officer position has not been filled for over a year, there are planning members assigned to historic projects, including those reviewed by the Cultural Heritage Commission (CHC). The City continues to maintain its Certified Local Government status with the State for historic preservation purposes, including filing of annual reports, CHC commissioner training and other activities. It continues to follow the Secretary of Interior standards for historic resources. In many ways the City's historic preservation program has never been stronger or more active. Still, there are initiatives that could strengthen this further, including the re-establishment of the Mills Act program and updating of design guidelines and inventories for historic districts, including boundary refinements, as necessary. These programs are being undertaken citywide, and would not be affected by the possible adoption of the Downtown Plan.

March 25, 2011

Steve Gerhardt, AICP  
Long Beach Development Services  
333 W. Ocean Blvd., 5<sup>th</sup> Floor  
Long Beach, CA 90802  
Fax: (562) 570-6068  
E-mail: [dtcommunityplan@longbeach.gov](mailto:dtcommunityplan@longbeach.gov)

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SENT VIA EMAIL

April 4, 2011

Dear Mr. Gerhardt:

Thank you for the opportunity to comment on the Draft Program Environmental Impact Report (Draft EIR) for the Long Beach Downtown Plan (referred to herein as the Plan or DTP). We write these comments on behalf of *Human Impact Partners* and its community partners *East Yard Communities for Environmental Justice* and *Californians for Justice*. Human Impact Partners (HIP) is a non-profit organization whose primary expertise is in conducting Health Impact Assessments, or HIA, to increase the consideration of health in decision-making arenas that typically do not consider health. HIP has conducted HIAs on the local, state and federal levels – with experience in communities across the country, from Hawaii to Maine. The findings from HIP’s HIAs have been integrated into numerous policy-making and planning processes including general plans and area plans in California.

Given the high levels of chronic disease, including obesity, diabetes, and asthma, that we are facing as a country and that we spend a higher percent of our GDP on healthcare than any other country, it is imperative that we address the root causes of disease. While access to healthcare and genetics are important factors that determine our health status, there is a growing recognition that the places we live, work, and play impact our personal behaviors related to health and directly and indirectly impact our health status even more. Health Impact Assessments use the best scientific evidence available to predict the often unintended impacts of proposals on health outcomes and make recommendations that can improve the health outcomes associated with those proposals. The origins of planning are rooted in health and HIAs are one of several tools available as part of a growing movement to bring public health back into planning decisions.

The inclusion of a robust, systematic approach to public health is supported by both NEPA and CEQA. For example, CEQA states that “health and safety problems caused by the physical changes” of a proposal must be discussed (CCR §15126.2 (a)). A complete analysis of health effects pursuant to CEQA would consider all potentially significant direct, indirect and cumulative health impacts associated with the proposed action and alternatives. The analysis would include descriptions of baseline health status and determinants of health for the affected population. These elements could be achieved through the implementation of an integrated HIA which would:

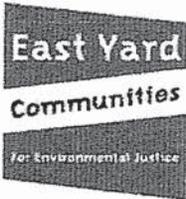
P-2.1

- Include a systematic scoping of potentially significant direct, indirect, and cumulative health impacts;
- Analyze baseline health conditions and determinants of health;
- Analyze direct and indirect health impacts of the project; and
- Analyze cumulative impacts related to health outcomes.

We commend the City Council on its efforts to revitalize Downtown Long Beach through the proposed Plan. Our Rapid Health Impact Assessment was conducted to assess the potential impacts of the Plan on the health of the local community. As you will see, we have outlined a number of recommendations to improve the potential impacts of the Plan's proposed activities. The findings and recommendations of the HIA conducted on the Draft EIR for the proposed DTP are included in the following report.

We look forward to your comments and are available for any questions.

Jonathan Heller  
Co-Founder and Executive Director  
Human Impact Partners (HIP)



Angelo Logan  
Co-Director  
East Yard Communities for Environmental Justice

Californians for Justice



Cesar Castrejon  
Organizer  
Californians for Justice-Long Beach  
Californians for Justice

Funded by TCE  
Child's Clinic  
F: G: A

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## 1.0 Background and Introduction

Local community health, environmental justice and social justice organizations, whose members and clients will be affected by the Long Beach Downtown Plan have expressed concern that the Plan and Draft Environmental Impact Report (D-EIR) may have failed to address some important potential impacts to the Downtown Long Beach community. To provide a more comprehensive analysis of the plan and its health related impacts a Health Impact Assessment was conducted.

Health Impact Assessment, or HIA, as defined by the International Association for Impact Assessment, is a combination of procedures, methods and tools that systematically judges the potential, and sometimes unintended effects of a proposed project, plan or policy on the health of a population and the distribution of those effects within the population. HIA also identifies appropriate actions to manage those effects. The analysis presented in this report demonstrates the findings from a rapid-HIA process that took place over a three month period. The rapid-HIA consists of the following analysis:

- (1) Assessment of the *existing conditions* in Downtown Long Beach;
- (2) Assessment of the *potential impacts* of the proposed Downtown Plan on these existing conditions; and
- (3) Assessment of potential *impacts* of recommended community benefits designed to mitigate potential impacts of the Downtown Plan on the population living in Downtown and the City of Long Beach.

The goal for this HIA is to ensure that decisions regarding the City of Long Beach Downtown Plan accounts for impacts to low-income and vulnerable populations, with regard to *housing* and *employment*, and that appropriate actions are taken to mitigate any potential negative impacts to these health determinants, similar to the way in which the Downtown Plan (hereafter “DTP”)’s Draft EIR (hereafter D-EIR) proposes mitigations for issues such as pedestrian quality and exposure to air pollution.

The California Endowment, as part of its ten year *Building Healthy Communities Initiative* in Long Beach, funded Human Impact Partners (HIP) a non-profit organization, to conduct this HIA in collaboration with *East Yard Communities for Environmental Justice* and *Californians for Justice* with input from The Children’s Clinic *Serving Children and Their Families*, the *Long Beach Alliance for Children and Their Families* and *Families in Good Health*. HIP’s primary expertise is using HIA to increase the consideration of health in decision-making arenas that typically do not consider health. HIP has conducted HIAs on local, state and federal levels – with communities across the country, from Hawaii to Maine. The findings from HIP’s HIAs have been integrated into numerous policy-making and planning processes. To date, HIP has conducted over a dozen HIAs on land use and transportation plans and development projects, and has trained over 600 individuals around the country in HIA processes and methods. HIP is considered a leader in the field of Health Impact Assessment in the U.S., spearheading efforts to convene HIA practitioners from across North America, and having recently been elected chair of the newly formed Society of Practitioners of Health Impact Assessment, an international association of those involved with HIA. HIP has been funded

by major foundations such as The California Endowment, Pew Charitable Trusts, and the W.K. Kellogg Foundation, to conduct HIAs and build the capacity of others to do so. HIP has also been funded by public agencies, including the Los Angeles Metropolitan Transportation Authority and the U.S. Environmental Protection Agency to conduct HIA work.

## 1.1 ORGANIZATION AND OUTLINE OF THE REPORT

This HIA report includes the following sections:

### *Report Methodology*

This section describes methods employed and primary data sources used to conduct this HIA.

### *The Proposed Long Beach Downtown Plan*

This section describes the Downtown Plan's proposed development activities.

### *Existing Standards, Guidelines, and Policies relevant to the Downtown Plan*

This section highlights goals and policies from key City of Long Beach guiding documents.

### *Downtown Long Beach Demographics & Health Conditions in the City of Long Beach*

These sections summarize research findings about built environment factors that impact demographics and health, and current conditions in Long Beach for the following measures: population by race/ethnicity, income & poverty, asthma rates, heart disease and high cholesterol, diabetes, overweight & obesity, and mental health.

### *Housing & Employment*

These sections begin with a summary of research that links housing and employment to health conditions; summarizes current conditions for housing and employment in Long Beach; outlines the potential impacts of the Downtown Plan on Housing and Employment; and concludes with a discussion of the ways that proposed community benefits could mitigate impacts of the Downtown Plan on Housing and Employment.

The Housing section discusses *Housing Affordability*, *Housing Stock* and *Housing Quality*.

*Housing affordability* is described in this report by the following measures:

- Proportion of renter and owner occupied housing
- Housing purchasing capacity
- Housing wage as a percent of minimum wage
- Proportion of households paying greater than 30% of their incomes on housing
- Proportion of housing stock that is affordable
- Proportion of housing production to housing need by income category (citywide)

*Housing stock* and *housing quality* is described in this report by the following measures:

- Proportion of households living in overcrowded conditions
- Housing Code Violations

The *Employment* section is described in this report by the following measures:

- Unemployment rates
- Jobs providing pay greater than or equal to the self-sufficiency wage (citywide)
- Proportion of Long Beach jobs filled by Long Beach residents

## 1.2 REPORT METHODOLOGY

The process of conducting this rapid-HIA involved identifying indicators of housing and employment; reviewing the literature supporting the connections between demographics, housing, employment and health; gathering data from publicly available sources for our indicators to characterize existing conditions in Downtown Long Beach, the City of Long Beach and when relevant, Los Angeles County; examining the aspects of the Downtown Plan relevant to housing and employment; and making qualitative assessments about the consequences of the DTP for existing residents, and ways that proposed community benefits could mitigate these impacts.

When possible, indicator data for Downtown Long Beach was taken from the 2009 Downtown Long Beach Market Study (hereafter “the Market Study”).<sup>1</sup> The boundaries for Downtown Long Beach used in the Market Study were Queensway Bay to the south, Alamitos Avenue to the east, 10th street to the north and Golden Avenue on the west (see Figure 2 below). It should be noted that this study area is smaller than the Downtown Plan area (shown in Figure 1 below). However, because of the significant overlap between these two defined areas, and because the D-EIR fails to include data regarding the expanded Plan area, the authors of this report determined it appropriate to use Market Study data where available to describe the characteristics of the Downtown Plan area.

Figure 1: Long Beach Downtown Plan Area <sup>2</sup>

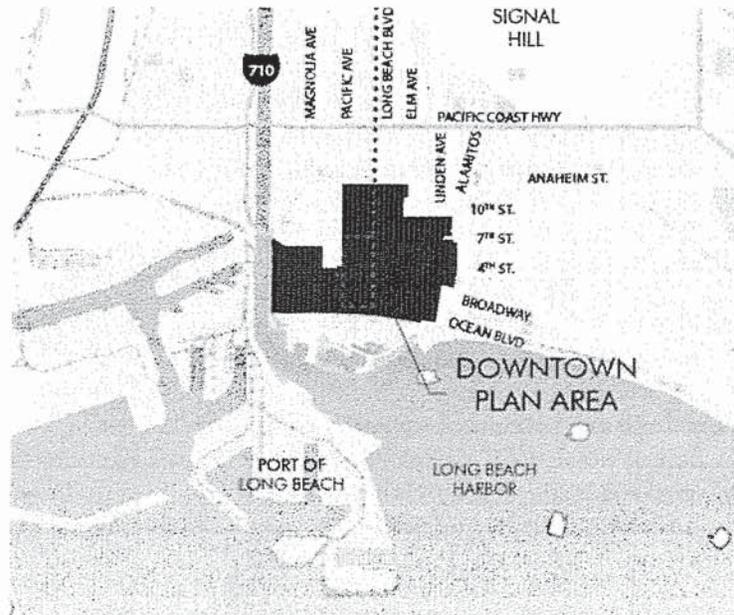
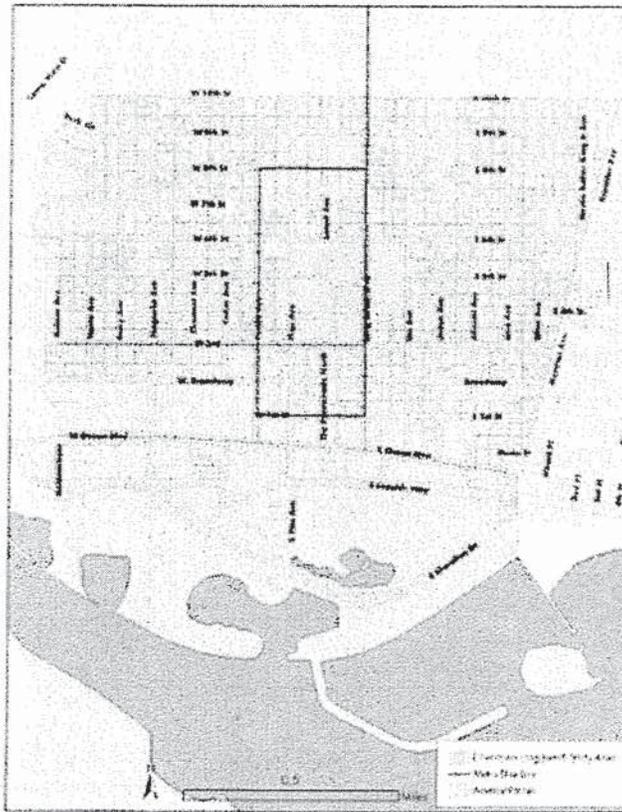
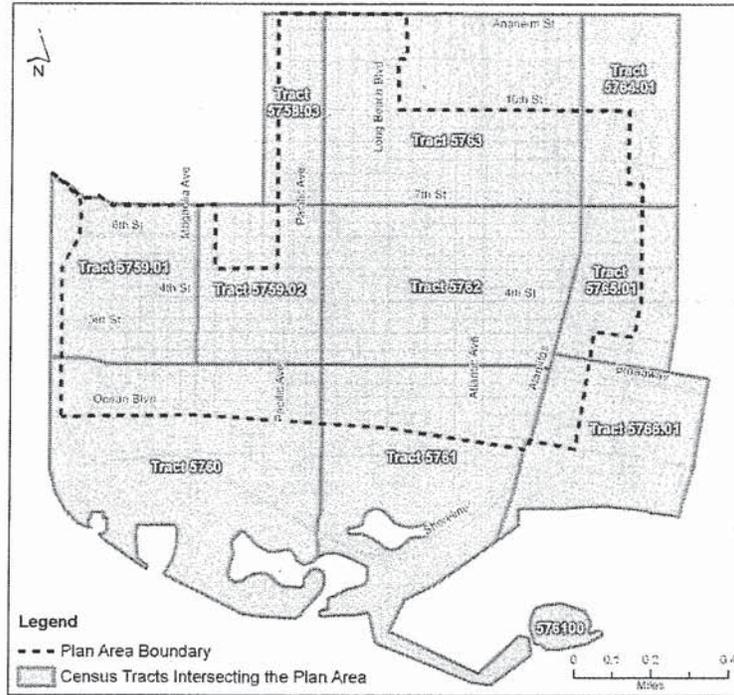


Figure 2: Downtown Long Beach Market Study Area<sup>3</sup>



Where data was not available from the Market Study, Census data was used. We report estimates from the American Community Survey's 2005 to 2009 five-year averages for the tracts that intersected the Downtown Plan area. The DTP area and the Census tracts do not overlap exactly; therefore we included some tracts that reach beyond the boundaries of the plan area, as shown in Figure 3 below. The aggregate area of the Census tracts is larger than the plan area mostly due to tracts that intersected the southern portion of the plan area and that stretch to the waterfront, unlike the Downtown Plan area, which stops at Ocean Blvd. Whenever these data are cited in this report they are referred to as "2005-2009 Census data."

