Letter R1

Long Beach Development Services
Public Records Request Form

Please tell us about your request and where we should send your documents.

Your Name: Kerrie Aey	Today's Date: 8/26/2016
Telephone: 562-212-0461	Alternate Telephone:
Your Company (if applicable):	
Your Mailing Address: On File- Please Email or call.	
Email: 6102ka@gmail.com	

Property Address:

Time Period:	All:	Last 5 Yrs:	Last 10 Yrs:	Other:
		x		

Requested Documents:

Note that this request was emailed to Amy Bodek on 8/26/2016.

Please email me the below documents/information needed to review the SEASP DEIR. R1-1

1 .The reduced intensity alternative traffic analysis is completely missing from section 5.16 and Appendix J. Please provide.

2. Long Beach Southeast Area Development and Improvement Plan (SEADIP) Multimodal Existing Conditions, Constraints, and Opportunities Assessment, Fehr & Peers, March 2014. The above document is referenced on page 1, 5.16 Transportation and Traffic (DEIR SEASP) but is not included in Appendix J TIA or the DEIR. R1-2

3. A breakdown of Project Trip Generation Estimates by ITE land use type and ksf. (Existing conditions, Reduced, and Proposed project).

DEIR Page 29, Table 5.16-5 Project Trip Generation Estimates only show "Total" Daily/AM Peak/PM peak trips for existing and proposed. There is a note that states "Source;Fehr & Perrs 2016a." but no information other than that. If the information I am requesting is in the document noted please provide. R1-3

Table 5.16-5 fails to provide any trip generation estimates for the reduced intensity alternative even though the DEIR provides summary information.

Typically the trip generations would be broken down by usage. For example ITE : Multi-Family - ITE 220, General Retail ITE 820, Hotel ITE 100. The ITE factors would then be multiplied by the ksf. The calculation would be presented in simple table showing estimated trips generated by land use.

4. Documents containing the data on how project trip generation estimates were calculated (existing, reduced and proposed project) in a table by land use, (ITE) and sq ft. This is a standard calculation provided in a typical EIR traffic analysis. R1-4

It is my understanding that the trip generation numbers by land use are then used by Fehrs and Peers in their MXD model to factor for mixed use internalization trip reductions.

5. If the EIR does not use standard ITE trip generation calculations could you please send a document showing the method and calculations used. R1-5

6. Page 29 5.16 Environmental Analysis Transportation and Traffic states that "this methodology is described in detail on pages 26 to 31 of the TIA ". (see Appendix J). I believe the page numbers are a typo. There information on page 34 talking about trip generation pertaining to the ITE internalization methodology versus MDX model but no information is provided on how the actual trip generation totals were obtained. Please provide the analysis. R1-6

R1-1

7. Please provide any documents containing empirical data or the technical basis for the use of 0.505 percent per year growth rate used in the SEASP cumulative traffic growth impacts analysis / LOS evaluation. The city has used a 1 percent a year growth rate prior to this EIR. R1-7

From: Kerrie Aley
Date: August 26, 2016 at 7:08:52 PM MDT
To: craig.chalfant
Subject: Request for delay in SEASP DEIR Hearing, public comment period and revision of the DEIR to include "Reduced Intensity Alternative" traffic analysis

Amy/Craig/Councilwomen Price-

- **I am requesting that city staff along with the Planning Commission act to delay the Sept. 19 deadline for comments on the SEASP DEIR.**
- **I believe that the upcoming hearing on this DEIR should be cancelled.**
- **The DEIR should be revised and reissued with the missing traffic information. I have only looked at the traffic analysis in sections 5.16 and Appendix J Traffic Impact Analysis (TIA) but this might apply to other areas of the SEASP DEIR.**

There is no traffic information on the "Reduced Intensity Alternative". Examples of what's missing: R1-8
Section 5.16 T **No Reduced Intensity Alternative**
Table 5.15 Project Trip Generation **No summary data and in the text no LOS analysis summary for the Reduced Intensity Alternative.**
Table 5.16-14 Intersection CMP Analysis shows only Existing, Existing With Project, Cumulative Year (2035) Without Project, Cumulative Year 2035 With Project. **There is no CMP Analysis for the Reduced Intensity Alternative.**

Detailed Trip Generation numbers by land use (ITE) calculations for all three project alternatives have been excluded. See public records request below.

More over the "Reduced Intensity Alternative" was not studied in Appendix J Traffic Impact Analysis (TIA).

I have also noticed that the table of contents do not match the referenced page numbers. I am using the latest documents linked on the city's R1-9
websitehttp://www.lbds.info/planning/environmental_planning/environmental_reports.asp. I've cleared my downloaded files and caching....Something is seriously wrong.

The SEASP DEIR states that

"1.5.3 Reduced Intensity Alternative
The Reduced Intensity Alternative was analyzed to reduce environmental impacts related to air quality, greenhouse gas emissions, noise, and traffic. In order to make a significant reduction to traffic impacts within the Project area, the proposed Project would need to be reduced below existing conditions. Therefore, the Reduced Intensity Alternative would reduce residential development intensity by 30 percent and nonresidential development intensity by 10 percent. This alternative would reduce the number of hotel units to 375." R1-10

I did find a mention of the Reduced Intensity Alternative in section 7.6.16 Transportation and Traffic

"7.6.16 Transportation and Traffic
The Reduced Intensity Alternative *would reduce impacts to the transportation system by reducing the number of vehicle trips. Vehicle trip generation would be reduced by approximately 16 percent during the day, 18 percent during the AM peak hour, and 6 percent during the PM peak hour, as compared to the proposed Project.3 This alternative could reduce the Project's impact at the intersection of Westminster Boulevard at Seal Beach Boulevard in the City of Seal Beach to less than significant.* ***This would eliminate one significant unavoidable adverse impact. However, all other identified impacts would likely remain under this alternative."*** R1-10 CONT'D

There is no analysis or data in the DEIR that supports 7.6.16. Nor doe the above statement show how the traffic volumes or intersection flow could be better with the Reduced Intensity Alternative.

Section 1 of the DEIR states that *"Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. However, only those impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed Project. Impacts involving air quality, cultural resources, greenhouse gas emissions, noise, and traffic were found to be significant and unavoidable. Section 7.8 identifies the Environmentally Superior Alternative."* R1-11

The SEASP DEIR is incomplete and must be revised. R1-12

The proposed project and existing SEASP DEIR 7.6.16 conclusion is effectively the "Spinal Tap" version of LOS goes from E to Z and suggests that adding massive density and traffic inducing developments to already horribly congestion roads does not matter. R1-13

Please note that this email does not include other issues I have with the DEIR. I would like as a minimum a complete DEIR to review.

As you are aware that these hearing are very and long and difficult for everyone and I do not believe that a hearing on an incomplete EIR would benefit anyone.

I have also included a new public records request pertaining to the DEIR traffic analysis here below.

Last week I requested some information on the signal timing of the intersection at PCH/2nd. I have also included a copy below.

I also have an outstanding public records request (over a 1 1/2 years outstanding) pertaining to the Financial Feasibility analysis. The city's Development Services Dept. has refused to comply with that request in violation with the state Freedom of Information laws. I would appreciate any help that you can give in expediting the release of the public records. R1-14

Best Regards,

Kerrie Aley
562-212-0461

Public Records Request:

Please email me the below information needed to review the SEASP DEIR.

The reduced intensity alternative traffic analysis is completely missing from section 5.16 and Appendix J.

1. **Long Beach Southeast Area Development and Improvement Plan (SEADIP) Multimodal Existing Conditions, Constraints, and Opportunities Assessment, Fehr & Peers, March 2014.** R1-15

   The above document is referenced on page 1, 5.16 Transportation and Traffic (DEIR SEASP) but is not included in Appendix J TIA or the DEIR.

2. **A breakdown of Project Trip Generation Estimates by ITE land use type and ksf. (Existing conditions, Reduced, and Proposed project).**

   DEIR Page 29, Table 5.16-5 Project Trip Generation Estimates only show "Total" Daily/AM Peak/PM peak trips for existing and proposed. There is a note that states "*Source;Fehr & Perrs 2016a.*" but no information other than that. If the information I am requesting is in the document noted please provide. Table 5.16-5 fails to provide any trip generation estimates for the reduced intensity alternative even though the DEIR states;

   Typically the trip generations would be broken down by usage. For example ITE : Multi-Family - ITE 220, General Retail ITE 820, Hotel ITE 100. The ITE factors would then be multiplied by the ksf. The calculation would be presented in simple table showing estimated trips generated by land use. R1-16

   I would like to see how the project trip generation estimates were calculated (existing, reduced and proposed project) in a table by land use, (ITE) and sq ft. This is a standard calculation provided in a typical EIR traffic analysis.

   It is my understanding that the trip generation numbers by land use are then used by Fehrs and Peers in their MXD model to factor for mixed use internalization trip reductions.

   If the EIR does not use standard ITE trip generation calculations could you please send a document showing the method and calculations used.

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generation pertaining to the ITE internalization methodology versus MDX model but no information is provided on how the actual trip generation totals were obtained. T R1-16 CONT'D

3. **Please provide any documents containing empirical data or the technical basis for the use of 0.505 percent per year growth rate used in the SEASP cumulative traffic growth impacts analysis / LOS evaluation. The city has used a 1 percent a year growth rate prior to this EIR.** R1-17

August 22 2016 Request for information regarding signal timing. Sent to both Record Coordinator and Development Services.

The documents are located in Public Works Traffic Department and/or Development Services.

Subject: Signal timing at the intersection of PCH and E 2nd (Westminster)
Documents requested:

Long Beach City documents pertaining to signal timing at the intersection of Pacific Coast Highway and E 2nd (Westminster Blvd) in Long Beach. R1-18

A list of CalTrans intersections which are currently operated and maintained by the city of Long Beach.

Correspondence between CalTrans and the City Long Beach pertaining to signal timing of the intersection of Pacific Coast Highway and E 2nd (Westminster Blvd) using Caltrans Adaptive Traffic Control System or any other means.

Both requests are very time sensitive. I would appreciate it very much if I could receive this information in a timely manner. Contact me if you need further information.

From: Kerrie Aley
Sent: Wednesday, September 07, 2016 12:07 PM
To: Amy Bodek
Cc: Council District 3; cityattorney@longbach.gov; Mayor; Craig Chalfant
Subject: Re: Request for delay in SEASP DEIR Hearing, public comment period and revision of the DEIR to include "Reduced Intensity Alternative" traffic analysis

Amy Bodek/ Long Beach Planning Commission/DEIR Comment,

I have issues with the City delaying and/or refusing to provide me the information pertaining to the Draft SEASP Plan and DEIR. R1-19

I have also included my concerns about the City removing all local serving commercial such as grocery stores, gas stations, etc. from the entire SEADIP area and replacing these businesses with regional serving retail, hotel, and office space..

CEQA Issues

Per CEQA guidelines, "No later than the date of the release of the draft environmental impact report, the lead agency shall make available to the public in a readily accessible electronic format the draft environmental impact report and **all other documents submitted to or relied on by the lead agency in the preparation of the draft environmental impact report.**" R1-20

It is also my understanding that the **lead agency shall make an index of copyright-protected or proprietary documents available in an electronic format no later than the date of the release of the draft EIR,** or within five business days if the document is received or relied on by the lead agency after the release of the draft environmental impact report. **The index must specify the libraries or lead agency offices in which hard-copies of the copyrighted or proprietary materials are available for public review.**

Both the Strategic Economics financial feasibility analysis and the Fehr & Peers traffic analysis utilize computer models whose parameters and software library are controlled by technical specifications. The City and consultant relied on the information contained in these documents as the models were developed for the SEASP Plan and DEIR. Typically a customer of a consultant is required to authorize the specification prior to the start of any analysis. What the city has provided in the DEIR is essential two black boxes with no way for the public or other agencies to review how the results were determined. I point out that without the specifications and the parameters as they relate to the specific project the DEIR does not document how these conclusions were determined either. This is in violation of the intent and requirements of CEQA.

For example the DEIR contains no specific trip generation factors (per land use type) and no specifics numbers on the square foot for each land use for existing, reduced or the proposed project. Commercial land uses trip generation vary greatly depending on the specific use, such as *fast food versus sit down restaurant* or *grocery store versus specialty store (small retail).*

How were the existing trip traffic numbers generated and what assumptions were made? R1-20 CONT'D

For the proposed and reduced projected options the trip numbers were then run through Fehr & Peers model to obtain lowered overall mix-use factored trip totals. What assumptions were made as far as trip generation of specific allowable uses? What factors were used to lower the project trip generation and miles traveled for the mixed-use projects? R1-21

Even worse the Fehrs and Peers traffic analysis in the DEIR appendix completely omits analysis for the reduced project option. Why is this acceptable to the city? Again conclusion with no documentation. R1-22

Another example is that the Strategic Economics states that they considered a value of $3,000,000 for land value based on "Broker Estimates" but the city will not provide any basis for this number. Strategic Economics financial feasibility analysis cites "Sources: Dataquick, 2014; Interviews with real estate brokers, 2014; Strategic Economics, 2014" but the city refuses to provide the material used to develop the numbers shown on Figure 10. *Estimated Land Value per Acre*. R1-23

I should of had access to this information when the DEIR was released for public review**.** I should not of had to submit a formal public records requests nor should I have to wait such a long period as the deadline Sept. 19 for DEIR comments is fast approaching. I am again requesting that the DEIR review period be extended so that I can adequately review the information I have requested and not yet received.

At past SEADIP/SEASP Town Hall meetings the public was not allowed to speak or ask questions in general assembly and were there together to only view the city's presentation. Typically at Town Hall meetings attendees openly present ideas and voice their opinions and ask questions of the public representatives in a group setting. R1-24

I and others have been told by Development Services at public input meetings that the city does not have to answer our questions. The city staff should be aware that an email or verbal request for environmental information is a valid Freedom of Information request. In addition a FOI request can be in the form of a question rather than a request for specific documents.

Please note that the above comments are not entirely representative of all of Development Services; C. Koontz has recently answered email questions I had about the Draft Land Use Plan, C. Chalfant has been helpful with general questions and others have provided information on some past projects.

SEADP Changes Commercial Uses R1-25

The Draft SEASP and Draft Land Use Plans changes the ENTIRE SEADIP area from "Commerical-Neighborhood" to **SEASP Regional "Mixed-Use Community Core"** which encourages regional retail, hotel, and office uses.

The attached page 79 of the proposed Draft Land Use Plan shows my neighborhood serving centers and corridors without ANY Neighborhood -Serving Center and Corridors-low and Moderate Place-types. In the Draft Land Use Element grocery stores are a specified acceptable commercial use only for Commerical-Neighborhood.

Page 37 of the Urban Design Element (see attached) confirms the city's intention as the entire SEADIP area is shown as "Regional-Serving Facilities".

The Coastal Act requires that when these mixed-used private dwellings are proposed they are balanced with regional coastal access public serving businesses not my local grocery store.

My neighborhood is suburban in nature with many seniors and families with small children. SEASP discourages large family friendly grocery and retail stores with adequate parking. The SEADIP area is now home to four locally serving grocery stores and many local serving retail stores. R1-25 CONT'D

The way the commercial land use is specified in SEASP and the Draft Land Use Element- people in the proposed mixed use projects will have to get in their car to shop for groceries/drug stores/local services. Residents in Belmont Shore, Belmont Park, Belmont Heights, Naples and other neighborhoods will also have to get in their cars and travel out of SEASP even farther to shop for everyday needs. I do not understand how the city can at the same time take credit for mix-use traffic reductions yet change the commercial use from local to regional serving. Adding to the current traffic congestion regional retail businesses can only succeed if they drawing in large amount of traffic from surrounding cities.

SEASP claims that this plan is smart growth and meets recent legislation requirements for complete streets, green house impacts yet creates a future where we drive farther than we are now.
Given the enormous volume of traffic generated by Ralph's at Marina Pacifica, Trader Joe's at the Marketplace, Whole Foods at Marina Shores, and Gelson's where will the cars go when the grocery stores are replaced by condos, apartments, and regional retail, hotel, and offices uses? Where will a neighborhood of 35,0000+ people buy groceries, sundries and gasoline?

This DEIR fails to address the change in commercial use from local to regional and that's one reason why I want to take at look at the trip generation calculations. R1-26

Most of us are donating our time without any expectation of financial or personal gain other than hoping that we can contribute to the success and well-being of Long Beach. R1-27

Given the obvious lack of significant public participation in the preparation of both SEASP and the Draft Land Use Plan, I hope that Long Beach takes a hard look at how the city communicates and relates to its citizens. The abstruse manner in which the city tries to on one hand to solicit citizens input yet blocks any attempts at reviewing information or asking questions defeats the goal of informed public input. R1-28

Regards,

Kerrie Aley
562-212-0461

Sept. 19 2016

Craig Chalfant, Senior Planner
City of Long Beach Development Services
333 W. Ocean Boulevard, 5th Floor
Long Beach, California 90802
craig.chalfant@longbeach.gov

Please find below my SEASP Plan and DEIR Comments,

1. **Conflicts with the Long Beach City General Plan and the Local Coastal Plan**

CEQA guidelines provide that the "EIR shall discuss any inconsistencies between a proposed project and applicable general plans and regional plans." The SEASP EIR fails to consider the project's conflicts with the Long Beach's General Plan Land Use Plan and Local Coastal Plan (LCP).

While the EIR mentions that the documents will be revised no mention is made of the actual conflicts. By not discussion these conflicts the public and decision making bodies cannot ascertain what these issues are.

The following is a list of inconsistencies between the proposed SEASP plan and the Local Coast Plan (LCP) and Land Use Plan: R1-29

> LCP Page I-4- *"Increased auto circulation in the coastal zone is discouraged by this program because (1) it would not provide increased access to coastal resourced; (2) it would have an adverse impact on the fragile coastal neighborhoods; and (3) there is little unused capacity available in the street system."*

> LCP Page III-S-"*Besides constraints imposed by the nature environment, there are a number of planning constraints that must be addressed. Traffic considerations are prime among these. The highway access advantages cited above also have the distinct disadvantage of forcing large volumes of traffic through the area primarily between Orange County residential community and Long Beach and educational center. Traffic congestion thus imposes a constraint on development density."*

Conflict – SEASP proposes to drastically increase the number of residential units, add additional regional commercial retail and change the nature of the commercial properties from local serving (Commercial-Neighborhood) to regional serving. See definitions from Draft Land Use Plan (2016).

The changes will greatly increase the number of vehicles due to increase in population and the fact that the additional regional serving commercial will draw traffic outside the area.

SEASP replaces local serving with regional attracting commercial businesses. The loss of local serving retail will force the 35,000 plus locals that use the existing four grocery stores Ralphs, Trader Joes, Whole Foods, and Gelson's to travel from Naples, University Park Estates, Belmont Shore, Belmont Heights, Alamitos Heights and Belmont Park to surrounding areas to buy food and sundries. Because proposed mix-use apartment/condos are adjacent to regional commercial developments it is unlikely that there will be significant traffic reduction as this residents will also have to travel outside the SEASP area to do everyday shopping. The proposed SEASP plan violates the current Land Use Plan by failing to "Preserve and enhance neighborhood qualities." R1-30

Source Reference:

A Specific Plan For Implementation SEADIP 1977

"The following shall be considered as the planning objectives for development of the SEADIP area:
a) No high-rise or higher intensity development catering to a regional market shall be developed.
h) Local resident-serving uses such as convenience shopping and compatible workplaces, reducing energy use and external trips are to be emphasized.

Draft Land Use Plan (2016)/SEASP- Excludes SEASP from Commercial-Neighborhood Zoning

Commercial Districts, Neighborhood Pedestrian (CNP) Zoning District.
Mixed Use Community Core This is envisioned as the primary activity center in the Project area. It provides for a mix of uses, including residential, regional retail, hotel, and office uses. The focus of this designation is on creating a pedestrian-scale environment, including increased connectivity, gathering spaces, and linkages to the marina and wetlands.

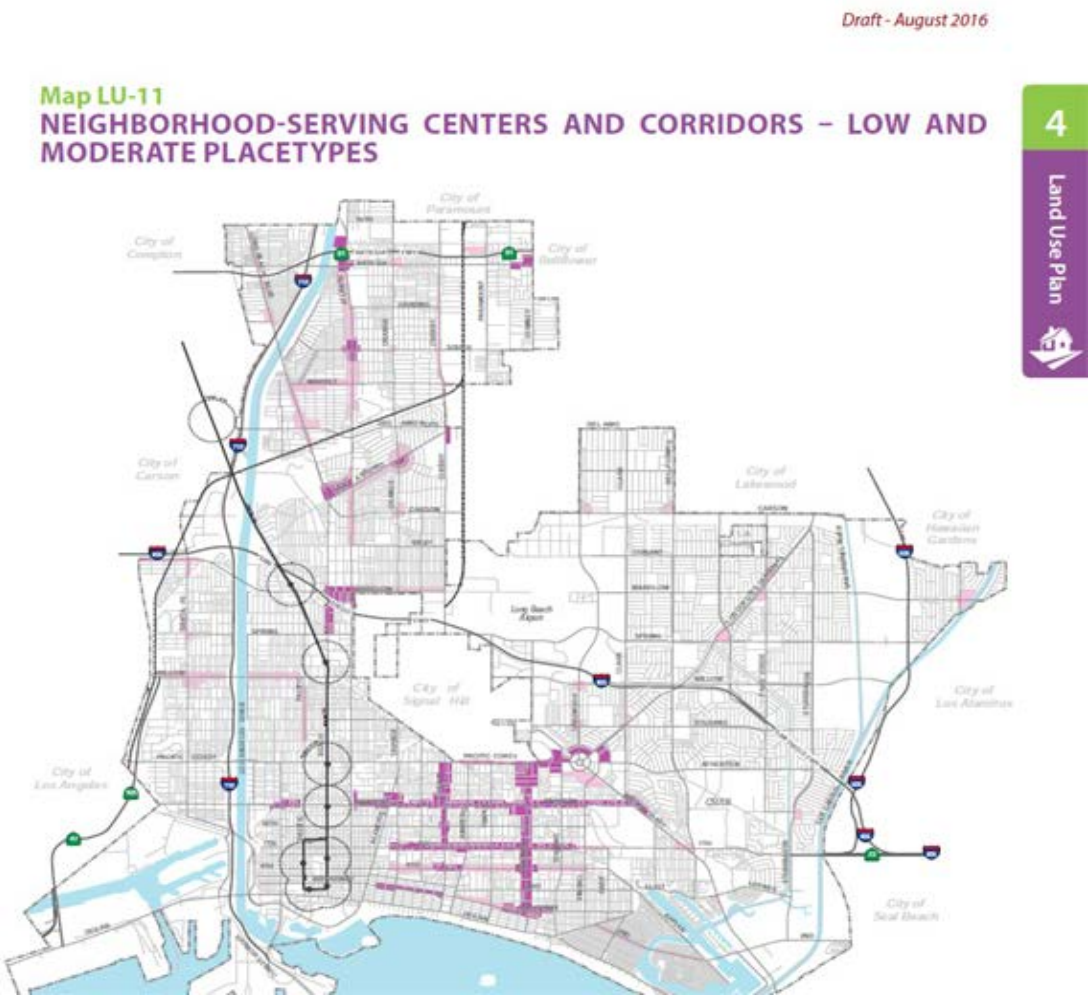
R1-30 CONT'D

Mixed Use Marina
Provides for a mix of uses, including residential, neighborhood retail, hotel, visitor-serving recreation, and marina. The focus of this designation is on creating a strong interface and connections with the Los Cerritos Channel and Marina. This area is also a transition from the Mixed Use Community Core areas to lower density residential uses north of Los Cerritos Channel. Coastal recreation uses (e.g. boating, kayaking, etc.) and public access to coastal waters are encouraged in this area.

Commercial-Neighborhood
This designation provides for neighborhood-oriented commercial uses, such as restaurants, retail, grocery, personal services, etc. It is intended to service smaller scale local retail needs and must comply with Long Beach Municipal Code Chapter 21.32.

NOTE: The entire SEADIP area has been changed to regional commercial use in the proposed SEASP plan. See figures below.

65 Draft Land Use Plan (2016)

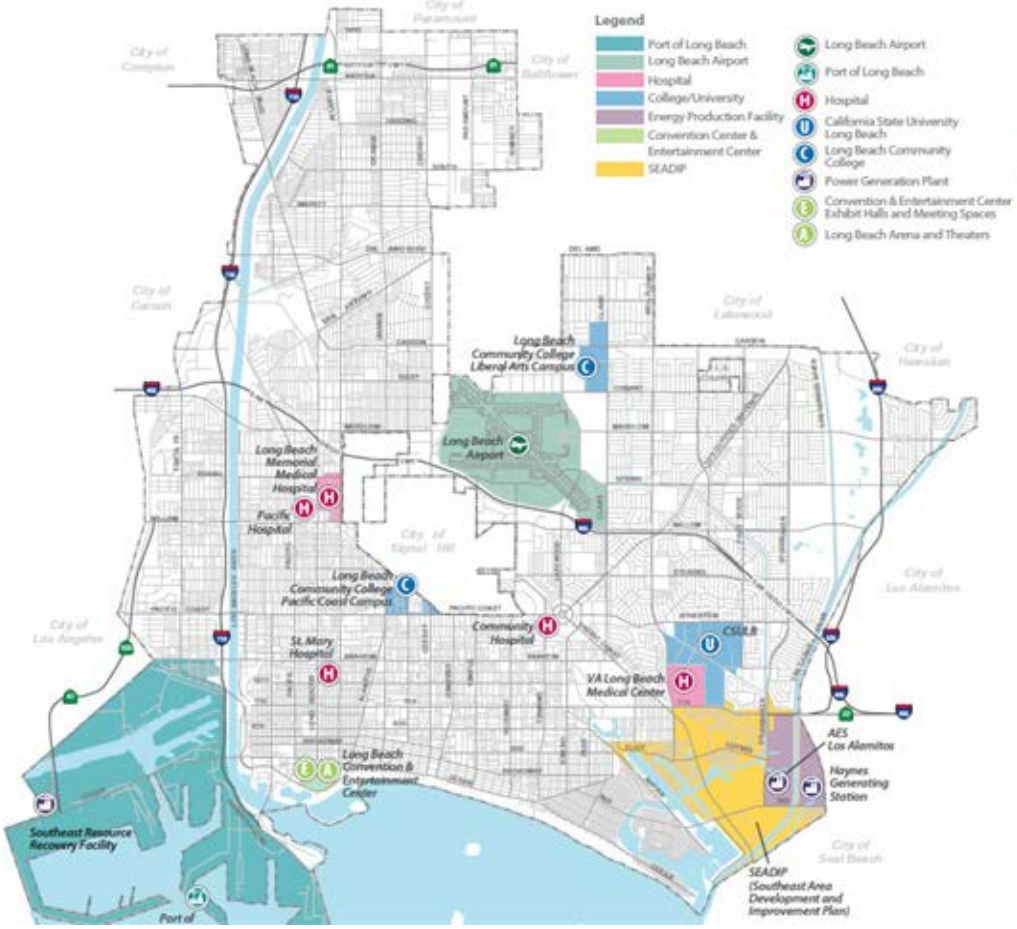


R1-30
CONT'D

66

67 Note the removal of all Neighborhood-Serving Centers and Corridors in SEASP area.

Map LU-3
Regional-Serving Facilities



R1-30 CONT'D

Note change in SEADIP area from locally serving commercial to SEASP Regional Serving Facilities.

The SEADIP plan required local serving neighborhood businesses.

72 LCP Page I-10

Page I-10

TABLE I

	Downtown	Area A	Area B	Area C	Area D	Area E	SEADIP	Totals
Total Population	1,100	9,214	2,810	4,902	6,911	6,379	11,306*	42,622
% 65 + years	42.0%	28.0%	17.0%	10.0%	10.0%	7.0%	n/a	16.4%
Average Income	$10,148	$15,000	$19,000	$23,000	$21,000	$30,000	n/a	$20,815**
Total Dwelling Units	1,000	4,395	1,376	2,812	4,342	2,646	5,335*	21,906
% Needing Rehabilitation	n/a	13%	13%	8%	6%	6%	n/a	9.0%
Total Acres	22.8	147	231	357	304	468	1,500	3,113.8
D/U Per Acre	48	30.0	5.9	7.9	14.3	5.7	3.2	6.8
Owned Units	--	1,551	516	1,109	1,804	1,410	n/a	6,390
Rental Units	--	2,844	860	1,703	2,538	1,236	n/a	9,181
% Owned	00	35%	37%	39%	42%	53%	n/a	41.0***

* Existing and Estimated Future Units/Population
** Weighted Income
*** Excluding Downtown and SEADIP

Source: Long Beach Department of Planning and Building, 1979

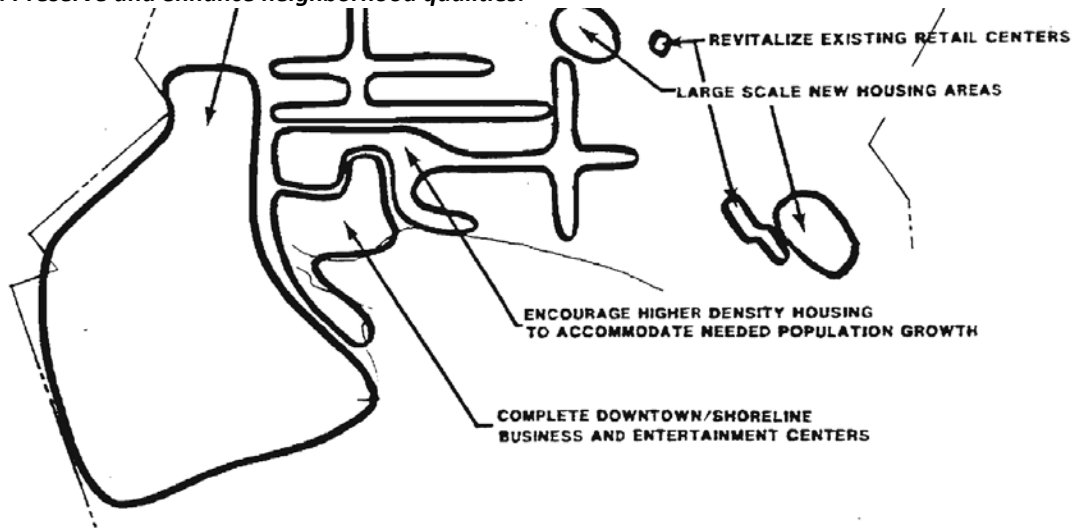
R1-30 CONT'D

73

74 LCP Page III-S-5

75 *"Approximately 440 acres are set aside for development of relatively low density housing that will provide a family oriented living*
76 *environment (a total of 2,898 units at an average density of 6.6 dwelling units per gross acre)."*

77 Land Use Plan- Page 48 "*Generalized Concept Plan. The map which follows presents a generalized concept of some of the*
78 *fundamental policies of the Land Use Element. Those policies are represented geographically by the outlined areas on the map, and*
79 *are identified by abbreviated policy statements. The largest areas on the map-those portions not encircled by dark outlines- are*
80 *primarily residential in nature and are governed by the policy expression at the bottom of the map, namely* ***"Maintain existing***
81 ***densities. Preserve and enhance neighborhood qualities."***



ALL OTHER AREAS...MAINTAIN EXISTING DENSITIES. PRESERVE AND ENHANCE NEIGHBORHOOD QUALITIES.

-49-

R1-31

82

Conflict- The current Land Use Plan was a smart growth plan which concentrated higher density housing downtown in an urban setting and required that in other parts of the city "maintain existing densities" and that "existing neighborhood qualities be preserved and enhanced".

The proposed SEASP plan replaces suburban residential densities and local serving commercial businesses with population increases comparable to downtown and at the same time destroys the village like character of the South East side of Long Beach. The increases in density and heights also compromise a goal that the Los Cerritos Wetlands and open space be protected and preserved. The loss of local serving commercial businesses and adequate parking also harms the suburban family and senior friendly characteristics of the area.

SEASP Table 3-2 Southeast Area Specific Plan Land Use Summary

Existing Projection Net Increase

	Existing	*Projection*	***Net Increase***
Dwelling Units	*4,079*	*9,518*	***5,439***
Population	*6,486*	*15,134*	***8,648***
Commercial/Employment (SF)	*2,091,476*	*2,665,052*	***573,576***
Employees	*3,555*	*4,115*	***560***
Hotel Rooms	*375*	*425*	***50***
Acres	*1,3811*	*1,4722*	***0***

Source: City of Long Beach; PlaceWorks (October 2015; March 2016).

R1-31
CONT'D

Long Beach Downtown Plan PEIR (2010)
6.0 No Project/Existing Zoning Alternative
6.4.1 No Project/Existing Zoning Alternative

"Unlike most master plan projects, the intent of the proposed Long Beach Plan is not to allow increased residential density or intensity of permitted commercial uses, but rather to provide a renewed focus on elements of exceptional urban design and neighborhood vitality. High residential densities are currently allowed by the existing land use districts, which permit residential densities from 30 dua to 108 dua, and two of the Plan Project area districts allow up to 249 dua. The PD-30 district regulations that encompass most of the Plan Project area west of Alamitos Avenue, allow densities ranging from 31 dua to 96 dua. The portion of the project that is within the PD-29 district is located between 7th Street and 10th Street and generally between Pine Avenue and Elm Avenue. The existing permitted density in this area is up to 108 dua. The range and type of commercial uses allowed under the PD-29 and PD-30 regulations, and the permitted height of buildings (as described in Section 4.8 of this PEIR) would not substantially differ with adoption of the proposed Plan."

R1-32

1.4.1 Cumulative Project Trip Generation

Table E-1 summarizes total net future trip generation of the Cumulative Projects (Without Project) within the study area by traffic analysis zone. Note that the trips are net trips and they account for all of the adjustments described above. The trip generation forecasts for the Cumulative Projects are – 38,994 daily trips, 2,419 AM peak hour trips (accounting for all adjustments) and 2,716 PM peak hour trips (accounting for all adjustments)

Table E-1: Summary Trip Generation of Cumulative Projects

Land Use Zones	Pending/Approved Projects					Total Trips						
						AM			PM			Daily
	Residential (DUs)	Office (KSF)	Shopping Center (KSF)	Restaurant (KSF)	Hotel (Rooms)	Total Trips	Ins	Outs	Total Trips	Ins	Outs	Total Trips
Cumulative Projects (without Project Scenario)												
3	291	535.00	8.00	2.00		673	513	160	683	195	488	5,965
12	624		16.74	4.18		258	81	177	329	200	128	5,821
13	166		14.90	3.72		141	58	83	185	106	79	3,444
14	96		3.70	0.92	191	158	72	86	196	109	87	3,617
24	324		10.10	2.53		161	53	108	205	123	82	3,640
28	1,586	340.00	37.42	9.36	265	1,027	554	473	1,163	552	611	16,507
Subtotal	1,501	535.00	53.44	13.35	191	**2,419**	**1,331**	**1,087**	**2,761**	**1,285**	**1,476**	**38,994**

Source - ITE Trip Generation, 8th Edition, 2009. Equation based trips were used where available, otherwise average trip rates were used.
Reduction for Pass-By, Transit Trips were applied only to the AM and PM peak hours only.
Per the guidance from the City of Long Beach staff, density for restaurant land uses assumed to be 20% of the total retail land use density.
No reductions are applied to the daily total trips.