Figure 3: Census Tracts that Intersect with the Downtown Plan Area



Findings from the 2008-2014 Housing Element of the City of Long Beach’s General Plan and data from the 2005-2010 Long Beach Consolidated Plan were also cited where relevant.

### 1.3 THE PROPOSED LONG BEACH DOWNTOWN PLAN

According to the City of Long Beach Downtown Plan Draft Environmental Impact Report, “the Downtown Plan provides development standards and design guidelines for an expected increase in the density and intensity of existing Downtown land uses by allowing up to:

- approximately 5,000 new residential units;
- 1.5 million square feet of new office, civic, cultural, and similar uses;
- 384,000 square feet of new retail;
- 96,000 square feet of restaurants;
- 800 new hotel rooms; and
- “[a]t full buildout...the number of jobs supported by the Project would be approximately 5,200.”<sup>4</sup>

The development assumed in the Downtown Plan would occur over a 25-year time period.”<sup>5</sup>

Potential impacts of the DTP on air quality, noise, greenhouse gas emissions, transportation, pedestrian and bike quality, open space, and public services are described in the D-EIR and mitigations measures (e.g., service fees, good design guidelines, air ventilation systems for sensitive receptors) to minimize adverse impacts in these areas are included in the D-EIR.<sup>6</sup> However, the Downtown Plan does not identify *housing* or *employment* mitigation measures to

offset the Plan's significant and unmitigated environmental impacts, nor does it accommodate the needs of Long Beach's most vulnerable residents. The D-EIR lacks a comprehensive assessment of how the proposed DTP would impact housing, displacement and employment for these populations.

Both housing and employment have historically been and continue to be pressing issues for Long Beach residents, particularly those who are low-income and face other vulnerabilities (in terms of health and other social support). As key factors that contribute to the determination of health outcomes and quality of life, it is important that the housing and employment impacts of the proposed Downtown Plan be recognized, and that mitigation measures to avoid any potential negative outcomes in these areas be adopted and monitored. Affordable Housing and Local Hiring Community Benefits (hereafter "Community Benefits") discussed in this report would greatly mitigate the DTP's significant and unmitigated impacts on population and housing, air quality, green house gas emissions and traffic.

#### **1.4 EXISTING STANDARDS, GUIDELINES, AND POLICIES RELEVANT TO THE DOWNTOWN PLAN**

Addressing housing needs when considering future development in Long Beach is outlined as an important goal in the City's guiding documents.

**The City of Long Beach's 2008-2014 General Plan** sets forth the goals, policies and directions the City will take in managing its future, and includes the following objectives for protecting and promoting affordable housing and local employment:

General Plan Principles:<sup>7</sup>

Create healthy neighborhoods where diversity is celebrated, arts and cultural programs flourish, services are accessible, and all people have tools to improve the quality of their lives.

Improve the quality and availability of housing by addressing declining homeownership, neighborhood stability and overcrowding.

State law requires that the City of Long Beach draft a **Housing Element** as part of its General Plan as a tool to guide communities to plan for present and future housing needs. Goals and policies in the 2008-2014 Housing Element that address the need for affordable and quality housing include:

*Goal 3: Retain and Improve the Quality of Existing Housing and Neighborhoods.*<sup>8</sup>

*Goal 4: Provide Increased Opportunities for the Construction of High Quality [Housing]*<sup>1</sup>

*Policy 4.1 Provide adequate sites, zoned at the appropriate densities and development standards, to facilitate the housing production and affordability goals set forth in the 2008-2014 RHNA.*<sup>9</sup>

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<sup>1</sup> Goal 4, as it appears on page V-16 of the 2008-2014 Housing Element is written, "Provide Increased Opportunities for the Construction of High Quality." The authors of this report made the assumption that the word "Housing" was intended to be included at the end of this goal, so that it would read "Provide Increased Opportunities for the Construction of High Quality Housing" instead.

*Policy 4.2* Encourage a balance of rental and homeownership opportunities, including high quality apartments, townhomes, condominiums, and single family homes to accommodate the housing needs of all socioeconomic segments of the community, including large families.<sup>10</sup>

*Policy 4.10* Through the LB2030 General Plan Update process, evaluate the proposed future distribution of housing units throughout the City in terms of how the plan promotes an economically, environmentally and socially equitable community; and, explore the transitions between the land uses along the City's primary mobility corridors and the land uses directly behind them.<sup>11</sup>

### **The Long Beach Downtown Plan**

#### *Guiding principles of the Downtown Plan*

In reviewing and approving development plans and discretionary permits in the Downtown area, the City Council, Planning Commission, Redevelopment Agency and Site Plan Review Committee shall be guided by the following:

1. The goals and policies of the General Plan;
2. The Redevelopment Plans;
3. The development and use standards set forth by the Planned Development Ordinance; and
4. The procedures, development and use standards set forth in Title 21 Zoning of the Long Beach Municipal Code.

**The 2009 Downtown Long Beach Market Study** was conducted by Strategic Economics for the Long Beach Redevelopment Agency in order to evaluate the market demand for a mixture of uses in Downtown Long Beach. The following is one of the implementation strategies that was suggested in order to guide future decisions about how Downtown Long Beach grows and develops:

#### *Support and preserve the continued diversity of Downtown residents*

Downtown is currently a very diverse place with a mixed-income, mixed-race, and multi-generational population. This is a key asset of Downtown and should be preserved and enhanced. Currently, Downtown functions well for lower income residents who are served by its retail opportunities, supply of rental housing, and access to transit. While attracting new residents to Downtown will be an important element in attracting new, more upscale retail, it should not be done at the expense of existing residents; there is room in Downtown for a variety of groups to coexist. Long Beach is well-positioned to create a vibrant, diverse district that values equity to all residents, while still offering premium living options for more affluent ones.<sup>12</sup>

## **2.0 Downtown Long Beach Demographics**

### **2.1 THE RELATIONSHIP BETWEEN NEIGHBORHOOD DEMOGRAPHICS AND HEALTH**

The demographics of a neighborhood are shaped by the economic, political, social and physical forces that help to determine who lives there. Examples of these forces include economic development policies that encourage certain businesses to locate in an area and determine the kinds of jobs available to local residents, market trends that shape

employment opportunities and housing costs, housing policies that facilitate the development and preservation of residences of different sizes and affordability ranges, real estate and loan practices that promote or discourage racial segregation, and social networks that encourage residents to locate and stay in certain neighborhoods near friends and family. The historic policies that sustained racial segregation and housing and loan discrimination in the mid-20<sup>th</sup> Century (i.e., “red-lining”) are an example of these forces.<sup>13</sup> These led to the creation of many of the inequities in neighborhood quality and the distribution of wealth that communities continue to experience today.<sup>14</sup> Gentrification is a process that is currently taking place in many low-income communities. In the US, gentrification is defined as the process by which higher income households displace lower income residents of a neighborhood, changing the essential character and flavor of that neighborhood.<sup>15</sup>

Displacement has many health implications such as increased stress, loss of supportive social networks, costly school and job relocations and increased risk for substandard housing and overcrowding that contributes to disparities among vulnerable groups, including the poor, women, children, the elderly, and members of racial/ethnic minority groups.<sup>16</sup> Vulnerable populations are at increased risk for the negative consequences of gentrification.

The quality of social, economic, and physical environments all have a profound impact on health and quality of life. Where people live can have an impact on financial security, school quality, job opportunities, safety, as well as access to goods and services. These factors have demonstrated relationships with health outcomes.

Regardless of the economic, political, social and physical factors that contribute to racial segregation and neighborhood poverty, race/ethnicity and income have proven links to health in and of themselves that may be due to neighborhood environments. Many people of color experience a wide range of serious health issues at higher rates than do whites, including breast cancer, heart disease, stroke, diabetes, hypertension, respiratory illness and pain-related problems. On average, African Americans, Native Americans, Pacific Islanders and some Asian American groups live shorter lives and have poorer health outcomes than whites. According to the Centers for Disease Control and Prevention, African American men die on average 5.1 years sooner than white men (69.6 vs. 75.7 years), while African American women die 4.3 years sooner than white women (76.5 vs. 80.8 years). People of color are likely to be less wealthy, less educated and more likely to live in segregated communities with underfunded schools, insufficient services, poor transportation and housing, and higher levels of exposure to toxic and environmental hazards.<sup>17</sup>

For individuals, income is one of the strongest and most consistent predictors of health and disease in the public health research literature.<sup>18</sup> Nationally, individuals with the lowest average family incomes (\$15,000-\$20,000) are three times more likely to die prematurely as those with higher family incomes (greater than \$70,000). It has also been shown that every additional \$12,500 in household income buys one year of life expectancy (up to an income of \$150,000). Poorer adults are also three times as likely to have a chronic disease that limits their activity; twice as likely to have diabetes, and are nearly 50% as likely to die of heart disease.<sup>19</sup> Additionally being low-income is also a risk factor for low birth weight babies, for injuries or violence, most cancers, and children in low-income families are seven times as likely to be in poor or fair health as compared to high-income families.<sup>20 21</sup> The relationship

between income and health is mediated through nutrition, employment conditions, parenting resources, leisure and recreation, housing adequacy, neighborhood environmental quality and community violence and stress.

Factors that contribute to people living in poverty include low levels of education, inadequate job skills, unemployment or underemployment at minimum wage, and language barriers. Poverty imposes many difficult issues on residents and families, including living in overcrowded and substandard housing, overpaying for housing, and inadequate income to provide for basic necessities such as food, clothing and healthcare.<sup>22</sup>

It is important to understand the demographics of a neighborhood, as they are a reflection of the policies and trends that have come before and represent an opportunity to adjust policies for the future to address inequalities, poor neighborhood quality and health.

## **2.2 DEMOGRAPHICS OF DOWNTOWN LONG BEACH RESIDENTS**

Long Beach comprises nearly 50 square miles at the southernmost end of Los Angeles County. As of 2010, according to the California Department of Finance, the City of Long Beach was the fifth largest city in California and, according to the Southern California Association of Governments (SCAG), the population of Long Beach is projected to be 533,000 by the year 2020.<sup>23</sup> It is the most ethnically diverse city in California with a rich mixture of cultures. According to the Census' 2009 American Community Survey, **Long Beach ranks 34<sup>th</sup> in the US and sixth in the state for the percentage of residents living below the poverty level.** The current population in the City of Long Beach is 462,823.<sup>24</sup>

As of 2008 the Market Study estimated 31,404 people lived in Downtown Long Beach.<sup>25</sup> The population of Downtown in particular has grown rapidly, approximately 32% from 1990 to 2008, surpassing the growth rate of both the City of Long Beach and Los Angeles County during that time period. While long time residents of Downtown Long Beach tend to be lower-income, over the past decade there has been an influx of new, middle to upper-income residents, described as “young professionals” and “empty nesters.”<sup>26</sup> The Market Study specifies that it is the residents of Downtown’s new development projects that make up the majority of these new, higher income residents. An influx in higher income residents is one of the indicators of gentrification, or the transformation of a neighborhood from low value to high value with the potential to cause displacement of long-time residents and businesses that may be forced to move from a gentrified area because of higher rents, mortgages, and property taxes.<sup>27</sup>

### ***2.2.1 Population by race/ethnicity***

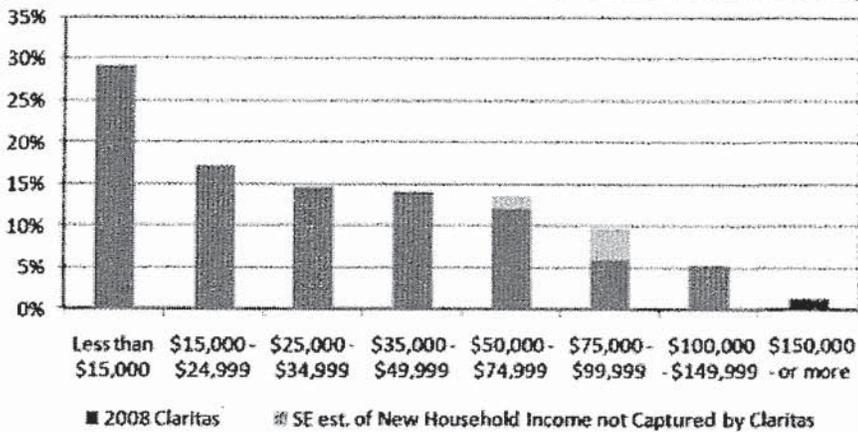
The City of Long Beach is home to one of the most ethnically diverse populations in California.<sup>28</sup> While the Market Study does not identify the racial/ethnic breakdown of the population in the study area, 2005-2009 Census data show this area has a higher percentage of minority residents than does the rest of the City of Long Beach. The population in the plan area is 25% white, 15% black or African-American, 11% Asian, and 47% Hispanic or Latino. The City of Long Beach has a population that is 30% white, 13% black or African-American, 13% Asian, and 40% Hispanic or Latino.