1.4.2 Year 2035 Without-Project Traffic Operations

11 intersections are projected to be operating at LOS E or LOS F (4 are currently operating at LOS E or F). The 11 intersections are:

- Magnolia Avenue and 6th Street – LOS E (PM Peak Hour)
- Magnolia Avenue and Ocean Boulevard – LOS E (AM Peak Hour)
- Pine Avenue and Broadway – LOS E (PM Peak Hour)
- Long Beach Boulevard and 7th Street – LOS E (AM Peak Hour)

TABLE E-2: SUMMARY TRIP GENERATION OF DOWNTOWN COMMUNITY PLAN

Land Use Zones	Downtown Community Plan					Total Trips Generated by the Community Plan						
						AM			PM			Daily
	Residential (DUs)	Office (KSF)	Shopping Center (KSF)	Restaurant (KSF)	Hotel (Rooms)	Total Trips	Ins	Outs	Total Trips	Ins	Outs	Total Trips
Downtown Community Plan (with Project Scenario)												
2	40					18	3	15	21	14	7	290
3		150.00	4.00	1.00		224	188	36	227	54	174	1,880
4	500	250.00	12.00	3.00	60	521	331	190	567	227	341	7,039
5	80					32	5	27	37	25	12	530
6	20					11	2	9	12	8	4	159
7	280		48.00	12.00		298	133	165	392	220	172	7,315
8	320					97	16	80	115	77	38	1,769
9	800	460.00	64.00	16.00		938	597	341	1,045	428	617	13,468
10	320	55.00				183	92	91	219	95	124	2,151
11	280	60.00				179	96	83	212	88	124	1,987
12	340	110.00				251	149	102	271	107	164	2,564
13	320	175.00	100.00	25.00		698	421	277	832	383	449	12,786
14	180	175.00				278	202	77	275	83	193	2,120
15	120					44	8	37	52	35	17	754
16	20					11	2	9	12	8	4	159
17	280		64.00	16.00	60	374	175	199	500	277	222	9,600
18	20		28.00	7.00	120	199	107	92	273	144	129	5,465
19	220		64.00	16.00	240	449	220	229	546	297	249	10,913
20	110	65.00				140	94	46	160	51	109	1,141
21	20					11	2	9	12	8	4	159
22	240				40	90	20	70	115	74	41	2,109
23	140				120	101	36	66	129	77	53	2,309
24	180				100	102	32	70	131	80	52	2,341
25	20				20	16	5	11	24	14	9	711
26	40					18	3	15	21	14	7	290
27	110				40	54	14	40	72	45	27	1,430
Subtotal	5,000	1,500.00	384.00	96.00	800	**5,338**	**2,952**	**2,386**	**6,273**	**2,932**	**3,341**	**91,439**
TOTAL						**7,757**	**4,284**	**3,474**	**9,034**	**4,217**	**4,817**	**130,433**

Source - ITE Trip Generation, 8th Edition, 2009. Equation based trips were used where available, otherwise average trip rates were used.
Reduction for Pass-By, Transit Trips were applied only to the AM and PM peak hours only.
Per the guidance from the City of Long Beach staff, density for restaurant land uses assumed to be 20% of the total retail land use density.
No reductions are applied to the daily total trips.

R1-32 CONT'D

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2. Financial Feasibility

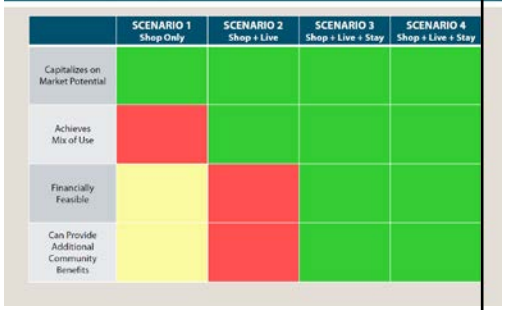
"A Financial Feasibility Analysis was prepared as part of the current SEADIP Plan development effort. This analysis serves to inform the type of uses and density and intensity of development feasible under current market conditions. In addition to social and environmental considerations, ***the economic considerations identified in the analysis help shape our efforts to develop a Specific Plan for Southeast Long Beach*** *that is both sustainable and implementable."*
City of Long Beach- SEASP Town Hall

On December 14 2014 The city presented Financial Feasibility Findings which stated that only Scenario 3 and Scenario 4 were financially feasible.

Overview of Scenarios

	SCENARIO 1 Shop Only	SCENARIO 2 Shop + Live	SCENARIO 3 Shop + Live + Stay	SCENARIO 4 Shop + Live + Stay
Development Type	Single-Story Retail Center	1-3 Stories Mixed-Use	1-5 Stories Mixed-Use	1-7 Stories Mixed-Use
Housing Units	None	72 townhomes	416 flats	710 flats
Ground-Floor Retail	None	None	7,000 sq. ft.	109,000 sq. ft.
Single-Story Retail	140,000 sq. ft.	62,000 sq. ft.	29,000 sq. ft.	None
Hotel Rooms	None	None	60 rooms	90 rooms
Parking Type	Surface parking	Surface parking, on-street parking, and private garages	Surface parking, parking structure, and podium parking	On-street parking, parking structure, and underground parking
Usable Open Space as % Site Area	15%	26%	20%	26%
% Internalization	10%	8%	28%	33%

Summary Comparison of Scenarios



R1-33

On February 1 2015 after learning that the public was not allow to get further details on the Financial Feasibility analysis. I submitted a public records request asking for the city to "provide supporting documentation which the city used to make the assumption for SEADIP that "Land values are currently $3 million – $4 million/acre." The city refused to give me any information for over 4 months.

Then on July 16 2015 the city sent me the following email
Good afternoon Ms. Aley, I am providing you with a PDF of the memorandum that our consultant, Strategic Economics Inc., wrote to summarized the financial feasibility analysis for four development scenarios in the SEADIP Plan Area. The Department of Development Services (Department) does not have other documents responsive to your request. The information for the December 10, 2014 SEADIP presentation came from DataQuick, a company that tracts real estate transactions and that the Department pays to access on-line. The Department does not have physical records of the data viewed on DataQuick.

Per discussions with the City Attorney's office, we are not required to print out and provide proprietary data from a service we pay to access as a part of a Public Records Act request. For more information about obtaining information from DataQuick, please contact them directly.
Thank you. Anne Hudson Assistant Administrative Analyst

Attached to this email was a: Memorandum for Strategic Economics June 26 2015-Financial Feasibility Analysis date June 26, 2015. In this document it says that:

> *" To determine the land value of sites in the SEADIP area, the Consultant Team analyzed recent sales transactions (sold from 2013-2014) in Long Beach and surrounding areas, and conducted interviews with real estate brokers. Figure 10 illustrates the results of the analysis of recent land transactions, showing that the average land value per acre is $3.8 million. Brokers estimated the average value of properties in the SEADIP area at $3 million per acre. For this financial analysis, the value was estimated as a range of between $3 and $4 million per acre, reflecting the fact that the land values of individual properties in the SEADIP area are likely to vary depending on location, access, size, and other conditions"*

Even though the SEASP plan continued to be developed, between February and July 16 2015 the city refused to provide me with any public records. I have heard complaints from many others who questioned this analysis but were ignored by city staff.

On August 28 2016 I again reminded Amy Bodek the head of Development Service that the city had not complied with the Freedom of Information Act, that I had no information on the broker's estimates or source information about the analysis and was told that the information I had requested was "**proprietary**". Concerned I began doing my own research with the information I had.

Several years earlier the owners of the SeaPort Marina Hotel submitted to the city a plan for a commercial center totaling 245,000 square feet (216,000 square feet of retail space and 29,000 square feet of restaurant space) and 1,172 on-site parking spaces (1,044 space three-level parking structure and 128 surface parking spaces). The proposed commercial structures would be one- and two-story buildings with a maximum height of 35 feet.
http://www.gazettes.com/news/seaport-marina-hotel-owners-add-partner-to-redevelop-property/article_e202837a-49eb-11e6-aade-17ad111ed542.html

If the city's financial feasibility study is valid why is this property owner proposing a retail commercial project that the city says is not financially feasible?

I then decided to look at the properties used in the Strategic Economics Memorandum Figure 10

Figure 10. Estimated Land Value per Acre

R1-33 CONT'D

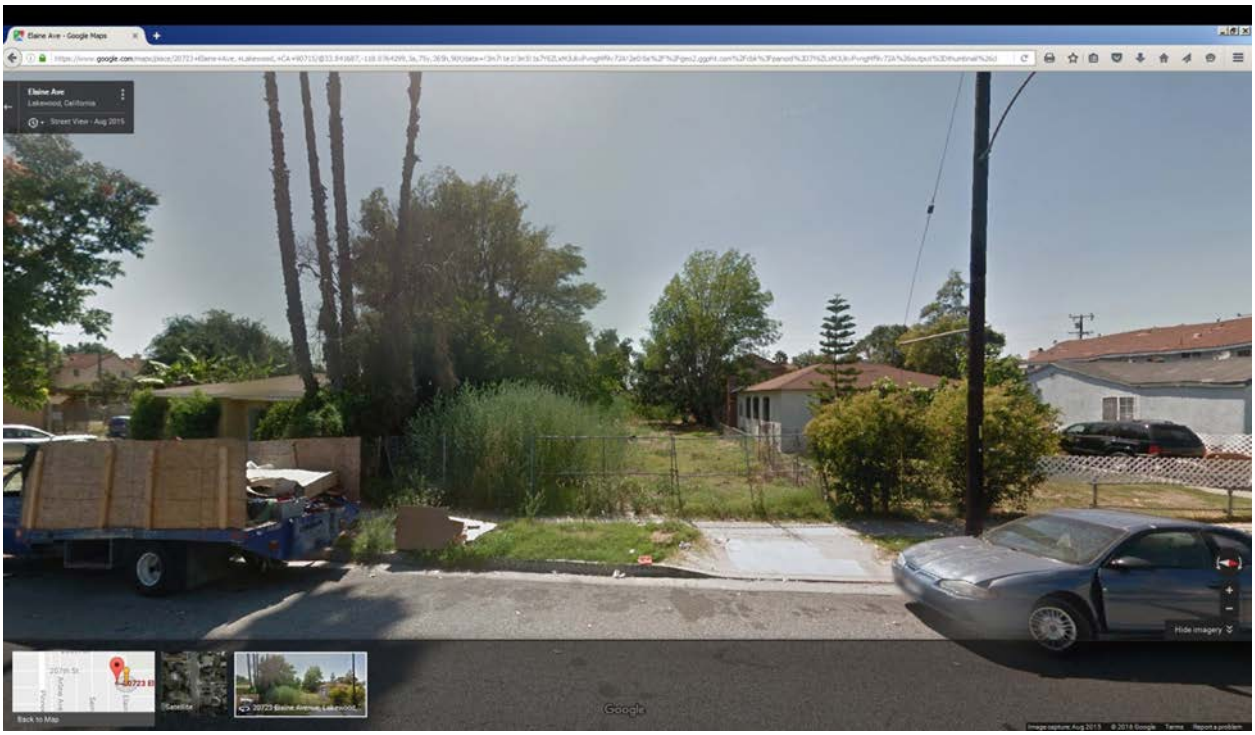
Site Address	Location	Sale Date	Price	Acres	Value/ Acre
4400 E Los Coyotes Diagonal	Long Beach	2014	$9,982,000	1.6	$6,178,908
20723 Elaine Ave	Lakewood	2014	$404,000	0.4	$1,126,215
4415 Parkview Drive	Lakewood	2014	$700,000	0.4	$1,978,202
1439 E Burnett St	Signal Hill	2012	$1,738,500	1.3	$1,333,845
1081 Long Beach Blvd	Long Beach	2013	$2,700,000	0.6	$4,443,722
1332 Locust Ave	Long Beach	2013	$1,900,000	0.4	$4,428,961
3855 N Lakewood Blvd	Long Beach	2014	$3,834,000	0.5	$7,111,912
Average Value per Sq. Ft.			$3,800,252		
Broker Estimates*			$3,000,000		

*Estimates of land value based on interviews with brokers.
Sources: Dataquick, 2014; Interviews with real estate brokers, 2014; Strategic Economics, 2014.

What I found is that the above six properties used to valuate land value are not comparable to the commercial properties in the SEASP area. The properties used in the valuation were alarming-- a trash strewn vacant residential lot near Norwalk/DelAmo, two REO foreclosure sales (RiteAid Center and a parking lot), properties located in the poorest most crime ridden areas of Long Beach with median household incomes of $20,000. Apparently the average value per square foot was not low enough so the number was dropped from $3.8 to $3 million per acre based on unnamed broker's advice.

Here are photos of the properties used in the city's Financial Feasibility Analysis:

20723 Elain Avenue Lakewood



R1-33
CONT'D

1081 Long Beach Blvd. Urban Village Apartments

1439 E Burnette St. Signal Hill

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187 1332 Locust Avenue Long Beach

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R1-33
CONT'D

3855 N Lakewood Blvd Long Beach

R1-33
CONT'D

4415 Parkview Lakewood

4400 E Los Coyotes Diagonal

R1-33
CONT'D

The zoning for Figure 10 properties were single family home mixed use, industrial and commercial retail and don't represent the properties in the SEADIP area. If the city wanted to provide fair estimates of SEASP land value why didn't they just hire a professional land appraiser?

Here is a photo of the SEASP waterside Marina Pacific Mall.

Because of the disparity between the properties used for valuation and the actual SEASP properties I believe that the Strategic Economics Financial Feasibility Analysis included with SEASP Plan and the DEIR is bogus.

Page 33 of Section 5. Environmental Analysis Transportation and Traffic, the DEIR conflicts with the city's own feasibility analysis by including a SEADIP conforming proposed 1-3 story retail center as a cumulative traffic impact.
"The existing Seaport Marina Hotel will be demolished, and a commercial center with retail and restaurant space will be constructed at the corner of 2nd St & Pacific Coast Highway".

Land values are not fixed and are dependent on

- Location
- What's already built on the property
- Parcel specific problems (i.e. land fill, contamination)
- The current zoning
- What the regulations developers anticipate or speculation as to what will be allowed in the future
- Real Estate Market Conditions

Predicting 40 years of developer profitability based on the SEASP land scenarios used in the Feasibility Study is ridiculous. The feasibility analysis should be eliminated from the SEASP Plan and DEIR. The SEASP land use plan should be developed with the specifics needs of our community. Priority should be on preserving the city's last remaining open space and protecting wildlife… not real estate development speculation. R1-33 CONT'D

3. Page 26 KEY CONSIDERATIONS

> *"Is there enough "developable" property to generate enough funds to help pay for restoration and/or maintenance? One of the first items for the City and the consultant team is to determine if there are sufficient opportunities for development to fund the restoration.*
>
> *Costs: "There is an opportunity for the existing parties to the plan to develop an in-lieu fee program that can sell compensatory mitigation credits to the ports and other entities in need of mitigation. Along these same lines, water quality/total maximum daily load (TMDL) credits and carbon sequestration credits could also be generated and sold to ensure the cost of long-term protection is secure. In addition, because the final Specific Plan will demonstrate a collective approach to the restoration, the project(s) will be very competitive for state or federal grants."*

The SEASP/DEIR fails to mention that the owners of oil drilling properties are required by law to pay and clean up their own properties and that funding for restoration is a separate issue from development.

There is no evidence that the project will be competitive for state or federal grants or that TML/sequestration credits could be generated.

The Coastal Act does not require that a project has enough "developable" property to generate enough fund to help pay for restoration and/or maintenance.

Neither is the Coastal Commission or the City of Long Beach required to ensure that a developer is guaranteed a profit through changes to a land use plan based on hypothetical "Feasibility Studies".

4. **Freedom of Information Issues**

The city has told me that details in both the financial feasibility (Strategic Economics) and the traffic analysis (Fehr and Peers) are proprietary and that they will not comply with my public records request. I cannot complete my comments on the plan or draft environmental report. Long Beach has hired consultants and then simply denies public access to their work by telling me that the work is confidential or proprietary. R1-34

It is my understanding that

> Per CEQA guidelines, "No later than the date of the release of the draft environmental impact report, the lead agency shall make available to the public in a readily accessible electronic format the draft environmental impact report and all other documents submitted to or relied on by the lead agency in the preparation of the draft environmental impact report."

> And that the lead agency shall make an index of copyright-protected or proprietary documents available in an electronic format no later than the date of the release of the draft EIR, or within five business days if the document is received or relied on by the lead agency after the release of the draft environmental impact report. The index must specify the libraries or lead agency offices in which hard-copies of the copyrighted or proprietary materials are available for public review.

The SEASP Plan, LCP amendment and Draft Environmental Impact Report should be rejected. All documents relied on by the lead agency to prepare these documents should be made available to the public.

5. **SEADIP and Conditional Use**

The SEADIP plan is not available for public review. The City of Long Beach has attempted to squash any comparisons or knowledge of the original standards of the SEADIP plan by ghosting the existence of this document:

> "*A Specific Plan For Implementation- South East Area Development and Improvement Plan*".
> This was the General Plan Amendment Specific Plan Adoption April 1977"

The city has not made this document readily available online or to the various task force/committee members I have talked to. The current SEADIP plan is not available on the LDDevelopment Services online list of SEADIP Documents & Reference Materials. R1-35

The only information I could find was the zoning document PD-1 SEADIP. PD-1 has been amended twelve times. PD-1 states that:

> "In reviewing and approving site plans and tract maps for the development of the areas within the City of Long Beach, the City Planning Commission shall be guided by the goals and policies of the Specific Plan and the Commission shall not permit variance from those standards unless it finds that such variance meets the intent of the **original standards** and is consistent with the overall goals and objectives of the adopted Specific Plan."

*The city should make the original SEASIP standards-"A Specific Plan For Implementation- South East Area Development and Improvement Plan" readily available for public review prior to release of the revised DEIR***.**

I was only able to obtain the original SEADIP standards from a 90 year old member of the original committee member.

Special Use Permits- In addition the DEIR should be rewritten to include the PD-1 Special Use Permits and describe the impacts of current condition commercial developments that were allowed through the use of Special Use Permits. :

> SUBAREA 13- a. Use: Commercial- b. This area is fully developed in accordance with Special Use Permit S-44-73.
> SUBAREA 16- a. Use: Commercial b. This area is fully developed in accordance with Special Use Permit No's. S-167-72 and S-13-61.
> SUBAREA 18- a. Use: Commercial b. This area is fully developed in accordance with Special Use Permit No. S-29-75. Also see Area 26.
> SUBAREA 19- a. Use: Industrial c. Commercial storage/self-storage (21.15.570) shall be allowed by Conditional Use Permit (21.52.219.5).

One obvious reason for the need for these discussions is to look at what was allowed at the 1979's mixed-use project Marina Pacifica Mall and Condos. When the mall went into bankruptcy the city allowed the property owner to block off most mall access to coastal waters and the property has turned into a strip center mall rather than the original SEADIP intent (small retail businesses, restaurants and public spaces with views of the water). R1-36

Now the city has presented architectural renderings of the Marina Pacifica Mall turned into an even more dense mixed use commercial/condos project on top of what was originally planned for Marina Pacifica. After decades of redevelopment and increased density most mixed use retail has failed in downtown, so why is the city proposing mixed use in the low density suburban context of South-East Long Beach?

The DEIR should be rewritten to analysis and discuss current conditions and as fully built to SEADIP (without the Special Use Permits).

6. SEASP Study Session Commissioner & City Staff Testimony Under Oath was misleading and factually not true.

On August 18 2016 the city's Planning Commission held a "SEASP Study Session". The city stated that they were taking testimony on the plan and DEIR. In response to public testimony city staff and commission members made statements that were misleading and factually not true.

- At 2:15:07 Financial Feasibility

  C. Kootz states that based on the feasibility study that there is "no market for 3 story development".

  This statement is not true as the owner of the Seaport Marina Hotel has submitted a plan to the city that included structures that were 35 feet (3 stories) high and meet the current requirement of SEADIP. R1-37

  7/14/2016 Gazette, by Harry Saltzgaver Executive Editor

  Cherin said. "We're hoping to have something by the end of the summer… As it stands, there is no residential and no hotel, so it would fit under the current and the new zoning."

  The owner of the Seaport Marina Hotel has submitted development plans for this property which proposed a 3 story commercial center. In the proposal submitted several years ago, the plan was for a commercial center totaling 245,000 square feet (216,000 square feet of retail space and 29,000 square feet of restaurant space) and 1,172 on-site parking spaces (1,044 space three-level parking structure and 128 surface parking spaces). The proposed commercial structures would be one- and two-story buildings with a maximum height of 35 feet."

- At 2:15:20 Density

  While responding to my earlier testimony regarding the proposed density in SEASP and downtown density, C. Kootz states that the LCP contains wording that states concentrated density should be downtown. Then he goes onto compare the Floor Area Ratios between downtown and proposed density in SEASP and says that downtown is still denser.

  This is not factually true. If you review section 1. of my DEIR comments I list all the sections of the LCP and Land Use Plan that the city has neglected to discuss in the DEIR. On page 5 of this document you will find a map in the Land Use Plan (page 49) that clearly states that "ALL OTHER AREAS...MAINTAIN EXISTING DENSITIES. PRESERVE AND ENHANCE NEIGHBORHOOD QUALITIES."

  Then C. Kootz goes onto to compare the Floor Area Ratios and heights between downtown and those for proposed for SEASP and finishes by saying that downtown is orders of magnitudes denser. As you can see from my earlier discussion there is NO mention of Floor Area Ratios (FAR) in the SEADIP, LCP or Land Use Plan… just population, the number of dwellings per acre, heights and open space.

  However if you used any definition of density the city is still violating the current Land Use Plan by failing to "maintain existing densities" as defined in SEADP, the LCP and the General Plan Land Use Plan.
  I can find no section in the LCP that states what C. Kootz is refers to in his testimony.

  The DEIR should be rewritten to present a comparison between the proposed densities versus the current requirements using all current SEASP, LCP, and Land Use Plan definitions of density, open space, population, heights

and dwelling per acre versus density as defined in the proposed SEASP plan. The conflicts between the proposed SEASP plan and the higher planning documents should be clearly stated and discussed. R1-37 CONT'D

- 02:32:05 **Signal Timing**

Commissioner Van Horik brought up the existing and future issues with signal timing in the SEASP area. City staff C. Kootz stated that the reason the city has been unable at this point to work with CalTrans to improve signal timing near the intersection of PCH and 2nd is that "***the truth is the city is not necessary as lawyered as a developer whose building permit is held up*".**

Through a Public Records request I requested from both Long Beach and CalTrans the following:
"Documents pertaining to signal timing at the intersection of Pacific Coast Highway and E 2nd (Westminster Blvd) in Long Beach. A list of CalTrans intersections which are currently operated and maintained by the city of Long Beach. Correspondence between CalTrans and the City Long Beach pertaining to signal timing of the intersection of Pacific Coast Highway and E 2nd (Westminster Blvd) using Caltrans Adaptive Traffic Control System or any other means."

In documents obtained from Long Beach Public Works I was able to determine that the Long Beach is under contract with CalTrans for Maintenance and Operation of the State Owned Signals at all PCH intersections in Long Beach. (Reference : 2007 Agreement of Maintenance of State Highways in the City of Long Beach Agreement 190015507.). In the SEASP area the costs of operation and maintenance of the intersections are paid for through cost distributions paid for by Long Beach and the State of California.

R1-38

PCH Route 1-

Studebaker	Cost Distribution City/State	50%/50%
2nd St-Westminster	Cost Distribution City/State	50%/50%
Marina Pacifica Mall	Cost Distribution City/State	33%/67%
Loynes	Cost Distribution City/State	50%/50%
Channel Dr.	Cost Distribution City/State	50%/67%
Bellflower	Cost Distribution City/State	50%/50%
7th St.	Cost Distribution City/State	50%/50%

At this same "Study Session" commissioners and city staff discussed their inability to work with Caltrans on intersections near freeway interchanges. Per the above noted agreement Long Beach is under contract with CalTrans for the maintenance and operation of Route 22 and 405 intersections impacted by SEASP as follows:

Route 22-

Bellflower	Cost Distribution City/State	50%/50%
Channel Drive (VA)	Cost Distribution City/State	50%/50%
West Campus	Cost Distribution City/State	50%/50%
Margo/East Campus	Cost Distribution City/State	50%/50%
Pepper Tree Lane	Cost Distribution City/State	50%/50%
EB Studebaker Rd	Cost Distribution City/State	50%/50%
WB Studebaker Rd	Cost Distribution City/State	50%/50%

Route 405-

NB, Studebaker Cost Distribution City/State 50%/50%

With documents from CalTrans I was also able to determine that the city was able to successfully work with CalTrans to install the new right hand turn lane at PCH and 2nd street. Per an email dated 12/18/2013 a Long Beach Traffic Engineer states "*The way how I set it up there will be* ***no need for any timing modifications****. The SBRT arrow will come on with the EBLT, attachment 2nd St. and PCH-Model.pdf"* R1-38 CONT'D

If the city wants to continue to use signal timing as a mitigation measure in the SEASP area then the DEIR should provide data that shows LOS can be significantly improved by specific adjustments in timing of intersections. The DEIR has failed to technically shown any inefficiency in the current signal timings. I suspect that the predominant problem is the huge volume of traffic heading East-West on 2nd street and that there may be only minimal efficiencies to be gained by a more sophisticated signal timing effort. R1-39

Given the city's cost sharing agreement with CalTrans for the maintenance and operation of intersections I find it laughable that the only way SEASP area signal timing can be improved is for **"lawyered developers" with "permits pending"** to strong arm CalTrans. Through a City of Long Beach public records request I received no documents showing that the city has made any recent efforts to synchronize timing at PCH and 2nd St./Westminister. R1-40

But today September 19 2016- I received documentation from CalTrans which clearly shows that traffic engineers both at Long Beach and Caltrans are actively working together adjusting the timing at PCH/2nd and 2nd/Marina Drive without the use of "lawyered developers". (See a sample of emails on next page, you will be impressed at their efforts.)

Minor "Signal Timing" improvements should not be used as a major component of mitigation for new massive traffic creating developments. Nor should timing be used as mitigation for traffic impacts when the efforts is already ongoing.

CalTrans also sent me the following documents:
a) Maintenance and Operation of State Owned Signals and Lighting by the City of Long Beach for CalTrans.
b) Copies of emails between CalTrans Traffic Engineers and Long Beach Traffic Engineers ensuring the PCH/2nd and 2nd/Marina signal timing is optimized for both safety and flow.
c) Copies Signal Timing Chart for PCH@2nd St-Westminister
d) A Drawing Showing Traffic Signal Improvements at PCH and 2nd Street
e) Traffic Investigation Reports showing Long Beach Traffic Engineer requests for timing adjustments at PCH/2nd and other modifications to improve the function and safety at this intersection.

From these documents I can see an impressive amount of effort by both CalTrans and Long Beach Traffic Engineers to ensure that the signals at PCH@2nd and Marina@2nd are operating efficiently and safely. The City Of Long Beach owes both its own and CalTrans Traffic Engineers an apology-they are doing an outstanding job!

Chapter 5.16-7 Proposed the following mitigation measures:
"PDF-7 Traffic Light Synchronization: Traffic signal timing at intersections along the Pacific Coast Highway are controlled by Caltrans and the City of Long Beach. To better coordinate progression of traffic signals in the area, the SEASP identifies the following options: Enter into a cooperative agreement with Caltrans to maintain the signals. Have Caltrans relinquish sections of their facility to the City, so that the City can update the equipment and maintain the signals. Work with Caltrans on a comprehensive signal timing program that is implemented to coordinate and maintain the timings, including hardware to ensure that the signal clocks do not drift from one another."

The mitigation measures proposed by PDF-7 Traffic Light Synchronization are largely already in place;
The City of Long Beach already has an agreement with Caltrans to maintain the signals. CalTrans and the City of Long Beach both sent me a copy of this document and have the document on file.

The City of Long Beach already has an agreement to maintain the signals and already updates the equipment and maintains the signals. CalTrans and City of Long Beach both sent me a copy of this document and have the document on file. R1-41

The last item appears to be in place and CalTrans and Long Beach traffic engineers are already coordinating and maintaining signal times and hardware. Given the hard work by these engineers it is doubtful how much traffic improvements are left in the timing setup other than more automation.

This is another instance where the City of Long Beach is either reusing mitigation measure or trying to obtain benefits from traffic work already completed or promised but not followed through on. This mitigation measure should be removed from the DEIR.

Nguyen, Lap@DOT

From: Nguyen, Lap@DOT
Sent: Thursday, May 19, 2016 12:48 PM
To: 'Carl Hickman'
Cc: Kevin Riley; Huu Do; Ajaykumar Shah (ajaykumar.shah@dot.ca.gov)
Subject: RE: Intersection of PCH / 2nd St

Mr. Hickman,
Thank you for contacting us regarding the traffic signals issues.
Item # 1 is being forward to the area engineer for review and I will discuss it with him.
Item # 2, 2nd St. and Marina Dr. is the City of Long Beach maintained and operated signal, any changes to that signal must be requested and direct by the City.
Please ask Kevin to send me the new timing sheet and the TP plan for the ATCS system and I will change the offset for you.
Please note, the TP plan must be compiled and ready to go.

From: Carl Hickman [mailto:Carl.Hickman@longbeach.gov]
Sent: Thursday, May 19, 2016 10:28 AM
To: Nguyen, Lap@DOT
Cc: Kevin Riley
Subject: Intersection of PCH / 2nd St

R1-41 CONT'D

Sir,

I have a pair of signal timing related concerns that I would like to share with you. The concerns are at two State owned traffic signals that happen to be within The City of Long Beach.

1. As you know, we are in the process of modifying signal timing and establishing new coordination plans on Bellflower Blvd. We have been working with Iteris to develop the coordination plans. After a few iterations, we have developed a 60 second cycle length for the intersection of Bellflower/ 27th/405 Fwy, at the off ramp. I think you will like the 60 sec cycle more than a 120 sec cycle. Please see the spreadsheet that I have attached. At this point, I would ask that your technicians input the new timing so that we can minimize delay for all who traverse the intersection.

2. I recently received complaints from a few residents regarding the 2nd St corridor, from Marina Dr to Studebaker Rd. I will deal with the overall corridor issue, but I would ask of your assistance to solve a problem between 2nd St/Marina Dr and 2nd St/PCH. It appears that NB drivers at 2nd St/PCH are attempting to turn left on to 2nd St and they are competing with vehicles that are stacked up waiting for the signal at 2nd St/Marina Dr to turn green. Of course, this occurs primarily during peak traffic periods. I am aware that both signalized locations are interconnected. I would like to reduce the offset at 2nd St/Marina Dr by 5 secs. This would allow traffic backed up at 2nd St/Marina Dr to clear as the NB left turners are approaching from 2nd St/PCH. We have observed the problem and we would like to keep an eye on the controller clocks and reduce the offset as I described. The minor adjustment and keeping the clocks in sync will help to improve overall traffic flow.

Let me know what you think of the suggestions that I am proposing and how soon you can implement the adjustments. Feel free to contact me if you have any questions or concerns.

Thank you for your efforts.

Nguyen, Lap@DOT

From: Nguyen, Lap@DOT
Sent: Wednesday, July 06, 2016 8:31 AM
To: 'Kevin Riley'; 'Mark Roberts'
Cc: Carl Hickman; Shah, Ajaykumar@DOT; Michael Sickles [Michael.Sickles@longbeach.gov]
Subject: RE: Traffic Signal Phasing

Mark,
Please check the communication to Marina and 2nd St. and PCH at Studebaker Rd.
We have lost comm to these two locations.
Thanks,

Lap Nguyen
(213) 897-9166

From: Kevin Riley [mailto:Kevin.Riley@longbeach.gov]
Sent: Tuesday, July 05, 2016 4:01 PM
To: Nguyen, Lap@DOT
Cc: Carl Hickman; Shah, Ajaykumar@DOT
Subject: RE: Traffic Signal Phasing

Hi Lap,

Are you around on Friday? I want to stop by 30 minutes before the start of the morning plan.

Thanks.

Kevin Riley, M.S.C.E., T.E.
City of Long Beach

From: Michael Sickles
Sent: Tuesday, July 05, 2016 3:27 PM
To: Teresa Dennis
Cc: Kevin Riley; Carl Hickman; David Roberts; Mark Roberts; Randall Sellers
Subject: FW: Traffic Signal Phasing

Please check the timing/coordination at Marina/2nd.
WB was backing up through PCH/2nd again on Wednesday 6/29 at Noon.

R1-41 CONT'D

Over the past decades the city has failed to implement the same promised traffic mitigation measures for Marina Pacifica, Marketplace, and Marina Shores. In recent years the city has tried to recycle previous EIR traffic mitigation measures on other different projects such as 2nd+PCH and Seaport Marina (Lennar) and the Home Design Center. The construction of Shopkeeper Rd. has been used for mitigation multiple times and should not be used as mitigation for new SEASP developments. R1-42

Given the city's past failures to comply with CEQA traffic mitigation monitoring programs the DEIR should specify

1. All SEADP/LCP, Transportation Plan or past SEADIP development traffic mitigation that was provided and a list of traffic mitigation that was promised and not provided.
2. Specify exactly how and when SEASP cumulative traffic mitigations will be implemented as each new development is proposed.

7. DEIR Section 5.16 Transportation and Traffic Comments

a. **SB743**

The DEIR discusses the impact that SB743 will have on future CEQA compliance. "When the CEQA guidelines are in place "automobile delay" as describe solely by level of service of similar measures of vehicular capacity of traffic congestion will not be considered a significant impact on the environment."

The city of Long Beach DEIR does not consider the impacts in traffic analysis due to SB743. A draft copy of the proposed CEQA Guidelines "Implementing Senate Bill 743" was released on January 20 2016.

In these guidelines the it states that "an analysis of vehicle miles traveled will be voluntary for the two years following adoption of the new guidelines". Given that this is a 40 year plan, the city should provide information in the DEIR as to what will be the procedure for implementing the new CEQA guidelines and what impacts will require certain specified mitigation. The Shopkeeper road extension could be considered to be inducing vehicle miles travelled yet it is being considered as traffic mitigation for new development. R1-43

When the CEQA guidelines are in place future SEASP developments could significantly increase traffic congestion but not trigger a CEQA significant impact on the environment. The DEIR does not state whether the SEASP new land use plan will exempt these projects from any city required traffic mitigation or what mitigation will be required. The original SEADIP Implementation Plan clearly specified specific mitigation measures for each parcel but no mitigation is attached to a specific parcel in the SEASP plan.