### 2.2.2 Income and poverty

The Market Study estimated that in 2008 the median income for Downtown Long Beach was \$27,438, which was lower than the City's overall median household income of \$45,127, and Los Angeles County's median household income of \$52,180.<sup>29</sup> The Market Study notes that the increase in higher income residents has resulted in a higher *average* income in the area, but has not brought up the median.<sup>30</sup>

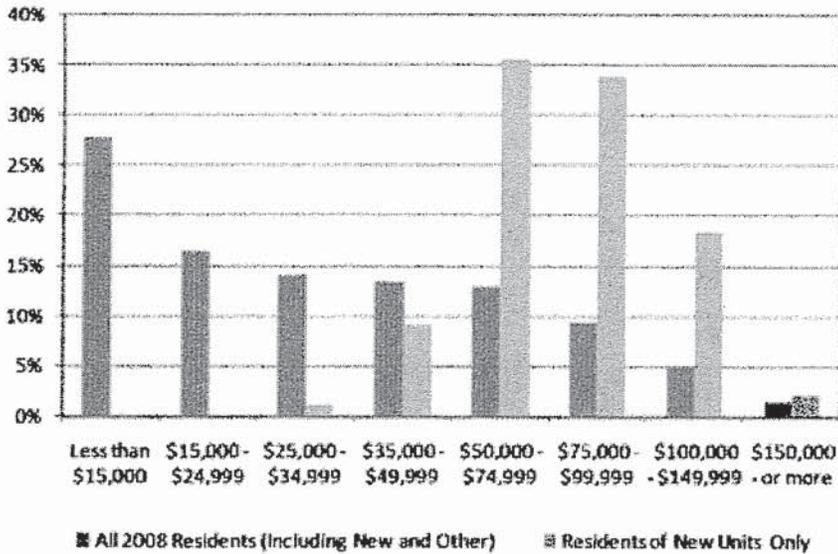
The distribution of income in Downtown Long Beach in 2008 shows that **there are a higher percentage of lower income than higher income households in the area**, and that residents of new units built in Downtown Long Beach have significantly higher incomes than the existing residents.<sup>31</sup>

**Figure 4: 2008 Distribution of Household Income in Downtown Long Beach**



Source: City of Long Beach; Claritas; Strategic Economics, 2009.

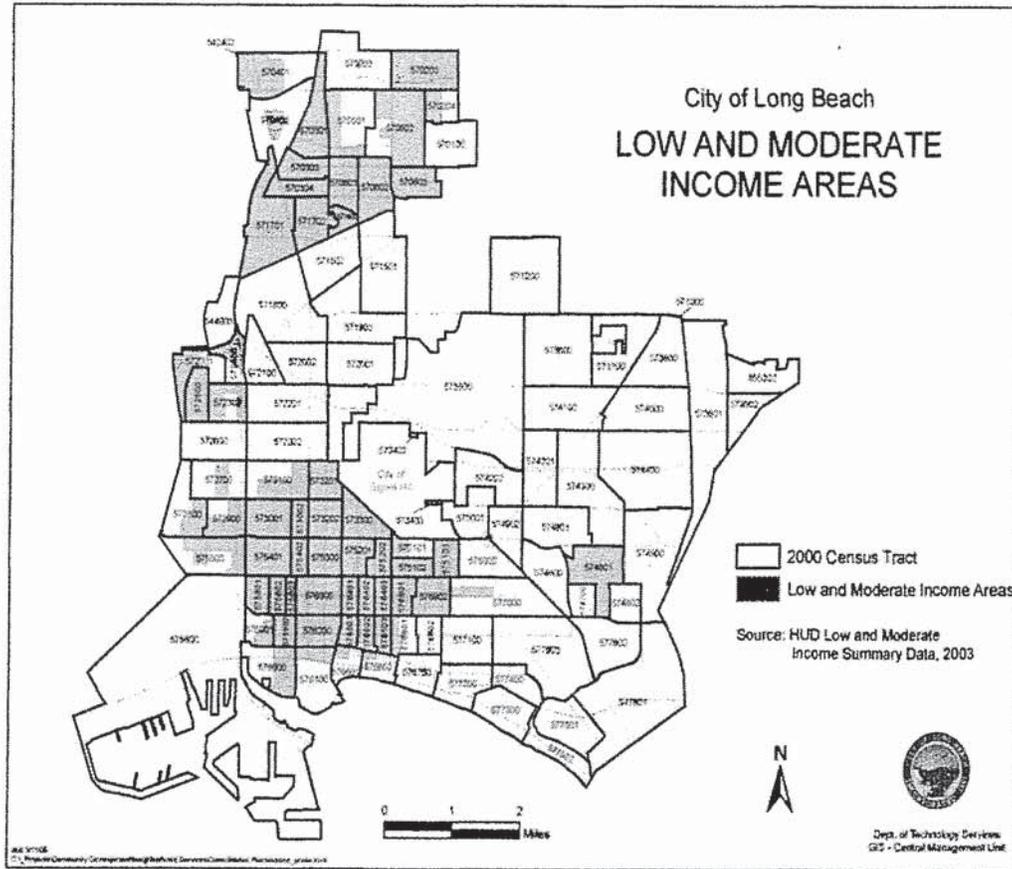
**Figure 5: Household Income Distribution of New Units Compared to All Households in Downtown Long Beach**



Source: Claritas, Strategic Economics, 2009.

**A high proportion of low-income residents live in Downtown Long Beach.** The 2008-2014 Housing Element of the City’s General Plan estimates that 28% of households in the City of Long Beach are considered to be very low-income (16% extremely low-income: 0-30% of area median income; and 12% very low-income: 31-50% of area median income).<sup>32</sup>

Figure 6: City of Long Beach's Low and Moderate-income Areas



2005-2009 Census data indicate that **27% of the residents of Downtown Long Beach live below the poverty line**. This is in contrast to the City of Long Beach and LA County, where 19% and 15% of the population earns below the poverty line, respectively.

Income inequality is also prevalent in the City of Long Beach. 2005-2009 Census data show that Long Beach households earning in the 80<sup>th</sup> percentile make 5.1 times more than households earning in the 20<sup>th</sup> percentile (\$105,692 vs. \$20,810).

**The high proportion of lower income and residents of color indicates Downtown Long Beach consists of a more vulnerable population that faces greater health risks.** Residents are more susceptible to neighborhood conditions such as unaffordable or substandard housing, poor quality schools, lack of appropriate job opportunities, unsafe streets, and inaccessible goods and services because they lack the resources to improve their living and working conditions. Poor neighborhood quality is also more likely to exacerbate existing health risks and problems. **Lower income residents are also more likely to be displaced by higher rents, mortgages, and property taxes caused by gentrification.**

To improve health, the Downtown Plan should support the challenges faced by current residents by facilitating the creation of quality affordable housing and job opportunities for Long Beach residents.

### 2.3 HEALTH CONDITIONS IN THE CITY OF LONG BEACH

While access to medical care when you are sick is very important, health does not start at the doctor's office. Health starts—long before illness—in our neighborhoods, homes, schools and jobs. Patterns of health and disease outcomes reflect patterns of social and economic circumstances.<sup>33 34</sup> Chronic and acute health problems impact quality of life and long-term health. Having to struggle with poor health makes populations more vulnerable to other adverse conditions and circumstances they may be exposed to, environmentally, socially, economically and politically.

In order to understand how the Downtown Plan will impact the health of residents, it is important to understand the health outcomes that are relevant for the area. Data from the Los Angeles Health Survey show that Long Beach residents fare poorly in comparison to LA County for key health outcomes.

**Table 1: Los Angeles County Health Survey Results**

	<b>Long Beach</b>	<b>LA County</b>
Children's Lifetime Asthma Diagnoses Rate	15.9%	12%
Adult Asthma Rate	7%	6.5%
Average unhealthy days reported (per 30 days)	7 days	5.4 days
Diagnosed with Depression	17%	13.6%
Heart Disease	10.3%	7.7%
Overweight	36.9%	35.9%
Obesity	31.2%	22.2%

**Rates of asthma, obesity, overweight, and heart disease in Long Beach are significantly higher than the average rates in Los Angeles County, and for children's asthma, the third highest rate among 26 health districts in the County.<sup>35</sup>**

Mental health issues are also a concern in the City of Long Beach. The 2007 Los Angeles County Health Survey found that on average adults 18 and over report feeling unhealthy (mentally and/or physically) 7 days per month (30 day period), compared to an average of 5.4 days reported for Los Angeles County. This places the Long Beach Health District in the top five of the 26 health districts. Throughout LA County, lower incomes correlated with a higher number of reported unhealthy days.<sup>36</sup> Rates of depression are also higher in Long Beach than most other areas of Los Angeles County, and fewer adults in Long Beach consider their neighborhood to be safe from crime compared with the average for LA County.<sup>37 38</sup>

## 3.0 Housing

### 3.1 THE RELATIONSHIP BETWEEN HOUSING AND HEALTH

High housing costs relative to the income of an individual or household can threaten food and financial security, lead to overcrowded living conditions and acceptance of lower cost substandard housing, and can also force people to move to where housing costs are lower or possibly become homeless. **Residential stability has been identified as one of the most important predictors of community health.**<sup>39 4041</sup> Moving can result in job loss, difficult school transitions, and the loss of health protective social networks.

According to federal and state programs, 30% of one's annual income is the maximum affordable amount that a household should pay for housing costs. Spending a high proportion of income on rent or a mortgage means fewer resources for heating, transportation, health care, childcare and food. Lower cost housing is often substandard with exposure to waste and sewage, physical hazards, mold spores, poorly maintained paint, cockroach antigens, old carpeting, inadequate heating and ventilation, exposed heating sources and wiring, and broken windows, all of which lead to negative health outcomes.

**Overcrowding can seriously impair quality of life. Sharing housing can mean crowded conditions with higher risks for mortality, infectious disease, poor child development and school performance, noise, and fires. Overcrowding also tends to result in more cars and traffic, deterioration of homes, and a shortage of on-site parking.**<sup>42</sup> For children, overcrowding has also been shown to lead to an increased risk of ear infection, and when exposed to one or more environmental risks - for example, overcrowding or noise - has shown to increase in urinary cortisol and epinephrine, which are biomarkers of chronic stress.<sup>43 44</sup> Overcrowding and poor-quality housing also have a direct relationship to poor mental health, developmental delay, heart disease, and even short stature.<sup>45</sup>

To avoid these negative impacts on health, it is essential that quality affordable housing be available for low-income residents of any city. Housing is a key measure of quality of life, and a consistently pressing issue for the City of Long Beach. As the 2008-2014 Housing Element of the City's General Plan notes, "In general, extremely low-income households had a disproportionate unmet need for affordable housing, especially rental housing, due to their limited incomes and the rising costs of housing."<sup>46</sup>

The City of Long Beach's Downtown area has an existing population of low-income residents in need of quality, affordable housing in order to prevent overcrowding, overpayment for housing, displacement and other adverse conditions that can impact health outcomes.

### 3.2 EXISTING CONDITIONS FOR HOUSING AFFORDABILITY

#### *3.2.1 Proportion of renter and owner occupied housing*

An estimated 94% of all housing units in Long Beach are occupied.<sup>47</sup> According to the Market Study, in 2008, **81% of the housing units in Downtown Long Beach were renter**

occupied.<sup>48</sup> This is a much higher percentage of renter occupied housing than in the City of Long Beach or LA County where 60% and 53% of units are renter occupied, respectively.<sup>49</sup>

### 3.2.2 Housing purchasing capacity

California's homeownership rate, at 57% was the second lowest among the 50 states in 2008.<sup>50</sup> Purchasing capacity reflects how much can be spent to purchase a home based on the median income of a neighborhood. For Los Angeles County, The California Budget Project estimates an affordability gap (between income needed to purchase a home and median income) of \$36,000.<sup>51</sup><sup>2</sup>

**Table 2: Affordability Gap**<sup>52</sup>

Median Priced Home (2008)	Median Household Income (2008)	Gap Between Median Income and Income Needed	Gap Between Median Income and Income Needed
\$400,000	\$55,499	\$21,587	\$36,040

Since 1999, prices for purchasing one and two bedroom units in the City of Long Beach have tripled or quadrupled for both single-family homes and condominiums, and doubled and tripled for larger-sized units.<sup>53</sup> As of 2007, the median price for single-family homes ranges from \$370,000 for a one-bedroom unit up to \$820,000 for a larger, five-bedroom home. The median price for condominiums ranged from \$299,000 for a one-bedroom unit to a median price of \$543,000 for a three-bedroom condo.<sup>54</sup>

According to the Market Study, the median income in Downtown Long Beach is \$27,438. It is estimated that the median household income in the plan area has the capacity to purchase a home that costs \$123,407 (see Appendix A for detailed calculation). This calculation assumes 33% of gross income can be spent to buy a home, a 30-year fixed interest rate mortgage at 5.85%, a monthly homeowners or condo association fee of \$350, a tax rate of 1.144%, and a down payment of 10%. Given that the median priced home in Long Beach in 2010 was \$285,000 **there is clearly a large gap between what Downtown Long Beach residents can afford and the cost of purchasing a home, making home ownership infeasible for many of the existing residents in the Downtown area.**<sup>55</sup> **The 2005-2010 City of Long Beach Consolidated Plan estimated that only 10% of Long Beach households earned enough to purchase the median priced single-family home in Long Beach.**<sup>56</sup>

Further, based on housing affordability estimates for Los Angeles County and Fair Market Rents for the City of Long Beach (see Figures below), it is clear that in addition to home prices, current **fair market rents in Long Beach far exceed what is affordable, particularly for the City's Downtown low-income residents.** For example, a 2 bedroom unit in the 90813 zip code currently is rented out at \$1,070 per month while a low-income 4 person family can only afford \$836 per month.

<sup>2</sup> This analysis assumes that mortgage payments make up 30 percent of household income and that buyers make a down payment of 5 percent. The affordability gap measures the difference between a county's 2008 median household income and the income needed to pay mortgage costs for the 2008 median-priced home.

**Table 3: Housing Affordability for a 4-person household in LA County in 2008** <sup>57</sup>

	Annual Income	Affordable Monthly Rent	Maximum Affordable Home Price
Extremely Low-Income (0-30% AMI)	\$17,940	\$388	\$54,083
Very Low-Income (31-50% AMI)	\$29,900	\$687	\$97,523
Low-Income (51-80% AMI)	\$35,880	\$836	\$140,964
Moderate-Income (81-120% AMI)	\$65,780	\$1,584	\$267,665

**Table 4: Current Fair Market Rents for Long Beach, 2011** <sup>58</sup>

Zip Code	Efficiency	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
90802	\$730	\$890	\$1,130	\$1,530	\$1,890
90813	\$690	\$850	\$1,070	\$1,450	\$1,790

### *3.2.3 Housing wage as a percent of minimum wage (citywide)*

Comparing the cost of renting or owning a home in Long Beach with the maximum amount that households of different income levels can pay for housing can provide a picture of who can afford what size and type of housing, as well as indicate the type of households that would likely experience overcrowding or overpayment.<sup>59</sup>

Housing costs currently require an individual to earn an annual income of approximately \$45,200 (or a wage of \$21.73 an hour) to afford a two-bedroom rental unit in the 90802 zip code of Long Beach. This translates into **an individual having to earn 2.72 times the California minimum wage of \$8.00, or a two-worker household needing to earn 1.36 times the minimum wage in order to afford the current fair market rent.** Similarly, for the 90813 zip code of Long Beach, to afford the cost of a two-bedroom rental would require an annual income of \$42,800 (or a wage of \$20.58 per hour), which is 2.57 times the minimum wage for one worker, or 1.29 times the minimum wage for a 2-worker household. For additional detail about the calculation of the housing wage, see Appendix A.

**Table 5: Housing wage as percentage of minimum wage - Long Beach, CA, 2011**

	2011 Fair Market Rent (FMR) for 2-bedroom <sup>1</sup>	Annual Income Needed to Afford FMR <sup>2</sup>	2011 Housing Wage for 2-bedroom FMR <sup>3</sup>	2008 CA Minimum Hourly Wage	Housing Wage as % of Minimum Wage (1-worker) <sup>4</sup>	Housing Wage as % of Minimum Wage (2-worker)
Zip code 90802	\$1,130	\$45,200	\$21.73	\$8.00	272%	136%
Zip code 90813	\$1,070	\$42,800	\$20.58	\$8.00	257%	129%

### *3.2.4 Proportion of households paying more than 30% of their income on housing*

Households spending more than 30% of their income on gross housing costs (including rent/mortgage payments, utilities, taxes, insurance and related costs) are considered to be overpaying for housing according to state and federal programs. In 2000, 46% of renters in Long Beach were spending more than 30% of income on housing and one-quarter of renters were spending more than 50% of their incomes on rent.<sup>60</sup> **Downtown Long Beach was an area of the City where the greatest concentration of renters were spending more than 50% of their income on housing costs.** As the current Long Beach Housing Element states, “Neighborhoods that exhibited high levels of severe renter overpayment were predominately lower income and also had a strong correlation with areas with high levels of poverty and renter overcrowding.”<sup>61</sup>

2005-2009 Census data show that 54% of households in Downtown Long Beach were paying more than 30% of their income on gross rent. **According to the Long Beach Housing Element an estimated 67% of extremely low-income renters, 30% of low-income renters and 62% of extremely low-income homeowners in Long Beach spend more than half of their income on housing costs.**<sup>62</sup>

### *3.2.5 Proportion of housing stock that is affordable*

Some of the lowest average rents in Long Beach can be found in Downtown Long Beach where there is a concentration of older housing units.<sup>63</sup> **Long Beach has been allocated 6,261 Section 8 vouchers and currently has a 10-year waiting list with over 4,700 qualified families.**<sup>64</sup> **The waiting list is currently closed, but the last time new applications were accepted for the waiting list, over 15,000 applications were received in less than 30 days.** As of 2010, there were an estimated 14,811 dwelling units in the Downtown Plan area. The Downtown Plan Draft EIR estimates that of these, approximately 11% or approximately 1,629 units are considered to be affordable per Section 8 vouchers, deed restrictions, or other housing affordability programs.<sup>65</sup> The Long Beach Fiscal Year 2011 Action Plan, however, indicates that federal assistance under the Section 8 program does not do an adequate job of addressing the needs of the City.

Further, the Downtown Plan Draft EIR states that based on estimates of construction of housing in Long Beach between 2000 and 2007, there were approximately 5 units built for

every 669 units lost citywide to demolition.<sup>66</sup> Failure to replace units when they are demolished contributes to the low vacancy rates in the city. Additionally, the 2008-2014 Housing Element of the City's General Plan estimates that more than 22 projects totaling 2,228 units of publically assisted affordable housing may be considered at risk of conversion to market rate from 2008 through 2018.<sup>67</sup>

### *3.2.6 Proportion of housing production to housing need by income category (citywide)*

Since the 1990s the increase in housing stock has not kept pace with the City's population growth. For example, the City of Long Beach's 2005-2010 Consolidated Plan notes that in the decade prior, **the population in Long Beach increased 7.5%, but new housing increased by less than 1%.**<sup>68</sup> **This has resulted in fewer vacancies, upward pressure on housing prices, and more people crowded into too few housing units.**<sup>69</sup>

SCAG has identified an optimal vacancy rate of 5% for rental housing, whereas **according to the 2006 American Community Survey, the vacancy rate in the City of Long Beach was 3.7%.**<sup>70</sup> Lower vacancy rates disproportionately impact lower income populations as they lead to increases in rental prices and subsequent overcrowding.

The Regional Housing Needs Assessment (RHNA) is the share of the region's projected housing needs required by State Housing Element law which Long Beach must accommodate. For the 2008-14 planning period, the RHNA need is 9,583 total housing units in the following categories:<sup>3 71</sup>

- 2,321 units of Extremely Low/Very Low-income housing (up to 50% of AMI)
  - 1,326 extremely low and 995 very low-income units
- 1,485 units of Low-income housing (51 to 80% of AMI)
- 1,634 units of Moderate-income housing (81 to 120% of AMI)
- 4,143 units of Above Moderate-income housing (more than 120% of AMI)

**Thus, 5,440 total *affordable* units must be produced by 2014 to meet the needs of the City's low and moderate-income residents.**

As part of the current planning period, the City has already begun work towards its RHNA allocations as shown below.

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<sup>3</sup> Refers to the RHNA for the 2008-2014 Housing Element of the City of Long Beach's General Plan

**Table 6: Progress to Achieve Regional Housing Needs Assessment 2008-2014, City of Long Beach**<sup>72</sup>

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
<b>RHNA</b>	<b>2,321</b>	<b>1,485</b>	<b>1,634</b>	<b>4,143</b>	<b>9,583</b>
Units Constructed	0	5	12	1,342	1,359
Units under Construction	121	50	0	587	758
Units Entitled	0	0	46	1,437	1,483
<b>Remaining RHNA</b>	<b>2,200</b>	<b>1,430</b>	<b>1,576</b>	<b>777</b>	<b>5,983</b>

The City of Long Beach estimates that since January 1, 2006 it has facilitated the development of (as defined by “constructed” or “under construction”) a total of 3,600 housing units 94% of which was Above Moderate-Income, **leaving Long Beach a remaining affordable housing RHNA need of 5,206 housing units** in the following categories:<sup>4</sup>

- **2,200 units of Extremely Low/Very Low-income (95% of estimated RHNA need)**
- **1,430 units of Low-income (96% of estimated RHNA need)**
- **1,576 units of Moderate-income (96% of estimated RHNA need)**

State law also mandates that jurisdictions provide sufficient land to accommodate a variety of housing opportunities for all economic segments of the community. The City of Long Beach must ensure the availability of residential sites at adequate densities and appropriate development standards to accommodate these units.<sup>73</sup> Seventeen sites have been identified by the City totaling almost 54 acres in Long Beach that can accommodate 5,199 new units at densities of at least 30 units per acre have been identified. The majority of these sites are located in the Downtown Plan Area, where height and density are not limited.<sup>74</sup> Although these 17 sites do not represent the full inventory of vacant and underutilized sites with residential development potential in Long Beach, **the City has identified PD-29 and PD-30 (although the majority are in PD-30) as the sites where it will build its 5,440 affordable units for the 2008-2014 RHNA.**<sup>75</sup> This conflicts with the Downtown Plan’s development envelope of 5,000 market rate units and millions of square feet of commercial and retail uses for PD-30 and parts of PD-29. The City cannot simultaneously identify PD-30 and PD-29 as the location for 5,440 affordable RHNA units and for the massive market rate development anticipated in the Downtown Plan.

The Housing Element states that the current number of development applications under review would bring an additional 2,321 new units to Long Beach, including 65 very low-income, 97 moderate-income units, and enough units to “more than fulfill the City’s remaining *above moderate-income* RHNA of 777 units.”<sup>76</sup>

**What remains is a large need to provide units for *moderate, low-income, very low and extremely low-income* residents in Long Beach. This housing gap is not new, but has**

<sup>4</sup> The RHNA uses January 1, 2006 population and housing data as the baseline for growth projections

persisted in the past in the City. For example, for the 2000 to 2005 RHNA construction targets the City attained only 54% of their RHNA allocation for *very low-income* housing, 42% of allocated *low-income* housing, and 20% of *moderate income* housing, while 767% of the *above moderate-income* housing allocation was attained.<sup>77</sup>

### 3.3 IMPACTS OF THE DOWNTOWN PLAN ON HOUSING AFFORDABILITY TO LOWER INCOME HOUSEHOLDS

1. The extremely limited rental vacancies, and lack of housing production to meet housing needs in Long Beach contribute to increased competition (i.e., housing prices) for available units and high levels of renter overcrowding and overpayment. High for-sale housing prices and a large low-income population has also lead to a wide affordability gap in the City. These conditions indicate the serious need for additional affordable rental housing in Long Beach, particularly in Downtown Long Beach, where there is a high concentration of low-income residents. **The Downtown Plan and the Downtown Plan EIR do *not* include explicit plans or mitigations for the protection of existing affordable housing units, or construction of new affordable housing units to meet existing or future housing needs in Downtown Long Beach. As a result, the current and future needs for affordable housing in Downtown Long Beach can be expected to increase along with the impacts resulting from a lack of affordable housing, such as overcrowding, overpayment for housing, displacement, and homelessness. Health problems associated with overcrowding, housing overpayment, displacement and homelessness, such as the spread of infectious disease, increased mortality rates, poor child development and school performance, noise, depression and fires would also be expected to increase. Populations that are low-income and suffer from existing vulnerabilities will be disproportionately affected by the Downtown Plan's failure to accommodate the housing affordability needs of current residents. Such impacts must be mitigated.**
2. The Downtown Plan includes only one reference to affordable housing, which appears in the section on Development Intensity and Development Incentives, and refers to a Floor Area Ratio bonus for affordable housing, stating: "Refer to City's existing density bonus program as set forth in Chapter 21.63 of the Long Beach Municipal Code."<sup>78</sup> Chapter 21.63 merely refers to a state law mandated system of incentives to encourage developers to provide affordable housing, pursuant to Section 65915 et seq. of the California Government Code. However, the City of Long Beach has not adopted a local ordinance implementing state law, with a detailed density bonus program, so density bonuses are rarely utilized. Moreover, and most importantly, developers will not need to seek density bonuses in the Downtown Plan area because the Plan significantly increases development intensity/density and incentivizes development (through fast tracked development, reduced parking requirements and elimination of the need for individual environmental impact reports for the next 25 years). Thus, density bonuses are unlikely to be utilized in the Plan area, which means that affordable housing will not be created as a result of density bonus incentives.
3. **The Downtown Plan does not propose a single measure that *would prevent the displacement of existing low income residents nor does it promote the development of affordable housing, and there are no special provisions to address the***

anticipated above normal level of displacement resulting from the proposed Downtown Plan developments.

4. 4. The Downtown Plan Draft EIR states that the Downtown Plan could result in removal of existing housing.<sup>79</sup> **Since some of the lowest average rents in Long Beach can be found in Downtown Long Beach where there is a concentration of older housing units, this would ultimately result in the loss of one of the largest sources of low-income rental housing in the city, leading to displacement, overcrowding, and housing overpayment particularly for the estimated 24,000 (or more) low income residents living in Downtown Long Beach.**
5. 5. The D-EIR also states that the implementation of the proposed Downtown Plan **“would result in the displacement of existing housing and people, primarily housed in medium density multi-family dwelling units. New development would occur at higher densities and with more modern housing, frequently as part of a mixed-use development. While many residents would relocate into different dwelling units either within or outside the Plan area, they would be displaced from their existing dwelling units and may be unable to obtain similar housing with respect to quality, price, and/or location. Therefore, the Project would have an adverse effect on the housing supply and may require construction of replacement housing elsewhere.”**<sup>80</sup> This would ultimately **reduce opportunity for displaced residents to find equivalent housing in the local area.**<sup>81</sup> Displacement has many health implications such as increased stress, loss of supportive social networks, costly school and job relocations and increases risk for substandard housing and overcrowding that contribute to disparities among vulnerable groups, including the poor, women, children, the elderly, and members of racial/ethnic minority groups.<sup>82</sup>
6. 6. Data about the current conditions in Downtown Long Beach indicates that the area has a high rate of renters, has been experiencing rising rents and home prices, and has had a recent influx in higher income residents. These, along with other measures, are all indicators of gentrification.<sup>83</sup> **By proposing to build 5,000 new units of market rate housing without plans to produce any additional units of affordable housing to address displacement and meet housing need, the proposed Downtown Plan would contribute to rising rents and home prices, and continue to encourage an influx of higher income residents, thus promoting displacement of existing low income residents and gentrification in Downtown Long Beach.** Gentrification has the potential to cause displacement of residents and businesses because of rising rents, mortgages, and property taxes. Displacement has many health implications that contribute to disparities among special populations, including the poor, women, children, the elderly, and members of racial/ethnic minority groups. These special populations are at increased risk for the negative consequences of gentrification. Health effects of gentrification include limited access to or availability of: affordable healthy housing; healthy food choices; transportation choices; quality schools; bicycle and walking paths, exercise facilities, etc.; social networks, and lead to changes to: stress levels; injuries; violence and crime; mental health; and social and environmental justice.<sup>84</sup>
7. 7. Chapter 21.60 of the Long Beach Municipal Code outlines mitigations required to address problems caused by displacement of very low and low-income households displaced due to condominium conversion. The code indicates that these households should receive written notice of the intended displacement, 18 months prior to the

intended date of displacement, advisement as to the availability of relocation benefits including \$3,941.00<sup>5</sup> (and additional benefits if a member of the household is disabled) in relocation costs.<sup>85</sup> However, approximately \$4,000.00 in relocation assistance has proven insufficient for families to find suitable, comparable housing, particularly in the same neighborhood. Therefore, in the limited circumstances where this relocation provision would apply, it is unlikely to offset the Project's significant impacts on displacement of existing residents.