Page 8 "Implementing Senate Bill 743" (b) Criteria for Analyzing Transportation Impacts states that "Lead agencies may use thresholds of significance for vehicle miles traveled recommended by other public agencies or experts provided the threshold is supported by substantial evidence". The SEASP DEIR fails to state what threshold will be used to determine significant impact.

In the above document "Implement of Senate Bill 743" there is a technical advisory which contains recommendations regarding threshold of significance, safety, and mitigation measure." The DEIR does not mention ANY Long Beach standards for traffic analysis. R1-44

One area of concern not mentioned in the DEIR is the following:
"Retail Projects. Lead agencies should usually analyze the effects of a retail project by assessing the change in total VMT, because a retail projects typically re-route travel from other retail destinations. A retail project might lead to increases or decreases in VMT, depending on previously existing retail travel patterns."

Since the city has chosen to remove all local serving area commercial (grocery stores) from the SEASP area yet the DEIR shows no analysis showing the impact outside of SEASP in total VMT. The city's plan to zone only regional commercial business in SEADP could add even more vehicle miles travelled. R1-45

Along with updating DEIR Section 5.16 Thresholds of Significance the city should produce a Municipal Code controlled Long Beach set of traffic analysis guidelines, threshold and mitigation requirements that will be used to guide future development in SEASP and the rest of the Long Beach. R1-46

Section 5-16-33 Mitigation Measures and Appendix J PDF-7 Traffic Light Synchronization:
"TRAF-1 As part of the subsequent environmental review for development projects that would be accommodated by the SEASP, a site-specific traffic study shall be prepared by the project applicant/developer to evaluate the project's potential traffic and transportation impacts and to identify specific improvements, as deemed necessary, to provide safe and efficient onsite circulation and access. The traffic study for the first development project to be considered under the SEASP shall include an analysis of signal timing of 2nd Street through Naples to identify timing adjustments needed to improve signal synchronization. The traffic study shall be approved by the Public Works Department, and improvements and signal timing shall be implemented prior to certificate of occupancy." R1-47

Since it is unclear that LOS impacts would no longer a CEQA require an significant impact per SB743 is unclear whether environmental review would be required for a development project. Per previous my comments the DEIR should include City wide specific procedures for implementation of SB743. The traffic study studying signal timing of PCH/2nd street proposed for the first development project should be included in this DEIR not for some undetermined project.
Per my above 4. Comments signal timing has already been accomplished at this intersection and should not be used again as a mitigation measure unless additional significant benefits can be demonstrated.

For example Page 23 of "Implement of Senate Bill 743" states
"*Lead agencies generally should presume that residential, retail, and office projects, as well as mixed use projects which are a mix of these uses, proposed within ½ mile of an existing major transit stop3 or an existing stop along a high quality transit corridor4 will have a less than significant impact on VMT. This presumption would not apply, however, if project-specific or location-specific information indicates that the project will still generate significant levels of VMT. For example, the presumption might not be appropriate if the project: ● Has a Floor Area Ratio (FAR) of less than 0.75 ● Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (only for jurisdictions specifying a parking minimum) ● Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization)* R1-48

Based on the above criteria the SEASP DEIR should address what is the VMT significant impact threshold and what mitigation measures if any will be required.

b. 5.16.1.3 Existing Traffic Conditions
In previous EIRs the city has stated that traffic conditions can vary seasonally and daily. The fact that there has been a wide swing in intersection traffic volumes between recent EIR traffic analyses shows that the DEIR use of vehicle counts on one day July 14 2105 is not adequate. The DEIR should also address the traffic conditions for each large special event which impacts the SEASP and coastal communities. There are large changes in traffic volume/patterns when school starts at CalState Long Beach and local public schools which were out for the summer on July 14 2015.

The DEIR states "*July was chosen based on comments received that summer travel patterns in this area are higher than non-summer travel patterns which was also confirmed with City staff."* The DEIR provide no data on ranges of existing traffic condition other than other than conjecture. The DEIR should be rewritten to provide actual traffic number using Traffic Surveys, traffic counts, previous EIRs to determine what the range of actual existing traffic conditions are and what the cumulative growth is. R1-49

c. 5.16-1 Study Area Intersections Analysis Locations
The DEIR fails to identify a number of significantly impacted intersections such as 7th @Santiago Avenue, 7th @ Park Avenue, 2nd @ Bayshore and 2nd at Livingston. These intersections were previously identified by the city as severely impacted in the Seaport Marina and 2nd+PCH EIRs. These impacted intersections affect the flow of local residential collector streets and the resulting gridlocks will significantly impacted by the proposed SEASP plan. The DEIR should also R1-50

consider the possibility of cut-through traffic into residential neighborhoods and loss of coastal access due to SEASP impacts. The DEIR should be rewritten to disclose these conditions. R1-50 CONT'D

d. Table 5.16-5 Project Trip Generation Estimates

The DEIR should be rewritten to show how the proposed trip generation estimates were made. The DEIR does not show what the breakdown of use and square footage per ITE standards for Existing, Reduced and Proposed Project.

Project Trip Generation

The proposed Project would generate additional vehicular travel in the study area. Given the mixed-use nature of the site, it would not generate traffic in a similar manner as traditional development sites. Therefore, the trip generation analysis considers the combined effects of the Project's mix of land uses, regional location, demographics, and development scale. The analysis utilized the MXD methodology (or mixed-use development trip generation) to calculate Project-related trips. This methodology is described in detail on pages 26 to 31 of the TIA (see Appendix J). Table 5.16-5 summarizes the existing and proposed trip generation. R1-51

Table 5.16-5 Project Trip Generation Estimates

Trips	Daily	AM Peak	PM Peak
Proposed Project	101,170	5,021	8,569
Existing Land Uses	65,731	3,047	5,299
Net Trips	35,439	1,974	3,270

Source: Fehr & Peers 2016a.

Today at 1:37 PM on the last day available for DEIR comments I received a response to my earlier requests for public information. The Memorandum was dated September 8 2016 From Jason D. Pack PE Fehr & Peers.

After reviewing the document I have the following issues with the project trip generation included in this document- For DEIR Existing conditions Fehr & Peers uses only one ITE Land Use Code-Shopping Center ITE Code 820 x 637,347 sq ft leasable area.

This underestimates the actual existing SEASP area traffic conditions which should include higher traffic generating businesses and categories than was used in the analysis such as:

4 large Grocery Stores (Ralphs, Trader Joes, Whole Foods, Gelson's) ITE 850

1 Fast Food Restaurant ITE 934

Numerous Restaurants (non-fast food)- ITE 932

1 Gas Station ITE 945

1 Bank ITE 912 R1-52

The Proposed Project and Reduced Alternative also underestimates the projected traffic conditions as only one ITE Land Use Code-Shopping Center ITE 820 is used.

The DEIR traffic analysis should be revised to calculate the existing traffic conditions using the appropriate ITE Category and square foot of each existing business (i.e. Ralphs Supermarket ITE 850) not a just general retail ITE 820. The DEIR traffic analysis should be revised to calculate the Reduced Alternative and Proposed Project based on the proposed allowable uses. If a development in SEASP results in predominately all regionally attracting restaurants/bars the trips generated could as be 932/820 or 14% higher than general retail used in the current DEIR. I'd like to point out again the DEIR traffic analysis does not include any trip generation from local serving supermarkets, gas stations or banks.

The Trip Generation calculations are missing and should be added to the DEIR.

e. Cumulative Year (2035) Without Project Conditions

"Future volumes for Cumulative Year (2035) Without and With Project conditions were developed using a 0.505 percent per year growth rate, consistent with the Los Angeles County CMP Guidelines. The growth rate accounts for pending and approved projects in the City of Long Beach as well as regional growth anticipated by Year 2035."

The CMP covers only freeway facilities such as PCH and 7th street. The 0.505 % CMP cumulative growth rates does not apply to other SEASP impacted streets such as 2nd St., Westminister, Loynes or Marina Drive.

The DEIR does not discuss why the city has decided to lower the entire SEASP impacted area from the standard SCAGG estimated cumulative growth rate of 1% to the CMP rate of .505%. The 1% growth rate has been used in the Downtown Master Plan, Home Depot Design Center, Seaport Marina (Lennar Project), 2nd+PCH project EIRs. I have submitted a public records request but the city has refused to provide me any information on why the cumulative growth rate has been lowered. The DEIR should be revised to consider accurate growth rates in on SEASP impacted streets.

The city recently approved their Mobility Plan with no traffic studies or an EIR and stated that future EIRs would consider cumulative impacts. All projects with citywide impacts along the coast such as the Downtown Master Plan (6500 new dwelling), Douglas Park and the Draft Land Use Plan (South-East LB increased density) should be included in the SEASP DEIR cumulative impact growth rate. R1-53

In section DEIR Appendix J 4.4 Assumptions Regarding Cumulative Impacts

> *Section 15130 of the CEQA Guidelines states that cumulative impacts shall be discussed where they are significant. It further states that this discussion shall reflect the level and severity of the impact and the likelihood of occurrence, but not in as great a level of detail as that necessary for the project alone. Section 15355 of the Guidelines defines cumulative impacts to be "…two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Cumulative impacts represent the change caused by the incremental impact of a project when added to other proposed or committed projects in the vicinity.*
> *The CEQA Guidelines (Section 15130 [b][1]) state that the information utilized in an analysis of cumulative impacts should come from one of two sources:*
> *1) A list of past, present and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency; or*
> *2) A summary of projections contained in an adopted general plan or related planning document designed to evaluate regional or area-wide conditions.*
> *The cumulative impact analyses in this DEIR use a combined Method 1 and 2. Generally, the growth projections that are identified in the current* ***Long Beach General Plan*** *have been utilized. To determine cumulative traffic impacts, a 0.505 percent per year growth rate was used, consistent with Los Angeles County CMP Guidelines. In addition to the growth rate, a list of current pending and approved projects were added to the assumptions in coordination with the cities of Long Beach and Seal Beach.*

In above section of the DEIR the document states that the city used growth projects which were identified in the current Long Beach General Plan. The current Long Beach General Plan Land Use Element was written in 1989. This document does not include the impacts of the Downtown Master Plan, Douglas Park, or the increases in density proposed in the recently released Draft Land Use Plan EIR. The DEIR and cumulative traffic growth factor should be increased to consider all of the above.

596 f. Page 5.16-56 Mitigation measures considered and rejected,

597 *"The traditional method of mitigating significant traffic-related impacts—when defined as delays to autos due to*
598 *overcapacity or increases in auto trips on street segments—is to increase auto capacity by providing additional lanes or*
599 *facilities. Widening roads is challenging because space in the Project area is already constrained and utilized by other land*
600 *uses, wetlands, or transportation facilities. Due to the limited right-of-way in the Project area and surrounding areas of Long*
601 *Beach, capacity improvements for autos may require the loss or constriction of bicycle lanes, sidewalks, parking lots, etc. The*
602 *traffic analysis for this project could not identify any additional capacity improvements for autos that would not impact*
603 *existing buildings or have negative secondary impacts—such as eliminating wetland areas or parking or degrading the*
604 *pedestrian environment."* R1-54

605 The city recently added a right hand turn lane on PCH at 2nd street by using the corner property's right-away so the
606 above mitigation is clearly feasible.

607 At the August 18 2016 "Study Session" C. Kootz listed a number of mitigation measures which the City considered R1-55
608 and rejected. The DEIR should be rewritten to include these and all other possible mitigation measures.

609 Page 5.16-56 Impacts for which mitigation measures were evaluated but improvements were deemed infeasible or R1-56
610 under the jurisdiction of another agency. The DEIR should state what mitigation measures were evaluated and
611 what was infeasible.

612 Page 5.16-3 Mitigation measures were considered and rejected to improve the CMP intersections of PCH at 7th
613 street. The city currently has in its Mobility Plan the plan to close Bellflower add a grade separation at the "Iron
614 Triangle". The City should fully describe how this project fits in with the Mobility Plans proposed transportation
615 projects (Iron Triangle & Shopkeeper Road) in the DEIR and state exactly what mitigation measure was considered
616 and why it was rejected.

617 In general this DEIR refuses to consider any mitigation measures which require Caltrans approval. The city has in R1-57
618 the past acquired right-of-way dedications despite the DEIRs refusal to consider this as a feasible mitigation
619 measure (i.e page 58). The DEIR should be rewritten and all mitigation measure should be evaluated including
620 those requiring Caltrans approval and right-of-way dedications.

621

622

623

g. Ch. 3 Page 3-14 Roadway Connectivity the following roadway connections and intersections would be improved:

- *Marina Drive would have two lanes and connect Pacific Coast Highway to 2nd Street.*
- *Studebaker Road/Shopkeeper Road would have two lanes and connect Pacific Coast Highway to 2nd Street.*
- *Pacific Coast Highway and the Studebaker Road westbound approach would be modified from one shared through-left-right lane to one shared through-left turn lane and one right-turn lane. This improvement is consistent with the proposed roadway connection at Studebaker Road/Shopkeeper Road.* R1-58

The DEIR does not state how Marina Drive would be improved nor does the analysis any analysis showing traffic improvements. The DEIR does not analysis the improvements in traffic flow from the extension of Shopkeeper Road. The DEIR should provide analysis showing traffic improvements with the above proposed roadway connectivity changes.

Ch.5.15-43 Mitigation Measure with Project Improvements Existing With Project Improvements

Existing With Project Improvements

"Studebaker Road & SR-22 Westbound Ramps: Construct a spiral striped roundabout with two circulating lanes, with a southbound slip (bypass) lane. The southbound approach would be striped with two through lanes and one shared through-left turn lane; the westbound approach would have two left turn lanes and one right turn slip lane; and the northbound approach would have two through lanes and one right turn slip lane. This measure would be funded through the City of Long Beach Capital Improvement Plan (CIP) and fair-share contributions from area developments.
Alternatively, the intersection could remain signalized with the following improvements: - Modify the westbound approach from two left turn lanes and one right turn lane, to three left turn lanes and one right turn lane.- Modify the southbound approach from one left turn lane and one through lane, to one left turn lane and three through lanes.- Optimize the AM and PM signal cycle lengths and splits.

Shopkeeper Road & 2nd Street: This intersection would require the following improvements:

- Modify the northbound approach from one shared through-left turn lane and one right turn lane, to one shared through-left turn lane and two right turn lanes. R1-59
- Modify the westbound approach from one left turn lane, two through lanes, and one shared through-right turn lane, to two left turn lanes, two through lanes, and one shared through-right turn lane."

The DEIR provides no analysis with any proposed mitigation measures so that the decision makers or the public and determine their benefit. Because of past development traffic impacts the Shopkeeper Road extension should have already build and been paid for from prior development though the City of Long Beach Capital Improvement Plan not recycled again as traffic mitigation for future development..

Traffic analysis showing the benefits for the Cumulative Year 2013 With Project Improvements such as lane restriping, signal timing at Studebaker Rd and SR22, Marina Drive approaches lane changes and Shopkeeper Road should be included in this DEIR.

h. Reduced Intensity Alternative

There is no traffic information on the "Reduced Intensity Alternative". Examples of what's missing:
Section 5.16 T- **No Reduced Intensity Alternative**
Table 5.15 Project Trip Generation- **No summary data and in the text no LOS analysis summary for the Reduced Intensity Alternative.**
Table 5.16-14 Intersection CMP Analysis shows only Existing, Existing With Project, Cumulative Year (2035) Without Project, Cumulative Year 2035 With Project- **There is no CMP Analysis for the Reduced Intensity Alternative.**

Detailed Trip Generation numbers by land use (ITE) calculations for all three project alternatives have been excluded from the DEIR Traffic Analysis.

More over the "Reduced Intensity Alternative" was not studied in Appendix J Traffic Impact Analysis (TIA).

The SEASP DEIR states that
"1.5.3 Reduced Intensity Alternative
The Reduced Intensity Alternative was analyzed to reduce environmental impacts related to air quality, greenhouse gas emissions, noise, and traffic. In order to make a significant reduction to traffic impacts within the Project area, the proposed Project would need to be reduced below existing conditions. Therefore, the Reduced Intensity Alternative would reduce residential development intensity by 30 percent and nonresidential development intensity by 10 percent. This alternative would reduce the number of hotel units to 375."

R1-60

I did find a mention of the Reduced Intensity Alternative in section 7.6.16 Transportation and Traffic
"7.6.16 Transportation and Traffic
The Reduced Intensity Alternative *would reduce impacts to the transportation system by reducing the number of vehicle trips. Vehicle trip generation would be reduced by approximately 16 percent during the day, 18 percent during the AM peak hour, and 6 percent during the PM peak hour, as compared to the proposed Project.3 This alternative could reduce the Project's impact at the intersection of Westminster Boulevard at Seal Beach Boulevard in the City of Seal Beach to less than significant.* ***This would eliminate one significant unavoidable adverse impact. However, all other identified impacts would likely remain under this alternative."***

There is no analysis or data in the DEIR that supports 7.6.16. Nor does the above statement show how the traffic volumes or intersection flow could be better with the Reduced Intensity Alternative.

Section 1 of the DEIR states that *"Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. However, only those impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed Project. Impacts involving air quality, cultural resources, greenhouse gas emissions, noise, and traffic were found to be significant and unavoidable. Section 7.8 identifies the Environmentally Superior Alternative."*

The Financial Feasibility Analysis should be trashed and not be used to develop land use plans.
The SEASP and the LCP Amendment should be redone. The SEASP DEIR violates CEQA, is incomplete inaccurate and must be revised.

Regards,

Kerrie Aley

From: dave allen
Sent: Sunday, September 18, 2016 6:58 PM
To: Craig Chalfant
Cc: susie.price
Subject: SEASP

We are long time Belmont Shore residents. We have read over the proposed SEASP plan and were very impressed with the thought and planning which went into it. Along with everyone else in Long Beach we welcome replacement of the Hotel at Second and PCH. We do have some concerns. R2-1

Southeast Long Beach is already a very dense area in terms of population and traffic particularly the intersection of Second and PCH. Adding several thousand residential units can't help but make it much worse considering each unit will have one to two cars. Synching traffic lights sounds good but it isn't likely to do very much to mitigate too many cars. If so lets do it this week. R2-2

Belmont Shore and the Peninsula have building height requirements which limit building height as do the current SEASP area allowances. Three stories should be enough to allow new construction which would blend in with the surrounding areas and not result in more congestion. The proposed plan allows five stories with some leeway to go to seven stories. If you allow it count on seven stories. Who would build less? R2-3

It's already built into the proposal that there won't be enough parking. In our years in Belmont shore we have struggled with parking always and continue to do so. We have not come up with a plan to add parking to an built out area and probably won't. Why start out that way? Circulators, walking and Cycling are great ideas but they won't replace cars in the foreseeable future.
The question is how much of this plan do we really need. We are not lacking for services in this area. Much of this seems to be geared to returning the desired return on investment to the landowners and developers. If that is the case maybe this isn't the project for them. R2-4

One last thought , is it wise to build a high density Residential and Commercial development on top of a very dangerous earthquake fault?
Thank you for your consideration. R2-5

--
Casey and Dave Allen
235 LA Verne Ave.

562-884-2711

-----Original Message-----
From: Christiane Badgley
Sent: Sunday, September 18, 2016 9:58 PM
To: Craig Chalfant
Subject: Southeast Area Specific Plan (SEASP)

Dear Mr. Chalfant:

I am writing to express my strong opposition to the SEASP.

I attended a number of meetings over the past three years and feel that community input was not taken into consideration in any meaningful way in the final plan. R3-1

The traffic in the 2nd street / Pacific Coast Highway area is already terrible. This project will only make it worse. R3-2 The mitigation measures are completely insufficient. Extra noise, congestion, pollution. We don't need it. Citizens expressed their concerns at every meeting. The environmental report indicates that mitigation is not possible. So how can this be good for the city? R3-3

Long Beach needs housing -- affordable housing. There is no mention of affordable housing anywhere in this current proposal. There is no shortage of housing for wealthy residents. R3-4

Long Beach does not need more retail. Our city needs to have a metric for success that measures more than return for big money developers.
What about the quality of life for the community? R3-5

There is nothing innovative here. No daring use of public space. No bold plans for public transportation or sustainability or local artists or small business incubation. Nothing that could make Long Beach stand out.
Just another mega money development that will look like every other development with the same shops, the same upscale condos and the same boutique hotels. R3-6

The best thing the city can do now is nothing, until a plan can be devised that puts the needs of Long Beach residents first.

Thank you for your consideration.

Sincerely,
Christiane Badgley
Long Beach resident

From:
Sent: Friday, September 16, 2016 5:26 PM
To: Craig Chalfant
Subject: SEASP

Dear Mr. Chalfant,

I am concerned that not enough study has been given to the effect of the planned construction in this area. I have lived in Belmont Park since 1953. I appreciate improvements, but not any that will increase traffic, pollution, building height, density, and noise. R4-1

Sincerely,

Jeanne Badgley

Letter R5

From: David Baker
Sent: Saturday, September 17, 2016 7:57 AM
To: Suzie Price
Cc: Craig Chalfant;
Subject: Re: Open letter re SEADIP vs SEASP

Suzie

Dear Ms. Price,

Thank you for your prompt reply to my expression of concern about the SEASP plan. If your stated position of neutrality on the ill conceived SEASP plan is, in fact, based solely upon legal considerations, then I look forward to learning of your stated position on SEASP at the appropriate time. R5-1

My concerns are well founded, and based upon disbelief that competent Long Beach City planners would, on their own initiative, create a proposal which is based upon parceling out non-existent traffic capacity to developers based upon the false premise that SEADIP is "outdated and needs updating", unless they were receiving their marching orders from City officials who had charged them with reaching a predetermined conclusion in favor of tax generating development. A reasonable planner would not, absent pressure from City officials, issue a plan for gridlock, which is what has been done here. R5-2

What would compel a City planner to propose narrowing the lanes of PCH, as proposed by the SEASP plan, the current size of which has been carefully developed by State traffic engineers, given the obvious safety issues arising from squeezing large vehicles and bicycles together, and to ignore the "choke points" created by the bridges on Studebaker and on PCH at the County Line, which will necessarily create traffic jams, unless they were told to do so by City Hall? R5-3

You and I both know that "Chinese Walls", which are intended to prevent one arm of a bureaucracy from influencing another, don't always work. I know this from personal experience. One of your predecessors in the position of Long Beach 3rd District City Council Representative improperly directed City personnel to alter my plans for reconstruction of the boat dock in front of my home, which had been submitted for approval, in order to benefit my neighbor, who was his old friend. I am, at this moment, looking through my window at the evidence of that improper influence on City staff by a Long Beach 3rd District City Councilperson. Thus, I have ample reason to be mistrustful of the process which has led us to even be discussing the ridiculous proposals contained in the SEASP plan. R5-4

I trust that you will conduct yourself in a manner consistent with the best interests of the citizens of the Third District, and preserve the SEADIP development restrictions which were designed to protect the quality of life of your constituents.

Best regards,

David P. Baker
Attorney at Law
Naples Island

-----Original Message-----
From: Suzie Price
To: David Baker
Cc: Craig Chalfant Editor Gazettes
Sent: Fri, Sep 16, 2016 10:08 pm
Subject: Re: Open letter re SEADIP vs SEASP

Dear Mr. Baker:

You are mistaken on my position. As an attorney, I am sure you understand that the appellate body has to refrain from supporting one side or another in advance of the matter coming to the board for decision. I sit on the City Council, which is the appellate body for SEASP. As you will note from a very cursory check on Westlaw or Lexis, a council representative who takes an affirmative position on an issue that will appear before the member on appeal, must recuse him/herself from making a decision on appeal. I will not be putting myself in that position on an issue that is vital to my district. Rather, I will be involved in every step of the discussion, read every piece of correspondence that is sent to me and watch the process unfold. I do have my own thoughts on this proposal, and I will listen to all sides before making a final recommendation to my colleagues at the time the matter comes before me on appeal.

Thank you for reaching out to our office. I encourage you to contact our City Attorney or any public entity attorney in order to clarify the legal parameters of pre-hearing decisions by those sitting on an appeal late body if you have any further questions. R5-5

Clearly you are not familiar with my work on council. I don't think anyone who has been watching my work would categorize anything I have done as a "cop out." If anything, the criticism has been that I am too outspoken and on the front lines with many significant items that have come before council.

I appreciate you sharing your comments on SEASP. You do make some excellent points and I look forward to hearing more from you as the process moves forward through the planning commission and then to Council, on appeal.

Harry, I think this would be an excellent story to write about. I am glad Mr. Baker has copied you on the email. Many people may be misinformed, as Mr. Baker was, about the ethical limitations of a member of an appellate body. The FPPC has very clear guidelines on the topic and the courts have consistently confirmed the guidelines and limited the scope of pre-hearing comment by individuals who are tasked with hearing an issue on appeal.

Thanks.
Suzie

Sincerely,

Suzie Price
Councilwoman, 3rd District
Office: 562.570-6300 | Field: 562.570-8756 | Fax: 562.570-6186
Email: suzie@suzieAprice.com
Website: www.suzieAprice.com

On Sep 16, 2016, at 9:34 PM, David Baker wrote:

To whom it may concern

It is my understanding that Suzie Price has not taken a position either for or against the SEASP development plan. That is a cop out. She's the elected representative for the Long Beach District most impacted by the traffic which will be generated by this obviously flawed plan which will create gridlock in our neighborhoods. It is her job to take a position on a plan which has impacts as far reaching as the SEASP plan. Her stated position of neutrality on this issue is inexcusable and dishonest.

Obviously, the City wants the increased tax revenues which this revision of SEADIP will generate. Obviously, the 2nd and PCH developers want to enrich themselves. Obviously, our elected representative, Suzie Price, as evidenced by her silence regarding the clear defects in the SEASP plan, favors the City's desire for increased tax revenues and the economic interests of the developers who supported her bid for election, over the quality of life of her constituents.

Revising the existing SEADIP development limitations based on the false premise that they are "outdated" fails to pass the common sense test. If the SEADIP development limitations made sense when they were created, then they make even more sense now, since, due to ambient growth in traffic loads, traffic at PCH and 2nd Street is now at level F, far greater than they were when SEADIP was crafted. SEADIP development limitations were designed to prevent gridlock, which is defined as traffic impacts which exceed level F. R5-6

SEADIP should be revised only if mitigation which will prevent traffic gridlock is possible and is included in the new SEASP plan. That is not the case with the current SEASP plan.

Let's all ask our Councilwoman how she justifies not taking a position on this issue, when the SEASP plan is a plan for gridlock. Planning for gridlock is, by definition, a failure of leadership.

David Baker
Attorney at Law
Naples Island

From: David Baker
Sent: Friday, September 16, 2016 9:34 PM
To: Craig Chalfant
Cc: Editor Gazettes; Suzie Price
Subject: Open letter re SEADIP vs SEASP

To whom it may concern

It is my understanding that Suzie Price has not taken a position either for or against the SEASP development plan. That is a cop out. She's the elected representative for the Long Beach District most impacted by the traffic which will be generated by this obviously flawed plan which will create gridlock in our neighborhoods. It is her job to take a position on a plan which has impacts as far reaching as the SEASP plan. Her stated position of neutrality on this issue is inexcusable and dishonest.

Obviously, the City wants the increased tax revenues which this revision of SEADIP will generate. Obviously, the 2nd and PCH developers want to enrich themselves. Obviously, our elected representative, Suzie Price, as evidenced by her silence regarding the clear defects in the SEASP plan, favors the City's desire for increased tax revenues and the economic interests of the developers who supported her bid for election, over the quality of life of her constituents.

R5-7

Revising the existing SEADIP development limitations based on the false premise that they are "outdated" fails to pass the common sense test. If the SEADIP development limitations made sense when they were created, then they make even more sense now, since, due to ambient growth in traffic loads, traffic at PCH and 2nd Street is now at level F, far greater than they were when SEADIP was crafted. SEADIP development limitations were designed to prevent gridlock, which is defined as traffic impacts which exceed level F.

SEADIP should be revised only if mitigation which will prevent traffic gridlock is possible and is included in the new SEASP plan. That is not the case with the current SEASP plan.

Let's all ask our Councilwoman how she justifies not taking a position on this issue, when the SEASP plan is a plan for gridlock. Planning for gridlock is, by definition, a failure of leadership.

David Baker
Attorney at Law
Naples Island

Letter R6

From: Jan Barcus
Sent: Monday, August 08, 2016 2:28 PM
To: Council District 3 <District3@longbeach.gov>; Julie Maleki
Subject: SEASP

Councilwoman Price,

I am one of the many District 3 residents that oppose the housing development proposal in SEASP.

The August 4th Grunion Gazette Commentary by Linda Pemberton expresses my views regarding the planned development at 2nd and PCH much better than I could ever hope to write. If her figures are correct, the 5,916 new homes could add nearly triple that in additional cars. That doesn't include additional traffic for guests, house cleaners, lawn services and many other home service professionals.

R6-1

Just yesterday afternoon while returning home from the Marina Pacific shopping area East bound 2nd Street traffic was backed up across the bridge past the Appian Way ramp. I can't imagine how much worse the congestion would be with the proposed development density.

From 2005 - 2008 I lived in Los Angeles (Playa Vista) near the intersection of Lincoln and Jefferson. It was not unusual for the 2 1/2 mile drive to Costco on Washington to take 20 minutes or longer (forget what MapQuest may say!); with traffic causing one to sit through 3 or 4 light changes along the way. I hope that is not what we have to look forward in our community.

Thank you,

Jan Barcus
Belmont Heights resident

Letter R7

From:
Sent: Monday, September 19, 2016 2:34 PM
To: Craig Chalfant
Subject: SEASP

Hello Craig,

Please see attached letter in regards to the South East Area Specific Plan. Thank you for your consideration.

Best,
Kristina Barger

Dear Mr. Chalfant,

Thank you for this opportunity to comment on the Draft Environmental Impa Report for the Southeast Area Specific Plan update. I along with my friends re support the notion of a plan update that will help our City and region prepare growth in the coming years.

City leaders should really strive to create a thoughtful strategy that sets a clea vision for where Long Beach wants to be in the next 20 to 40 years. I think SE a promising start and aims to bring a fresh take on an area that has long been need of an update. I'm really looking forward to the new opportunities for businesses and residents that will result from this proposal. R7-1

I find that SEASP really reflects the needs and wants of local residents like my which includes more pedestrian friendly corridors and better use of the wate for recreational purposes. The mixed-use zoning is also a great concept and something the area was sorely lacking. I'm happy to know that the City chose that worked closely with the community to develop the plan we see before us

Please approve the DEIR today so we are one step closer to seeing SEASP bec reality.

Sincerely,

Kristina Barger 430
Obispo Ave
Long Beach, CA 90814 925-
487-9160

Letter R8

fax

From: LYNN A BARILLARO
Address: 6225 E GOLDEN SANDS DRIVE
City: LONG BEACH State: CA Zip: 90803
Phone: 562/431-0892 FAX: same, notify first
E-mail: beez96@charter.net
Web:

To: Craig Calfort, Date: Sept. 19, 2016
Address: /craig.calfant@longbeach.gov
City: State: Zip:
Phone: 562/570-6388 Subject: SEASP
Fax: 562/570-6068 Pages: Urgent [ ] Reply [ ]

Comments:

Mr. Calfort: With regard to SEASP.
I just found that these two letters that I Emailed to last evening did not send out, much to my horror + disappointment.
I compared my letter with attachment, as well as did my husband Ben.
I am aware that the cut-off was today, Sept 19, 2016. I wanted to check to see if the EMail sent as we have had problems recently, that is when + found that they did not. R8-1
I hope that you will consider our opinions.

Respectfully,
Lynn A. Barillaro

P.S. I could have FAXED to you earlier in the day, had I known.

From: beez96@charter.net
To: "Craig.calfant@longbeach.gov" <Craig.calfant@longbeach.gov>
Cc:
Date: Monday September 19 2016 3:05:31AM

I am writing to express my concerns over the Hearing Draft SEASP , aka: SEADIP.
First and foremost I want you to know that I am a 12 year resident of the target area, Loynes/PCH and I am very well aware of the traffic congestion, air, light and sound pollution and the ecology and geology issues in this area. R8-1 (cont)

I am strongly opposed to this and any plan that will increase the number of residential units, thereby creating additional traffic in this area, known to be heavily traveled and extremely congested. This area consists of several major arteries: PCH North/South, 2nd St/Westminster East/West, 405 North/South entrance and exit ramps. There are also several Long Beach Transit routes and an Orange County bus route traversing PCH in this area.Traffic in this area is extremely heavy between the hours of 8:00am & 9:30am, 11:30am & 1:30pm , and 3:30pm & 7:00pm. This is based on my personal use and experience using these roads at these times, not a skewed report. I would also like to add that any changes to Loynes Dr to accommodate additional traffic to mitigate congestion is totally unreasonable. This road was built on a landfill and is subject to subsidence, causing constant movement and heaving, creating hills, dips, bumps and off-set banked curves. There are many accidents on this road. R8-2 R8-3 R8-4
I have other concerns that the impact of additional traffic will have on Fire, Police and Emergency response time. It will take longer for emergency help to reach the accident, fire, health emergency. R8-5

PCH is bounded by an ecologically fragile wetland, home to many species of animals and birds that live, feed and breed there. If the current zoning is changed to allow 5 - 7 story buildings, it would be detrimental to the birds flying in and out as well as those migrating through the fly zone seasonally. R8-6
We are encouraged to use public transportation, a very good idea, however, as a person who did depend on and use public transportation, I can attest to the fact that with current traffic, it is not easy or is it safe to cross these streets to get to bus stops. I cannot imagine how difficult and hazardous it would be if traffic volume is increased in this area. R8-7

Since the Coastal Commission will ultimately review these proposals and either approve or reject them, I am attaching a copy of a Local Coastal Program Amendment Supporting Materials, Golden Shore Master Plan, application # 0712-01. Page # 4 of 5, paragraph #1 alludes to the original LCP first certified thirty years before the Commission endorsement of the planning principle developed by a local Coastal Program Advisory Committee recommending "that future dense and high-rise development be focused in the downtown area in order to protect the down-coast areas of the City from such development pressures in the future. This planning principle is consistent with the policy direction of Coastal Act 30212.5 because it works to protect overcrowding and overuse of the more sensitive resource areas in the eastern or down-coastal areas of the City while encouraging higher density in the downtown area that is better able to accommodate high volume activity". The document provides a justification for the development of the Golden Shore Master Plan. R8-8

I can see no reason to support any proposed changes as the residents in this area will not benefit at all and will, in fact,. suffer property value loss.

Thank you for allowing me to express my opinion and concerns in this matter.