8. 8. As **proposed, the Downtown Plan would not offer the City an opportunity to meet the City's remaining RHNA allocation for moderate, low, very low and extremely low-income units.** This also indicates an inconsistency between the stated goals of the City's Housing Element and the proposed Downtown Plan, which, as policy and planning documents, must be consistent, pursuant to state law.

### 3.4 EXISTING CONDITIONS FOR HOUSING STOCK AND HOUSING QUALITY

#### *3.4.1 Proportion of households living in overcrowded conditions*

Overcrowding, as defined by the U.S. Department of Housing and Urban Development (HUD), is having greater than 1 person per habitable room in a household, and severe overcrowding occurs when there are more than 1.5 occupants per habitable room. Overcrowding occurs when housing costs are so high relative to income that families double up to devote income to other basic needs such as food and medical care.<sup>86</sup> As stated in the 2008-2014 Housing Element of the City of Long Beach General Plan, the cost of housing is directly related to the pervasiveness and severity of housing problems in a community. If housing costs are relatively high in comparison to household income, there will be a correspondingly higher prevalence of overpayment and/or overcrowding.<sup>87</sup>

The population of the City of Long Beach has shifted from smaller households of majority White homeowners to an increasing number of Hispanic and Asian renter households with larger families. **The City's existing rental housing stock of primarily older, one and two bedroom units are of inadequate size to house this population, contributing to significant unit overcrowding and deterioration.**<sup>88</sup>

**According to the 2008-2014 Housing Element of the General Plan, overcrowding remains a "significant" issue for the City of Long Beach.**<sup>89</sup> The Market Study does not calculate the rates of overcrowding in Long Beach, but 2005-2009 Census data show that 15% of renters and 9% of owners were living in overcrowded conditions.<sup>6</sup>

#### *3.4.2 Housing Code Violations*

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<sup>5</sup> These amounts are to be increased on a percentage basis as determined by the change in the consumer price index between January 1, 2009, and January 1 of the year in which the application for demolition, or a condominium conversion final tract map, is filed with the city.

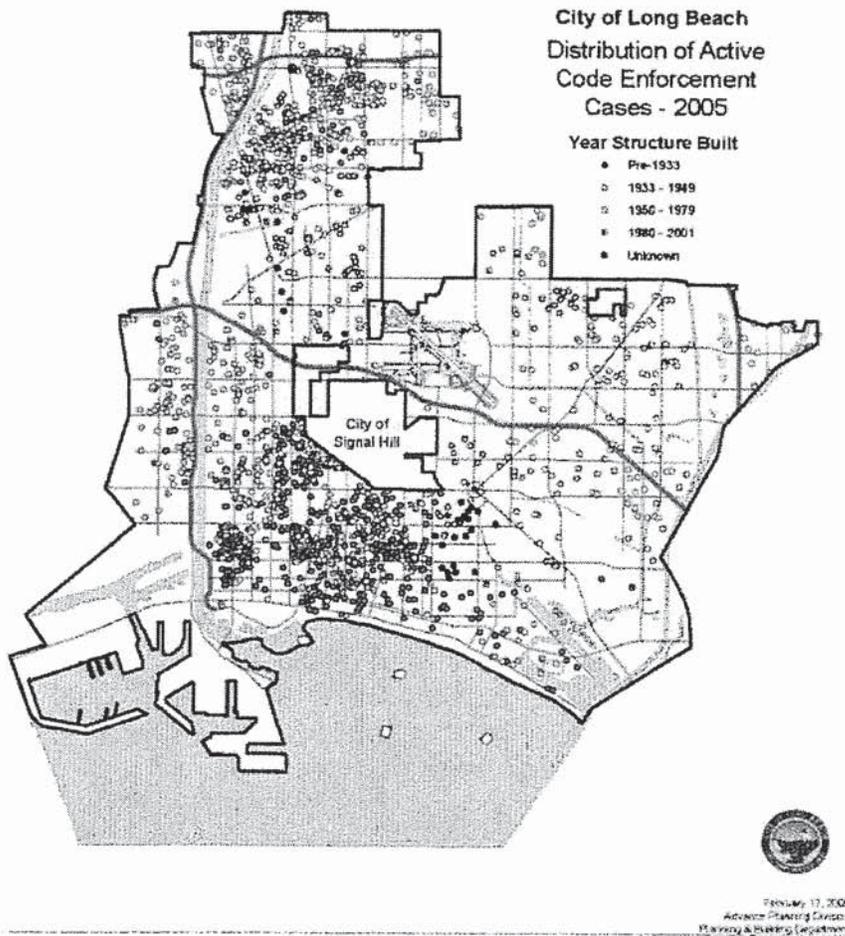
<sup>6</sup> It is important to note that estimates of overcrowding, as with other measures in the census, are often considered to be underreported, thus indicating that the "ground truth" of the current conditions may actually be more severe than what this data indicates.

Housing Code Violations are a good indicator for the quality and state of the housing stock in a City. The California Department of Finance documented a total of 174,547 housing units in Long Beach in 2007, and as of February 2005, the City had approximately 2,200 active code enforcement cases on file.<sup>90 91</sup>

- Over 60% of these violations were for property maintenance issues such as deteriorated paint or roof covering, broken windows, overgrown vegetation, or other maintenance issues not directly related to the structural condition of the unit.
- Another 20% were for unpermitted construction (such as an illegal storage shed).
- 213 cases, or 10%, were for substandard conditions, a citation related to one or more structural deficiencies relatively limited in scope.
- 201 code enforcement cases (9%) were for substandard buildings, the most severe citation used for extensive structural deficiencies and necessitating building demolition if the infractions are not promptly remedied.

Each of these categories is associated with older housing stock. It is clear from Figure 7 below that a heavy concentration of these violations were for buildings located in Downtown Long Beach, indicating that the quality of the housing stock there is dilapidated, which is likely one of the reasons that it is of lower cost than other housing stock to rent. As noted above, housing quality is associated with numerous adverse health outcomes.

Figure 7: City of Long Beach Distribution of Active Code Enforcement Cases



The Market Study states that almost one quarter of Downtown Long Beach’s housing units were built before 1940, another 14% were built in the 1960s and 15% were built in the latest housing boom from 2000 to 2008.

Table 7: Age of Housing Stock <sup>92</sup>

Year Structure Built	Renter Occupied Housing	Percent Renter	Owner Occupied Housing	Percent Owner	Total Percent
1990-2000	4,201	4%	2,536	4%	4%
1980-1989	10,440	11%	4,127	6%	9%
1970-1979	15,772	17%	5,776	9%	13%
1960-1969	18,434	19%	6,956	10%	16%
1950-1959	17,794	19%	20,094	30%	23%
1940-1949	12,878	13%	15,010	22%	17%
1939 or earlier	16,666	17%	12,472	19%	18%
<b>Total</b>	<b>96,136</b>	<b>100%</b>	<b>66,971</b>	<b>100%</b>	<b>100%</b>

Source: U.S. Census 2000.

### 3.5 IMPACTS OF THE DOWNTOWN PLAN ON HOUSING STOCK AND HOUSING QUALITY

1. Downtown Long Beach is one of the areas of the City that has the highest prevalence of overcrowding. **Without a plan for the creation of new, quality affordable housing units to meet existing and future housing needs, displacement and overcrowding of the current affordable housing stock is anticipated as a result of the proposed Downtown Plan.** Overcrowding can lead to the spread of infectious disease, increased mortality rates, poor child development and school performance, noise, and fires. The D-EIR must be revised to include mitigation measures to address these significant and unmitigated impacts on population and housing.
2. The City's existing rental units in Downtown Long Beach are more likely to be older housing stock, which is what makes them affordable. Given this trend, and that rental housing tends to suffer more wear and tear than does owner housing, **increases in overcrowding in Downtown Long Beach will expose a higher proportion of low-income residents to poor quality housing and its known associated health impacts**, including safety concerns from structural deficiencies, asthma exacerbation due to increased concentration of indoor allergens and mold found in substandard housing, exposure to lead based paint, and other impacts.
3. The advanced age of much of the housing stock in Downtown Long Beach indicates the significant need for continued code enforcement, property maintenance and housing rehabilitation programs to stem housing deterioration as well as the creation of new, quality affordable units.<sup>93</sup> Typically, housing over 30 years in age is likely to have rehabilitation needs that may include new plumbing, roof repairs, foundation work and other repairs.<sup>94</sup> Three-quarters of the housing stock in Long Beach is greater than 30 years in age and in deteriorated conditions, particularly in Downtown and Central Long Beach, where there were 2,200 active code enforcement violations on file in 2005. **The Downtown Plan does not propose measures to protect and improve the quality of existing housing stock or create new, quality affordable units for the estimated 24,000 (or more) low-income residents living in Downtown Long Beach.** Given that Downtown is an area with high levels of household overcrowding and a predominance of low and moderate-income households, if new, quality affordable units are not created, these vulnerable populations would be disproportionately affected by the adverse impacts of living in deteriorating rental housing, from overcrowding or from the impacts of being displaced to other parts of the City.<sup>95 96</sup>

### 3.6 PROPOSED COMMUNITY BENEFITS RELATED TO HOUSING

Preservation of the existing stock of affordable housing and preparing to construct new affordable housing units to meet the current and future needs of Long Beach residents is crucial to the health and well being of all people in the City of Long Beach. The Downtown Plan offers the opportunity to establish additional protections for affordable housing, and plans for the construction of enough affordable housing units to help meet the City's required RHNA allocations. The 2011 David Rosen & Associates *Long Beach Downtown Plan Community Benefits Analysis* (hereafter "DRA study") proposes the following community benefits, which would mitigate the Downtown Plan's significant and unmitigated environmental impacts on housing:

### Inclusionary Housing for Rental Units

- A. Designate 10% of the Downtown Plan's 2,500 apartment units as affordable to very low-income (VLI) households (those at or below 50% of area median income). *If adopted, this would result in 250 VLI apartments.* (This assumes 50% of Downtown Plan residential units will be apartments.)

**OR**

- B. Establish an In-Lieu Fee of \$19.83 per net square feet of building area for the proposed 2,500 apartment units. *If adopted this would raise up to \$52,043,944, enough to produce 250 VLI apartments.*

### Inclusionary Housing for Ownership Units

- C. Designate 15% of the Downtown Plan's condominium units as affordable to moderate-income (MI) households (those at or below 90% of area median income). *If adopted this would result in 375 MI condominiums.* (This assumes that 50% of Downtown Plan residential units will be condominiums.)

**OR**

- D. Establish an In-Lieu Fee of \$10.34 per net square feet of building area for the proposed 2,500 condominium units. *If adopted this would raise up to \$28,962,095, enough to produce 375 MI condominiums, or 139 VLI apartments.*

### Commercial Linkage Fees

- E. Establish a \$10.00 per square foot linkage fee for the Downtown Plan's proposed 1,500,000 square feet of office space, 384,000 square feet of retail space, 96,000 square feet of restaurant space, and 800 Hotel Rooms. *This would raise \$25,400,000 in Linkage Fees, and provide the ability to produce 122 VLI apartments.*

**If adopted in full, the proposed community benefits would result in the addition of 511 VLI apartments and 375 MI condominiums.<sup>7</sup>**

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<sup>7</sup> 1,166 VLI apartments (affordable units produced from in-lieu fees), and 364 VLI apartments (affordable units produced from linkage fees), would equal a total of 1,530 VLI apartments.

**Table 8: Affordable Housing Production Projections, Long Beach Downtown Plan**

Affordable Housing Production Projections Long Beach Downtown Plan							
Land Use	Proposed Max. New Development Under Plan (1)	Recommended Community Benefit	On-Site Affordable Units Produced	In-Lieu Fee Per SF Bldg	In Lieu Fees Raised (2)	Affordable Units Produced From In Lieu Fees (3)	Affordable Unit: Produced From Linkage Fees (3)
Apartment Units	2,500	10% VLI Apts.	250 VLI Apts.	\$19.63	\$52,043,944	250 VLI Apts.	
Condominium Units	2,500	15% MI Condos	375 MI Condos	\$10.34	\$28,967,095	375 MI Condos or 139 VLI Apts.	
Office Square Feet	1,500,000	\$10.00/SF					\$15,000,000 72 VLI Apts.
Retail Square Feet	384,000	\$10.00/SF					\$3,840,000 18 VLI Apts.
Restaurant Sq. Ft.	96,000	\$10.00/SF					\$960,000 5 VLI Apts.
Hotel Rooms (4)	800	\$10.00/SF					\$5,600,000 27 VLI Apts.
<b>Total</b>			<u>625 VLI/MI Units</u>		<u>\$81,006,039</u>	<u>625 VLI/MI Units or 389 VLI Apts.</u>	<u>\$25,400,000</u> <u>122 VLI Apts.</u>

Notes: VLI = Very low income (affordable to households at or below 50% of area median income).  
MI = Moderate income (affordable to households between 80% and 120% of area median income, calculated at 100% area median income).  
SF = Net square feet of building area

(1) Assumes 50% of total projected residential production of 5,000 units are apartments and 50% are condominiums.

(2) Assumes average unit size of 1,050 SF for apartments and 1,120 SF for condominiums.

(3) Units produced from in lieu and linkage fees based on the following per unit affordability gaps:

Affordability Gap	
Very low income apartment:	\$208,176
Moderate income condominium:	\$77,232

In lieu and linkage fees may be leveraged at historical ratios of up to 3:1 through use of tax credits and other financing sources.

(4) Assumes average hotel room size of 800 SF.

Source: David Rosen & Associates Long Beach Downtown Plan Community Benefits Analysis, 2011

The additional affordable units provided by the proposed community benefits would help to:

- Lessen the City's existing need for affordable housing, and move towards attainment of the *remaining* RHNA of 5,206 lower-income units.
- Maintain affordable housing units in Downtown Long Beach. This will prevent the cost of housing from being driven up in Downtown, where the need for affordable housing is high, and help to prevent gentrification.
- Avoid displacement of the estimated over 24,000 (or more) low-income residents at great risk of displacement.
- Alleviate potential increases in overcrowding resulting from the lack of affordable housing planned in the current Downtown Plan. Reducing overcrowding will lead to decreases in poor health outcomes associated with overcrowding, and protect the quality of existing affordable housing, which deteriorates much more quickly as a result of overcrowding.
- Allow for balanced development to support the needs of all Downtown residents and support a diverse and vibrant Downtown.
- Off-set the project's significant and unmitigated impacts on population and housing, displacement, air quality, green house gas emissions and traffic.

## 4.0 Employment

### 4.1 THE RELATIONSHIP BETWEEN EMPLOYMENT AND HEALTH

The nature and stability of employment conditions have a strong impact on our health. In general, those at the top of the job ladder live longer, healthier lives than those in the middle, who in turn fare better than those at the bottom. While much of this advantage is tied to wealth, it is also affected by how much power and autonomy people have at work, their job security, job design, safety of work conditions, and the respect their occupational status commands. The lowest wage job earners are also the least likely to have control over their tasks or schedule, job security, “say” in the workplace, supervisor support and benefits, and are more likely to have hazardous work conditions, debt, worries about their child's safety and future, trouble balancing the demands of work and home, and access to fewer healthy avenues for stress relief.<sup>97</sup>

Wealth, employment and economic mobility are important determinants of good health. Job training and access to good jobs with benefits, decent pay and career ladders help families avoid falling into financial disaster and reduces their risk for premature death and chronic disease.<sup>98</sup> Numerous studies have shown that income inequality, a measure of the distribution of income, is strongly and independently associated with decreased life expectancy and higher mortality, as well as reduced self-rated health status and higher rates of violence. Nationally, individuals with the lowest average family incomes (\$15,000-\$20,000) are three times more likely to die prematurely as those with among the higher family incomes (greater than \$70,000). It has also been shown that every additional \$12,500 in household income buys one year of life expectancy (up to an income of \$150,000).

For adults, wealth is tied to neighborhood quality, work conditions, food security, access to medical care, and the availability of buffers against stress. Poorer adults are three times as likely to have a chronic disease that limits their activity. For children, the impact of wealth on health is cumulative, and the greater proportion of life a child spends at the upper end of the class spectrum, the more benefits accrue. Children from affluent families are more likely to grow up in a house owned by their parents and to live in a neighborhood with healthy food options, safe places to play, good schools, libraries and other quality public services, all of which help set them on the path to a successful, healthy life. Children from less affluent families lack these advantages and are more likely to experience conditions that limit their health such as injuries, inadequate or delayed health care, physical inactivity, poor nutrition, insecure or substandard housing, and exposure to toxins, high lead levels and violence.<sup>99</sup>

### 4.2 EXISTING CONDITIONS FOR EMPLOYMENT

#### 4.2.1 *Unemployment by Race/Ethnicity*

As of December 2010 the unemployment rate in California was 12.3%, and 12.7% in Los Angeles County.<sup>100</sup> **The 2005-2010 Consolidated Plan for Long Beach noted that the official unemployment rate for Long Beach residents mirrored State trends in unemployment, however, a larger proportion of Long Beach residents are long-term discouraged workers, who are no longer looking for employment, and these individuals are not counted in official statistics.**<sup>101</sup>

The Market Study does not address levels of unemployment in Long Beach. According to 2005-2009 Census data, 8% of white, 11% of black or African-American, 11% of Asian, and 8% of Hispanic or Latino residents of Downtown Long Beach in the labor force were unemployed. These figures, compared to unemployment rates for the City of Long Beach, are higher for whites (7% in Long Beach), lower for blacks and African-Americans (14% in Long Beach), higher for Asians (7% in Long Beach) and lower for Hispanics or Latinos (10% in Long Beach).

#### *4.2.2 Jobs paying greater than or equal to the self-sufficiency wage (citywide)*

The self-sufficiency standard measures how much income is needed for a family of a certain composition (number of adults and children), living in a particular county to adequately meet minimal basic needs without public or private assistance. Costs taken into account in the self sufficiency wage calculation include those that families face on a daily basis, such as housing, food, child care, health care, transportation, and other necessary spending.<sup>102</sup>

Unlike the Federal Poverty Line, the self-sufficiency standard demonstrates how much income is needed for a family of a certain composition in a given place to adequately meet its minimal basic needs. In contrast, the federal poverty line is based solely on the cost of food – assuming that food represents one-third of a family's budget - and does not vary by the local cost of living. For families—whether in a higher cost market like Long Beach, CA or a more affordable market—the poverty line remains equivalent in annual household earnings. The self-sufficiency wage, as calculated below, shows the specific income needs related to the conditions in Los Angeles County.

**In Long Beach, the self-sufficiency wage for one adult with one preschool-age child is \$21.02 per hour. The combined self-sufficiency wage for two adults, one preschool-age child and an infant is \$30.38 per hour.** Even though California's minimum wage (\$8.00) is higher than the federal minimum wage in the US (\$7.25), it is still not high enough to meet the self-sufficiency standard.

Table 9 below illustrates the distribution of median wages for various occupations in comparison to the wages necessary for self-sufficiency in Los Angeles County. As the data shows, many occupations do not pay enough to cover a family's basic expenses. For additional information about how these calculations were made, see Appendix A.

*Educational attainment*

**Table 9: Comparison of LA-Long Beach Self-sufficiency Wage to Hourly Median Wages for Selected Occupations, Los Angeles County, 1st Quarter Earnings, 2010**

Occupations	Median Hourly Wage
Food Preparation and Serving-Related Occupations	\$9.35
Farming, Fishing, and Forestry Occupations	\$9.58
Personal Care and Service Occupations	\$10.83
Building and Grounds Cleaning and Maintenance Occupations	\$11.48
Production Occupations	\$12.31
Healthcare Support Occupations	\$12.60
Transportation and Material Moving Occupations	\$12.61
Sales and Related Occupations	\$12.81
Office and Administrative Support Occupations	\$15.93
Protective Service Occupations	\$16.88
Installation, Maintenance, and Repair Occupations	\$20.77
<b>Self-sufficiency wage for one adult with a preschooler</b>	<b>\$21.02</b>
Construction and Extraction Occupations	\$21.94
Community and Social Services Occupations	\$22.19
Education, Training, and Library Occupations	\$24.84
Arts, Design, Entertainment, Sports, and Media Occupations	\$26.95
<b>Combined self-sufficiency wage for 2 adults, 1 preschooler, and 1 infant</b>	<b>\$30.38</b>
Life, Physical, and Social Science Occupations	\$30.85
Business and Financial Operations Occupations	\$30.98
Healthcare Practitioners and Technical Occupations	\$34.39
Computer and Mathematical Occupations	\$37.30
Architecture and Engineering Occupations	\$39.59
Legal Occupations	\$50.87
Management Occupations	\$50.89

**4.2.3 Proportion of Long Beach Jobs Filled by Long Beach Residents**

In 2008 SCAG estimated that there were approximately 183,685 jobs available in Long Beach.<sup>103</sup> The Market Study identified approximately 38,325 full- and part-time jobs in Downtown Long Beach in 2006.<sup>104</sup> The Market Study also estimated that **only 24% of Downtown Residents work within Long Beach**—10% work in Downtown and another 6% work in the neighborhoods directly north of Downtown and south of the 405 Freeway. Another 14% work within the City of Los Angeles, and 4% in Torrance. The 2005-2010 Long Beach Consolidated Plan found that **non-residents held 63% of jobs within the City of Long Beach.**<sup>105</sup>

In the recent past, the quality of jobs in Long Beach has declined, and the economy has shifted from a manufacturing and trade-based economy to one focused on health services, education, tourism, and professional and businesses services. Although employment appears to have remained relatively stable in the decade leading up to 2005, **declines in manufacturing and increased employment in tourism, retail trade, health care, and**

professional and administrative services has led to a decreasing middle class and increasing rates of poverty, as new jobs pay less on average than jobs that have been lost over this time period.<sup>106</sup>

Most Downtown Long Beach residents work in service oriented jobs in industries with low barriers to entry such as industrial sectors, retail, hospital and leisure sectors. These industries account for greater than 30% of the jobs in Downtown Long Beach.<sup>107</sup>

#### 4.3 IMPACTS OF THE DOWNTOWN PLAN ON EMPLOYMENT

1. Neither the Downtown Plan or the D-EIR address impacts of the Plan's proposed activities to employment other than to state that "[a]t full buildout...the number of jobs supported by the Project would be approximately 5,200."<sup>108</sup> However, the Downtown Plan proposes to develop approximately: 5,000 new residential units; 1.5 million square feet of new office, civic, cultural, and similar uses; 384,000 square feet of new retail; 96,000 square feet of restaurants; and 800 new hotel rooms, and therefore a significant number of new construction, retail, food service, leisure sector, office, and various other jobs can be anticipated in Downtown Long Beach. Considering that non-residents currently hold the majority of jobs in Long Beach, that less than one-quarter of Downtown Long Beach residents work in the Downtown area, and that there are a large number of people unemployed (including those too discouraged to even look for work), **without policies to encourage local hiring, Long Beach residents will not benefit from the estimated 5,200 new employment opportunities resulting from the proposed Downtown Plan, and the Downtown Plan will not alleviate local unemployment rates.** Importantly, it is unclear if 5,200 jobs represents an accurate accounting of the number of jobs that will be created by the Downtown Plan, as the D-EIR does not indicate whether this figure (5,200) represents the number of construction (temporary) jobs, the number of retail/commercial (permanent) jobs or a combination of both. The D-EIR should include an accounting of the number of temporary and permanent jobs that will be created by the project.
2. Opportunities for employment at a variety of wage levels can be anticipated as a result of the proposed Downtown Plan. Some new jobs will be service oriented in industries with low barriers to entry (such as retail, food service and leisure sectors), similar to the industries that currently account for greater than 30% of the jobs in Downtown Long Beach. These jobs are lower paying on average than occupations that require higher levels of education and training, and likely pay below the self-sufficiency wage. **If local residents are employed in jobs that pay below the self-sufficiency wage, it is crucial that quality, affordable housing is also available to these residents. Without access to affordable housing, local residents who could potentially be employed by new job opportunities resulting from the Downtown Plan could be displaced, be forced to live in overcrowded conditions, and face other negative health outcomes associated with low-wage employment and housing overpayment** [see section on **Housing** in Section 3.0]. By spending an affordable amount on housing, workers in lower wage-earning jobs would be more likely to afford their basic needs, such as food, transportation and medical care.
3. As the Downtown Plan is currently proposed, without the creation of new, quality affordable housing for the existing residents in Downtown Long Beach, **it is likely that**

workers in newly created lower paying jobs, such as those in the service industries, may not be able to afford to live in Long Beach, and would have to commute greater distances to work in Downtown Long Beach. Transportation expenses pose an additional cost burden, particularly for residents already earning lower incomes. Additionally, residents who may work in Long Beach but live outside of the City may likely spend their incomes in areas outside of Long Beach, thus not contribute as much to the City's local economy. Inclusion of local hiring community benefits will help off-set the project's significant and unmitigated impacts on population and housing, air quality, greenhouse gas emissions and traffic.

4. **The Downtown Plan does not outline any specific opportunities for local residents to gain experience and job training as a result of new employment resulting from the Plan's proposed developments.** A number of construction and other types of jobs that offer opportunities for training and building job experience will be created as a result of the Downtown Plan. These opportunities, if offered to Downtown residents, could help to increase the number of residents who are able to earn wages on par with the self sufficiency wage, and potentially decrease the concentration of poverty in Downtown Long Beach and increase wage earning capacity of Long Beach residents, which would help mitigate the proposed impacts on displacement and overcrowding.

#### 4.4 PROPOSED COMMUNITY BENEFITS RELATED TO EMPLOYMENT

In order to address displacement, overcrowding and poverty rates, the City of Long Beach should focus on economic development activities to expand employment opportunities for *all* residents, including Downtown Long Beach's most vulnerable. Given the high concentration of poverty in Downtown Long Beach, and the potential for employment and job training opportunities resulting from the Downtown Plan activities, the City of Long Beach has an opportunity to utilize the Downtown Plan as a way to address some of the most important conditions that determine health outcomes for Downtown Long Beach residents.

The DRA study proposes the following local hiring community benefits for employment opportunities within the Downtown Plan area:

##### *4.4.1 Local Hiring Language for Permanent Jobs Associated with the Downtown Plan*

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The City of Long Beach recognizes that Local Hiring Requirements for permanent jobs (i.e., non-construction jobs such as retail, food service and clerical jobs) in the Downtown Community Plan Area are important to advancing the City's propriety interests and the interests of its residents. As such, all Covered Employers within the Downtown Community Plan Area that receive City Assistance will operate under Local Hiring Agreements with the City that contain targeted hiring provisions ensuring that at least 30% of all Covered Work Hours are performed by Long Beach residents and at least 10% of all Covered Work Hours are performed by Disadvantaged Long Beach

residents.<sup>8</sup> Disadvantaged residents are defined as those whose household income falls below 50% of the area median income.

For the purposes of the provisions set forth above, “Covered Employers” is defined as all employers within the Downtown Community Plan Area who are Beneficiaries or who have entered into a lease or contract with a Beneficiary for the performance of work within the Downtown Community Plan Area. “Beneficiary” is defined as an entity located or locating within the Downtown Community Plan Area and receiving financial assistance from the City or entering into a contract with the City for the performance of work within the Downtown Community Plan Area.

For the purposes of the provisions set forth above, “Financial Assistance” is defined as any loan, grant, subsidy or similar participation in the cost of development of a project within the Downtown Community Plan Area provided by the City, irrespective of source, valued at \$50,000 or more.

For the purposes of the provisions set forth above, “Covered Work Hours” are defined as hours worked by individuals in positions performed predominantly on-site within the Downtown Community Plan Area other than executive, managerial or licensed professional positions.

The City will utilize a Master Local Hiring Agreement that will be utilized for all Covered Employers, to allow for proper monitoring and enforcement of the local hiring provisions set forth above.