Sincerely,
Lynn Barillaro

attachment
L. BARILLARO

* When the original Long Beach LCP was first certified thirty years ago, the Commission endorsed the planning principle, developed by a Local Coastal Program Advisory Committee and approved by the Long Beach City Council, that future dense and high-rise development along the City's coastline should be focused in the downtown area along Ocean Boulevard in order to protect the down-coast areas of the City from such development pressures in the future. This planning principle is consistent with the policy direction of Coastal Act §30212.5 because it works to protect overcrowding and overuse of the more sensitive resource areas in the eastern or down-coast coastal areas of the City while encouraging higher density in the downtown area that is better able to accommodate high volume activity.

The General Development and Use Standards set forth in PD-6 will continue to apply to the entire downtown coastal area including the new Subarea 1a. For instance, as stated in the section concerning access, "All subareas should contain public walkways, seating in landscape areas, and, whenever feasible, shoreline viewing areas as specified in the Subarea Standards. Such areas shall be guaranteed public access through easements or deed restriction, or lease agreement provisions." Coastal Act §30001.5 provides, in part, that it is a basic goal of the State to "Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners." R8-9

All areas covered by PD-6 are subject to the building design rule that "All buildings shall be arranged on their sites so as to provide views between the buildings, so as to avoid the impression of a wall of buildings, so as to minimize blocking shoreline views of other buildings, and so as to entice pedestrians into the shoreline area." Applying this design rule together with the height the amendment allows will make the site open to views toward the ocean and help create more usable open space.

The LCP indicates that the Victory Park and Santa Cruz Strip Park has been dedicated or designated in perpetuity by City Ordinance as public parks. Under the LCP, no parkland in the Coastal Zone shall be committed to another use unless the City replace such parkland on an acre-by-acre basis within or adjacent to the Coastal Zone. The project would be consistent with this objective in that the park designation along the project site's Ocean Boulevard frontage east of Golden Shore would be maintained for this purpose and improved in accordance with LCP requirements.

vii) Environmental Documents

The Golden Shore Master Plan Draft and Final EIRs are included in Attachments J and K. R8-10

viii) Zoning Measures That Will be Used to Carry Out the LUP Amendment

As noted above, the provisions of the Amendment contain elements of both an LUP and an LIP. As an element of the LCP's implementation, the Amendment provides that all future development "shall be carried out in accordance with the Golden Shore Master Plan" pursuant to the elements set forth in PD-6 for Subarea 1a. In addition, before entitlements for the first new building in the Subarea can be approved, the City's R8-11

From: beez96@charter.net
To: "Craig.calfant@longbeach.gov" <Craig.calfant@longbeach.gov>
Cc:
Date: Monday September 19 2016 3:51:06AM

Hearing Draft SEASP

My wife Lynn and I have lived in the contentious south-east Long Beach neighborhood affected by the proposed revision to the SEADIP plan.

My concern is for the proposed amendments to the current height restrictions dictating a maximum of three story structures. The current proposed changes reflect building five, six and seven stories. An increase in retail and residential space , as proposed will increase the already congested traffic in this area. An increase of traffic in this area will have a tremendous impact on the environment surrounding our community, compromising air quality, and increasing light and noise pollution. R8-12

Consideration for the wetlands and all that inhabit it is vitally important as well.

Thank you for taking my comments into consideration.

Ben Barillaro

Letter R9

From: Alex Bellehumeur
Sent: Thursday, September 15, 2016 3:32 PM
To: Craig Chalfant
Cc:
Subject: SEESO

Craig Chalfant
Senior Planner
Long Beach Development Services
333 W. Ocean Blvd., 5th Floor
Long Beach, CA 90802

RE: DEIR for SEASP

Dear Mr. Chalfant:

I would like to start by commending the City for their work on the Draft Environment Impact Report for the South East Area Specific Plan. It is clear from reading through the document that staff has taken the time to engage community stakeholders and put forward a thoughtful plan for the future of our community. R9-1

In my review of the Transportation and Traffic portion of the Draft Environment Impact Report for the draft SEASP, I noticed many of the "significant and unavoidable" impacts. I believe the benefits of this project outweigh the impacts, however the impacts could also be mitigated with a variety of traffic fixes. In order to identify the appropriate mitigations, a traffic study should be conducted for every proposed development within the SEASP area, **and to establish an estimate of how many drivers, when reaching PCH, turn east** – a new look at traffic mitigation options could then be more effective. R9-2

Project conditions could also be mitigated if the City was able to take over the operation and management from Caltrans for the Pacific Coast Highway (PCH). I would like to encourage the City and Caltrans to explore the opportunity for relinquishment. Certainly portions of PCH and the adjacent neighborhoods would be best served from more direct local control and coordination of the roadways and intersections. R9-3

Sincerely,

Alex

State-Wide Developers, Inc.
Alex Bellehumeur
President

OFF: 562.597.6801 FAX: 562.498.3621 CELL: 562.682.7882 EMAIL: wyld.crd@verizon.net
ADDRESS: 6242 Napoli Court, Long Beach, CA. 90805

From: Kent Bimson
Sent: Monday, September 12, 2016 12:50 PM
To: Randy Peck
Cc: Craig Chalfant; Suzie Price
Subject: Re: SEADIP comment regarding Seaport Marina property specifically

Mr. Chalfant,

I concur with Randy Peck's comments and assessment, both in favor of renovation and opposed to height and density variances. Here are a few comments of my own, a couple of which simply add more detail to Randy's, since Randy covered the primary points.

1. **Increased traffic at PCH/2nd Street.** 2nd Street/PCH is ALREADY the busiest intersection in Long Beach. It can take many stop lights to get through that intersection not only at rush hour but also during summer weekends, when all of LA is heading to the beach. I avoid that intersection as much as I can. R10-1

2. **Increased neighborhood traffic.** I often take the residential streets around PCH/2nd to avoid that intersection. I am not the only one. I would venture an educated guess that a valid simulation model would show increased traffic congestion through those residential areas, give increased congestion at PCH and 2nd. A more congested 2nd/PCH intersection will certainly push more traffic through those residential neighborhoods. Traffic, like water, will seek the least obstructed path to its destination. R10-2

3. **Fair play.** Property owners in appurtenant neighborhoods (Naples, the Peninsula, Belmont Shore, and other seaside areas) have to live with height and density restrictions all the time. It's only fair to do so in order to keep our community livable. Why should commercial developers and commercial property owners be granted variances when property owners in appurtenant residential areas have to abide by similar restrictions? I just renovated my home (next to Randy Peck's) on the Peninsula. I paid a lot of money to ensure that I did NOT violate zoning and building restrictions, which are good for all residents, despite the fact that variance to those restrictions would have been in my best interest as an investor and property owner. Adding a couple of more stories to my home certainly would have improved my property value, resulting in an excellent investment for me, but it would not have been fair to the community I live in. In my opinion, variances should be considered when (1) they are in everyone's best interest, (2) they do not violate the living conditions they were written to protect. In my opinion, granting height and density variances in this case does not meet these criteria, for the reasons stated in Randy's and my emails. R10-3

4. **The faulty argument of an increased tax base**. Increasing the tax base is frequently cited as one of the "pros" in favor this kind of development, but it is a dubious argument in many cases. While one could argue that an increased population provides an increased tax base, which is good, one could also argue that the increased population puts added demands on all local infrastructure and services, eroding the true value-added buying power of those taxes. R10-4

Thank you for listening to our concerns.

Warm regards,

Kent

Kent Bimson
5580 E. Bay Shore Walk
Long Beach
562 438-2312

On Mon, Sep 12, 2016 at 11:07 AM, Randy Peck wrote:

Craig Chalfant

Senior Planner

Long Beach Development Services

Hi Mr. Chalfant,

I just want to provide my input regarding the new Draft Southeast Area Specific Plan, specifically with regards to the property where the Seaport Marina hotel is located at PCH and 2nd Street. I understand you are accepting public comment until Sept 19.

While I am not opposed to including a mixed-use facility at the location of the Seaport Marina hotel, I am *__extremely__* opposed to granting variances for height and density beyond what is currently allowed. R10-5

I am opposed for all of the reasons stated in the Significant Unavoidable Adverse Impacts report, but most especially because of the negative impact on traffic and corresponding population density in the area. WHY would Long Beach continue to entertain a proposal that has so many unavoidable adverse consequences for Long Beach residents? WHAT BENEFIT is there in increasing the population density in this area? For the sake of "growth"? To accommodate developers and the existing property owner? We don't need growth in our community, and we don't need to cater to developers. R10-6

I understand that this will enrich developers and others on a short-term basis, as well as the property owners on a long-term basis, and presumably bring greater tax revenue to the city, but at TREMENDOUS COST to the existing residents. Why grant a variance if you are truly working for the citizens of Long Beach? This would degrade our quality of life, not enhance it. R10-7

Shops and restaurants and movie theaters such as are in Marina Pacific and the Market Place are great, and would be wonderful to have at the Seaport Marina location – but I strongly object to adding residential and hotel units that exceed current zoning height and density, and that would

create more traffic, more pollution, and provide virtually no benefit to the vast majority of current residents. I am thoroughly confused as to why this is still being considered. R10-7 (cont.)

Thank you for your time and consideration.

Randy Peck

5596 E. Bay Shore Walk

Long Beach

562/706-7492

-----Original Message-----
From: cathyblack
Sent: Sunday, September 11, 2016 8:56 PM
To: Craig Chalfant
Subject: SEASP Feedback

The proposed SEASP density plans would adversely impact what is already a problematic traffic situation at 2nd and PCH and would result in building heights out of character for this area of East Long Beach.

The DEIR proposed traffic mitigation plans do not appear adequate to address the additional traffic that would result from the density as proposed for the Mixed Use Community Core region along PCH. The existing wait time at almost all day time hours (seven days a week) at 2nd and PCH would be severely impacted by the density proposed in the SEASP plan. R11-1

Additionally, the five story building height is grossly out of character for this region of Long Beach. As a long time Long Beach (Naples) resident, we do not wish to see PCH turn into a copy of Huntington Beach near Main Street. R11-2

Please take these considerations into account. I believe my opinions are shared by many of our local neighbors. I do not wish to be NIMBY resident, but would encourage future development in this region to be less dense to minimize what is already a bad traffic situation and to limit building heights to no greater than three stories. R11-3

Respectfully,

Cathy Black
17 Savona Walk
Long Beach, CA 90803

Letter R12

From: Patricia Bliss
Sent: Monday, September 19, 2016 3:40 PM
To: Craig Chalfant
Subject: Comments re SEASP DEIR

Patricia T. Bliss

7215 E. Killdee Street

Long Beach, CA 90808

Phone or Fax: 562-425-6302

September 19, 2016

Craig Chalfant

Department of Development Services

City of Long Beach

Some Good Things

1. Inclusion of almost all remaining Southeast Long Beach wetlands in the category of wetlands, so that the Coastal Commission can get all these lands certified

2. Calming of traffic on PCH from Second Street to the Orange County border

3. Encouragement of the use of bicycles and walking

4. Allowing public viewing of wetlands (Someone, perhaps the Planning Commission, should carefully specify that there should be no trespass on wetlands except for the viewing areas on the perimeter. However, I favor taking from the wetlands space for a bike path, 2-way, running parallel with and next to 2nd St.-Westminster from Shopkeeper Rd. to Seal Beach Blvd. on the south side.) R12-1

Some Bad Things (See P. 7-33 "Summary of Impacts of Alternatives . . .")

1. The increase in dwelling units leading to a big increase in population leading to an insupportable increase in traffic (SU on chart). It is difficult to see how the EIR could consider this change in dwelling units LTS. R12-2

2. The increase in commercial units leading to an increase in traffic (SU on chart) R12-3

3. The increases in traffic from the above causes would inevitably lead some people (and thus the City) to propose roads through wetlands. Roads through wetlands are completely unacceptable because they cut off wildlife from necessary corridors. R12-4

4. The increased height allowed, even though limited, would substantially change the aesthetics of the region, contrary to the conclusions of Chapter 501 of the EIR. Even a few more stories can be readily seen across the wetlands and are unwelcome, as is illustrated by the BestBuy sign in the Marina Pacifica Mall. What residents would get in view corridors to the water is not worth what they would lose in views of the trees. R12-5

It is a fact that no one is compelled by law to consider the economics of building one way or another when zoning an area, so I object to any assumption that there is required some kind of *quid pro quo* in planning for any area. However, like many Long Beach residents, I am sensitive to the fact that residents may have to forego amenities in return, for example, for not having seven stories. From my point of view that is acceptable. (Mitigation measures are overrated anyway, given that there have been any number of them required over the years that have never been fulfilled even though variances were granted by the City Council. Better to leave things alone than to buy a "bill of goods.") R12-6

I would pick an Alternative except that I disagree with some of the analysis of the Alternative that I would otherwise approve, as discussed above. All I can say, then, is that the Proposed Project should be rejected. R12-7

Letter R13

From: Michael Bohn
Sent: Monday, September 19, 2016 8:09 PM
To: Craig Chalfant
Subject: S111_SEASP Comments.docx

Mr. Chalfant,

I am submitting the attached letter on behalf of Studio One Eleven to express strong support for the Draft Southeast Area Specific Plan (SEASP). We have provided the enclosed recommendations and questions to help the City of Long Beach strengthen the Plan and successfully implement its vision.

Please let me know if you have any questions or would like to discuss our recommendations in further detail. Thank you.

Michael Bohn, AIA
Design Director/Senior Principal

studioneleven
at P+R Architects
111 West Ocean Blvd., 20th Floor
Long Beach, CA 90802
562.901.1500 phone
562.901.1501 fax
www.studio-111.com

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Please consider the environment before printing this e-mail.

September 19, 2016

Mr. Craig Chalfant
Senior Planner
Long Beach Development Services
333 W. Ocean Blvd., 5th Floor
Long Beach, CA 90802

RE: Draft Southeast Area Specific Plan and Draft Environmental Impact Report Comments

Dear Mr. Chalfant,

Studio One Eleven is writing to express our strong support for the Draft Southeast Area Specific Plan (SEASP). We have been retained by the Alamitos Bay Partnership to understand the impact of the revised specific plan as it relates to their specific properties. Based in downtown Long Beach, Studio One Eleven is an integrated practice in architecture, landscape, and urban design dedicated to creating more vibrant and healthy communities. We believe the update to SEASP is R13-1

aligned with this goal, and serves as an opportunity for the City of Long Beach to tactically guide future development in the area, in order to achieve the vision of a complete community that is as economically prosperous as it is sustainable.

It is important for the community to understand that increased development intensity on select and suitable sites will be a necessary and contributing factor in the restoration of the wetlands through a potential mitigation bank and monitoring funds. In addition by utilizing the most intensive development option, investment can be made in providing numerous public amenities such as waterfront promenades, an event's park and plazas.

R13-1 (cont.)

We would want the community to recognize that the regulations set forth in the Plan facilitate appropriately scaled development for the surrounding context. Using the development standards in SEASP, we have developed a design concept for two sites (one in the Mixed-Use Community Core, and one in the Mixed-Use Marina) with the most density suggested in the Plan - and have received favorable comments from the community on our proposal. We are open to sharing our proposal with any stakeholders to show the standards articulated in a built form, to help the community to better understand the Plan.

We raise the following questions to the City of Long Beach to test their recommended strategies, in order to achieve SEASP's vision. We hope this process enables the City to strengthen their recommendations and revisit the parts of the Plan that need greater articulation.

Transportation

The mobility section in SEASP could take a closer look at transportation alternatives that take a more holistic approach. For instance, separated bike lanes are recommended in parallel with an increase in the number of lanes along PCH without addressing how these two components tie together as part of a larger narrative on how mobility within the district will be transformed over SEASP's visioning period of 50 years.

R13-2

From the recommendations to increase the number of lanes along PCH, it appears to still be very focused on moving regional vehicular traffic through the corridor without truly understanding the impact of a six lane roadway on the Plan's potential to create a sense of place. How does walkability and pedestrian character begin to create the quality of a 'main street' and create relationships between programs along both sides of the street? What is the value of traffic calming solutions in light of an increased number of lanes for vehicular travel?

What is the intended speed limit of PCH and how is the goal for walkability and pedestrian comfort going to be implemented and measured? How does introducing a stronger grid network impact traffic? For instance, how does extending Marina Drive north of Second Street or connecting Colorado to Pacific Coast Hwy impact traffic? Finally, why is the city using the LOS methodology when VMT is available, a better means of assessing and disclosing environmental impacts?

Relinquishment of Pacific Coast Highway (PCH) to the City

R13-3

We strongly support the relinquishment of PCH by Caltrans to the City of Long Beach, assuming an equitable financial settlement can be attained. We also believe with the most intensive development option implemented, a PBID could be established to maintain Pacific Coast Hwy.

once initial improvements are made. There are numerous reasons for this: there is a lack of synchronization between traffic signals on PCH and the collector streets, leading to greater delays and lack of streamlined traffic flow. Integrating the street network within the SEASP area into a seamless management system will create greater efficiency in moving traffic through the district. Relinquishment also provides other benefits. Currently, the lanes along PCH are required to maintain the Caltrans standard of 11' in width. Reducing the lane widths to 10'-6" (as already proposed in SEASP) would provide additional room for street infrastructure such as bike lanes, and create opportunities for traffic calming through the use of planted buffer zones. Narrower lanes promote slower travel speeds, as will a decrease in the number of travel lanes, making room for on-street parking and making the streets safer for pedestrian use and walkability. R13-3 (cont.)

In addition to these suggestions, we also recommend revising the street section diagrams (see attached) to include appropriate landscaping, adjacent program and massing elements to provide a complete picture of the proposed street character. R13-4

Density

There have been objections to the proposed densities within SEASP with concerns over traffic congestion and air quality. We would like to point out that a holistic solution to mitigate these concerns is not in lesser density and roadway infrastructure with faster speeds. It is actually in providing a suite of well designed, multimodal transportation solutions that can encourage transit ridership.

It is important to note that transit ridership is an economic argument as much as it is an environmental one. To be able to support a transit service with a high frequency that is convenient for commuters on a regular basis (anything above one bus service every 30 minutes), there is a minimum required development density of at least 10 to 15 dwelling units per acre (du/ac). Information published by the Institute for Transportation Engineers in the manual 'A Toolbox for Alleviating Traffic Congestions' (1989) verifies that densities at or below a threshold of 5 du/ac will only support a minimum level of bus service (one bus per hour in each direction). This level of transit service is grossly inadequate to achieve the kind of sustainable district that SEASP aspires to be. At such low service, there isn't sufficient frequency and ease of use for residents to make a shift to transit, and driving will continue to be the primary form of transportation. To follow this argument through, the continued prevalence of driving as a primary mode of transportation will not only lead to sustained levels of congestion, but it will also add to continued GHG emissions and release of particulate matter into the environment. This will be far more harmful and difficult to contain over the longer term than any short term emissions from construction activity that can be monitored and limited to acceptable standards. R13-5

The existing density in the SEASP area is under 3 du/ac. The proposed density under SEASP once built out will be in the range of 6.5 du/ac, which is far more viable to support transit services. With other uses such as retail, office and hospitality proposed, this should further support more frequent transit. Less density will reduce transit amenities resulting in a greater reliance of the automobile.

Architecture

We believe this area should be of a world class quality in terms of building materials and architectural style. We suggest the City respond to the document by encouraging a material

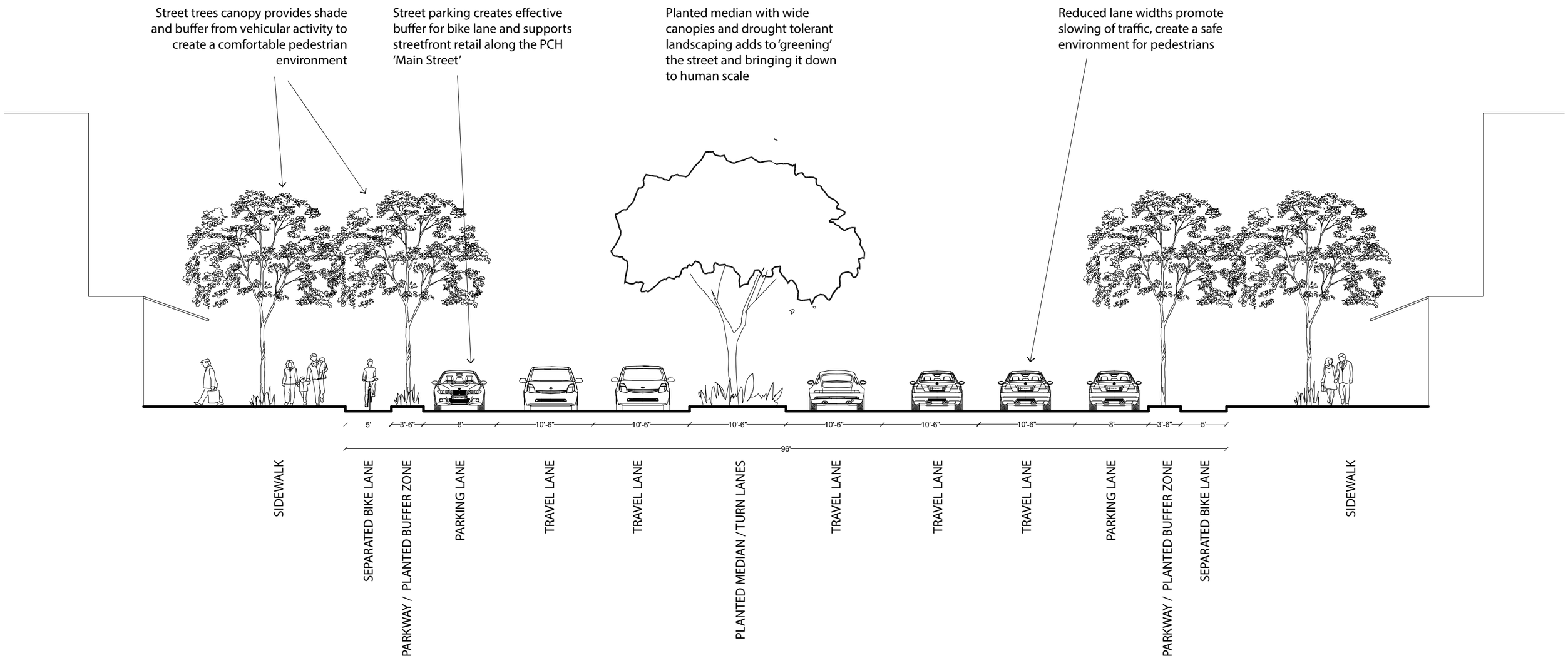
palette for SEASP that is reflective of the community's beachside culture. This should include textures, such as various siding, panels, and wood like products to bring in a warm quality and human scale. We have shared images that reflect this goal with the community that has been very favorable. R13-6

The comments above are intended to provide critical reflection and suggestions to achieve the intended purposes of the SEASP. We are fundamentally in support of the vision, goals, and objectives in the Plan and are available to clarity our comments, as needed.

Thank you,

Michael Bohn, AIA
Design Director/Senior Principal
studioneleven
at P+R Architects
111 West Ocean Blvd., 20th Floor
Long Beach, CA 90802
562.901.1500 phone
562.901.1501 fax
www.studio-111.com

STREET SECTION RECOMMENDATION FOR PACFIC COAST HIGHWAY FROM SAN GABRIEL RIVER TO 2ND STREET (looking north)



From: Sarah Brinton
Sent: Thursday, September 15, 2016 10:42 PM
To: Craig Chalfant
Subject: SEASP plan and alternative

Good Evening Mr Chalfant,
Please do not ruin out access in and out of the Shore by passing the SEASP developemnet plan!!! Please pass the No Project/ No Development Plan.

Please use our experience from growing up in Redondo Beach to be your guide and hear us out....
Both my husband and I are from "The South Bay" South Redondo Beach to be exact. After living all over the country and returning to Redondo Beach, I knew I needed to leave and come to the BEST CITY in California. Growing up in the 70's and 80's in South Redondo, I would have never have thought Long Beach was that place. But when family homes of my neighbors were turned into multi unit condos - which people bought to rent to others, the traffic was so bad that in 2001 my husband bought a house in East Long Beach. Why? Because it was a desirable single family home neighborhood- and still is.

Once the Large scale development and multi-unit buildings moved into Redondo, small businesses like my father owned were put out of business by larger retailers with more capital. Rents were driven higher by the large chains that could pay them. Traffic increased and made out neighborhoods less safe as Condo units were built and 2 single family homes turned into 8plexes. R14-1

Our schools were impacted and quality of education in an affluent area went down, because no one thought to write in proposals for new schools for the 4000+ new residents children to attend. As Lowell downsizes their number of classes, will they be able to respond to the new population and expand again? I am all for progress and growth, but we beg and implore you to think hard about the long term effects of increased population in a small space.

I grew up a block from the ocean in South Redondo in the house my mother grew up in. The lifestyle is much how my child is growing up now. We chose Belmont Shore to give our child a similar life that we had growing up- and WE CANNOT OBTAIN IN THE SOUTH BAY DUE TO THE RAPID GROWTH AND ILL THOUGHT OUT DEVELOPMENT.

We are residents of Belmont Park (Claremont Avenue) who still own a home in East Long Beach. We also own a successful business in Long Beach. We trust that you will help make the best decision possible. We would like to See NO Project/ No Development approved.

Thank you so much for hear us.
Thomas and Sarah Brinton

Letter R15

From: Kevin Brown
Sent: Wednesday, September 07, 2016 3:45 PM
To: Craig Chalfant
Cc: Suzie Price
Subject: SEASP comments

I recently reviewed the SEASP hearing draft updated July 2016 and have comments:

1. Overall, the plan looks attractive
2. Although I know many local residents object to high-rise buildings, I have no direct objection to seven story buildings in the area, and recognize the need for density to fund other improvements. R15-1
3. The traffic plan appears terribly insufficient. PCH and 2nd is already a very busy intersection, and the doubling of total residents in the area will make a bad situation much worse, and push traffic up to PCH and 7th, another overcrowded intersection. R15-2
4. In my view, the increase in residential density must be accompanied by a significant increase in transportation, or not allowed at all. If you can't find a way to alleviate the traffic congestion, don't make it worse. R15-3
5. I would like to see major intersections (like PCH and 2nd, PCH and 7th) converted to rotaries / roundabouts / traffic circles which allow traffic to move smoothly without stoplights. At PCH and 2nd, this might need to encroach on some of the existing corners (e.g., the In-N-Out, gas station, hotel parking lot) to make a traffic circle large enough for three lanes coming in from each direction. At traffic circle at PCH and Loynes would help as well. R15-4

Regards,

Kevin Brown

-----Original Message-----
From: Nancy
Sent: Monday, September 19, 2016 8:36 AM
To: Craig Chalfant
Subject: SEASP

It's my understanding that the maximum height won't occur on all buildings. Also low cost housing will be included & lots of open space. Thus I support SEASP. R16-1
What I do recommend as an alternative is making 7th St the Main Street to the freeways.
Nancy Buchanan
562-225-9947

Sent from my iPhone

From: Mike Buhbe
Sent: Monday, September 19, 2016 11:04 AM
To: Craig Chalfant
Subject: SEADIP comments

I am opposed to the SEADIP planning at the corner of PCH and Second Street in Long Beach. This development will impact traffic heavily in my town of Seal Beach. We residents are opposed to high density development. We are opposed to buildings over 2 stories in height. R17-1

Reject the current plan. Lower the density and building heights to two stories.

Please enter my comments in the public record

Mike Buhbe

Letter R18

-----Original Message-----
From: Jennifer Cameron
Sent: Monday, September 12, 2016 10:25 AM
To: Craig Chalfant
Subject: 2nd&PCH

Regarding the new draft the most impact on our community will be from unmanageable traffic. Until the state, and local government agencies can meet to resolve and deal with traffic issues there should be no action taken. Traffic is already an F during certain hours. It will come to a standstill if you allow more development. This draft does not address the most key issue. R18-1

This should be turned down until traffic can be controlled.

Camerons 65-63rd Place LB 90803

Sent from Jennifer

Sent: Monday, September 19, 2016 9:52 AM
To: Craig Chalfant
Subject: SEASP DEIR comments

Dear Mr. Chalfant:

Please consider these comments for SEASP DEIR.

I find the Plan does not follow the objectives desired by the majority of the public who participated in the many public meetings.

It is stated in the DEIR:
"To create a sustainable, feasible and effective plan, three primary planning "pillars" must be equally considered:
• Physical Benefits (amenities, design, placemaking)
• Environmental Benefits (conservation of coastal resources) R19-1
Economic Benefits (can the proposed mix of uses be built under existing circumstances)"

I attended all but one of the public meetings for SEASP and what I heard from the public were not these three objectives, but two big concerns: **Terrible Traffic in the area and a desire to Preserve and Restore the Wetlands.**

Even with the attempts at mitigating the effects of adding 5,429 dwelling units, 8,648 population increase, 560 more employees, the DEIR's conclusion was that the traffic impacts are considered significant and unavoidable. In other words, traffic will continue to be at D, E, and F levels at most of the intersections in the area and the added population will only worsen the problem to levels beyond F.

In addition to Transportation and Traffic, other Significant and Unavoidable impacts are: Air Quality, Cultural Resources, Greenhouse Gas Emissions, and Noise. All of these Significant and Unavoidable Impacts render this Plan unacceptable. R19-2

Many of the mitigations proposed in this EIR appear inadequate. The area of most concern for me are the mitigations suggested in the Biological portion. I believe they will not protect the plants and animals in the wetlands, especially the birds. In fact, the DEIR states:

5. Environmental Analysis DEIR BIOLOGICAL RESOURCES

"Implementation of the proposed Specific Plan could directly impact sensitive species and natural communities. [Thresholds B-1 and B-2] " R19-3

"Artificial lighting at night has been demonstrated to significantly reduce or curtail the normal activity patterns of nocturnal animals by interfering with foraging, mating, nurturing young, other important social interactions. . . . The introduction of new buildings with increased heights in the proposed mixed-use areas or an interpretive center in the proposed Coastal Habitat, Wetlands & Recreation areas could impact sensitive habitat and wildlife in the LCWC and open space areas."

There are a number of suggested mitigations for lights, including:

Buildings shall be designed to minimize light spillage and maximize light shielding to the maximum feasible extent.

Building lighting shall be shielded and directed downward, up-lighting is prohibited. Use of "event" searchlights or spotlights shall be prohibited.

Landscape lighting shall be limited to low-intensity and low-wattage lights.

Red lights shall be limited to only that necessary for security and safety warning purposes, blue or green lights are a better option if the use of colored lights is desired.

However the DEIR states: <u>Even with these measures, new lighting proposed within and adjacent to sensitive habitat could impact wildlife.</u> These are not adequate mitigations.

R19-3 (cont.)

Human Activities/Urban/Wetland Interface
"The proposed Coastal Habitat, Wetlands & Recreation land use designation encourages trails and public viewing areas and allows for the development of visitor-serving recreation or an interpretive center. Additionally, the proposed Project would increase residential uses, increasing population in the Project area. The proposed uses and Specific Plan buildout would attract residents and visitors to the wetland areas. Increased recreational use has damaging effects on wildlife due to trampling, bicycle use, and unregulated movement of domestic animals. The impact of human intrusion into sensitive biological resources could result in a significant impact."

I find no mitigation for the problem of increased human activity in the wetlands other than planting native plants and attempting to avoid hybridization with wetland species.

Wherever possible, there should be the 100 foot wetlands buffer included in this plan as required by the Coastal Commission.

R19-4

All public trails should be be on the perimeter of the wetlands to protect the plant and animal species.

No type of development should be allowed on the Alamitos Partners or the wetlands portion of the Pumpkin Patch, which would destroy sensitive species habitat.

R19-5

5.4.4 Cumulative Impacts
"Loss of native vegetation and habitat, on removal of mature trees, or excessive outdoor lighting could contribute to a cumulative impact. However, only a small area of wetland habitat would be impacted which would not result in a significant cumulative impact. The vast majority of wetlands in the LCWC would be preserved. With the mitigation required for the Project area, no significant cumulative impacts to biological resources".

With the loss of over 90% of California coastal wetlands, even a "small area of wetland habitat" is a significant impact. This mitigation is inadequate.

R19-6

Avian Species – Bird Strikes
"Of the 26 special status wildlife species present in the specific plan area, 15 are birds. The LCWC provides habitat for a number of bird species and is part of the Pacific Flyway. However, development that increases building heights near sensitive habitats—Sims' Pond, Jack Dunster Marine Biological Reserve, LCWC, and all areas proposed to be designated Coastal Habitat, Wetlands & Recreation—has the potential to impact sensitive birds due to bird strikes. For example, a mixed-use development with a hotel component could allow up to seven stories in the Mixed Use Community Core or new industrial uses on the vacant Pumpkin Patch, adjacent to the wetlands."

R19-7

"It is well established that buildings can pose a significant hazard to flying birds from collision. . . .About 90 percent of bird strikes with buildings are within the first 40 feet in height (comparable to a 3 story building)." R19-7 (cont.)

The only acceptable mitigation for these building bird kills is to retain the current 3 story height limit and use adequate 'bird safe' glass on all buildings.

"In addition to the building, lighting, and landscaping requirements, height limitations are required within 100 feet of a wetland (see Section 7.1.5 of the Specific Plan, Special Edge Conditions, Wetlands Edge at Shopkeeper Road)."

Birds do not stay within 100 feet of a wetland. They fly in and out to forage, especially those nesting outside of the wetlands at the Seal Beach National Wildlife Refuge and Alamitos Bay. These are the ones who will be most impacted by 5-7 story buildings.
I find the mitigations for the protection of nesting birds totally inadequate. Many birds, especially raptors and herons, nest outside of the stated January 15 to September 1time frame. Hummingbirds nest year round in So. CA. And what happens to the birds who are allowed to raise their young in the same tree for years, only to return the next year to find the tree gone? Birds have specific needs for nesting which includes tree height, species, near available food source, and protection from predators. Although there are some species who will nest in colonies in a few trees, most birds need separation from other birds who might prey on their eggs and young. When mature trees are removed, it takes years for the replacements to grow large enough to be used for nesting. In the meantime, generations of birds are lost from the area because of a "housing shortage". R19-8

I especially wish to address the idea that if birds lose habitat in one place, they will 'just go somewhere else'. As experienced birders know, birds return to the same breeding site year after year. Even if the displaced birds try to find another nesting site, with the small available habitats, it will most likely be already taken by other birds. There is no such thing as 'Free as a bird'--they are constrained by need for special food, nesting, roosting and concealment requirements.

I find most of the mitigations in the Biological section totally inadequate and conclude the only feasible alternative is NO PROJECT/NO DEVELOPMENT ALTERNATIVE. The only way to protect the wetlands and keep traffic from getting worse is to reduce density below the present SEADIP and allow no further development in the area. R19-9

I do not agree with the conclusions in the DEIR, which state:
7.5.4 Biological Impacts
"The No Project/No Development Alternative would not result in any new development, and direct impacts to biological resources would be reduced. However, existing development adjacent to the wetlands would continue to operate as is—in some instances, allowing untreated stormwater runoff to flow directly into the wetland and nearby habitats. This alternative would not allow for the development of wetland buffers or the wetland monitoring fund, which would serve to preserve, restore, and maintain the wetlands, as provided in the proposed Specific Plan. Therefore, impacts would be greater compared to the proposed Project." R19-10

These arguments are unsubstantiated. The CA Coastal Commission already requires 100 foot wetland buffers and the wetland monitoring fund can proceed without SEASP. If there is untreated stormwater runoff flowing directly into the wetlands, it should be halted immediately.