#### ***4.4.2 Project Labor Agreement Local Hiring Language for the Downtown Plan <sup>110</sup>***

The City of Long Beach recognizes that Project Labor Agreements are important to advancing the City’s proprietary and policy interests, including the ability to ensure on-time, on-budget completion of projects, target construction job opportunities to Long Beach residents and low-income communities, prompt generation of tax flow and other income to the City, and boost the local economy by generating local construction jobs and job training. As such, all new developments within the Downtown Community Plan Area that are undertaken by the City with a contract value of \$500,000 or more, receive City Investment of more than \$1,000,000, or are located on public land and developed under lease from the City, will operate under Project Labor Agreements that contain targeted hiring provisions ensuring that at least 30% of all construction work hours are performed by Long Beach residents residing in High Unemployment Areas and at least 10% of all construction work hours are performed by Disadvantaged Long Beach residents. Disadvantaged residents are defined as those whose household income falls below 50% of the area median area income. Such Project Labor Agreements should also set goals to provide at least 15% of entries into apprenticeship programs and 30% of total apprentice work hours on a project are performed by Disadvantaged Long Beach residents. Finally, such Project Labor Agreements should ensure that contractors request in writing and unions refer targeted workers prior to referral of any other individuals into journey person or apprentice positions on the project in question.

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<sup>8</sup> Hours worked by out-of-state residents are not included in this calculation.

## HIA Screening Worksheet

Screening Questions	Response and Supporting Facts
<p><b>Project and Timing</b></p> <p><i>Has a project, plan or policy been proposed?</i></p> <p><i>Is there sufficient time to conduct an analysis before the final decision is made?</i></p>	
<p><b>Health Impacts</b></p> <p><i>Does the decision have the potential to affect environmental or social determinants that impact health outcomes? If so, which determinants and which health outcomes?</i></p> <p><i>Would health inequities be impacted? In what ways?</i></p> <p><i>Are the proposal's impacts to health likely to be significant in terms of the number of people impacted, the magnitude, breadth and/or immediacy of impacts?</i></p> <p><i>Do evidence, expertise, and/or research methods exist to analyze health impacts of the decision?</i></p>	
<p><b>Potential Impact of HIA Findings</b></p> <p><i>Is health already being considered in the proposal or as part of the decision-making process?</i></p> <p><i>Are the links between the proposal and health or health determinants clear?</i></p> <p><i>Is the decision-making process open to the HIA and/or recommendations for changes to design, mitigations and/or alternatives?</i></p> <p><i>If applied, would HIA findings and recommendations potentially improve the impact that the proposal has on health?</i></p>	
<p><b>Potential Impact of the HIA Process</b></p> <p><i>What are the potential impacts of the HIA process? (e.g., building relationships, empowering community members, demonstrating how health can be used in decision making)</i></p>	
<p><b>Stakeholder Interest and Capacity</b></p> <p><i>Have public concerns about the health impacts of the decision been voiced or documented?</i></p> <p><i>Who are the stakeholders and interest groups involved in the decision-making process?</i></p> <p><i>Do stakeholders have the interest to participate in the HIA?</i></p> <p><i>Do stakeholders have the capacity (resources, skills, etc.) to participate in the HIA?</i></p> <p><i>Would stakeholders use the HIA to inform or influence the decision-making process? How?</i></p>	

The City of Long Beach recognizes that construction projects can create opportunities for small, local businesses and therefore promote the economic development of our community. As such, all new developments within the Downtown Community Plan Area that are undertaken by the City, receive City Investment, or are located on public land, will ensure that at least 10% of all construction work, as measured by the dollar value of contracts related to the project in question, be contracted with a Section 3 or city certified local Small Business Enterprise (LSBE).

For purposes of the provisions set forth above, “City Investment” means financial assistance provided by the City to a developer that is expressly articulated or identified in writing by the City and establishes a proprietary interest in the development project in question, and shall include, but not be limited to: grants (requiring repayment where terms not met); rent subsidies or reductions; below-market loans; loan forgiveness; City-approved bond financing (excluding conduit bond financing); a sale or lease of City-assembled land for less than its fair market value; contingent obligations taken on by the City such as any guaranty or pledge of City funds.

For the purposes of the provisions set forth above, “High Unemployment Areas” means Long Beach zip codes containing census tracts in which the unemployment rate exceeds 150% of the L.A. County average.

If these changes occurred, by increasing income, improving job autonomy, and reducing unemployment and poverty, the health and quality of life of residents and their families could be greatly improved. Premature mortality, chronic disease and stress would be reduced, mental health status would be improved, and children would be exposed to fewer conditions that could put their long and short-term health at risk.

## 5.0 Recommendations

The findings of this Health Impact Assessment demonstrate that the proposed Downtown Plan could have the following health impacts on vulnerable populations living in Downtown Long Beach:

- Increased displacement
- Increased housing overcrowding
- Increased Housing cost burden
- Gentrification
- Increased exposure to poor quality housing
- Increased unemployment
- Decrease in the number of local residents who earn greater than or equal to the self-sufficiency wage
- Decrease in Long Beach jobs filled by Long Beach residents

All of the above conditions have been shown to lead to adverse health outcomes for the populations impacted.

The HIA also found that the proposed community benefits would serve to mitigate or avoid some of the negative health impacts resulting from the proposed Downtown Plan.

**In order to ensure that Long Beach residents benefit from the proposed DTP activities, this HIA recommends adoption of the proposed Affordable Housing Community Benefits, as well as the proposed Local Hiring Community Benefits and Project Labor Agreements.**

## Appendix A

### Housing Purchasing Capacity in Long Beach, CA

Downtown Long Beach HH Median Income <sup>1</sup>	Available for Housing (33% of gross income) <sup>2</sup>	Annual Homeowners Fee <sup>3</sup>	Supportable Mortgage <sup>4</sup>	Down Payment (10%) <sup>5</sup>	Taxes <sup>6</sup>	Annual Housing Cost <sup>7</sup>	Purchasing Capacity
\$27,438	\$9,055	\$4,200	\$112,188	\$11,219	\$1,283	\$14,538	\$123,407
<sup>1</sup> This is the median household income reported for Downtown Long Beach in the Market Study							
<sup>2</sup> Multiply median household income by .33 to get the amount a household earning \$27,438 would have available for housing. 33% of annual income represents what can be considered an affordable mortgage.							
<sup>3</sup> This value represents a \$350 per month homeowners or condo association fee and is multiplied by 12 to get the yearly cost.							
<sup>4</sup> This value combines the interest rate for the period, the total number of payment periods (in this case a year or 12 months), and the amount of the payment made each period (in this case \$9,055) to estimate the yearly value of the mortgage. Supportable mortgage = $(0.0058 \times 12) \times \$9,055$							
<sup>5</sup> To get the down payment multiply the supportable mortgage by .10							
<sup>6</sup> To get the taxes multiply the supportable mortgage by 0.01144							
<sup>7</sup> Annual housing costs are the sum of the yearly amount available for housing (\$9,055), the annual homeowners association fee (\$4,200) and the yearly taxes (\$1,283)							

**Table 5: Housing wage as percentage of minimum wage - Long Beach, CA, 2011**

	2011 Fair Market Rent (FMR) for 2-bedroom <sup>1</sup>	Annual Income Needed to Afford FMR <sup>2</sup>	2011 Housing Wage for 2-bedroom FMR <sup>3</sup>	2008 CA Minimum Hourly Wage	Housing Wage as % of Minimum Wage (1-worker) <sup>4</sup>	Housing Wage as % of Minimum Wage (2-worker)
Zip code 90802	\$1,130	\$45,200	\$21.73	\$8.00	272	136
Zip code 90813	\$1,070	\$42,800	\$20.58	\$8.00	257	129
<sup>1</sup> Small Area Fair Market Rent - HUD Demonstration Project for Selected Metropolitan Areas in FY 2011 ( <a href="http://www.huduser.org/datasets/fmr.html">http://www.huduser.org/datasets/fmr.html</a> )						
<sup>2</sup> Annual Income Needed to Afford FMR = Multiply the FMR for a unit of a particular size by 12 to get the yearly rental cost (2BR: $\$1,130 \times 12 = \$13,560$ ). Then divide by .3 to determine the total income needed to afford \$13,560 per year in rent ( $\$13,560 / .3 = \$45,200$ )						
<sup>3</sup> Housing Wage = Divide income needed to afford the FMR for a particular unit size (2BR: \$45,200) by 52 (weeks per year), and then divide by 40 (hours per work week) ( $\$45,200 / 52 / 40 = \$21.73$ )						
<sup>4</sup> Housing Wage as % of Minimum Wage (1-worker) = Divide the Housing Wage for a particular unit size (2BR: \$21.73) by any locality's minimum wage (\$8.00 in CA), and then multiply by 100 ( $\$21.73 / \$8.00 \times 100 = 272\%$ ) - for two workers, multiple minimum wage by two						

**Table 9: Comparison of LA-Long Beach Self-sufficiency Wage to Hourly Median Wages for Selected Occupations, Los Angeles County, 1st Quarter Earnings, 2010\***

Occupations	Median Hourly Wage
Food Preparation and Serving-Related Occupations	\$9.35
Farming, Fishing, and Forestry Occupations	\$9.58
Personal Care and Service Occupations	\$10.83
Building and Grounds Cleaning and Maintenance Occupations	\$11.48
Production Occupations	\$12.31
Healthcare Support Occupations	\$12.60
Transportation and Material Moving Occupations	\$12.61
Sales and Related Occupations	\$12.81
Office and Administrative Support Occupations	\$15.93
Protective Service Occupations	\$16.88
Installation, Maintenance, and Repair Occupations	\$20.77
<b>Self-sufficiency wage for one adult with a preschooler</b>	<b>\$21.02</b>
Construction and Extraction Occupations	\$21.94
Community and Social Services Occupations	\$22.19
Education, Training, and Library Occupations	\$24.84
Arts, Design, Entertainment, Sports, and Media Occupations	\$26.95
<b>Combined self-sufficiency wage for 2 adults, 1 preschooler, and 1 infant</b>	<b>\$30.38</b>
Life, Physical, and Social Science Occupations	\$30.85
Business and Financial Operations Occupations	\$30.98
Healthcare Practitioners and Technical Occupations	\$34.39
Computer and Mathematical Occupations	\$37.30
Architecture and Engineering Occupations	\$39.59
Legal Occupations	\$50.87
Management Occupations	\$50.89

\* Data are provided for the LA-Long Beach Metropolitan Division. Available at: <http://www.labormarketinfo.edd.ca.gov/?pageid=152>

These survey data are from the 2009 Occupational Employment Statistics (OES) survey. The wages have all been updated to the first quarter of 2010 by applying the US Department of Labor's Employment Cost Index to the 2009 wages. Occupations are classified using the Standard Occupational Classification (SOC) codes. For details of the methodology, see the Overview of the OES Survey at <http://www.labormarketinfo.edd.ca.gov>.

<sup>1</sup> Downtown Long Beach Market Study. April, 2009. Available at: <http://www.downtownlongbeach.org/uploads/Reports/Final%20Downtown%20Long%20Beach%20Market%20Study%20-%20Compressed.pdf>

<sup>2</sup> City of Long Beach Downtown Plan. Prepared for City of Long Beach Development Services Department AECOM, Cityworks Design, Iteris, Strategic Economics, and ICF Jones and Stokes. November 2010.

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- <sup>3</sup> Downtown Long Beach Market Study. April, 2009.
- <sup>4</sup> City of Long Beach Development Services Department. City of Long Beach Downtown Plan, Program Environmental Impact Report, Public Review Draft. sch No. 2009071006. December 2010. Greenhouse Gas Emissions Section 4.5-22
- <sup>5</sup> City of Long Beach Development Services Department. City of Long Beach Downtown Plan, Program Environmental Impact Report, Public Review Draft. sch No. 2009071006. December 2010.
- <sup>6</sup> City of Long Beach Development Services Department. City of Long Beach Downtown Plan, Program Environmental Impact Report, Public Review Draft. sch No. 2009071006. December 2010. Table ES-1 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts
- <sup>7</sup> City of Long Beach 2008-2014 Housing Element. Page V-12
- <sup>8</sup> City of Long Beach 2008-2014 Housing Element. Page V-15
- <sup>9</sup> City of Long Beach 2008-2014 Housing Element. Page V-16
- <sup>10</sup> City of Long Beach 2008-2014 Housing Element. Page V-16
- <sup>11</sup> City of Long Beach 2008-2014 Housing Element. Page V-16
- <sup>12</sup> Downtown Long Beach Market Study. April, 2009. P. 63. Available at: <http://www.downtownlongbeach.org/uploads/Reports/Final%20Downtown%20Long%20Beach%20Market%20Study%20-%20Compressed.pdf>
- <sup>13</sup> <http://salt.unc.edu/T-RACES/mosaic.html>
- <sup>14</sup> California Newsreel. Backgrounders from the Unnatural Causes Health Equity Database. 2008. Available at <http://www.unnaturalcauses.org/assets/uploads/file/primers.pdf>
- <sup>15</sup> Kennedy M; Leonard P. Dealing with Neighborhood Change: a primer on gentrification and policy choices. A Discussion Paper Prepared for The Brookings Institution Center on Urban and Metropolitan Policy and PolicyLink. April 2001. Available at: <http://www.brookings.edu/es/urban/gentrification/gentrification.pdf>
- <sup>16</sup> Guzman C, Bhatia R, Durazo C. Anticipated Effects of Residential Displacement on Health: Results from Qualitative Research. San Francisco Department of Public Health, 2005. Available at: [http://dphwww.sfdph.org/phes/publications/PHES\\_publications.htm](http://dphwww.sfdph.org/phes/publications/PHES_publications.htm)
- <sup>17</sup> California Newsreel. Backgrounders from the Unnatural Causes Health Equity Database. 2008.
- <sup>18</sup> Yen I, and Bhatia R. How Increasing the Minimum Wage Might Affect the Health Status of San Francisco Residents: A Discussion of the Links Between Income and Health, Working Paper, February 27, 2002.
- <sup>19</sup> California Newsreel. Backgrounders from the Unnatural Causes Health Equity Database. 2008.
- <sup>20</sup> California Newsreel. Backgrounders from the Unnatural Causes Health Equity Database. 2008.
- <sup>21</sup> Yen IH and Syme SL. 1999. The Social Environment and Health: A Discussion of the Epidemiologic Literature. Annual Review of Public Health 20:287-308.
- <sup>22</sup> City of Long Beach Consolidated Plan 2005-2010.
- <sup>23</sup> City of Long Beach 2008-2014 Housing Element. Page II-2
- <sup>24</sup> US Census Bureau. American Fact Finder. 2005-2009 American Community Survey 5-Year Estimates. Available at: [http://www.factfinder.census.gov/servlet/ACSSAFFacts?\\_event=Search&\\_name=long+beach&\\_state=04000US06&\\_county=long+beach&\\_cityTown=long+beach&\\_zip=&\\_sse=on&\\_lang=en&pctxt=fph&\\_submenuId=factsheet\\_1](http://www.factfinder.census.gov/servlet/ACSSAFFacts?_event=Search&_name=long+beach&_state=04000US06&_county=long+beach&_cityTown=long+beach&_zip=&_sse=on&_lang=en&pctxt=fph&_submenuId=factsheet_1)
- <sup>25</sup> Downtown Long Beach Market Study. April, 2009.
- <sup>26</sup> Downtown Long Beach Market Study. April, 2009. P.8
- <sup>27</sup> Centers for Disease Control and Prevention. Healthy Places. "Health Effects of Gentrification". Available at: <http://www.cdc.gov/healthyplaces/healthtopics/gentrification.htm>
- <sup>28</sup> City of Long Beach Consolidated Plan 2005-2010.
- <sup>29</sup> Downtown Long Beach Market Study. April, 2009. P.75
- <sup>30</sup> Downtown Long Beach Market Study. April, 2009. P.9
- <sup>31</sup> Downtown Long Beach Market Study. April, 2009. P.9
- <sup>32</sup> City of Long Beach 2008-2014 Housing Element. Page IV-1. Estimate based on CHAS data (based on Census data).
- <sup>33</sup> McGinnis M, Williams-Russo P. Journal of Health Affairs, v. 21 (2). 2002.
- <sup>34</sup> California Newsreel. Backgrounders from the Unnatural Causes Health Equity Database. 2008.
- <sup>35</sup> Los Angeles County Health Survey, 2007. Percent of Children (0-17 years) Ever Diagnosed with Asthma and Currently Still Have Asthma or Had an Asthma Attack in the past 12 months. [http://publichealth.lacounty.gov/ha/LACHSDataTopics2007\\_rev.htm](http://publichealth.lacounty.gov/ha/LACHSDataTopics2007_rev.htm)