As this DEIR has many unsatisfactory mitigations and significant issues which cannot be mitigated, I respectfully ask you to approve the No Project/No Development Alternative. R19-11

Ann Cantrell
3106 Claremore
Long Beach, CA 90808

From: Patricia Chen
Sent: Monday, September 19, 2016 10:35 PM
To: Craig Chalfant
Subject: Southeast Area Specific Plan Draft Environmental Impact Report

Mr. Chalfant,

Attached please find my comments. Thank you for the opportunity to provide input on this important document.

Patricia Chen
4651 Hazelbrook Ave.
Long Beach, CA 90808

Letter R20

Patricia Chen
4651 Hazelbrook Ave.
Long Beach, CA 90808

September 19, 2016

Mr. Craig Chalfant
Senior Planner,
Long Beach Development Services
333 W. Ocean Blvd., 5th Floor
Long Beach, CA 90802
by e-mail to craig.chalfant@longbeach.gov.

Dear Mr. Chalfant,

I am writing with comments on Sections 2, 5, 7, 8, and 10 of the Draft Environmental Impact Report (DEIR) for the Southeast Area Specific Plan (SEASP). I am concerned about the Alamitos Energy Center (AEC), which is located in the plan area. The owner of the plant is proposing to include a new gas-fired burner. I am a resident of the City of Long Beach and live in the area served by the power plant which AEC will replace. Burning gas, or methane, emits sulfur dioxide, which harms neighbors, emits carbon dioxide which contributes to global warming, and leaks methane which is a powerful greenhouse gas (GHG), and is sourced mostly from brokers of hydraulic fracturing sites. That means that allowing the power plant in the proposed configuration would contribute to climate change, earthquake damage, and poisoned aquifers, as well as the health impacts on the neighbors. The Obama Administration considered downstream issues in rejecting the KXL Pipeline application. The state should do so with the upstream issues in this DEIR.

The DEIR should include a discussion of the environmental and health impacts of the AES proposal as compared with those of an optional proposal under which the AEC performs its peaker function by storage of renewable energy, charging up when supply is ample and releasing when demand is high. Energy storage could be accomplished by batteries or by other, less hazardous means, such as thermal energy storage in salt. R20-1

As a person who is gravely concerned about the climate, I don't want another gas-fired burner where the current one is being removed by law. I want to see the fastest possible transition to renewable energy. I am not alone. The County of Los Angeles is spearheading an effort to implement Community Choice Aggregation (CCA) to accelerate the clean energy transition. Most, if not all, cities in the South Bay area have adopted resolutions to perform the feasibility study which is the first step toward CCA implementation. The City of Lancaster has already implemented CCA. The City of Los Angeles has just adopted a zero emission goal which will apply to its utility, the Department of Water and Power. Clean power. California State University Long Beach has adopted a zero emissions by 2030 goal, as has the University of California, including all nine campuses. As clean power comes online it will further increase the temporal mismatch between energy production and use, make the need for AES' peaker function more acute. An energy storage approach will do it best and with the least environmental impact.

Please consider in the environmental impact report for the SEASP the health and environmental impacts of the current AES proposal, including the seismic damage, leaks and emissions of fracking fluids, carbon dioxide, and methane which will result from the extraction, transportation, storage, and combustion of the methane fuel. Thank you for your consideration. R20-1 (cont.)

Sincerely,

PATRICIA CHEN

Letter R21

From: Christensen George
Sent: Monday, September 19, 2016 3:20 PM
To: Craig Chalfant
Subject: Response to the SEADP DEIR

Dear Mr. Chalifant, Here is my response to the SEADIP DEIR (also sent as an attachment if that works better for you).

September 19, 2016
Anna Christensen
259 Termino Ave, Long Beach, 90803

The Draft Environmental Report for SEADIP is inadequate and should be rejected by the City of Long Beach Planning Commission for the following reasons:

1. Lack of consultation with appropriate California Native American tribes by the City of Long Beach and its contracted agents re SEASP (Placeworks, J. McKenna et al), including lack of outreach to and lack of follow up with California Indian tribes and organizations with cultural connection to the affected area. R21-1
2. Denial of right to consultation re the DEIR for SEASP, including false statements in the DEIR and in the Cultural Resources Overview resulting in the misrepresentation of a California Indian Tribal group's request for consultation during the DEIR process.
3. Inadequate communication re the scope of the project (a rezoning and change to the General Plan of the City of Long Beach) resulting in a failure to communicate the probable destruction of both cultural and biological resources essential to the integrity of the Cultural Traditional Tribal Landscape of the Los Cerritos Wetlands. R21-2
4. Failure to acknowledge the past and present relevance of the area to California Indian tribes.

1. no reference to well-documented inter-tribal cultural/spiritual connections to the area, including past and current spiritual practices related to the Chinigchinich tradition by Luseno, Ajachemen, and Tongva tribes.

1. no reference to Puvugna as a sacred site as the birthplace of Chinigchinich and the place of origin for his teachings.
2. no reference to past and present efforts by members of these groups to protect sacred sites and burial sites in the area from destruction and to protect the ecosystem of the Los Cerritos Wetlands and surrounding open space in keeping with California Native American tribal beliefs regarding responsibility for the well-being of ancestors, relatives, and future generations. R21-3
3. no reference to the area as part of the communities of Puvugna and Motuucheynga and as such eligible as a Traditional Tribal Cultural Landscape, Sacred Site, and National Register Site.
4. no reference to current cultural and spiritual practices within and adjacent to SEADIP, including the annual Ancestor Walk and activities of the Ti'at Soceity.
5. no reference to the historic alliance of California Indian tribes and community members which resulted in the protection oft the National Register Site of Puvugna from destruction by CSULB, nor any reference to the National Register Site of Puvugna at Rancho Los Alamitos
6. no reference to biological resources in the context of California Native American cultural/spiritual beliefs and practices, nor in the context of maintaining these beliefs and practices through access to and maintenance of the ecosystem.

1. Failure to follow CEQA and SB 18 by the City of Long Beach as evidenced by

1. adopting the perspectives of archaeologists and excluding California Native American perspectives. The SEADP DEIR focuses on California Native Americans, California Native American History, and California Native American culture as the subject of scientific investigation. R21-4

2. using consultants (Placeworks and J McKenna et al (an archaeological firm) as intermediaries and "gatekeepers" re consultation with California Native American tribal and cultural groups, resulting in lack of information, misinformation, and the marginalizing of California Indian tribes and tribal representatives R21-5
3. failure by the City of Long Beach to acknowledge the value of California Indian tribal culture and history to the citizens of Long Beach, including the relationship of California Indian tribes to the Los Cerritos Wetlands, resulting in lack of community concern for the destruction of tribal cultural resources. California Native American people and California Indian cultures, and California Indian places can no longer be seen as mere subjects of scientific investigation R21-6
4. failure to establish meaningful and ongoing direct communication with California Indian tribes as regards the understanding and protection of areas within and/or under the jurisdiction of the City of Long Beach (LCWA). Failure to acknowledge California Native American tribes as community participants having a legitimate and legal stake in decisions that affect them, including establishing tribal conservation easements for the purpose of protecting tribal cultural resources. R21-7

Senate Bill 18 states as follows:
Per SB 18, the law institutes a process which would require a city or county to consult with the NAHC and any appropriate Native American tribe for the purpose of preserving relevant TTCP prior to the adoption, revision, amendment, or update of a city's or county's general plan. (SEASP is a change to the General Plan of the City of Long Beach).

Prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the lead agency shall begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation.

In addition, SB 18 law also amended Civil Code Section 815.3 and adds California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places. R21-8

The Cultural Resources sections of the SEASP DEIR and the Cultural Resources Overview report fail to acknowledge requests for further consultation re the SEASP EIR and make false statements re Native American comments on the DEIR. Letters re SEASP were mailed by McKenna et all, an archaeological firm, to selected Native American representatives. McKenna et all states that "responses have been incorporated into this technical report." Under *Native American Consultation* the individual responses of some tribal representatives are summarized. These summaries conclude that tribal representatives request only that they be notified when specific projects are proposed and/or that Native American monitors be present during earth moving activities. Regarding Rebecca Robles the summary states that "she requests no further consultation, but should be consulted on a project-by-project basis." However, in appendices attached re *Native American Consultation* is a letter dated 1/7/16 from Rebecca Robles, representing the United Coalition to Preserve Panhe, which reads as follows, "Thank you for the opportunity to comment on the above mentioned project (SEASP). We consider portions of the project area to be sensitive for the presence of buried archaeological resources. Therefore, we request that you continue to keep us informed. We look forward to the results of archaeological and cultural investigations and to further participation in the environmental review process. To that end we reserve our right to comment further in the future." Since no other responses from Native American representatives are in the appendices, we have no way of knowing if, in addition to Rebecca Robles, others have been misquoted and denied their legal right to consultation by the City of Long Beach as represented by McKenna et all.

SEASP DEIR makes no reference to Rebecca Robles (and possibly others) requesting to participate in the EIR processes R21-9

1. Environmental Analysis CULTURAL RESOURCES

American Consultations Sacred Lands File

On December 8, 2015, the NAHC conducted a Sacred Lands File check and found one site on the Los Alamitos Quadrangle. Additionally, they provided a tribal consultation list. Requests for consultation were sent to 18 tribal representatives. Responses were received from the following representatives:
♣ Rebecca Robles, Juaneño/United Coalition to Protect Panhe
♣ Joyce Perry, Juaneño Band of Mission Indians Acjachemen Nation
♣ Andrew Salas, Gabrieleño Band of Mission Indians Kizh Nation
♣ Anthony Morales, Gabrieleño/Tongva Band of Mission Indians.

R21-9 (cont.)

Each of the respondents stated that the study area was within the traditional territories of their tribe and was highly sensitive for archaeological resources. All requested continued contact as individual projects in the Specific Plan are proposed. Three of the representatives requested Native American monitoring of all earth-moving activities."

In light of the above the SEASP DEIR is incorrect ire its conclusion that all impacts to Cultural Resources can be mitigated to Less than Significant Impact - "Cumulative impacts would be less than significant, and Project impacts to cultural resources would not be cumulatively considerable." 5.5.8 Level of Significance After Mitigation
Impact 5.5-2 Implementation of the mitigation measures set forth above would reduce impacts to cultural resources to less than significant. No significant and unavoidable impacts would occur. Impact 5.5-3 Implementation of the mitigation measures set forth above would reduce impacts to human remains to less than significant. No significant and unavoidable impacts would occur.

The SEADP DEIR should be rejected because it incorrectly states as follows, "the decision-making body has balanced the benefits of the proposed Project against its unavoidable significant environmental effects and has determined that the benefits of the Project outweigh the adverse effects, and therefore, the adverse effects are considered to be acceptable." However, "the decision-making body" reached this conclusion without having information re "unavoidable significant environmental effects" which could have been avoided if California Native American tribes were included as required by law in the decision-making process. R21-10

SEASP, the Southeast Area Specific Plan, will change the existing zoning restrictions (SEADIP) for a section of Long Beach that includes the Los Cerritos Wetlands. The SEASP DEIR is being opposed by local residents and environmentalists on a number of grounds and opposed by Southern California Indians as well.

Even though,under SEASP, more land will be set aside as protected wetlands, the impact of as many as 5000 more residential units plus hotels and shopping malls and an increase in building height from 3 to 5 and possibly 7 stories will be devastating to wildlife and the wetlands ecosystem as a whole. The cultural resources section of the DEIR identifies numerous marked archaeological sites within the SEASP area, and the probability of disturbing more sites during future construction projects is assumed. R21-11

The cultural resources section of the SEADP DEIR is a cut and paste of the same section in the Initial Study for SEADP. Prepared by and reflecting the perspective of an archaeologist relying solely on past archaeological data, it is devoid of any tribal voice regarding the historical and present significance of the Los Cerritos Wetlands to the tribal peoples of Southern California. Nor does the DEIR include any reference to tribal input in the rezoning design itself, even though SEASP rezoning is a change to the General Plan of the City of Long Beach which requires tribal consultation. Nor is there any reference to tribal input re the use and restoration of the Los Cerritos Wetlands and surrounding waterways.

The Los Cerritos Wetlands are eligible for consideration as a Traditional Tribal Cultural Landscape according to the Native American Heritage Commission. These wetlands originally connected Puvugna R21-12

and Motuucheynga and were an integral part of both communities. Archaeological evidence of tribal occupation including human remains have been found in the wetlands and in the surrounding areas. Historical records document their relevance to California Indian peoples, past and present as a site of ceremony, habitation, trade, and travel. The Ancestor Walk and the Ti'at Society currently include the Los Cerritos Wetlands and surrounding waterways in their sphere of activities. Additionally, both the Tongva and the Acjachemen continue to acknowledge their connection to the wetlands as a living being and their responsibility to protect and preserve the health of the wildlife and the ecosystem as a whole. R21-12 (cont.)

Consideration of the DEIR for SEADP cannot be approved without considering the consequences of a second project currently before the Planning Commission which would have an equally, if not even more, devastating effect on the area within SEADP and beyond. The Los Cerritos Wetlands Restoration and Oil Consolidation Project, would allow the drilling of 120 new oil and water wells beneath the wetlands (diagonal injection methods). The oil company's restoration plan includes draining polluted soil and water into Steamboat Slough, the only remaining ancient and healthy section of the original Los Cerritos Wetlands. The Audubon Society has already filed a lawsuit against this project. The Planning Commission must consider the additional impacts of the proposed drilling and waste disposal in relation existing and proposed density under SEASP, certainly as regards the increased potential for an earthquake along the Newport-Inglewood Fault due to increased injection drilling, and/or pollution of ground water, wetlands, and waterways due to accidental or intentional release of pollutants as a result of The Los Cerritos Wetlands Restoration and Oil Consolidation Project. R21-13

Finally, as a participant in the community outreach events, it became clear that massive private development was sole focus. At one Placework's event, community members were separated and forced to march through a set of stations where proposed mixed-use developments of various shapes and sizes were presented. I can testify to the fact that open dialogue was discouraged and even prevented by Placeworks representatives. The format ran counter to the priorities of residents and was limited to a consideration of what was most profitable for developers and the public's preference in regard to the design of for-profit mixed-use development. No information re the Los Cerritos Wetlands was presented, even though both the LCWA and the LCLT have created excellent restoration plans and wetlands restoration is a community priority and part of the Healthy Communities Policy of the City of Long Beach. Residents are outraged, and rightly so, that their quality of life, and that of the fragile wetlands, is being endangered by SEASP. The Planning Commission must reject the SEASP DEIR and choose 1.5.2 No Project/No Development Alternative. R21-14

Dear Mr. Chalfant,

My name is Tahesha Knapp-Christensen. I am a life-long resident of the City of Long Beach. I also graduated with my Bachelor's Degree from California State University Long Beach but most important to my identity is that I am an enrolled member of the Omaha Tribe of Nebraska. As a college-educated, concerned citizen of Long Beach, and a Native American, I implore you to consider the glaring lack of tribal consent for this project in the Draft Environmental Review by local Tongva and Acjachemen representatives and community members as required by law under Senate Bill 18 and the California Coastal Commission Act. This is not just a courtesy, IT IS STATE LAW. To put this local issue in a larger perspective, consider the recent Banning Ranch decision that was reached after a 13 hour long hearing whereby 3 out of 10 of the Commissioners cited "a lack of tribal consultation" as a determining factor for rejecting a similar large scale residential and commercial development and oil extraction industry, in Newport Beach, at the expense of sensitive wetland habitat that included not only endangered plant and animal species in the EIR but also a high likelihood of discovering protected cultural and human remains. To put this in an even greater perspective, you can see now the social mobility of people across the nation with regards to protecting our land and waters from desecration by big oil and industry surrounding the Standing Rock, North Dakota actions. As a Native American, I am telling you that the lack of tribal consultation with local Native leaders, and in addition the denial and misrepresentation of archaeological firm McKenna et al of Acjachemen tribal member Rebecca Robles's request for continuing contact from the firm will not stand up in a hearing. The time for ignoring Native people is over Mr. Chalfant. We will not be ignored. We demand respect for our sacred lands. This wetlands habitat is documented former village site and eligible for registration as a Native American Heritage Commission site. A Cultural Landscape Designation for the Los Cerritos Wetlands was proposed by a staff member of the Native American Heritage Commission. These wetlands originally connected the villages of Puvungna and Motuucheygna and were an integral part of both communities. Archaeological evidence of tribal occupation including human remains have been found in the wetlands and in the surrounding areas. Historical records document their relevance to California Indian peoples, past and present as a site of ceremony, habitation, trade and travel. The cultural resources section of the DEIR identifies numerous marked archaeological sites within the SEASP area, and the probability of disturbing more sites during future construction projects is assumed by the project developers.

R22-1

R22-2

Jeannette McKenna has referenced Rebecca Robles as a Tribal Contact in the SEASP DEIR yet has publicly disregarded and misconstrued Rebecca's request to be informed and included in the EIR process. They have misquoted her and excluded her from participation, a violation of California Environmental Quality Act and the Coastal Commission Act which requires tribal consultation as part of the EIR process. The Cultural Resources Report fails to acknowledge requests for further consultation re: the SEASP EIR and makes false statements re: Native American comments on the DEIR. Letters re SEASP were mailed by McKenna et al, an archaeological firm, to selected Native American representatives. McKenna et al states that "responses have been incorporated into this technical report." Under Native American Consultation the individual responses of some tribal representatives are summarized. These summaries conclude that tribal representatives request only that they be notified when specific projects are proposed and/or that Native American monitors be present during earth moving activities. Regarding Rebecca Robles, the summary states that "She requests no further

R22-3

consultation, but should be consulted on a project by project basis." However, in appendices attached re Native American Consultation is a letter dated 1/7/2016 from Rebecca Robles, representing the United Coalition to Preserve Panhe, which reads as follows, "Thank you for the opportunity to comment on the above mentioned project (SEASP). We consider portions of the project to be sensitive for the presence of buried archaeological resources. Therefore we request that you continue to keep us informed. We look forward to the results of archaeological and cultural investigations and to further participation in the environmental review process. To that end we reserve or right to comment further in the future." R22-3 (cont.)

Missing from the draft EIR is commentary regarding compliance with CEQA and the California Coastal Commission Act with regards to tribal consultation. These wetlands very likely have burials and artifacts of Tongva and Ajachemen origin. I would like to refresh the memory of others of last week's CCA 13 hour long hearing in which 3/10 of the Coastal Commissioners cited lack of tribal consultation as a reason for rejecting Shell/Exxon's proposal for similar large scale commercial and oil extraction industry development. You cannot afford to ignore tribal cultural property perspectives. Native people are done being ignored and having our lands and sacred places violated!!. Thank you for your time and consideration. R22-4

Sincerely,
Tahesha Knapp-Christensen
Long Beach Resident
Letter Dated: Monday 9/19/2016

Letter R23

-----Original Message-----
From: Lynne Clarke
Sent: Tuesday, September 06, 2016 3:44 PM
To: Craig Chalfant
Subject: SEASP Comments

Dear Sir:
The current traffic conditions at 2nd and PCH are untenable. The impact this plan would have on the Southeast Section of Long Beach would create a situation that, rather than increase the desirability and value of the area, would cause congestion, pollution and a devaluation of existing properties. R23-1
Before any redevelopment goes forward, this issue must be addressed.
Please take our comments to heart.
Thank you.
Lynne Clarke
Naples Resident

Date: September 16, 2016 at 1:41:44 PM PDT
Subject: Fwd: Automatic reply: SEASP Comments

Hi Christopher

I received the following email from Craig advising he will return to the office on Monday. The meeting regarding SEASP is scheduled for Monday and I was concerned that my attached comments might not make it in time for Craig to pull and make it part of the presented file, regarding comments concerning the existing SEASP plan.
Any assistance you can provide would be greatly appreciated.
Aileen Colon
cc Craig - Kindly advise if my comments made the file- thanks.

September 16, 2016

City of Long Beach
333 W. Ocean Blvd
Long Beach Ca

Re: Southeast Area Specific Plan (SEASP)

To: Craig Chalfant

From: Aileen Colon
4842 E. Shaw St
Long Beach Ca 90803

Dear Mr. Chalfant;

I would very much enjoy seeing the current Marina Pacific Hotel razed, however I am not in agreement with the current SEASP proposed rezoning changes to the immediate Southeast Area.

SEASP has been designed to allow for major density of both residential and commercial mixed use buildings. I am opposed to allow, such a build up along PCH between the wetlands and Alamitos Bay. In particular, allowing, according to DEIR, up to 5400 new residential units and adding up to 8600 additional people within an area of an 86 acre block is of great concern. R24-1

Today, the intersection at PCH at 2nd Street is heavily congested. I use 2nd Street to access the 22 FWY during work days and the dinner hour on weekends. I normally miss several lights waiting to cross PCH in order to access 22 FWY. We sit on top of the bridge idling and burning fuel which increases pollution. I've tried other routes. An alternate route to include Colorado to Bellflower to Loyne's, however it is such an awful road and seemingly dangerous with its dips and moving road, as even the painted road lines are wavy. I've tried the route along Colorado to Bellflower to 7th Street, which takes me through more residential neighborhoods that have a number of stop signs and it is currently a heavily congested route during commuter morning and afternoon hours. I can only imagine the increased congested traffic SEASP will bring. R24-2

According to the DEIR, increased traffic congestion will occur in Long Beach to include at least 12 other intersections. While attending presentations, the usual response received is that currently the intersection has a Grade F rating, with the presenter body language that reflects a "so-what" attitude, it's already an "F" grade. They have not yet to date, presented any mitigation data, other than to indicate residents will more than likely not need an automobile, as they will bike, walk and use the autonomous vehicle concept. Anyone that currently lives and works in Southern California, knows, that living without a car to commute to work is a necessity and change is unlikely in decades to come.

What is being done to alleviate the current extremely serious traffic problems?

Relief should be provided before allowing any increased dwelling density and commercialization as being proposed within the SEASP. I oppose the height limit planned that the DEIR indicates it will allow 5 to 7 story buildings. I am very opposed to this area resembling Marina Del Ray. R24-3

In recent weeks the L.A. Times has featured the issues increased density brings. Which has been documented and is currently being experienced in both Los Angeles and the City of San Francisco. These cities are currently struggling to resolve what they allowed with the density build up, they permitted.

In short: Let's avoid such density within the Southeast Area of Long Beach.

If you have any questions, please feel free to contact me.

Regards,

(Signed)

Aileen Colon
Phone: 562 987 1680

Begin forwarded message:
From: Melinda Cotton
Date: September 16, 2016 at 2:23:49 PM PDT
To: Christopher Koontz
Subject: Fw: SEASP DEIR Response submitted Sept. 16, 2016

Attached is my Response to the SEASP DEIR, I'd appreciate it if you would acknowledge that you have received it by the due date, as I understand you are out of the office until Monday.

(I've sent this to Craig Chalfant also, however he is also out so hoping it is received by your office.)

Thank you.

Melinda Cotton

Melinda Cotton
PO Box 3310
Long Beach, CA 90803

September 16, 2016

Mr. Craig Chalfant, Senior Planner
Long Beach Development Services
333 W. Ocean Blvd., 5th Floor
Long Beach, CA 90802,

Re: SEASP DEIR Response

The DEIR for SEASP has resoundingly failed in regard to "ISSUES TO BE RESOLVED":

1. NO - this DEIR DOES NOT "..adequately describe the environmental impacts of the project".
2. NO - the benefits of the project DO NOT "..override those environmental impacts which cannot be feasibly avoided or mitigated to a level of insignificance".
3. NO - the proposed land use changes ARE NOT "...compatible with the character of the existing area". R25-1
4. NO - "the identified goals, policies or mitigation should" NOT "be adopted or modified"
5. NO - there are NOT "other mitigation measures that should be applied" (most are not feasible, according to the DEIR itself).
6. NO - the proposed alternatives are not adequate

Over and over again, at public meetings, it was stated that protecting and preserving the Los Cerritos Wetlands was the number one concern and goal to be achieved by the Southeast Area Specific Plan. Traffic congestion was a close second.

Yet what the lead agency and consultants proposed was 5,439 additional dwelling units, 8,648 additional residents, 573,576 sq. ft. in additional commercial usage and 560 additional employees. All of this totally antagonistic to the goal of protecting the Wetlands and preventing further traffic congestion.

The Consultants and City of Long Beach have argued that the public must accept 5 to 7

R25-1 (cont.)

The Consultants stated we had to agree to significant additional development and additional heights from 5 to 7 stories, in order to achieve ill-defined 'public/community benefits' which were never quantified in dollar terms, and never quantified as to required developer fees. There is no guarantee of realistic, substantial improvements in wetlands, open space, traffic, parking, livability - in fact, just the opposite ... with 'Significant and Unavoidable Impacts' listed at every turn and claims of 'Less Than Significant' impact, which are unsubstantiated.

The additional density, population, building height, traffic, and lack of parking will all create a negative impact on the Wetlands - and the livability of this entire SEASP area and beyond. The Project Area itself, and communities surrounding SEASP will be further choked with traffic congestion, their access across the region hindered.

I'll deal first with overall EIR issues raised, and then focus on the unacceptable traffic outcome and development density.

5.2-3 Environmental Impact 5.3.1 Aesthetics

It is totally **inaccurate** to state that buildout with 5 to 7 story developments along PCH would be "Less than Significant". Scenic Vistas, Scenic resources along PCH, the existing visual appearance of the Project area; and generation of additional light and glare into the Project area would ALL be Significantly Impacted by these large developments, and no mitigation is possible.

R25-2

The DEIR **fails** to address the loss of ocean, sky and mountain views from Naples, the Peninsula, Belmont Park, Spinnaker Bay and Alamitos Landing and the 2nd Street Bridge if 5 - 7 story buildings were allowed along PCH from Seal Beach to the current Golden Sails location. Also boats of all types passing west of this area would lose similar views. All of these 'Aesthetic' Environmental Impacts would be Significant.

"Significant and Unavoidable worsening" of Air Quality due to construction, increased population, increased density and increased congestion will negatively impact the Wetlands and its inhabitants as well as those living in the Project area and nearby.

R25-3

5.4 Biological Resources" will be **significantly** affected by the Project, sensitive species and natural communities will be impacted, it is inaccurate to say this is "Less than Significant"

R25-4

5.43 Buildout of the Specific Plan Update will **significantly** impact jurisdictional waters and/or wetlands, and affect wildlife movement. R25-5

5.5 Cultural Resources will endure "Significant and Unavoidable" Impacts, as noted in the DEIR. R25-6

5.6 Geology and Soils - with acknowledged Sea Level Rise, and acknowledged earthquake hazards, Significant Impacts can be expected. R25-7

5.7 Greenhouse Gas Emissions are acknowledged in the DEIR to be "Significant and Unavoidable" R25-8

5.12-4 Noise - Years of construction will make Cumulative Impacts due to Noise "Significant and Unavoidable" according to the DEIR R25-9

5.13 Population and Housing - Adding 8,648 additional residents into this small area along PCH will be a burden as noted in the Traffic section. R25-10

5.14 Public Services for 8648 additional residents and the large proposed increase in development will be costly and burdensome for LBFD, LBPD, Long Beach schools and library services. It is inaccurate to say this would be "Less Than Significant". R25-11

5.16 Transportation/Traffic "**SIGNIFICANT AND UNAVOIDABLE**" IMPACTS of the Project are clear.

Table 6-1 Significant and Unavoidable Traffic Intersection Impacts

Table 6.1 shows 14 intersections with Significant Unavoidable Impacts, 11 due to "Insufficient Right of Way" and three to Caltrans (and not included in the Study be equally impacted would be Livingston at 2nd Street and Bay Shore at 2nd Street) -- all due to the proposed SEASP Project.

In addition, the DEIR states: "...the identified impacts to the freeway system are considered ***significant and unavoidable***.

R25-12

Under "existing conditions" six important intersections in the Project Area are at a 'deficient' LOS and with the implementation of SEASP and 'buildout' of Project developments these would all get worse and the DEIR states that at buildout 15 intersections are at a deficient LOS (most of them at LOS F).

The DEIR details numerous expensive 'mitigation measures' - all of them requiring millions and millions of dollars CalTrans and the City of Long Beach **cannot afford and would not be able to implement**. The DEIR leads one to believe developer fees would cover these huge costs, but no explanation of how this would occur are mentioned. Developers would not be asked to pay the huge amounts needed to cover the cost of the freeway, highway and local street 'mitigations' noted. And nearly all of these 'mitigation measures' are later noted as unfeasible due to Cal Trans, environmental, or other constraints.

The Fehr & Peers Study notes: "The traffic analysis for this project could not identify any additional capacity improvements for autos that would not impact existing buildings or have R25-13

negative secondary impacts -- such as eliminating wetland areas or parking or degrading the pedestrian environment." Improvements were deemed infeasible or are under the jurisdiction of another agency at seven major intersections, including PCH & 2nd St., PCH & 7th Street and Shopkeeper Road & 2nd Street. "Significant and Unavoidable" was the declaration for these many intersections important to the flow of traffic in the SEASP area. R25-13 (cont.)

Bicycle paths and facilities in the area are largely 'discontinuous'. For example there are no clearly marked safe bike lanes on 2nd Street from PCH east to Studebaker or the San Gabriel bike paths and bicycle riding on PCH is unsafe. Bicycle paths are often listed as potential 'mitigations' in the DEIR, but again it's unclear what would actually be allowed and constructed. The Fehr & Peers Study notes: "Due to the limited right-of-way in the Project area and surrounding areas of Long Beach, capacity improvements for autos may require the loss or constriction of bicycle lanes, sidewalks, parking lots, etc." R25-14

Pedestrian improvements are claimed in the DEIR - and it's stated that there would be sidewalks throughout the Project Area on both sides of PCH, on both sides of 2nd Street, on both sides of Marina Drive, on both sides of Studebaker Road, on both sides of Shopkeeper Road and on both sides of Channel Drive. But again there is the stated sticky problem of "limited right-of-way", likely unapproved elimination of wetland areas or parking" and conflict with yet unbuilt bicycle paths. And again, where will the funds come from to pay for these highly expensive improvements (if they are allowed), surely not from limited developer fees? So what is really possible? We have no idea.

Also the 'Volume/Capacity Ratio' in many tables has notations that they have not analyzed "intersections with exclusive pedestrian phases." Pedestrians, including the disabled, cross wide highways and six land intersections at a very slow pace - these are not accounted for, so again it's not clear what the real situation would be. R25-15

(It should be noted that for this very important SEASP Project, the Fehr & Peers Traffic Study looked at only 21 Intersections, while in March 2011 the much smaller 2nd+PCH project DEIR studied twenty- five (25) key study intersections (four (4) more than SEASP). These included Livingston Drive at 2nd Street and Bay Shore Avenue at 2nd Street. The SEASP Traffic Study had no study intersection further west than Naples Plaza at 2nd Street, thus severely failing to study true impacts for a currently heavily traffic impacted nearly two mile stretch - this is a significant mistake. R25-16

In 2011, Bay Shore Avenue at 2nd Street was already at LOS D in the AM Peak Hour and LOS F in the PM Peak Hour and Sat. Midday.

The 2011 2nd+PCH DEIR Traffic Study acknowledged that just this one Project (not all the possible developments expected by SEASP) would impact PCH at 7th, Bay Shore Avenue at 2nd, PCH at 2nd and Studebaker Road at 2nd taking them all to LOS E or LOS F levels)

Overall the 2011 2nd+PCH DEIR Traffic Study seems <u>much more thorough and complete</u> than the one for SEASP. R25-17

Elsewhere in the SEASP DEIR there are tables for "Project-related trip generation" stating "No feasible mitigation is available."

"Breaking up" long blocks in the SEASP area and creating shorter blocks along with "Midblock crossings" on PCH are planned in the DEIR, but the Consultants fail to address the problem of additional stoplights with lengthy pedestrian crossing times which will significantly delay traffic and block traffic flow - thus adding to the traffic congestion in the Project Area and adjacent communities.. R25-18

Note Problems with failure to include additional congested intersections in Belmont Shore, etc. R25-19

Note the SEASP DEIR says the City of Long Beach acknowledges numerous approved and pending development projects such as the Synergy Oil Field, the AES Facility, Light Industrial Development on Studebaker Road, the Seaport Marina Hotel commercial center project and the "Belmont Pool Revitalization Project" with 4250 spectators and hundreds of aquatic participants. But the "City of Long Beach directed the traffic consultant (Fehr & Peers) to consider only the Seaport Marina Hotel project" in its study. Thus excluding major planned developments. R25-20

Parking in the SEASP area will be heavily negatively impacted by the "Reduced Parking Requirements in SEASP". This is a huge mistake. Existing parking lots near the Marinas supposedly dedicated to Coastal Access and ocean/bay/marina activities will be taken over by residents, tenants and customers of the proposed new 'mixed use' developments. These "Reduced Parking Requirements" are dependent on supposed 'Car sharing', 'Carpool/vanpool', 'Unbundled parking', and 'Joint use (shared parking). However these "Reduced Parking Requirements" have proven unworkable in downtown Long Beach and elsewhere -- and will be a detriment to Project Area residents and visitors, and a severe detriment to Coastal visitors in R25-21

Letter R26

September 19th, 2016

Craig Chalfant, Senior Planner, Long Beach Development Services
333 W. Ocean Blvd., 5th Floor
Long Beach, CA 90802

Thank you for this opportunity to comment on the SEASP DEIR. I respectfully request a "No Project/No Development" alternative, for reasons briefly outlined below but not limited to those listed in this letter. The "mixed use" area proposing development zoning changes resulting in an 8600+ population increase due to the addition of 5400+ residential units is way too much, even if reduced 30% the environmental impact to the area would still be very severe. I'm also including a brief outline and attached information I hope for inclusion in a new DEIR or revised preferred alternative which would be more suited to the area, helping in resolving "unavoidable significant impacts" the current DEIR poses. R26-1

Both Jan Hall, former 3rd District Councilperson and Commissioner Fox have commented on how this plan is not a really good fit for the area and in fact Commissioner Fox stated if he were still in office in November he would not vote for it. Numerous citizens and organizations have also expressed concerns. I do agree with the many concerns about this project's impacts everyone has brought up, which I won't repeat here as I'll try to keep this brief. R26-2

The "Mixed use" section below outlines issues with SEASP as proposed which needs to be changed, the "Gateway" section outlines and briefly describes both things we should include to any zoning regardless, in addition to a better plan more fitting for the area.