- <sup>36</sup> Los Angeles County Health Survey, 2007. Average Number of Unhealthy Days (Mental and/or Physical) in the past 30 days Reported by Adults (18+ years old). Available at: [http://publichealth.lacounty.gov/ha/LACHSDDataTopics2007\\_rev.htm](http://publichealth.lacounty.gov/ha/LACHSDDataTopics2007_rev.htm)
- <sup>37</sup> Los Angeles County Health Survey, 2007. Percent of Adults (18+ years old) Ever Diagnosed with Depression.
- <sup>38</sup> Los Angeles County Health Survey, 2007. Percent of Adults (18+ years old) Who Reported They Perceive Their Neighborhood to be Safe from Crime.
- <sup>39</sup> California Newsreel. Backgrounders from the Unnatural Causes Health Equity Database. 2008.
- <sup>40</sup> San Francisco Department of Public Health, Program on Health, Equity, and Sustainability. The Case for Housing Impacts Assessment: The human health and social impacts of inadequate housing and their consideration in CEQA policy and practice. May, 2004. Available at: [http://dphwww.sfdph.org/phes/publications/PHES\\_publications.htm](http://dphwww.sfdph.org/phes/publications/PHES_publications.htm)
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- <sup>42</sup> City of Long Beach, 2008-2014 Housing Element, Page II-40
- <sup>43</sup> Antunes JL, Waldman EA. The impact of AIDS, immigration and housing overcrowding on tuberculosis death in Sao Paulo, Brazil, 1994-1998. Soc Sci Med. 2001;52(?);1071-1080.
- <sup>44</sup> Bhatia R, Guzman C. The case for housing impacts assessment: the human health and social impacts of inadequate housing and their consideration in CEQA policy and practice. San Francisco, CA: Department of Public Health; 2004.
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- <sup>46</sup> City of Long Beach 2008-2014 Housing Element. Page II-39
- <sup>47</sup> Downtown Long Beach Market Study. April, 2009. P.75
- <sup>48</sup> Downtown Long Beach Market Study. April, 2009. P.75
- <sup>49</sup> see Downtown Long Beach Market Study. April, 2009. P.75
- <sup>50</sup> US Census Bureau, American Community Survey data.
- <sup>51</sup> California Budget Project. Making Ends Meet: How Much Does It Cost To Raise a Family in California?. P. 7. June, 2010.
- <sup>52</sup> California Budget Project. Making Ends Meet: How Much Does It Cost To Raise a Family in California?. P. 7. June, 2010. This analysis assumes that mortgage payments make up 30 percent of household income and that buyers make a down payment of 5 percent. The affordability gap measures the difference between a county's 2008 median household income and the income needed to pay mortgage costs for the 2008 median-priced home.
- <sup>53</sup> City of Long Beach, 2008-2014 Housing Element, Page II-34
- <sup>54</sup> City of Long Beach, 2008-2014 Housing Element, Page II-34
- <sup>55</sup> California Association of Realtors. <http://www.car.org/marketdata/historicalprices/2010medianprices/dec2010/>
- <sup>56</sup> City of Long Beach Consolidated Plan 2005-2010.
- <sup>57</sup> Source: State Department of Housing and Community Development 2008 Income Limits; Veronica Tam and Associates. Chart 26, City of Long Beach, 2008-2014 Housing Element, Page II-38
- <sup>58</sup> Small Area Fair Market Rent - HUD Demonstration Project for Selected Metropolitan Areas in FY 2011 (<http://www.huduser.org/datasets/fmr.html>)
- <sup>59</sup> City of Long Beach, 2008-2014 Housing Element, Page II-37
- <sup>60</sup> City of Long Beach Consolidated Plan 2005-2010.
- <sup>61</sup> City of Long Beach, 2008-2014 Housing Element, Page II-43
- <sup>62</sup> City of Long Beach, 2008-2014 Housing Element, Page II-39
- <sup>63</sup> City of Long Beach, 2008-2014 Housing Element, Page II-37
- <sup>64</sup> City of Long Beach, FY11 Action Plan. Available at: <http://www.longbeach.gov/civica/filebank/blobdload.asp?BlobID=27326>
- <sup>65</sup> City of Long Beach Development Services Department. City of Long Beach Downtown Plan, Program Environmental Impact Report, Public Review Draft. sch No. 2009071006. December 2010. 4.10-1
- <sup>66</sup> D-EIR. Chapter 4.10-1 (p. 233-238): Population and Housing. p. 233
- <sup>67</sup> City of Long Beach, 2008-2014 Housing Element, Page II-48
- <sup>68</sup> City of Long Beach Consolidated Plan 2005-2010.

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- <sup>69</sup> City of Long Beach Development Services Department. City of Long Beach Downtown Plan, Program Environmental Impact Report, Public Review Draft. sch No. 2009071006. December 2010. 1-24
- <sup>70</sup> City of Long Beach, 2008-2014 Housing Element, Page II-27
- <sup>71</sup> City of Long Beach, 2008-2014 Housing Element, Page IV-1
- <sup>72</sup> City of Long Beach, 2008-2014 Housing Element, Page IV-14. Chart 48: Residential Development Potential and RHNA
- <sup>73</sup> City of Long Beach, 2008-2014 Housing Element, Page IV-1
- <sup>74</sup> City of Long Beach, 2008-2014 Housing Element, Page IV-11
- <sup>75</sup> City of Long Beach, 2008-2014 Housing Element, Page IV-7, 13
- <sup>76</sup> City of Long Beach, 2008-2014 Housing Element, Page IV-14
- <sup>77</sup> City of Long Beach, 2008-2014 Housing Element, Page V-8
- <sup>78</sup> City of Long Beach Downtown Plan. Prepared for City of Long Beach Development Services Department AECOM, Cityworks Design, Iteris, Strategic Economics, and ICF Jones and Stokes. November 2010.
- <sup>79</sup> City of Long Beach Development Services Department. City of Long Beach Downtown Plan, Program Environmental Impact Report, Public Review Draft. sch No. 2009071006. December 2010. 1-24
- <sup>80</sup> City of Long Beach Development Services Department. City of Long Beach Downtown Plan, Program Environmental Impact Report, Public Review Draft. sch No. 2009071006. December 2010. 4.10-3
- <sup>81</sup> City of Long Beach Development Services Department. City of Long Beach Downtown Plan, Program Environmental Impact Report, Public Review Draft. sch No. 2009071006. December 2010. 1-24
- <sup>82</sup> Guzman C, Bhatia R, Durazo C. Anticipated Effects of Residential Displacement on Health: Results from Qualitative Research. San Francisco Department of Public Health, 2005. Available at: [http://dphwww.sfdph.org/phes/publications/PHES\\_publications.htm](http://dphwww.sfdph.org/phes/publications/PHES_publications.htm)
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- <sup>84</sup> Centers for Disease Control and Prevention. Healthy Places. "Health Effects of Gentrification". Available at: <http://www.cdc.gov/healthyplaces/healthtopics/gentrification.htm>
- <sup>85</sup> Long Beach, California, Municipal Code. Division III Relocation Assistance. 21.60.310 - Relocation benefits to be provided. Available at: [http://library.municode.com/HTML/16115/level4/VOII\\_TIT21ZO\\_CH21.60REASMEHONEPEVELOLOINHO\\_DIVIIIIEAS.html](http://library.municode.com/HTML/16115/level4/VOII_TIT21ZO_CH21.60REASMEHONEPEVELOLOINHO_DIVIIIIEAS.html)
- <sup>86</sup> City of Long Beach, 2008-2014 Housing Element, Page II-40
- <sup>87</sup> City of Long Beach, 2008-2014 Housing Element, Page II-33
- <sup>88</sup> City of Long Beach, 2008-2014 Housing Element, Page II-41
- <sup>89</sup> City of Long Beach, 2008-2014 Housing Element, Page II-40
- <sup>90</sup> City of Long Beach, 2008-2014 Housing Element, Page II-26
- <sup>91</sup> City of Long Beach, 2008-2014 Housing Element, Page II-29
- <sup>92</sup> City of Long Beach, 2008-2014 Housing Element, Page II-29
- <sup>93</sup> City of Long Beach, 2008-2014 Housing Element, Page II-28
- <sup>94</sup> City of Long Beach, 2008-2014 Housing Element, Page II-28
- <sup>95</sup> City of Long Beach Consolidated Plan 2005-2010. V-14
- <sup>96</sup> Neighborhood Services Bureau, City of Long Beach. City of Long Beach, 2008-2014 Housing Element, Page II-30
- <sup>97</sup> California Newsreel. Backgrounders from the Unnatural Causes Health Equity Database. 2008.
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- <sup>100</sup> State of California Employment Development Department. Labor Market Information Division. Monthly Labor Force Data for Counties December 2010. <http://www.calmis.ca.gov/file/lfmonth/countyur-400c.pdf>
- <sup>101</sup> City of Long Beach Consolidated Plan 2005-2010.
- <sup>102</sup> For more information see: the Insight Center for Community Economic Development <http://www.insightccd.org/index.php?page=ca-sss>; and the Center for Women's Welfare <http://www.selfsufficiencystandard.org/standard.html#whatis>
- <sup>103</sup> Southern California Association of Governments (SCAG) Regional Council. Profile of the City of Long Beach. May 2009. <http://www.scag.ca.gov/resources/pdfs/LosAngeles/LongBeach-D29.pdf>
- <sup>104</sup> Downtown Long Beach Market Study. April, 2009. P.12
- <sup>105</sup> City of Long Beach Consolidated Plan 2005-2010.

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<sup>106</sup> City of Long Beach Consolidated Plan 2005-2010.

<sup>107</sup> Downtown Long Beach Market Study. April, 2009. P.12

<sup>108</sup> City of Long Beach Development Services Department. City of Long Beach Downtown Plan, Program Environmental Impact Report, Public Review Draft. sch No. 2009071006. December 2010. Greenhouse Gas Emissions Section 4.5-22

<sup>109</sup> David Rosen & Associates Long Beach Downtown Plan Community Benefits Analysis, 2011

<sup>110</sup> David Rosen & Associates Long Beach Downtown Plan Community Benefits Analysis, 2011

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**Letter P-2: Comment Letter from Health Impacts Partners, March 25, 2011**

Comment P-2.1: The commenter provides a Health Impact Assessment for Downtown as an attachment, and states the Assessment was conducted to assess the potential impacts of the Downtown Plan on the health of the local community. The Assessment includes recommendations to lessen impacts of the Plan and cites a number of economic and community benefit factors related to health issues that is suggested the Draft PEIR should address.

Response to Comment P-2.1: The Health Impact Assessment is an independent analysis of the potential health impacts of the proposed Downtown Plan rather than a comment letter on the Draft PEIR. The Assessment is part of the record of comments received on the Draft PEIR and will be passed on to the decision-makers for their consideration when reviewing the EIR and the Downtown Plan. The Health Impact Assessment does analyze the health impacts of new development in the project area, but instead focuses on impacts from the lack of affordable housing and other particular community benefits.

Though not focused on the Draft PEIR, the Health Impact Assessment suggests that the Draft PEIR should include mitigation measures for residential displacement and overcrowding, and should provide an accounting of temporary and permanent jobs generated by Downtown Plan implementation.

Issues related to displacement and community benefits are addressed in Topical Responses #1 and 2. Residential displacement is also addressed in Draft PEIR Section 4.10, Population and Housing. Impact Pop-2 in that section acknowledges that, despite the fact the Plan implementation is expected to add about 5,000 residences within the Downtown area, it may displace existing residences as new housing is constructed. This impact is identified as unavoidable and significant. As the Health Impact Assessment acknowledges, the Downtown area already has high levels of overcrowding; therefore, the development of additional units would be expected to generally aid in relieving this condition. As noted in Section 4.10 (page 4.10-2), displaced tenants would be eligible for relocation assistance if they are displaced. In addition, as noted on page 4.10-4, residential developments in much of Downtown would be subject to 20 percent set-aside requirements for affordable housing. Finally, mitigation has been provided in various Draft PEIR sections (Aesthetics, Air Quality, Transportation and Traffic) to address the physical effects associated with project area development.

With respect to the request for more detailed employment, generalized employment estimates have been developed in order to aid in the analysis of the physical effects associated with employment growth. However, it is not the Draft PEIR's purpose to address socio-economic impacts such as those associated with employment. The potential physical effects associated with employment growth (increased traffic and associated air pollutants and noise, for example) are addressed in the Draft PEIR.