<u>"Mixed use" change is the root of most major issues with all three proposed options resulting in</u>:

- Traffic cannot be mitigated; impacts large surrounding areas of already "F" rated intersections
- Public safety concerns; police/fire emergency response times unacceptable due to traffic increase by the project
- project not meeting air quality standards
- Water quality concerns
- Increased demand on already strained potable water resources
- Impacts to adjacent sensitive wetlands habitat:
    - Building to less than 100' from wetlands (responsible habitat preservation states at least 100' away from wetlands)
    - Road extensions resulting in loss of wetlands acreage (responsible preservation results in no net loss)
    - Tall buildings causing bird strike kills to resident and migratory birds
    - Night lighting from development disrupting functions of wetlands (plants, insects, aquatic life, animals and birds)

R26-3

There is no community benefit of an overdeveloped project, nor is overdevelopment more important than public safety, human health and health of our environment, which people often take for granted forgetting our own existence in fact relies on a healthy environment. When we have a choice not to continue overdeveloping, instead putting people and the environment before profit, we should do so. The proposed SEASP does not

contain any option putting people and environment first. Only "large", "extra-large" or "super-sized" were given as choices, with "this is what the community wants" implied by the developer. Please note a number of petitions not in favor of the project are floating around Long Beach, one I know has 187 signatures all disagreeing with the proposed project size, density and height. R26-3 CONT'D

In addition to the mixed use, a few other elements of the proposed SEASP alternatives are in question as well, which I'll mention just two for now.

Regarding the "pumpkin patch" property at Studebaker & PCH, I don't believe this is an appropriate area to locate more oil drilling operations given the fact people work in the nearby office buildings in addition to the area is intended for shopping and dining. Perhaps oil drilling should be kept in the industrial zoned area East of Studebaker Rd., where the "tank farm" and other industrial uses reside. I don't believe mixing "industrial use" with "retail" (or if approved, "mixed use") is appropriate and raises other environmental and health concerns. R26-4

In the current SEASP DEIR Los Cerritos Wetlands is referred to as "Coastal Habitat/Wetlands/Recreation". Wetlands should not be turned into "recreation", this is sensitive and increasingly rare habitat in Southern California. "Recreation" should be removed and replaced with "Coastal Wetlands Habitat Preserve" and treated as such. R26-5

<u>Gateway to our city, a better plan</u> R26-6

Following SEASP process, repeatedly we have heard how a "gateway" to Long Beach from Orange County is desired and how this proposed SEASP project would (supposedly) provide this desired gateway and benefit the community.

Entering Long Beach from Orange County it should transition from a nature theme/low rise retail district/wetlands & waterfront (the SEASP area), to the seaside communities of Naples/Belmont Shores, to the ocean view bluffs, finally to a downtown metropolis – one great city, many different neighborhoods. We really don't need to duplicate a downtown tall building style area on the Orange County coastal border side of town. This certainly wouldn't fit into "diversity" along our Long Beach coast.

An urban nature theme in the SEASP area would be more desirable especially given the fact the "area of change" also known as the "mixed use" along PCH and Marina Drive including Marketplace, Marina Pacifica, etc. sits directly between Alamitos Bay and Los Cerritos Wetlands. Placing the proposed height and/or density right between a sensitive environmental resource and the ocean front is a very bad idea. A more environmentally friendly and aesthetically pleasing development, benefiting both the local community and visitors to our coast, could by accomplished by:

- Lower buildings (the existing 35' limit with no mixed use is fine, let's not change this)
- Large open spaces between buildings, allowing views and unimpeded bird flight passage
- Roads and buildings 100' away from wetlands
- Tree-scape nature theme landscaping in the retail areas: rocks/dry creek beds, native trees and native plants throughout the development
- Winding sidewalks and bike paths throughout the project, separate paths for bikes for pedestrian safety.
- Bird safe buildings: attractive etched glass for bird strike prevention, all the way to ground and lower floors. An artistic pattern to be used on ground level, such as wetlands scenes, bay/boating/kayaking

scenes, or other coastal scenes to fit with the area for example. Regardless of design, the important factor is the "2x4" rule, patterns must be close as in 2" by 4" to be effective.

R26-6
CONT'D

The above "gateway" description should be adopted as the zoning standard in Southeast Long Beach by our city. Please see the attached documents for further details on a few of the bulleted list items above. Zoning shouldn't be dictated by developer's desired profit margin. A project respectful of the current zoning height incorporating the best protection possible for sensitive adjacent wetlands resources and people (without 5400+ new residential units putting the health and safety of people at risk) would work too.

Attached documents:

Bird Friendly Building Design
Urban Street Trees, 22 benefits, specific applications
Air pollution poses significant threats to birds (and people)
My April 2016 SEASP Comment Letter

Please take my comments and information provided into consideration. Again, thank you for this opportunity to comment.

Sincerely,

Cindy Crawford
6821 E. Mantova St.
Long Beach, CA 90815

Urban Street Trees

22 Benefits
Specific Applications

Dan Burden,
Senior Urban Designer, Glatting Jackson, Walkable Communities, Inc..
Summer, 2006

Urban Street Trees

22 Benefits

By Dan Burden, Senior Urban Designer
Glatting Jackson and Walkable Communities, Inc;
August, 2006

U.S Forest Service facts and figures and new traffic safety studies detail many urban street tree benefits. Once seen as highly problematic for many reasons, street trees are proving to be a great value to people living, working, shopping, sharing, walking and motoring in and through urban places.

For a planting cost of $250-600 (includes first 3 years of maintenance) a single street tree returns over $90,000 of direct benefits (not including aesthetic, social and natural) in the lifetime of the tree. Street trees (generally planted from 4 feet to 8 feet from curbs) provide many benefits to those streets they occupy. These trees provide so many benefits that they should always be considered as an urban area default street making feature.

With new attentions being paid to global warming causes and impacts more is becoming known about negative environmental impacts of treeless urban streets. We are well on the way to recognizing the need for urban street trees to be preferred urban design, rather than luxury items tolerated by traffic engineering and budget conscious city administrators.

The many identified problems of street trees are overcome with care by designers. Generally street trees are placed each 15-30 feet. These trees are carefully positioned to allow adequate sight triangles at intersections and driveways, to not block street luminaries, not impact utility lines above or below ground. Street trees of various varieties are used in all climates, including high altitude, semi-arid and even arid urban places.

The science of street tree placement and maintenance is well known and observed in a growing number of communities (i.e. Chicago, Illinois; Sacramento, Davis, California; Eugene, Oregon; Seattle, Redmond, Olympia and Issaquah, Washington; Charlotte, N.C.; Keene, New Hampshire and Cambridge, Mass). Although care and maintenance of trees in urban places is a costly task, the value in returned benefits is so great that a sustainable community cannot be imagined without these important green features.

Properly placed and spaced urban street trees provide these benefits:

Increased motorized traffic and pedestrian safety (contrary to engineering myths). See below article for details on mode safety enhancements. See especially the compilation of safety benefits detailed in, Safe Streets, Livable Streets, by Eric Dumbaugh Journal of the American Planning Association, Vol. 71, No. 3, Summer 2005. One such indication of increased safety with urban street trees is quoted from this document:

"...Indeed, there is a growing body of evidence suggesting that the inclusion of trees and other streetscape features in the roadside environment may actually reduce crashes and injuries on urban roadways. Naderi (2003) examined the safety impacts of aesthetic streetscape enhancements placed along the roadside and medians of five arterial roadways in downtown Toronto. Using a quasi-experimental design, the author found that the inclusion of features such as trees and concrete planters along the roadside resulted in statistically significant reductions in the number of mid-block crashes along all five roadways, with the number of crashes decreasing from between 5 and 20% as a result of the streetscape improvements. While the cause for these reductions is not clear, the author suggests that the presence of a well defined roadside edge may be leading drivers to exercise greater caution."

Trees

I think that I shall never see
A poem lovely as a tree.
A tree whose hungry mouth is prest
Against the sweet earth's flowing breast;
A tree that looks at God all day,
And lifts her leafy arms to pray;
A tree that may in summer wear
A nest of robins in her hair;
Upon whose bosom snow has lain;
Who intimately lives with rain.
Poems are made by fools like me,
But only God can make a tree.

...Joyce Kilmer (1913)
American poet,
killed during WWI at the age of 31

22 Benefits Detailed:

1. **Reduced and more appropriate urban traffic speeds**. Urban street trees create vertical walls framing streets, providing a defined edge, helping motorists guide their movement and assess their speed (leading to overall speed reductions). Street safety comparisons show reductions of run-off-the-road crashes and overall crash severity when street tree sections are compared with equivalent treeless streets. (Texas A and M conducted simulation research which found people slow down while driving through a treed scape. These observations are also seen in the real world when following motorists along first a treed portion of a street, and then a non treed portion (see page 13). Speed differentials of 3 mph to 15 mph are noted.

2. **Create safer walking environments**, by forming and framing visual walls and providing distinct edges to sidewalks so that motorists better distinguish between their environment and one shared with people. If a motorist were to significantly err in their urban driving task, street trees help deflect or fully stop the motorist from taking a human life.

3. **Trees call for placemaking planting strips and medians**, which further separate motorists from one another, pedestrians, buildings and other urban fabric. This green area adds significantly to aesthetics and placemaking. Urban area medians with trees are safer than those without trees (R. Ewing, Caltrans Study, circa 2003). Medians reduce crashes by 50% or more.

4. **Increased security**. Trees create more pleasant walking environments, bringing about increased walking, talking, pride, care of place, association and therefore actual ownership and surveillance of homes, blocks, neighborhoods plazas, businesses and other civic spaces.

5. **Improved business.** Businesses on treescaped streets show 12% higher income streams, which is often the essential competitive edge needed for main street store success, versus competition from plaza discount store prices.

6. **Less drainage infrastructure.** Trees absorb the first 30% of most precipitation through their leaf system, allowing evaporation back into the atmosphere. This moisture never hits the ground. Another percentage (up to 30%) of precipitation is absorbed back into the ground and taken in and held onto by the root structure, then absorbed and then transpired back to the air. Some of this water also naturally percolates into the ground water and aquifer. Storm water runoff and flooding potential to urban properties is therefore reduced.

7. **Rain, sun, heat and skin protection.** For light or moderate rains, pedestrians find less need for rain protection. In cities with good tree coverage there is less need for chemical sun blocking agents. Temperature differentials of 5-15 degrees are felt when walking under tree canopied streets.

8. **Reduced harm from tailpipe emissions**. Automobile and truck exhaust is a major public health concern and contains significant pollutants, including carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NOx), and particulate matter (PM). Tailpipe emissions are adding to asthma, ozone and other health impacts. Impacts are reduced significantly from proximity to trees.

9. **Gas transformation efficiency.** Trees in street proximity absorb 9 times more pollutants than more distant trees, converting harmful gasses back into oxygen and other useful and natural gasses.

10. **Lower urban air temperatures.** Asphalt and concrete streets and parking lots are known to increase urban temperatures 3-7 degrees. These temperature increases significantly impact energy costs to homeowners and consumers. A properly shaded neighborhood, mostly from urban street trees, can reduce energy bills for a household from 15-35%.

11. **Lower Ozone**. Increases in urban street temperatures that hover directly above asphalt where tailpipe emissions occur dramatically increase creation of harmful ozone and other gasses into more noxious substances impacting health of people, animals and surrounding agricultural lands.

12. **Convert streets, parking and walls into more aesthetically pleasing environments.** There are few streetmaking elements that do as much to soften wide, grey visual wastelands created by wide streets, parking lots and massive, but sometimes necessary blank walls than trees.

13. **Soften and screen necessary street features** such as utility poles, light poles and other needed street furniture. Trees are highly effective at screening those other vertical features to roadways that are needed for many safety and functional reasons.

14. **Reduced blood pressure, improved overall emotional and psychological health.** People are impacted by ugly or attractive environments where they spend time. Kathlene Wolf, Social Science Ph.D. University of Washington gave a presentation that said "the risk of treed streets was questionable compared to other types of accidents along with the increased benefit of trees on human behavior, health, pavement longevity, etc." She noted that trees have a calming and healing effect on ADHD adults and teens.

15. **Time in travel perception.** Other research and observations confirm that motorists perceive the time it takes to get through treed versus non-treed environments has a significant differential. A treeless environment trip is perceived to be longer than one that is treed (Walter Kulash, P.E.; speech circa 1994, Glatting Jackson).

A2-102

16. **Reduced road rage**. Although this may at first seem a stretch, there is strong, compelling research that motorist road rage is less in green urban versus stark suburban areas. Trees and aesthetics, which are known to reduce blood pressure, may handle some of this calming effect.

17. **Improved operations potential.** When properly positioned and maintained, the backdrop of street trees allow those features that should be dominant to be better seen, such as vital traffic regulatory signs. The absence of a well developed Greenscape allows the sickly grey mass of strip to dominate the visual world. At the same time, poorly placed signs, signals, or poorly maintained trees reduces this positive gain, and thus proper placement and maintenance must be rigidly adhered to.

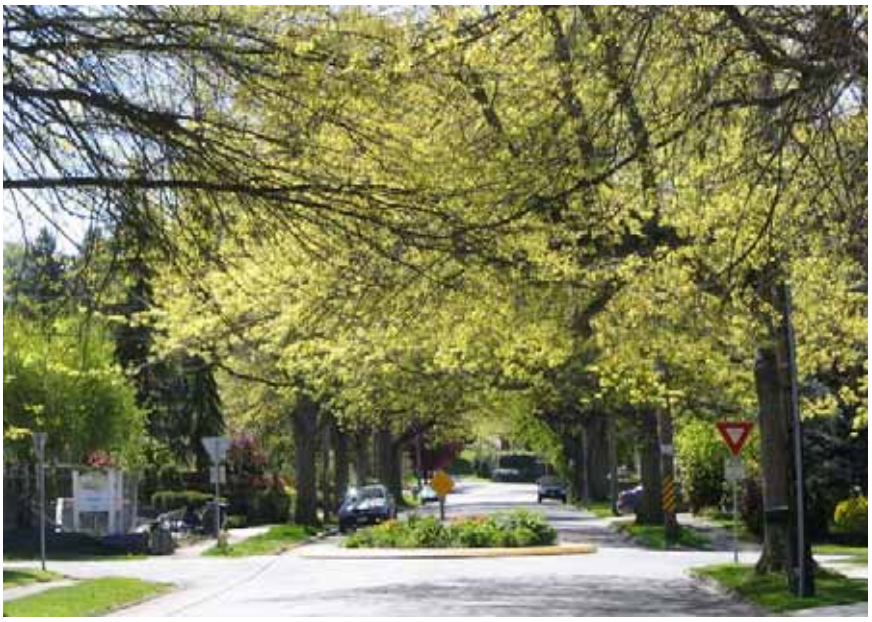
18. **Added value to adjacent homes, businesses and tax base.** Realtor based estimates of street tree versus non street tree comparable streets relate a $15-25,000 increase in home or business value. This often adds to the base tax base and operations budgets of a city allowing for added street maintenance. Future economic analysis may determine that this is a break-even for city maintenance budgets.

19. **Provides a lawn for a splash and spray zone, storage of snow, driveway elevation transition and more.** Tree lawns are an essential part of the operational side of a street.

20. **Filtering and screening agent.** Softens and screens utility poles, light poles, on-street and off-street parking and other features creating visual pollution to the street.

21. **Longer pavement life.** Studies conducted in a variety of California environments show that the shade of urban street trees can add from 40-60% more life to costly asphalt. This factor is based on reduced daily heating and cooling (expansion/contraction) of asphalt. As peak oil pricing increases roadway overlays, this will become a significant cost reduction to maintaining a more affordable roadway system.

22. **Connection to nature and the human senses.** Urban street trees provide a canopy, root structure and setting for important insect and bacterial life below the surface; at grade for pets and romantic people to pause for what pets and romantic people pause for; they act as essential lofty environments for song birds, seeds, nuts, squirrels and other urban life. Indeed, street trees so well establish natural and comfortable urban life it is unlikely we will ever see any advertisement for any marketed urban product, including cars, to be featured without street trees making the ultimate dominant, bold visual statement about place.



Trees provide enclosure

West Hartford's Farmington Avenue tree canopy forms an attractive wall of green. This sense of enclosure creates an important quality allowing pedestrians to feel fully separated from the movement of more than 25,000 vehicles in the adjacent street.

Trees provide shelter

It rained all day. When author Dan Burden spent mid morning to mid-afternoon on West Hartford's Farmington Avenue he did not get wet. The canopy cover kept sidewalks dry, despite a steady light all-day rain. Trees have the ability to capture significant rainfall then transpire it back into the atmosphere before reaching the ground. Meanwhile water runs down branches and trunk to allow deep root penetration.

Tree and Lamp Placement

Well placed trees allow even and attractive lamp placement. It is important that lamps provide proper levels of lumination to create welcoming and comfortable walking environments.

Generally lamps are placed midway between trees, allowing for some variation between other essential furniture such as seating and fire hydrants.

Traffic Calming results from correct tree placement

The top two images are both collector category streets (Avenues). Historic tree plantings reduce speeds, provide greater green cover, and allow homes to face streets, thus rewarding walking activity. More recent street making maximizes asphalt, increases the tendency to speed and highly discourages developers from orienting homes toward the street. Walking becomes a lonely and sometimes scary activity. The bottom two images each have the same curb to curb dimensions. Trees placed at the street and on street parking bring speeds down 7-8 mph.

Trees Screen Parking

Effective tree placement softens harshening effects of on-street parking. A combination of tree planting tools, from curb extensions, block entry tree clusters, mid-block tree clusters at curb extensions and tree wells are common tools for screening and greening parking areas.

Alley versus driveway loaded blocks

There is a distinct visual advantage in using alley loaded properties. Driveways break up the natural rhythm and opportunity of attractively and evenly spaced street trees. Driveways also eliminate the possibility of using a longer tree planter strip. Long and narrow strips are sometimes essential to getting in quality growth trees in a minimum right-of-way.

Maximize Green

Plan good caliper trees (3” or wider) on all streets to soften buildings and street impacts. Use wide or long tree wells and all of the technical knowledge for setting and maintaining successful urban trees. Utilities are placed in locations minimizing impact on green cover.

Urban street trees are generally placed each 15-20 feet. Dense placement is highly desired.

Tree Wells

Tree Wells

In tight urban spaces there may be insufficient space in sidewalks to place trees. In these settings placement of tree wells roughly each 40-60 feet allows two or three parking spaces. Often not a single parking space is lost. Tree wells can be added to both parallel and angled parking. Depending on the amount of parking needed, desired visual pattern, and tree density wells are placed every other car, third car and sometimes every fourth car. Wells must be deep enough to prevent backing into trees.

Tree Wells

Tree Wells and curb extensions

One of the greatest benefits to the use of tree wells is the added screening of parked cars. Properly used tree wells establish a compelling line of green, hiding much of the excess asphalt needed for parking. Tree wells are often accented with colorful ground cover. The term tree well is used independently of curb extension. Curb extensions add to the use of tree wells, but are much larger, and often include sitting areas or corner placement.

Comfort
INN

A2-115

Kathlene Wolf, Social Science Ph.D. University of Washington gave a presentation that said that the risk of treed streets was questionable compared to other types of accidents along with the increased benefit of trees on human behavior, health, pavement longevity, etc. She noted that trees have a calming and healing effect on ADHD adults and teens. And I added that through my review of literature, ADHD males 16 to 22 years of age had an incident of serious accident that was 5 times what a control population of 16 to 22 male drivers would experience

Date: April 26th, 2016

To: Christopher Koontz, Long Beach Development Services

Re: SEASP

I am respectfully requesting that city officials think long and hard before approving the mega development project plan described in SEASP. It will increase traffic drastically (even the City consultants admitted to the increase) which will negatively impact the area adding to an increase in pollution. This raises serious health related concerns, among many others. No tall, dense "beautiful gateway" to our city, no "amenities", no fees and taxes collected from such a huge project should have a higher value than the quality of life, health and welfare of our children and adult residents of this great city. I encourage you to look at the facts, the health and environmental impacts of pollution from cars and exhaust and perhaps visit a cancer treatment ward in a Children's Hospital.

Since 2005 childhood cancers have drastically increased (1). One of the most common type of childhood cancer is leukemia (3), which is associated with Benzene (4)(5), a component of car exhaust. Other types of childhood cancer are also linked to car exhaust (2). In addition there is increasing evidence air pollution (including car exhaust) is linked to Autism in children (6).

Cars sitting idle for longer periods of time in traffic jams increases pollutants on the roads, plus the longer vehicles sit in slow moving traffic the more car exhaust that is emitted. The proposed SEASP revision (13) drastically increases density by adding more buildings and increasing building heights from the existing 35' to 70', changing the zoning to mixed use (including 5,300 new residential units) significantly impacts the traffic at already rated "F" intersections such as those along 2nd St and Pacific Coast Highway. There is no feasible mitigation for the traffic increase, which not only affects the immediate SEASP project area but surrounding areas as well, even as far as Studebaker Road North of 2nd/Westminster Ave. Belmont Shore and Naples along 2nd Street, Pacific Coast Highway in both Seal Beach and Long Beach would also be affected by traffic increases, to name a few. The air pollution from vehicle exhaust would also no doubt affect the surrounding existing communities or neighborhoods. We have three schools just north of the SEASP project area, directly upwind.

The SEASP consultants attempt to design a "self-contained" development with "amenities" to reduce the need of future residents of approximately 5,300 new dwellings to travel outside the SEASP project area. The design is thought to encourage non-motorized means of transportation such as bicycles, which is not an acceptable or reliable means of traffic mitigation. People living outside the immediate SEASP project area which surrounds Alamitos Bay will want to continue visiting, shopping, boating, and enjoying other water recreation in the coastal waterfront area. Building a project so dense (which the height and addition of mixed use residential is the major factor in increased density) brings up other issues, such as public access to coastal resources (12) (reference California Coastal Act Chapter 3). We all know people love their cars and the ocean waterfronts. Many travel a significant distance to visit the coast via automobile throughout the year. The consultant's idea of non-motorized transportation and amenities taking away the need of future project residents to drive elsewhere will not prevent other people from driving to the waterfront in or near the SEASP project area. Also there is no guarantee a diverse number of shops and services will setup for business removing or drastically reducing the need of project residents to drive elsewhere. And the 5,300+ new residents most likely will not work within walking or biking distance from their home as we don't have enough living wage jobs for 5,300+ people near the SEASP project area. Therefore the traffic, pollutants from cars and exhaust will undoubtedly be drastically increased by this proposed plan.

Cancer is not the only health risk from car exhaust and smog. Asthma and other respiratory illnesses are also a direct result (8) and can also be just as deadly or significantly impact an individual's quality of life with serious health issues.

Our future generations will be those who pay the price for over developments such as this proposal in Southeast Long Beach (13). While we search for a "cure" for cancer and other diseases, perhaps the best medicine is to prevent that which is known to cause it in the first place. Long Beach touts itself as a "green city". We've done a lot to conserve water and lessen pollution such as reducing emissions in the harbor. Huge development projects such as proposed in

SEASP cancels out any progress we have made. We need to do as much as possible to continue reducing pollution. Evidence already points to the fact we aren't doing enough for cleaner air, as seen in a recent 2016 study by The American Lung Association, which Long Beach still rates in the top 10 worst for several air quality factors (7)(8). And the 5,300 new residential units will require 1.12 million gallons of water a day (13), draining our already stretched resources.

The high density raises many other environmental concerns regarding impacts to the Los Cerritos Wetlands and Alamitos Bay, which the proposed project plan surrounds. The close proximity and building up to a hundred feet from the waterfront or wetlands, building a new road extension alongside and through a portion of the wetlands and the fact that increased traffic will also increase road surface pollutants (such as heavy metals, oil, grease, debris) which washes into storm drains directly discharging into the river, bay and wetlands is another concern. This pollutes the water impacting birds/wildlife, habitat, wetlands and a bay that people swim, paddleboard and kayak in. Although the proposed project plan includes bioswales, we've learned from other natural method cleanup projects of waste water runoff, such as our Dominguez Gap (9) or Irvine Water District's San Joaquin Marsh/Wildlife sanctuary (10)(11), it takes a week or more for polluted water to filter through a *series of numerous ponds* before it removes all the pollutants. Therefore I question the effectiveness of a single bioswale proposed on the edges of such a large development project to remove all the pollutants in water runoff before that water ends up in our bays and wetlands. This raises even more human health concerns in relation to direct body contact with polluted water and toxicity to species of fish and seafood we eat. Plus environmental concerns in general regarding how urban runoff negatively impacts the aquatic plant and animal life (limiting growth, toxicity, fish kills), degrading water quality, and contributing to eutrophication (5). This is a backwards step for the adjacent wetlands we are trying to restore (14).

For these reasons, although I've looked at the SEASP plans (13) and listened to the plan promoters with an open mind, I oppose the project due to increased building height and inclusion of mixed use residential causing too high of density, in turn greatly increasing traffic and resulting in harmful pollution impacting both air and water. Keeping the area to the California Coastal Act (12) building height limit of 35' with no mixed use residential --as it is currently -- is the best mitigation to the increased pollution issues and adverse health impacts of the proposed plan allowing this huge development (13).

Please take all these facts into consideration. People before profit! Let's make Southeast Long Beach a "Beautiful *Green* Gateway" for all! The SEASP revision as proposed will not facilitate this. Thank you!

Sincerely,

Cindy Crawford
6821 E Mantova St.
Long Beach CA 90815
3rd District, boat owner

Jeffrey Pitre
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May Crawford
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Mary Parsell
Long Beach CA 90815
4th District

Jean Miles
Long Beach CA (near Elm & 1st St)

Alex Zauala
Stanton CA
Long Beach Supporter & visitor

Mike Patterson
Westminster CA
Former Long Beach boat worker & LB visitor

Jimmy Halpin
Stanton CA
Former Long Beach Resident,
Mantova St., LB visitor, boat owner

James A. Halpin
Stanton CA
Former Long Beach resident, Parkcrest Ave., LB visitor

Mark & Laurie Halpin
Apple Valley CA
Former Long Beach residents, Parkcrest Ave., LB visitor

Crystal Halpin
Apple Valley CA
Former Long Beach resident

Cassandra Vetter
Apple Valley CA
Former Long Beach resident

Scott Schroeder
Garden Grove CA
Former Long Beach resident

Jason Cashen
Stanton CA
Former Long Beach resident, Mantova St.

References:

(1) Childhood Cancer Incident Rates Over time (increasing), CURESEARCH for Children's Cancer:
http://curesearch.org/Incidence-Rates-Over-Time

(2) Car Pollution Linked to Childhood Cancers, TIME Magazine
http://healthland.time.com/2013/04/09/car-pollution-linked-to-childhood-cancers/

(3) Types of Children's Cancer (most common), CURESEARCH for Children's Cancer:
http://curesearch.org/Types-of-Childrens-Cancer

(4) Benzene, American Cancer Society:
http://www.cancer.org/cancer/cancercauses/othercarcinogens/intheworkplace/benzene

(5) Vehicles and Air Pollution, University of Vermont:
http://www.uvm.edu/~empact/air/cars.php3

(6) Autism and Air Pollution: The Link Grows Stronger, TIME Magazine
http://healthland.time.com/2012/11/27/autism-and-air-pollution-the-link-grows-stronger/

(7) Study: LA/LB Area has the Worst Ozone Pollution in the Nation, CBS News Los Angeles, April 20, 2016:
http://losangeles.cbslocal.com/2016/04/20/la-long-beach-worst-ozone-pollution/

(8) 2016 State of the Air Report, American Lung Association
http://www.lung.org/about-us/media/press-releases/2016-state-of-the-air.html

(9) Dominguez Gap Wetlands Water Treatment Project, County of Los Angeles:
http://dpw.lacounty.gov/wmd/documents/DominguezGap_article.cfm

(10) San Joaquin Marsh, Irvine Water District:
http://www.irwd.com/san-joaquin-marsh/san-joaquin-marsh

(11) San Joaquin Marsh (how it works), Irvine Water District:
http://www.irwd.com/assets/files/brochures/Natural_Treatment_System.pdf

(12) California Coastal Act
http://www.coastal.ca.gov/ccatc.html

(13) SEASP
http://www.lbds.info/seadip_update

(14) Los Cerritos Wetlands (restoration)
http://www.lcwetlands.org/wetlands/wetlands-intro.html

Bird-Friendly Building Design

AMERICAN BIRD CONSERVANCY

NEW YORK CITY AUDUBON

A2-120

Vassar's Bridge for Laboratory Sciences, shown here under construction in October 2015. The building is scheduled to open in January 2016. Cover rendering and photos courtesy of Ennead Architects

Exterior glass detail

Glass detail, showing frit pattern

Cover rendering and photo this page: The new Bridge for Laboratory Sciences building at Vassar College, designed by Richard Olcott/Ennead Architects, redefines the identity of the sciences on the College's historic campus and provides technologically advanced facilities for students, faculty, and researchers.

Fundamental to the building's design is its seamless integration with the natural landscape, scale, and campus aesthetic of the College. In this natural wooded setting, the need for strategies to reduce bird collisions with the building was apparent. In response, the building was designed to comply with LEED Pilot Credit 55: Bird Collision Deterrence.

Ennead managing partner Guy Maxwell is a nationally recognized champion of bird-friendly design and has led Ennead's innovative approach to make the building's glazing safer for birds, employing patterned glass, screens and sunshades, and Ornilux glass, a specialty glass product that uses a UV coating visible to birds but not humans.

By framing and showcasing views of the landscape, the building celebrates and connects students with the surrounding environment, while the overall development of the precinct repurposes an underutilized sector of campus.

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The area of glass on a façade is the strongest predictor of threat to birds. There are also other reasons to limit glass. Skidmore Owings Merril's Bronx, New York, Emergency Call Center is a handsome example of creative design with restricted glass, for a building intended to be both secure and blast-resistant. Photo by Chris Sheppard, ABC

For updates and new information, see **collisions.abcbirds.org**

A2-122

Executive Summary

A bird, probably a dove, hit the window of an Indiana home hard enough to leave this ghostly image on the glass. Photo by David Fancher

Collision with glass claims the lives of hundreds of millions of birds each year in the United States. It is second only to domestic cats as a source of mortality linked directly to human action. Birds that have successfully flown thousands of miles on migration can die in seconds on a pane of glass; impacts kill fledglings before they can truly fly. Because glass is dangerous for strong, healthy, breeding adults, as well as sick or young birds, it can have a particularly serious impact on populations.

Bird kills occur at buildings across the United States and around the world. We know most about mortality patterns in cities, because that is where most monitoring takes place, but virtually any building with glass poses a threat wherever it is. The dead birds documented by monitoring programs or provided to museums constitute merely a fraction of the birds actually killed. The magnitude of this problem can be discouraging, but there are already effective solutions and an increasing commercial commitment to developing new solutions, if people can be convinced to adopt them.

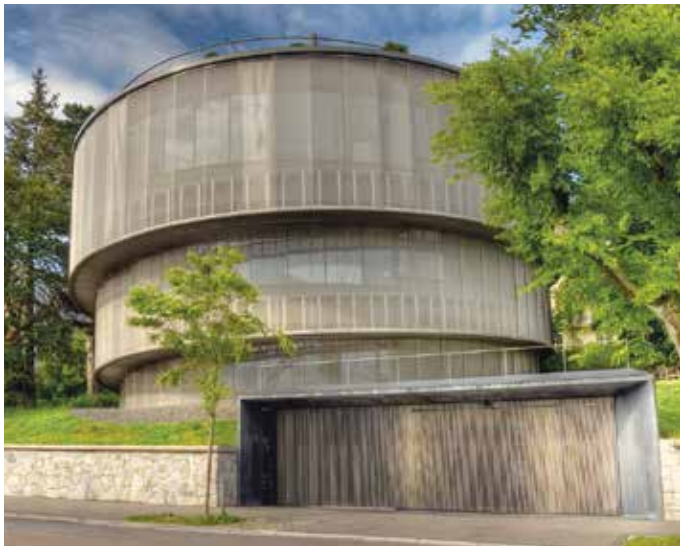
That artificial lighting at night plays a significant part in mortality from glass is widely accepted, but often misunderstood. The majority of collisions with buildings take place during daylight. There are many well-documented instances of bright lights at night disorienting large numbers of birds—usually night-migrating passerines but also seabirds—some of which may circle in the light, sometimes until dawn. Nocturnal mortality associated with circulation events is caused by collision with guy wires and other structures. Such events were described starting in the late 19th century at lighthouses, and later at the Washington Monument, Statue of Liberty, and Empire State Building, which were the only brightly lit structures in their areas. Today, such events occur mostly at offshore drilling platforms and communication towers. These situations have in common bright light surrounded by darkness, and their frequency has decreased in cities as areas of darkness around bright structures have also become lit. However, there are strong indications that birds are still being disoriented by urban lights and that lights are linked to mortality, even though mortality patterns have changed.

Advances in glass technology and production since the mid-twentieth century have made it possible to construct skyscrapers with all-glass walls, homes with huge picture windows, and miles of transparent noise-barriers on highways. There has been a general increase in the amount of glass used in construction—and the amount of glass on a building is the best predictor of

Newhouse III, designed by Polshek Partnership Architects, is part of Syracuse University's S.I. Newhouse School of Public Communications. This building incorporates an undulating, fritted glass façade with the words of the first amendment etched in letters six feet high along the base. Photo by Christine Sheppard, ABC

the number of birds it will kill. However, while glass is important for bringing light into buildings, a façade with over 30-40% glass dramatically increases energy use for heating and cooling. Bird-friendly design is becoming recognized as part of sustainable design, required increasingly by legislation across North America.

New construction can incorporate from the beginning bird-friendly design strategies that are cost neutral. There are many ways to reduce mortality from existing buildings, with more solutions being developed all the time. Because the science is constantly evolving, and because we will always wish for more information than we have, the temptation is to postpone action in the hope that a panacea is just around the corner. But we can't wait to act. We have the tools and the strategies to make a difference now. Architects, designers, city planners, and legislators are key to solving this problem. They not only have access to the latest building construction materials and concepts; they are also thought leaders and trend setters in the way we build our communities and prioritize building design issues.



The steel mesh enveloping Zurich's Cocoon in Switzerland, designed by Camenzind Evolution, Ltd, provides privacy, reduces heating and cooling costs, and protects birds, but still permits occupants to see out. Photo by Anton Volgger

This publication aims to provide planners, architects, and designers, bird advocates, and local, municipal, and federal authorities, as well as the general public, with a clear understanding of the nature and magnitude of the threat glass poses to birds. Since the first edition, in 2011, there has been increased awareness of collisions, evidenced by new ordinances and guidelines for bird-friendly construction, new materials to retrofit existing buildings, and promotion by the glass industry of bird-friendly materials.

This edition includes an updated review of the underlying science, examples of solutions that can be applied to both new construction and existing buildings, and an explanation of what information is still needed. We hope it will spur individuals, businesses, communities, scientists, and governments to address this issue and make their buildings safer for birds. Constructing bird-friendly buildings and eliminating the worst existing threats require only imaginative design, effective retrofits, and recognition that birds have intrinsic and cultural as well as economic and ecological value to humanity.

American Bird Conservancy's Collisions Program works at the national level to reduce bird mortality by coordinating with organizations and governments, developing educational programs and tools, evaluating and developing solutions, creating centralized resources, and generating awareness.

The façade of Sauerbruch Hutton's Brandhorst Museum is a brilliant example of mixing glass and non-glass materials. Photo by Tony Brady

INTRODUCTION

Why Birds Matter

For many people, birds and nature have intrinsic worth. Birds have been important to humans throughout history, often symbolizing cultural values such as peace, freedom, and fidelity. In addition to the pleasure they can bring to people, we depend on them for critical ecological functions. Birds consume vast quantities of insects and control rodent populations, reducing damage to crops and forests and helping limit the transmission of diseases such as West Nile virus, dengue fever, and malaria. Birds play a vital role in regenerating habitats by pollinating plants and dispersing seeds. Birds are also a direct economic resource. According to the U.S. Fish and Wildlife Service, bird watching is one of the fastest growing leisure activities in North America, an over $40 billion industry accounting for many jobs.

The Legal Landscape

At the start of the 20th century, following the extinction of the Passenger Pigeon and the near extinction of other bird species due to unregulated hunting, laws were passed to protect bird populations. Among them was the Migratory Bird Treaty Act (MBTA), which made it illegal to kill a migratory bird without a permit. The scope of this law, which is still in effect today, extends beyond hunting, such that anyone causing the death of a migratory bird, even if unintentionally, can be prosecuted if that death is deemed to have been foreseeable. At present, the scope of the MBTA is under challenge in federal court and it is impossible to say whether it will ever be used to curb glass collisions. However, courts in Canada have ruled that building owners are responsible for mortality caused by glass.

Violations of the MBTA can result in fines of up to $500 per incident and up to six months in prison. The Bald and Golden Eagle Protection Act (originally the Bald Eagle Protection Act of 1940), the Endangered Species Act (1973), and the Wild Bird Conservation Act (1992) provide further protections for birds that may apply to building collisions. Recent legislation, primarily at the city and state levels, has addressed the problem of mortality from building collisions and light pollution. Starting with Toronto, Canada, in 2009 and San Francisco, California, in 2010 an increasing number of states and municipalities have passed laws mandating bird-friendly design, while other authorities have passed voluntary measures.

Glass: The Invisible Threat

Glass is invisible to both birds and humans. Humans learn to see glass through a combination of experience and visual cues like mullions and even dirt, but birds are unable to use these signals. Most birds' first encounters with glass are fatal when they collide with it at full flight speed. Aspects of bird vision contribute to the problem. Whereas humans have eyes in the front of their heads and good depth perception, most birds' eyes are placed at the sides of their heads. Birds thus have little depth perception beyond the range of their bills but extensive fields of view to the side and behind. They judge their flight speed by the passing of objects to their sides, so their focus in flight is not necessarily ahead. Besides simply using designs with less glass, we can protect birds by using screens, shutters, and details that partly obscure glass while still providing a view, or by using two-dimensional patterns that birds perceive as actual barriers. However, birds have poor contrast sensitivity compared to humans: shapes at a distance merge into a blur at closer range for birds. This means that most signals that make glass safe for birds will probably be readily visible to people.

Reflections on home windows are a significant source of bird mortality. The partially opened vertical blinds here may break up the reflection enough to reduce the hazard to birds. Photo by Christine Sheppard, ABC

Birds may try to reach vegetation seen through two or more glass walls or windows; the single decal here is not enough to solve the problem, but two or three could do the trick. Photo by Christine Sheppard, ABC

(Opposite) The White-throated Sparrow is the most frequent victim of collisions reported by urban monitoring programs. Photo by Robert Royse

Lighting: Exacerbating the Threat

Most birds, with obvious exceptions, are active by day, with eyes best adapted for daylight sight. However, many bird species migrate by night, allowing them to use daylight hours for feeding. We still don't know everything about how night-flying birds navigate. We do know that birds probably have two special senses that allow them to determine location and direction using the Earth's magnetic field. One of these, located in the eye, may allow birds to "see" magnetic lines in the presence of dim blue light. Star maps, landmarks, and other mechanisms are also involved.

Artificial night lighting seemingly disrupts orientation mechanisms evolved to work with dimmer, natural light sources and can cause birds to deviate from their flight paths. The problem is compounded for birds flying in mist or cloud, which can cause them to fly lower and closer to artificial light sources, depriving them of celestial and magnetic cues. As birds fly near light sources, they may become disoriented and eventually land in the built environment.

Light at night can disorient birds, and the problem is not restricted to tall buildings. This scene of Las Vegas by night depicts a threat to any bird migrating nearby at night. Photo by BrendelSignature, Wikipedia

The majority of collisions with buildings actually take place by day. As birds seek food to fuel their next migratory flight, they face a maze of structures, and many, unable to distinguish between habitat and reflections, hit glass. The amount of light emitted by a building is a strong predictor of the number of collisions it will cause, more so than building height. Patterns of light intensity across a nocturnal landscape may influence the pattern of birds landing in that landscape at the end of migration stages. Thus, reducing light trespass from all levels of buildings and their surroundings is an important part of a strategy to reduce collisions with glass. There is some recent evidence that electromagnetic radiation outside the visible spectrum may also disorient birds.

Birds and the Built Environment

Humans first began using glass in Egypt around 3500 BCE. Glass blowing, invented by the Romans in the early first century CE, greatly increased the ways glass could be used, including the first crude glass windows. The 17th century saw the development of the float process, enabling production of large sheets of glass. This technology became more sophisticated, eventually making glass windows available on a large scale by the 1960s. In the 1980s, development of new production and construction technologies culminated in today's glass skyscrapers and increasing use of glass in all types of construction.

Sprawling land-use patterns and intensified urbanization degrade the quality and quantity of bird habitat across

the globe. Cities and towns encroach on riverbanks and shorelines. Suburbs, farms, and recreation areas increasingly infringe upon wetlands and woodlands. Some bird species simply abandon disturbed habitat. For resident species that can tolerate disturbance, glass is a constant threat, as these birds are seldom far from human structures. Migrating birds are often forced to land in trees lining our sidewalks, city parks, waterfront business districts, and other urban green patches that have replaced their traditional stopover sites.

The amount of glass in a building is the strongest predictor of how dangerous it is to birds. However, even small areas of glass can be lethal. While bird kills at homes are estimated at one to 10 birds per home per year, the large number of homes multiplies that loss to millions of birds per year in the United States, representing over 46% of the total problem. Other factors can increase or decrease a building's impact, including the density and species composition of local bird populations; local geography; the type, location, and extent of landscaping and nearby habitat; prevailing wind and weather; and patterns of migration through the area. All must be considered when planning bird-friendly buildings.

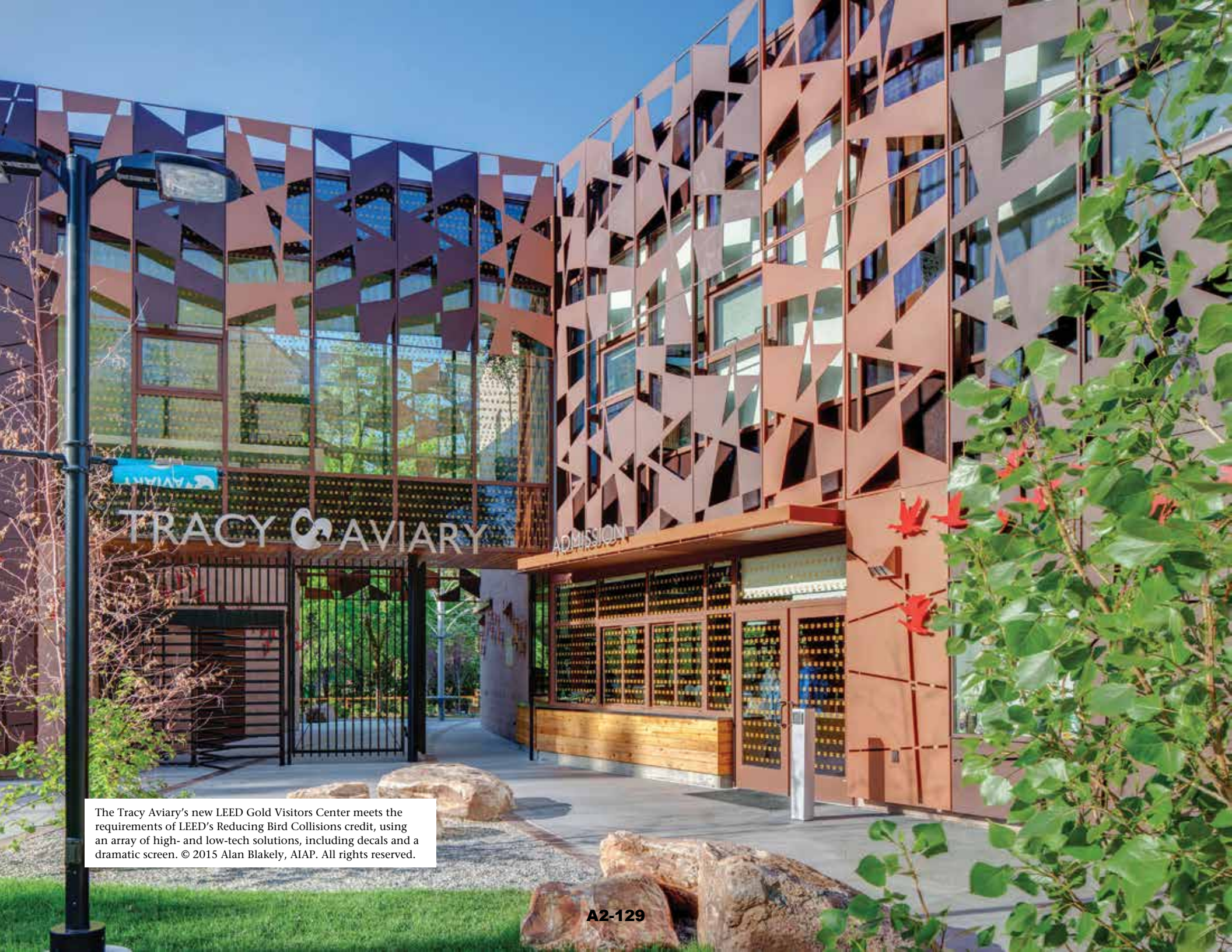
Impact of Collisions on Bird Populations

About 25% of species are now on the U.S. Watch List of birds of conservation concern (abcbirds.org/birds/watchlist/), and even many common species are in decline. Habitat destruction or alteration of both breeding and wintering grounds remains the most serious man-made problem, but collisions with buildings are second only to domestic cats as direct fatality threats. Nearly one-third of the bird species found in the United States—more than 258 species, from hummingbirds to falcons—are documented as victims of collisions. Unlike natural hazards that predominantly kill weaker individuals, collisions kill all categories of birds, including some of the strongest, healthiest birds that would otherwise survive to produce offspring. Without action, the cumulative effect of these deaths will result in significant population declines. Most of the mortality is avoidable. This document is one piece of a strategy to keep building collisions from increasing and, ultimately, to reduce them.

Bird Collisions and Sustainable Architecture

In recent decades, advances in glass technology and production have made it possible to construct tall buildings with all-glass walls, and we have seen a general increase in the amount of glass used in all types of construction. This is manifest in an increase in picture windows in private homes, glass balconies and railings, bus shelters, and gazebos. New applications for glass are being developed all the time. Unfortunately, as the amount of glass increases, so does the incidence of bird collisions.

The Cape May campus of Atlantic Cape Community College inherited a building with large areas of glass that did not have coatings or film to control temperature and glare—and there were many collisions. The addition of Collidescape has eliminated the threat to birds while reducing heating and cooling costs. Photo by Lisa Apel-Gendron



The Tracy Aviary's new LEED Gold Visitors Center meets the requirements of LEED's Reducing Bird Collisions credit, using an array of high- and low-tech solutions, including decals and a dramatic screen. © 2015 Alan Blakely, AIAP. All rights reserved.

In recent decades, growing concern for the environment has stimulated the creation of "green" standards and rating systems for development. The best known is the U.S. Green Building Council (USGBC) Leadership in Energy and Environmental Design, or LEED. While the USGBC concurred that sustainable buildings should not kill birds, it was initially difficult to create recommendations within the LEED credit system. The solution was based on a technique called "tunnel testing," a non-lethal method using live birds that permits a relative threat score to be assigned to patterned glass and other materials. (The section on Research in Chapter 6 reviews the work underlying the assignment of threat scores.)

On October 14, 2011, USGBC added Pilot Credit 55: Bird Collision Deterrence to its Pilot Credit Library. The credit was drafted by American Bird Conservancy (ABC), members of the Bird-Safe Glass Foundation, and the USGBC Site Subcommittee. Building developers that wish to earn this credit must quantify the threat level to birds posed by various materials and design details. These threat factors are used to calculate an index, or weighted average, representing the building's façade; that index must be below a standard value to earn the credit. The index is intended to provide wide latitude in creating designs that meet the criteria. The credit also requires adopting interior and exterior lighting plans and post-construction monitoring.

Pilot Credit 55 has been the most widely used credit in the pilot library. A revised version of the credit, posted in the fall of 2015, expands its availability to all LEED rating systems except "neighborhoods."

ABC is a registered provider of the American Institute of Architects (AIA) Continuing Education System, offering classes on bird-friendly design and LEED Pilot Credit 55 in face-to-face and webinar formats. Contact Christine Sheppard, csheppard@abcbirds.org, for more information.

Defining What's Good for Birds

It is increasingly common to see the term "bird-friendly" used in a variety of situations to demonstrate that a particular product, building, legislation, etc., is not harmful to birds. All too often, however, this term is unaccompanied by a clear definition and lacks a sound scientific foundation to underpin its use. Ultimately, defining "bird-friendly" is a subjective task. Is bird-friendliness a continuum, and if so, where does friendly become unfriendly? Is "bird-friendly" the same as "bird-safe?" How does the definition change from use to use, situation to situation? It is impossible to know exactly how many birds a particular building will kill before it is built, and so, realistically, we cannot declare a building to be bird-friendly before it has been carefully monitored for several years.

There are factors that can help us predict whether a building will be particularly harmful to birds or generally benign, and we can accordingly define simple "bird-friendly building standards" that, if followed, significantly reduce potential hazard to birds. That said, a 75% reduction of mortality at a structure that kills 400 birds a year means that structure will still kill 100 birds a year. Because window kills affect reproductively active adult birds, the cumulative effect of saving some birds is amplified by their reproductive output. Because a 100% reduction in mortality may be difficult to achieve, ABC takes the position that it is better to take reasonable available actions immediately than to put off taking action until a perfect solution is possible or to take no action at all.

Hariri Pontarini Architects with Robbie/Young + Wright Architects used botanical imagery in 3M laminates to depict the plants that produce many of the compounds used by students at the University of Waterloo School of Pharmacy, Canada. Photo by Christine Sheppard, ABC

Problem: Glass

The glass in this Washington, D.C., atrium poses a double hazard, drawing birds to plants inside as well as reflecting sky above. Photo by Christine Sheppard, ABC

Properties of Glass

Glass, as a structural material, can range in appearance from transparent to mirrored to opaque. Its surface can completely reflect light or let virtually 100% of light pass through. A particular piece of glass will change appearance depending on environmental factors, including position relative to the sun, the difference between exterior and interior light levels, what may be reflected, and the angle at which it is viewed. Combinations of these factors can cause glass to look like a mirror or a dark passageway, or be completely invisible. Humans do not actually "see" clear glass, but are cued by context such as mullions, dirt, or window frames. Birds, however, do not perceive right angles and other architectural signals as indicators of obstacles or artificial environments: they take what they see literally. While local birds may become familiar with individual pieces of glass, they do not ever grasp the concept "glass."

The glass-walled towers of the Time Warner Center in New York City appear to birds as just another piece of the sky. Photo by Christine Sheppard, ABC

Reflection

Under the right conditions, even transparent glass on buildings can form a mirror, reflecting sky, clouds, or nearby habitat attractive to birds. When birds try to fly to the reflected habitat, they hit the glass. Reflected vegetation is the most dangerous, but birds also attempt to fly past reflected buildings or through reflected passageways, with fatal results.

Transparency

Birds strike transparent windows as they attempt to access potential perches, plants, food or water sources, or other lures seen through the glass, whether inside or outside. Large planted atria are frequent problems, as are glass balcony railings and "skywalks" joining buildings. The increasing trend toward glass used in landscapes, as walls around roof gardens, as handrails or walkway dividers and even gazebos is dangerous because birds perceive an unobstructed route through them to habitat beyond.

Black Hole or Passage Effect

Birds often fly through small gaps, such as spaces between leaves or branches, into nest cavities, or through other small openings that they encounter. In some light, the space behind glass can appear black, creating the appearance of just such a cavity or "passage" with unobstructed access through which birds try to fly.

Transparent handrails are a dangerous trend for birds, especially when they front vegetation. Photo by Christine Sheppard, ABC

Large facing panes of glass can appear to be a clear pathway. Photo by Christine Sheppard, ABC

The same glass can appear transparent or highly reflective, depending on weather or time of day.

Photos by Christine Sheppard, ABC

Factors Affecting Rates of Bird Collisions for a Particular Building

Every site and every building can be characterized as a unique combination of risk factors for collisions. Some of these, particularly aspects of a building's design, are very building-specific. Many problem design features can be readily improved, or, in new construction, avoided. Others of these—for example, a building's location relative to migration stopover sites, regional ecology, and geography—are difficult if not impossible to modify.

Building Design

People like glass and it has become a popular building material. All-glass buildings have become more and more common as glass has become a low-cost material for construction. Glass causes virtually all bird collisions with buildings. Studies based on monitoring data have shown a direct relationship between the amount of glass on a building and the number of collisions at that site—the more glass, the more bird deaths.

Mirrored glass is often used intentionally to make a building "blend" into a vegetated area by reflecting its surroundings, making those buildings especially deadly to birds. However, all-glass buildings are coming increasingly into question. According to groups like the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) and the International Code Council, when there is more than 30-40% glass on a façade, heating and cooling costs begin to increase.

Building Size

Glass skyscrapers, because of their height and visibility, are often the main focus of collision documentation, and they do account for more collisions per building than smaller structures. However, because there are many more homes and low-rise buildings, the latter account for more total mortality. A study published by scientists at the Smithsonian in 2014 estimated 508,000 annual bird deaths for high-rises, 339 million for low-rises, and 253 million for homes. More collisions probably occur at glass on lower floors, where most bird activity takes place, but when monitors have had access to setbacks and roofs, they have consistently found at least some carcasses, indicating that glass at any level can be a threat.

Orientation and Siting

Because migrating birds are frequent collision victims, it is often assumed that more collisions will occur on north- and south-facing façades. However, most building collisions take place during the day, and building orientation in relation to compass direction has not been implicated as a factor. Siting of buildings with respect to surrounding habitat and landscaping has more

Birds flying from a meadow on the left are channeled toward the glass doors of this building by a rocky outcrop to the right of the path. Photo by Christine Sheppard, ABC

Mirrored glass is dangerous at all times of day, whether it reflects vegetation, sky, or simply open space through which a bird might try to fly. Photo by Christine Sheppard, ABC

Plantings on setbacks and rooftops can attract birds to glass they might otherwise avoid. Chris Sheppard, ABC

implications. Physical features like walkways that provide an open flight path through vegetated landscape, or obstacles like outcrops of rock or berms, can channel birds toward or away from glass and should be considered early in the design phase. Movement patterns of birds within surrounding habitat may cause unanticipated collisions. Birds often fly between landscape features, for example, between two stands of trees, and may be at risk from structures along their route.

Glass that reflects shrubs and trees causes more collisions than glass that reflects pavement or grass. Studies that measured vegetation within only 15 to 50 feet of a façade have led to the misconception that plantings beyond a certain distance don't influence collisions, but vegetation at much greater distances can easily be visible in reflections. Vegetation around buildings will bring more birds into the vicinity of the building; the reflection of that vegetation brings more birds into the glass. Taller trees and shrubs correlate with more collisions. It should be kept in mind that vegetation on slopes near a building will reflect in windows above ground level. Studies using bird feeders (Klem *et al.* 1991) have shown that fatal collisions result when birds fly toward glass from more than a few feet away.

Time of Day

Collisions tend to happen most when birds are most active. Many studies have documented that although collisions peak during the early morning, they can happen at almost any time of day. Most monitoring programs have focused on early morning before cleaning crews have swept sidewalks because of the increased likelihood of finding birds and because it is easier to obtain volunteer searchers in the pre-work hours.

Green Roofs and Walls

Green roofs bring elements attractive to birds to higher levels, but often they are built in close proximity to glass. However, recent work shows that well-designed green roofs can become functional ecosystems, providing food and even nest sites for birds. Siting of green roofs, as well as green walls and rooftop gardens, should therefore be carefully considered, and glass adjacent to these features should have protection for birds.

Green roofs and walls can provide food and other resources to birds, but they can also attract birds to glass that they might not otherwise encounter. Emilio Ambasz's ACROS building in Fukuoka, Japan, is an interesting example. Photo by Kenta Mobuchi

This atrium has more plants than anywhere nearby on surrounding streets, making the glass deadly for birds seeking food or shelter in this area. Photo by Christine Sheppard, ABC

Solutions: Glass

It is possible to design buildings that can reasonably be expected to kill few or no birds. Numerous examples already exist, not necessarily designed with birds in mind but simply to be functional and attractive. These buildings may have many windows, but their screens, latticework, louvers, and other devices outside, or patterns integrated into the glass, warn birds before they collide. Finding glass treatments that can eliminate or greatly reduce bird mortality, while minimally obscuring the glass itself, has been the goal of several researchers, including Martin Rössler, Daniel Klem, and Christine Sheppard. Their work, discussed in more detail in the Science chapter, has focused primarily on the spacing, length, width, opacity, color, and orientation of elements marked on glass, and has shown that patterns covering as little as 5% of the total glass surface can deter most strikes under experimental conditions. They have shown that as a general rule, most songbirds will not attempt to fly through horizontal spaces less than 2 inches high or through vertical spaces 4 inches wide or less. We refer to this as the 2 x 4 rule, and it is clearly related to the size and shape of birds in flight. (See chart on page 47).

Designing a new structure to be bird-friendly does not require restricting the imagination or adding to the cost of construction. Architects around the globe have created fascinating and important structures that incorporate little or no dangerous glass. In some cases, inspiration has been borne out of functional needs, such as shading in hot climates; in others, from aesthetics. Being bird-friendly usually has been incidental. Now, however, buildings are being designed with birds in mind, and materials designed for this purpose are multiplying. Until recently, retrofitting existing buildings has been more difficult and costly than it is today. However, new materials are appearing and costs can be controlled by targeting problem areas rather than entire buildings.

Bird-friendly materials and design features often overlap in function with materials to control heat and light, security measures, and decorative design details. Bird-friendly building-design strategies also fall into three general categories, although all three could be combined in a single structure. These are:

1. Using minimal glass (Bronx Call Center, U.S. Mission to the United Nations)
2. Placing glass behind some type of screening (de Young Museum, Cooper Union)
3. Using glass with inherent properties that reduce collisions (Brooklyn Botanic Garden Visitors Center; Student Center at Ryerson University, Toronto; and Cathedral of Christ the Light)

Netting, Screens, Grilles, Shutters, Exterior Shades

There are many ways to combine the benefits of glass with bird-friendly design by incorporating elements that preclude collisions while providing light and views. Some architects have designed decorative façades that wrap entire structures. Decorative grilles are also part of many architectural traditions. Exterior, motorized solar screens and shades are effective at controlling heat and light, increase security, and can be adjusted to maximize view or bird and sun protection at different times. Netting, grilles, and shutters are common elements that can make glass safe for birds on buildings of any scale. They can be used in retrofit or be an integral part of an original design and can significantly reduce bird mortality.

The Brooklyn Botanic Garden's Visitors Center, designed by Weiss/Manfredi, was intended to be bird-friendly from its inception—a challenge, as it makes extensive use of glass. Photo @ Alber Vecerka, ESTO

Glass walls and doors at the Brooklyn Botanic Garden's Visitors Center include a custom fritting pattern that meets bird-friendly criteria. Monitoring for collisions after the building opened indicates that the design was successful. Photo by Christine Sheppard, ABC

(Opposite) The external glass screen on the GSA Regional Field Office in Houston, Texas, designed by Page Southerland Page, helps control heat but also reduces the likelihood of collisions. Photo by Timothy Hursley

Overhangs block viewing of glass from some angles, but do not necessarily eliminate reflections. Photo by Christine Sheppard, ABC

Reflections in this angled façade can be seen clearly over a long distance, and birds can approach the glass from any angle. Photo by Christine Sheppard, ABC

Before the current age of unopenable windows, screens protected birds in addition to serving their primary purpose of keeping bugs out. Screens are still among the most cost-effective methods for protecting birds, and, if insects are not an issue, nearly invisible netting can often be installed. Screens and netting should be installed at some remove from the window so that the impact of a strike does not carry birds into the glass. Several companies sell screens that can be attached with suction cups or eye hooks for small areas of glass. Others specialize in much larger installations. (Find sources at collisions.abcbirds.org).

Awnings and Overhangs

Overhangs have been frequently recommended to reduce collisions. However, there are many situations in which overhangs do not eliminate reflections and only block glass from the view of birds flying above. They are thus of limited effectiveness as a general strategy. Overhangs work best when glass is shadowed from all sides. Functional elements such as balconies and balustrades can block the view of glass, protecting birds while providing an amenity for residents.

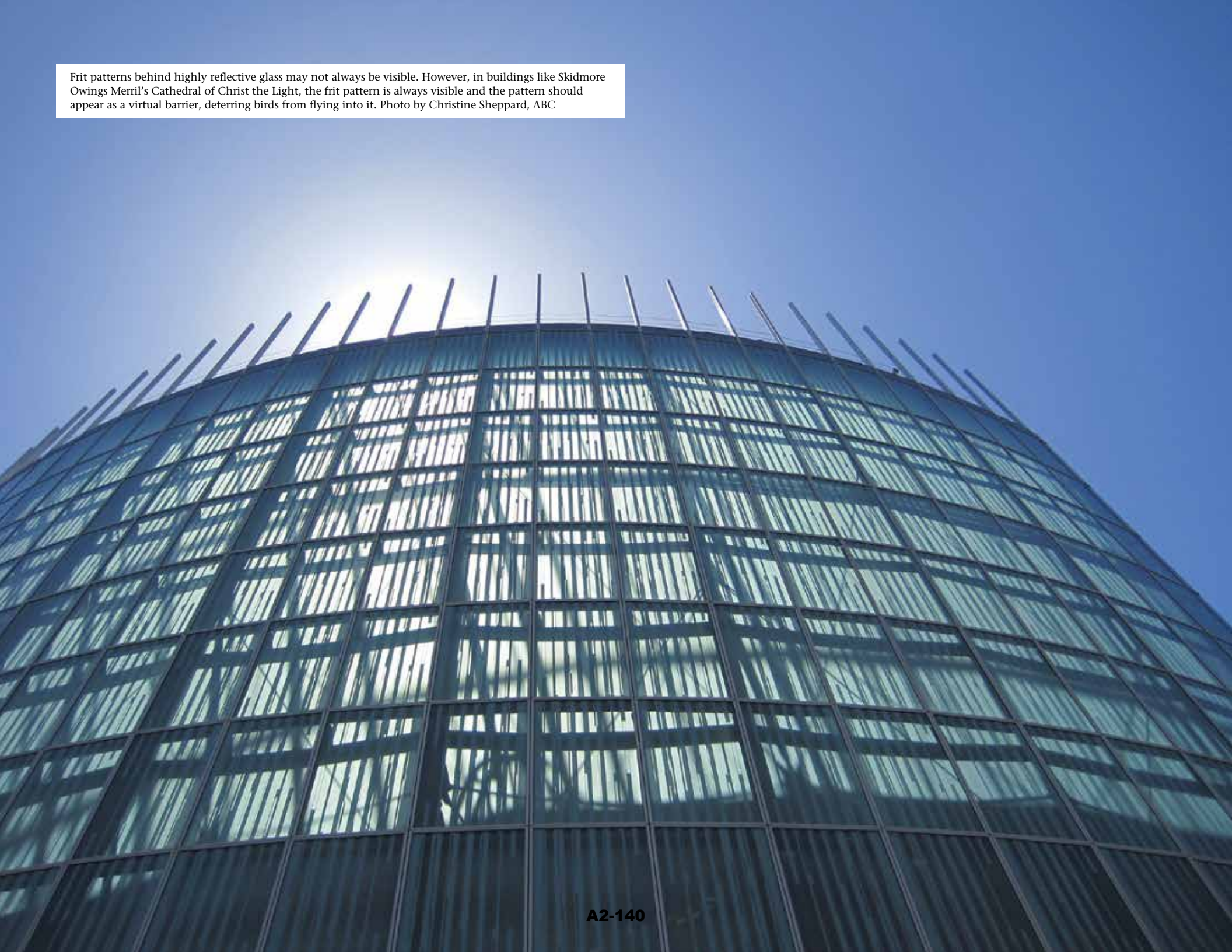
Angled Glass

In a study (Klem et al., 2004) comparing bird collisions with vertical panes of glass to those tilted 20 or 40 degrees, the angled glass resulted in less mortality. Klem speculated that this was because the glass reflected the ground, not vegetation. Using angled glass has become a common recommendation as a bird-friendly feature. However, while angled glass may be useful in special circumstances, the birds in the study were flying parallel to the ground from nearby feeders, hitting the glass at acute angles, with less force than a perpendicular strike. In most situations, however, birds may approach glass from any angle.

Patterns on Glass

Ceramic dots, other types of “frits,” and other materials can be screened, printed, or otherwise applied to glass surfaces. This is often done to reduce the transmission of light and heat and can also provide design detail. In some cases, frit patterns are hardly visible, but when designed according to the 2 x 4 rule (see p. 47), patterns on glass can also prevent bird strikes. Patterns on the outside surface of glass deter collisions most effectively because they are always visible, even with strong reflections. This type of design, useful primarily for new construction, is currently more common in Europe and

A custom frit pattern was designed by Ennead Architects for Vassar College’s Bridge for Laboratory Sciences building. Elements of the pattern occur on two separate surfaces, increasing visibility to birds in flight, who will see a constantly changing pattern that may appear to move. Photo by Christine Sheppard, ABC



Frit patterns behind highly reflective glass may not always be visible. However, in buildings like Skidmore Owings Merril's Cathedral of Christ the Light, the frit pattern is always visible and the pattern should appear as a virtual barrier, deterring birds from flying into it. Photo by Christine Sheppard, ABC

While some internal fritted glass patterns can be overcome by reflections, Frank Gehry's IAC headquarters in Manhattan is so dense that the glass appears opaque. Photo by Christine Sheppard, ABC

Ornilux Mikado's pattern reflects UV wavelengths. The spiderweb effect is visible only from very limited viewing angles. Photo courtesy of Arnold Glass

Asia, but is being offered by an increasing number of manufacturers in the United States. New technologies allowing printing of ceramic inks on the outside surface of glass may greatly increase options for bird-friendly design in the U.S.

More commonly, frit is applied to an internal surface of insulated glass units. This type of design may not be visible if the amount of light reflected by the frit is insufficient to overcome reflections on the outside surface of the glass or if frit is applied as dots below the visual threshold of birds. Some internal frits may only help break up reflections when viewed from some angles and in certain light conditions. However, with the right combination of surface reflectivity and frit application, a pattern on an inside surface can still be effective. The headquarters of the internet company IAC in New York City, designed by Frank Gehry, is composed entirely of fritted glass, most of high density and always visible. No collision mortalities have been reported at this building after two years of monitoring by New York City Audubon. FXFOWLE's Jacob Javits Center, also in Manhattan, reduced collisions by as much as 90% with a renovation that eliminated some dangerous glass and replaced other glass with a visible frit pattern. Another example of a visible internal frit pattern is seen in Skidmore Owings Merril's Cathedral of Christ the Light in Oakland, California.

UV Patterned Glass

Songbirds, gulls, parrots, and other birds can see into the ultraviolet (UV) spectrum of light, a range largely invisible to humans (see page 41). Other bird types, including raptors, kingfishers, hummingbirds, and pigeons, are less sensitive to UV. Ultraviolet reflective and/or absorbing patterns "invisible to humans but visible to birds" are frequently suggested as the optimal solution for many bird collision problems, but few such products are available commercially as of 2015. Progress in development of bird-friendly UV glass has been slow, but with legislation in multiple locations mandating bird-friendly design, glass manufacturers and distributors, as well as window-film manufacturers, are taking an active role in developing new solutions for this application. Research indicates that UV patterns need strong contrast to be effective, especially in the early morning and late afternoon, when UV in sunlight is at low levels. However, UV patterns may be ineffective for many species that have been reported as victims of collisions with glass, including hummingbirds, flycatchers, American Woodcock, and woodpeckers.

Opaque and Translucent Glass

Opaque, etched, stained, or frosted glass and glass block are excellent options to reduce or eliminate collisions, and many attractive architectural applications exist. They can be used in retrofits but are more commonly used in new construction. Frosted glass is created by acid etching or sandblasting transparent glass. Frosted areas are translucent, but various finishes are available with differing levels of light transmission. An entire surface can be frosted, or frosted patterns can be applied. Patterns should conform to the 2 x 4 rule described on page 47. For retrofits, glass also can be frosted by sandblasting on site. Stained glass is typically seen in relatively small areas but can be extremely attractive and is not conducive to collisions. Glass block is versatile, can be used as a design detail or primary construction material, and is also unlikely to cause collisions. Another promising material is photovoltaic glass, which has been used in stained-glass windows and highway noise barriers. This solution is especially interesting, because

The Wexford Science and Technology Building in Philadelphia, designed by Zimmer, Gunsul, Frasca, uses translucent glass to provide light without glare, making it safe for birds. Photo courtesy of Walker Glass

transparent highway noise barriers can cause collisions, and such barriers are beginning to be installed in the United States.

Window Films

Most patterned window films were initially intended for use inside structures as design elements or for privacy. Now, outside surface applications intended to reduce bird collisions are coming onto the market, and some have proved highly effective and popular. The oldest such product creates an opaque white surface on the outside of glass that still permits viewing from the inside. Patterns can be printed on this material, although images of trees and other habitat are not recommended.

A film with a pattern of narrow, horizontal stripes has eliminated collisions at the Philadelphia Zoo Bear Country exhibit for over five years (see photo opposite) and has been similarly successful in other installations when applied to outside surfaces of glass. In these cases, the response has been positive. Another option is to apply vinyl patterns like window film but with the transparent backing removed.

Solutions Applied to Interior Glass

Light colored shades have been recommended as a way to deter collisions. However, when visible, they do not effectively reduce reflections, and reflections may make them completely invisible. Closed blinds have the same problems, but if visible and partly open, they can produce the appearance of a 2 x 4 pattern. If an exterior solution is not possible and tape or sticky notes are applied to the inside of windows, be sure to check the windows several times a day to ensure that these materials are visible.

Decals and Tape

Decals are probably the most familiar solution to bird collisions, but their effectiveness is widely misunderstood. Birds do not recognize decals as

A Zen Wind Curtain is an inexpensive but extremely effective way to deter collisions. Lengths of parachute cord or similar materials are strung vertically, every four inches, in front of problem glass, creating both a visual and a physical barrier. Photo by Glenn Phillips, ABC

This window at the Philadelphia Zoo Bear Country exhibit was the site of frequent bird collisions until window film was applied. Collisions have been eliminated for over five years, with no complaints from visitors about visibility of bears! Photo courtesy of the Philadelphia Zoo

ABC BirdTape

ABC, with support from the Rusinow Family Foundation, has produced ABC BirdTape to make home windows safer for birds. This easy-to-apply tape lets birds see glass while letting you see out, is easily applied, and lasts up to four years. For more information, visit abcbirdtape.org

Photos by Dariusz Zdziebkowski, ABC

silhouettes of falcons, spiderwebs, or other natural objects, but simply as obstacles that they may try to fly around. Decals can be very effective if applied following the 2 x 4 rule on the outside of glass, but in general, they must be replaced frequently, at least annually. Tape is generally more cost effective and quicker to apply, but most household tapes don't stand up well to the elements. Tape intended to last for several years on the outside of windows has become commercially available and is effective when applied following the 2 x 4 guide.

The Consilium Towers, a mirror-glass complex in Toronto, once killed thousands of birds each year. After being taken to court, its owners retrofitted the lower 60 feet of glass with a Feather Friendly dot pattern that has greatly reduced bird mortality.

Reflected in this glass is Michael Mesure, the founder of Toronto's Fatal Light Awareness Program. Photos by Christine Sheppard, ABC

Temporary Solutions

In some circumstances, especially for homes and small buildings, quick, low-cost, temporary solutions, such as making patterns on glass with paint, stickers, or even post-its, can be very effective in the short term. Even a modest effort can reduce collisions. Such measures can be applied when needed and are most effective following the 2 x 4 rule. (For more information, see ABC's flyer "You Can Save Birds from Flying into Windows" and other sources at collisions.abcbirds.org).

ABC BirdTape was effective at the Forest Beach Migratory Reserve in Wisconsin (left), and also performed well in tunnel tests conducted in Austria. Photo by Christine Sheppard, ABC

REMEDIATION CASE STUDY: Javits Center

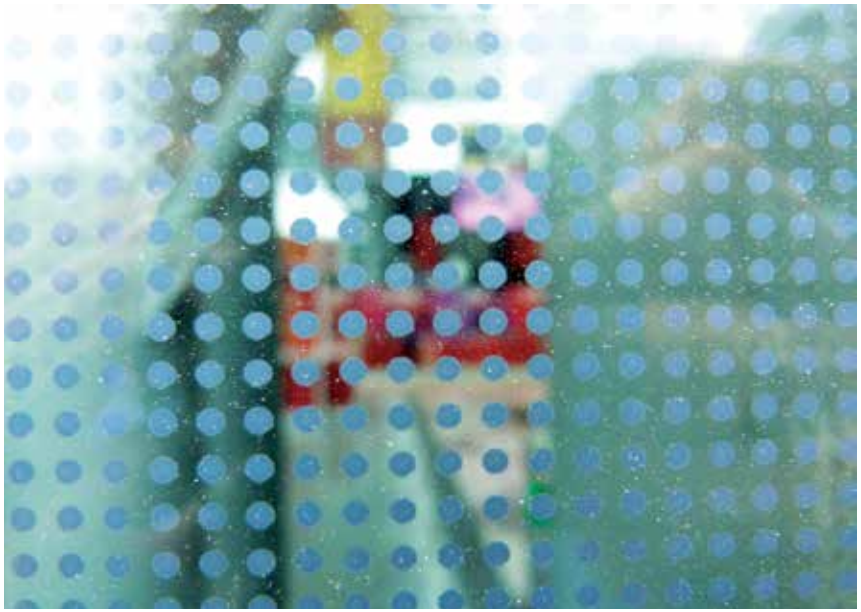
In 2009, the New York City Audubon Society identified the Jacob K. Javits Convention Center as having one of the highest bird-collision mortality rates in New York City.

A major renovation and expansion, designed by the bird-friendly architectural firm of FXFOWLE, was completed in 2014. Some especially deadly glass at street level was replaced with opaque panels. Large panes of clear fritted glass with varying surface characteristics were brought to the site and compared to find the right combination for birds and people.

A 6.75-acre green roof, with adjacent translucent glass, crowns the building and is already providing resources for birds.

Best of all, collisions at the now much larger site have been reduced by 90%.

From a distance, the Javits Center looks like a potential threat to birds.



At close range, a visible pattern of frit dots breaks up reflections, making the glass safe for birds.
Photos by Glenn Phillips, ABC

A2-146

Light: Problems and Solutions

Fixtures such as these reduce light pollution, saving energy and money and reducing negative impacts on birds. Photo by Dariusz Zdziebkowski, ABC

Birds evolved complex complementary systems for orientation and vision long before humans developed artificial light. We still have much more to learn, but recent science has begun to clarify how artificial light poses a threat to birds, especially nocturnal migrants. Although most glass collisions take place during daylight hours, artificial lighting at night plays a role in the number and distribution of collisions across the built environment. Unfortunately, the details of how birds respond to night lighting are less well understood than has been commonly believed.

Many collision victims, especially songbirds, are ordinarily active by day and have eyes specialized for color vision and bright light. But although they migrate at night, these birds have poor night vision. Instead, they have magnetic senses that allow them to navigate using the Earth's magnetic field. One of these is located in the retina and requires dim blue natural light to function. Red wavelengths found in most artificial light have been shown to disrupt that magnetic sense. Studies in Germany and Russia have documented birds flying through beams of light and diverting from their course anywhere from a few degrees to a full circle. Areas with significant light pollution may be completely disorienting to birds.

Birds are attracted to relative brightness, and by day often orient toward the sun. If a songbird flies into a home, darkening the room and opening a bright window is the best way to release it. Birds are thought to be attracted to artificial light at night, but we don't know what light level at what distance is sufficient to cause attraction or other behavioral impacts. Gauthreaux and Belser, discussing impacts of night lighting on birds, speculated that in fact, birds affected by night lighting may simply be on course to pass over the lights, not necessarily attracted from a distance. Marquenie and Van de Laar, studying birds and lights on a drilling rig in the North Sea, estimated that when all the lights on the platform were lit, they affected birds up to 3 to 5 kilometers away, causing many to circle the platform.

The science is inconclusive: Lights may only impact birds as they end a migratory stage and come down close to the built environment, or lights may divert birds that would ordinarily pass by. Bad weather can cause birds to fly lower and closer to lights, while also eliminating any visual cues. The interactions that produce correlations between building light emissions and collisions may take place at relatively close range. Once birds come close to a light source, the electromagnetic radiation actively interferes with their magnetic orientation mechanism.

Overly lit buildings waste electricity and increase greenhouse gas emissions and air pollution levels. They also pose a threat to birds. Photo by Matthew Haines

Houston skyline at night. Photo by Jeff Woodman

Examples of Acceptable/Unacceptable Lighting Fixtures

Reprinted courtesy of DarkSkySociety.org

Some combination of attraction and disorientation may result in larger numbers of birds in the vicinity of brighter buildings and thus, by day, in more collisions. Interestingly, there seem to be no reports of lights attracting or disorienting migrants as they take off on a new migratory stage.

There has been a tendency to associate collision events with very tall structures, though published reports clearly document impact from light at all levels. Early reports of this phenomenon came from lighthouses. Contemporary reports of light-associated circling events are common at oceanic drilling rigs, and disoriented birds have been reported at night skiing sites. A study in Toronto, using the number of lighted windows on a series of buildings as an index of emitted light, found that the amount of light emitted, not the height of the building, was the best predictor of bird mortality.

Solutions

Poorly designed or improperly installed outdoor fixtures add over $1 billion to electrical costs in the United States every year, according to the International Dark Skies Association. Recent studies estimate that over two-thirds of the world's population can no longer see the Milky Way, just one of the nighttime wonders that connect people with nature. Glare from poorly shielded outdoor light fixtures decreases visibility and can create dangerous conditions, especially for older people, and recent studies suggest that long-term exposure to night lighting can increase the risk of breast cancer, depression, diabetes, obesity, and sleep disorders. Together, the ecological, financial, and cultural impacts of excessive building lighting are compelling reasons to reduce and refine light usage.

Reducing exterior building and site lighting has proven effective at reducing mortality of night migrants at

individual buildings, but achieving overall reduction in collisions will require applying those principles on a wider scale. At the same time, these measures reduce building energy costs and decrease air and light pollution. Efficient design of lighting systems plus operational strategies to reduce light trespass or "spill light" from buildings while maximizing useful light are both important strategies. In addition, an increasing body of evidence shows that red light and white light (which contains red wavelengths) particularly confuse birds, while green and blue light may have far less impact.

Light pollution is largely a result of inefficient exterior lighting, and improving lighting design usually produces savings greater than the cost of changes. For example, globe fixtures permit little control of light, which shines in all directions, resulting in a loss of as much as 50% of energy, as well as poor illumination. Cut-off shields can reduce lighting loss and permit use of lower powered bulbs. Most "vanity lighting" is unnecessary. However, when it is used, down-lighting causes less trespass than up-lighting. Where light is needed for safety and security, reducing the amount of light trespass outside of the needed areas can help by eliminating shadows. Spotlights and searchlights should not be used during bird migration. Communities that have implemented programs to reduce light pollution have not found an increase in crime.

Using automatic controls, including timers, photosensors, and infrared and motion detectors, is far more effective than relying on employees turning off lights. These devices generally pay for themselves in energy savings in less than a year. Workspace lighting should be installed where needed, rather than in large areas. In areas where indoor lights will be on at night, minimize perimeter lighting and/or draw shades after dark.

Switching to daytime cleaning of office buildings is a simple way to reduce lighting while also reducing costs.

Lights Out Programs

Despite the complexity of reducing bird collisions with glass, there is one simple way to decrease mortality: turn lights off. Across the United States and Canada, "Lights Out" programs at the municipal and state levels encourage building owners and occupants to turn out lights visible from outside during spring and fall migration. The first of these, Lights Out Chicago, was started in 1995, followed by Toronto in 1997. The programs themselves are diverse. Some are directed by environmental groups, others by government departments, and still others by partnerships of organizations. Participation in most, such as Houston's, is voluntary. Minnesota mandates turning off lights in state-owned and leased buildings.

Powerful beams of light, even in a landscape of urban light pollution, can entrap migrating birds, seen here circling in the beams of the 9/11 Memorial Tribute in Light in New York City. Because birds may circle for hours, monitors watch all night, and the light beams are temporarily turned off to release large accumulations of birds. Photo by Jason Napolitano

Many jurisdictions have monitoring components. Monitoring programs can provide important information in addition to quantifying collision levels and documenting solutions. Ideally, lights-out programs would be in effect year-round and be applied widely, saving birds and energy costs and reducing emissions of greenhouse gases. ABC stands ready to help develop new programs and to support and expand existing programs.

Solutions: Policy

Legislation

Changing human behavior is generally a slow process, even when the change is uncontroversial. Legislation can be a powerful tool for modifying behavior. Conservation legislation has created reserves, reduced pollution, and protected threatened species and ecosystems. Policies that promote bird-friendly design and reduction of light pollution have recently proliferated across the United States and Canada, following the early examples of Toronto and San Francisco. They vary considerably in scope and detail, often reflecting local politics. (A real-time database of ordinances and other instruments mandating or promoting bird-friendly action, including links to source language, can be found at collisions.abcbirds.org).

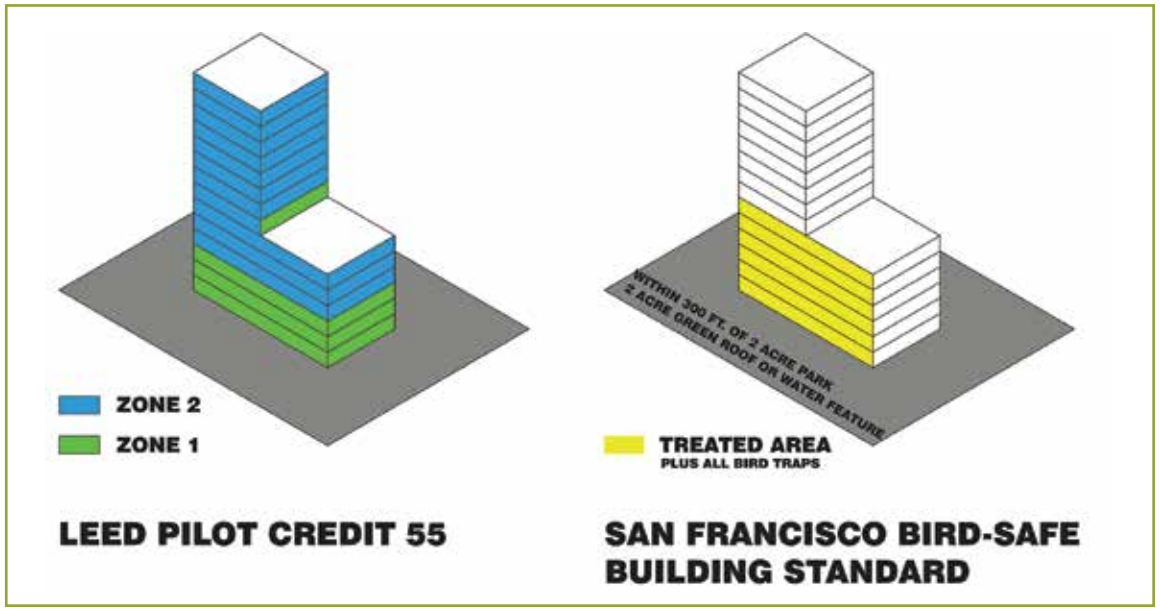
An early challenge in creating effective legislation was the lack of objective measures that architects could use to accomplish their task. For example, a common recommendation, to "increase visual noise," because it was unquantified and undefined, made it difficult for architects and planners to know whether a particular design complied with requirements. Material testing (see p. 45) has made it possible to assign relative threat factors to various building façade materials and to use those scores to create quantitative guidelines and mandates.

The illustration to the right broadly compares San Francisco's Bird-safe Building Standard with LEED Pilot Credit 55, both based on the use of materials with quantified threat levels. San Francisco's standard applies generally to new construction and is restricted to façades within 300 feet of a two-acre park or pond. The LEED credit is intentionally very flexible. It applies to all building facades and allows for restricted amounts of high-threat glass, or larger amounts of bird-friendly glass. Because birds are found throughout the built environment, ABC prefers the LEED model. (ABC's model legislation can be found on page 35.)

Bird lovers across the country are proposing bird-friendly design ordinances at both local and state levels. ABC is ready to actively support such efforts. Both mandatory and voluntary instruments can be effective. Voluntary guidelines are easier to modify if they prove to have unintended consequences and can lead to a mandate, but can also be ignored. Generally ABC recommends mandatory guidelines, beginning with a small subset of buildings and expanding as community support increases and resistance decreases.

Incorporating bird-friendly design issues into local sustainability policies is another way to drive change. An interesting example of this is the Fairfax County, Virginia, proffer system. New construction projects are required to address a series of sustainability issues, including potential bird mortality, and either to describe

The design of the Grange Insurance Audubon Center in Columbus, Ohio, includes many panels of glass, fritted with the silhouettes of species of birds in flight. Photo by Christine Sheppard, ABC



courtesy of Deborah Laurel

(Opposite) United States Capitol, Washington, D.C. Photo by stock.xchng

A2-152

For its new Visitors Center in Sempach, opened in May 2015, the Swiss Ornithological Institute designed a mandala from bird silhouettes (below) that was applied on the inside of all glass using digital printing. The design provides 40-50% coverage and generates much discussion among visitors, an achievement second only to preventing bird collisions.

Photos by Hans Schmid

how these will be addressed by the project or explain why such action is not possible.

Priorities for Policy Directives

ABC generally recommends against attempting to map locations where bird-friendly design is required because birds can be found in almost every environment, even in seemingly inhospitable ones. However, there may be occasions when it is necessary to compromise on the scope of legislation. In such cases, it must be recognized that proximity to undeveloped land, agricultural areas, parks, and water often correspond to increased bird populations and therefore increased risk of collisions. In addition, areas located in between landscape features desirable to birds may also pose higher risks. For example, in New York City some evidence suggests that birds approach Central Park from due south during spring migration, creating a greater risk zone directly south of the park. Also, building features such as green roofs should be considered when determining greater risk zones for policy purposes.

Sustainability Rating Programs

Another driver of bird-friendly policies consists of sustainability rating programs like the Green Building Council's LEED program, Green Globes, Living Building Challenge, and others. There is general agreement that sustainable buildings should not kill birds. This tenet appears with differing levels of robustness in different systems, with the most specific being the LEED program, which grants Pilot Credit 55: Bird Collision Deterrence. The credit is calculated using a weighted average of the relative threat rating of each material on a building's façade. The credit has attracted a lot of attention, with many projects applying for it. The new Vassar Bridge for Laboratory Sciences on the cover of this publication was one of the first to be designed with the credit in mind and to earn the credit.

Because a number of glass-walled buildings have been awarded LEED certification at the highest level, at one point there was concern that sustainable design was not compatible with bird-friendly design. This was ironic, as in addition to providing natural light, glass on sustainable buildings is intended to link people inside with the natural world outside. However, according to both ASHRAE and ICC, costs for heating and cooling increase when total glass surface exceeds 30-40% of the total building envelope, depending on climate. This is more than sufficient for providing light and views when glass placement is considered thoughtfully. This is a great place to start the design of a bird-friendly structure.

The façade of the WÜRTH Building in Switzerland is mostly glass, laminated with a fabric that is black on the inside but aluminium-coated outside. The inner surface delivers good visibility, and the fabric provides shade and interesting visual effects outside. Preliminary studies by the Swiss Ornithological Institute suggest that the materials used in this building may also deter bird collisions. Photo by Hans Schmid

Model Ordinance for Bird-Friendly Construction

[ORDINANCE Name] Sponsored by:
[list names]

WHEREAS, birds provide valuable and important ecological services,

WHEREAS, [location] has recorded [ ] species of resident and migratory bird species,

WHEREAS, birding is a hobby enjoyed by 64 million Americans and generates more than $40 billion a year in economic activity in the United States,

WHEREAS, as many as one billion birds may be killed by collisions with windows every year in the United States,

WHEREAS, reducing light pollution has been shown to reduce bird deaths from collisions with windows,

WHEREAS, new buildings can be designed to reduce bird deaths from collisions without additional cost,

WHEREAS, there exist strategies to mitigate collisions on existing buildings,

WHEREAS, more than 30% glass on a façade usually increases costs for heating and cooling

WHEREAS, bird-friendly practices often go hand-in-hand with energy efficiency improvements,

And WHEREAS [any additions specific to the particular location]

NOW, THEREFORE, BE IT ORDAINED, by [acting agency] [title of legislation and other necessary language]

(a) In this section the term "Leadership in Energy and Environmental Design (LEED)" means a green building rating system promulgated by the United States Green Building Council (USGBC) that provides specific principles and practices, some mandatory but the majority discretionary, that may be applied during the design, construction, and operation phases, which enable the building to be awarded points from reaching present standards of environmental efficiency so that it may achieve LEED certification from the USGBC as a "green" building.

b) [acting agency] does hereby order [acting department] to take the steps necessary to assure that all newly constructed buildings and all buildings scheduled for capital improvement are designed, built, and operated in accordance with the standards and requirements of the LEED Green Building Rating System Pilot Credit 55: Bird Collision Deterrence.

(c) The USGBC releases revised versions of the LEED Green Building Rating System on a regular basis; and [acting department] shall refer to the most current version of the LEED when beginning a new building construction permit project or renovation.

(d) New construction and major renovation projects shall incorporate bird-friendly building materials and design features, including, but not limited to, those recommended by the American Bird Conservancy publication *Bird-Friendly Building Design*.

(e) [acting department] shall make existing buildings bird-friendly where practicable.

The Studio Gang's Aqua Tower in Chicago was designed with birds in mind. Strategies included fritted glass and balcony balustrades. Photo by Tim Bloomquist

The Science of Bird Collisions

Hundreds of species of birds are killed by collisions. These birds were collected by monitors with FLAP in Toronto, Canada. Photo by Kenneth Herdy

Magnitude of Collision Deaths

The number of birds killed by collisions with glass every year is astronomical. Quantifying mortality levels and impacts on populations has been difficult, however. Until recently, local mortality studies—despite producing valuable information—aimed more at documenting mortality than quantifying it, and did not follow rigorous protocols. Loss *et al*. (2012) created methodology and techniques of analysis to determine the magnitude of anthropogenic mortality, using existing data sets. The authors comprehensively acquired published and unpublished data sets on collisions with buildings (Loss *et al*., 2013). Data sets were filtered using a variety of criteria to ensure that they could be used in single analyses. Loss *et al*. (2014b) have also comprehensively described how to collect meaningful data on collisions.

The authors calculated the median annual mortality at homes at 253 million, or 2.1 birds per structure. Urban residences without feeders account for 33% of this mortality cumulatively, as there are more such residences, even though residences with feeders produce more collisions individually. Rural residences without feeders account for 31% of residential mortality, followed by urban residences with feeders (19%) and rural residences with feeders (17%). Median mortality at low-rise buildings (4 to 11 stories), calculated from two data sets, was averaged as 339 million, or 21.7 birds per building. High-rises, although collectively causing the least mortality (508,000), individually had the highest median rate of 24.3 bird collisions per building. Combining all building classes produces an estimate of 365 and 988 (median 599) million birds killed annually in the United States.

Machtans, *et al*. (2013) estimated that about 25 million (ranging from 16 to 42 million) birds are killed by colliding with windows in Canada annually, with 90% of building-related mortalities caused by houses, slightly less than 10% by low-rise buildings, and approximately 1% by tall buildings. In both cases, the total mortality caused by houses is a function of their large number compared to the two other classes of buildings.

Previously, Dunn (1993) surveyed 5,500 people who fed birds at their homes and recorded window collisions. She derived an estimate of 0.65-7.7 bird deaths per home per year for North America. Klem (1990) estimated that each building in the United States kills one to 10 birds per year. Using 1986 U.S. census data, he combined numbers of homes, schools, and commercial buildings for a maximum total of 97,563,626 buildings, producing an estimate of 100 million to one billion birds killed annually.

Klem *et al*. (2009a) used data from New York City Audubon's monitoring of 73 Manhattan building façades to estimate 0.5 collision deaths per acre per year in urban environments, for a total of about 34 million migratory birds annually colliding with city buildings in the

This Barn Swallow illustrates the type of acrobatic flying that may keep swallows from being frequent collision victims. If birds do identify glass as a barrier at close range, perhaps by sound or air movements, most species may be unable to react fast enough to avoid striking the surface. Photo by Keith Ringland

A sample of collision victims from Baltimore.
Photo by Daniel J. Lebbin, ABC

Sharp-shinned Hawk. Photo by Ted Ardley

United States. However, there could be major differences in collision patterns in cities across the United States, and these numbers should be confirmed using data from additional locations.

In *The American Bird Conservancy Guide to Bird Conservation* (Lebbin *et al.*, 2010) the authors state "…we have reached a point in history when the impacts of human activities are so profound and far-reaching that from now on, it will always be impossible to untangle the completely natural declines from those that are partially or completely anthropogenic. From a conservation standpoint, it is largely irrelevant, anyway. Any human-caused stress that we can alleviate from a declining species can potentially benefit its population, and we should take action to lessen that stress if we can." This is abundantly true for bird mortality from glass because there are actions that many, if not most, individuals can take themselves, directly, to reduce the toll taken by existing glass.

Patterns of Mortality

It is difficult to get a complete and accurate picture of avian mortality from collisions with glass. Collision deaths can occur at any time of day or year. Monitoring programs focus on cities, and even intensive monitoring programs cover only a portion of a city, usually visiting the ground level of a given site at most once a day and often only during migration seasons. Many city buildings have stepped roof setbacks that are inaccessible to monitoring teams. Some studies have focused on reports from homeowners on backyard birds (Klem, 1989; Dunn, 1993) or on mortality of migrants in an urban environment (Gelb and Delacretaz, 2009; Klem *et al.*, 2009a; Newton, 1999). Others have analyzed collision victims produced by single, large-magnitude incidents (Sealy, 1985) or that have become part of museum collections (Snyder, 1946; Blem *et al.*, 1998; Codoner, 1995). There is general support for the fact that birds killed in collisions are not distinguished by age, sex, size, or health (for example: Blem and Willis, 1998; Codoner, 1995; Fink and French, 1971; Hager *et al.*, 2008; Klem, 1989), but the majority of work has focused on data taken during migratory periods, primarily east of the Mississippi River.

Species at Risk

Snyder (1946), examining window collision fatalities at the Royal Ontario Museum, noted that the majority were migrants and "tunnel flyers"—species that frequently fly through small spaces in dense, understory habitat. Conversely, resident species well adapted to and common in urban areas, such as the House Sparrow and European Starling, are not prominent on lists of fatalities, possibly because individuals surviving their first collision may teach offspring to avoid windows.

It is well known that zoo birds in exhibits with glass walls can and do learn about specific pieces of glass, but birds do not learn about glass as a general concept.

Dr. Daniel Klem maintains running totals of the number of species reported in collision events in countries around the world. (This information can be found at http://tinyurl.com/ob3nc4s). In 2015, the site identifies 868 species globally, with 274 from the United States. The intensity of monitoring and reporting programs varies widely from country to country, however.

Hager *et al.* (2008) compared the number of species and individual birds killed at buildings at Augustana College in Illinois with the density and diversity of bird species in the surrounding area. The authors concluded that the

total window area, the habitat immediately adjacent to windows, and behavioral differences among species were the best predictors of mortality patterns, rather than the mere size and composition of the local bird population. Kahle *et al*. (2015) reached similar conclusions in an analysis of five years of data at the California Academy of Sciences, also finding that migrants do not make up the preponderance of birds killed and that males are overrepresented relative to their abundance in habitats adjacent to the museum. Dunn (1993), analyzing winter data from homes with bird feeders, found that the frequency distribution of birds at the feeders closely paralleled the distribution of species killed by nearby windows. Dunn found few collisions on windows of less than one square meter, and an increase in collisions with an increase in window size.

Species such as the White-throated Sparrow, Ovenbird, and Common Yellowthroat appear consistently on top 10 lists from urban areas. It is possible that these species respond more readily to light and thus are more likely to end migratory stages in the built environment, but this needs to be confirmed. Additionally, Loss *et al*. (2013) noted that Golden-winged Warbler, Painted Bunting, Canada Warbler, Wood Thrush), Kentucky Warbler, and Worm-eating Warbler—species identified as birds of conservation concern—were also disproportionately represented in building kills. Hager (2009) noted that window-strike mortality was reported for 45% of raptor species found frequently in urban areas of the United States and was the leading source of mortality for Sharp-shinned Hawks, Cooper's Hawks, Merlins, and Peregrine Falcons. Because most data on glass collisions are from the eastern half of the United States, these lists are presumably biased toward species occurring in that range.

Common Yellowthroat. Photo by Owen Deutsch

Characteristics of Buildings

Amount of Glass

From a study of multiple buildings in Manhattan, Klem *et al.* (2009a) concluded that both the proportion and absolute amount of glass on a building façade best predict mortality rates, calculating that every increase of 10% in the expanse of glass correlates to a 19% increase in bird mortality in spring and 32% in fall. How well these equations predict mortality in other cities remains to be tested. Collins and Horn (2008), studying collisions at Millikin University in Illinois, concluded that total glass area and the presence/absence of large expanses of glass predicted mortality level. Hager *et al.* (2008, 2014) came to the same conclusion, as did Dunn (1993) and Kahle *et al.* (2015). However, the "patchiness" of glass across a façade—how many pieces, their size, how they are separated, etc. (another way of saying "visual noise")—has not yet been explored in detail but could be important.

The façade of the New York Times building, by FXFOWLE and Renzo Piano, is composed of ceramic rods, spaced to let occupants see out while minimizing the extent of exposed glass—good for controlling heat and light, and safe for birds. Photo by Christine Sheppard, ABC

Snohetta's Student Learning Centre at Ryerson University is one of the first constructed under Toronto's design law. Photo by Rick Ligthelm

Time of Day

Most monitoring programs focus on early morning hours to document mortality during migration, often starting monitoring routes at dawn, before sidewalks are cleared. This can, however, lead to the misperception that night-flying migrants are crashing into lighted buildings at night, or only in early morning, whereas in fact most collisions take place during the day. It should be noted that "dawn" is a time that varies among species (Thomas *et al.* (2002), with some bird species active before humans start to see light in the sky.

Hager and Craig (2014), in a study of resident population collisions in northwestern Illinois between June and early August, found that 66% of birds died between sunrise and 4:00 p.m., with no collisions between 4:00 p.m. and sunset. Delacretaz and Gelb (2006) found collisions from early morning until mid-afternoon, but with a peak during morning hours. This finding is confirmed by monitoring programs like that of Pennsylvania Audubon, where routes were followed three times in succession early each day, with birds found at each pass (Keith Russell, pers. comm.) and where people living or working in buildings report window strikes through afternoon hours (Olson, pers. comm).

Local Landscape

Gelb and Delacretaz (2006, 2009) evaluated data from collision mortality at Manhattan building façades. They found that sites where glass reflected extensive vegetation were associated with more collisions than glass reflecting little or no vegetation. Of the 10 buildings responsible for the most collisions, four were "low-rise." Klem (2009) measured variables in the space immediately associated with building façades in Manhattan as risk factors for collisions. Both increased height of trees and increased height of vegetation increased the risk of collisions in fall. Ten percent increases in tree height and the height of vegetation corresponded to 30% and 13% increases in collisions in fall. In spring, only tree height had a significant influence, with a 10% increase corresponding to a 22% increase in collisions. Confusingly, increasing "facing area," defined as the distance to the nearest structure, corresponded strongly with increased collisions in spring and with reduced collisions in fall. Presumably, vegetation increases risk both by attracting more birds to an area and by being reflected in glass.

Bayne *et al.* (2012) confirmed that the risk of bird–window collisions varies according to location (urban versus rural, home versus apartment, with or without feeders, and age of neighborhood). They used online surveys and determined that rural residences had more collisions than urban ones and residences with feeders had almost twice as many collisions as those without feeders. For urban dwellings, incidence of collisions increased with age of neighborhood, associated with presence of mature trees. Frequency of collisions varied seasonally: 24% in fall, 35% summer, 25% spring, 16% winter. Mortality patterns were similar: 26% fall, 31% summer, 26% spring, 17% winter. Forty-eight species were reported.

Hager *et al.* (2013) noted that estimates of bird-collision mortality often postulate a relatively constant range of collisions at all buildings (for example, Klem, 1990). However, they suggested that each building in a landscape has its own mortality "signature," based not only on characteristics of the structure but also on the distribution of resources throughout the local landscape, including land cover, habitat type, water, and pavement. Their protocol selected buildings at random and has recently been expanded to multiple other sites across North America.

Avian Vision and Collisions

Bird species like falcons are famous for their acute vision, but taking a "bird's-eye view" is much more complicated than it sounds. To start with, where human color vision relies on three types of sensors, birds have four, plus an array of color filters that together allow birds to discriminate between many more colors than people (Varela *et al.* 1993) (see figure this page).

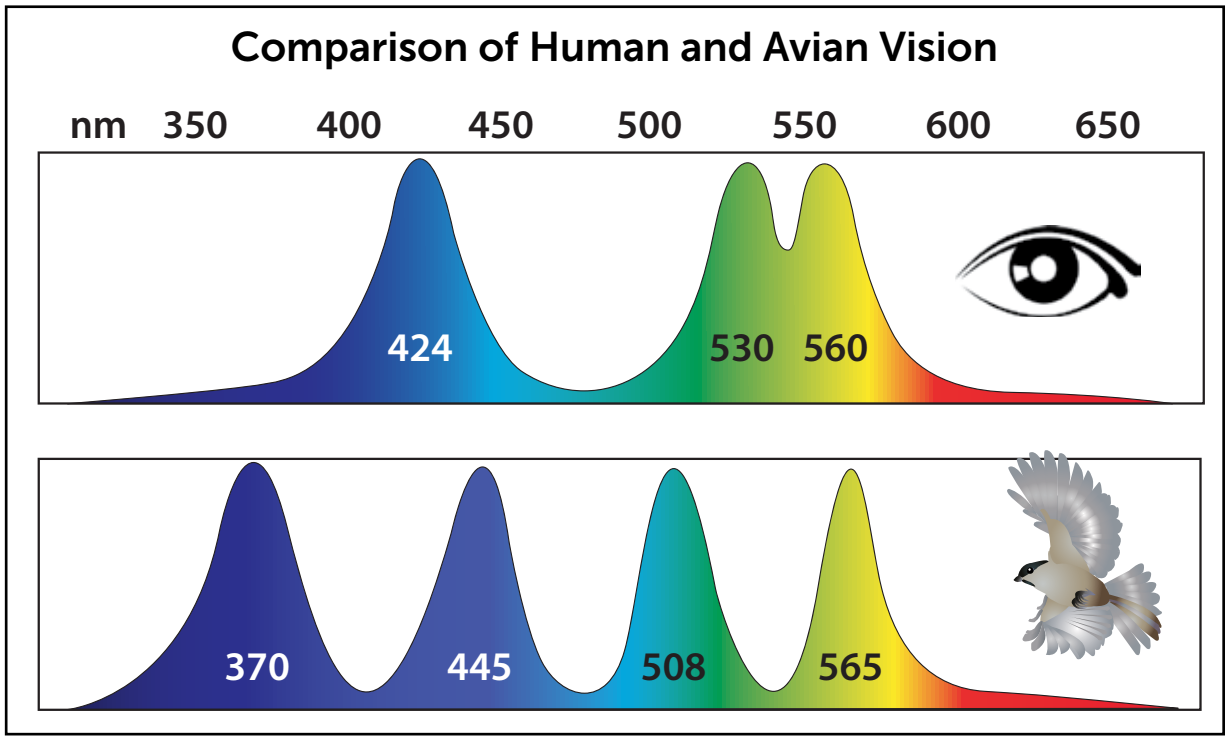
There is also variation in vision among different groups of birds. While some birds see only into the violet range of light, many birds, including most passerines (Ödeen and Håstad, 2003, 2013) see into the ultraviolet spectrum (UVS species).

Ultraviolet can be a component of any color (Cuthill *et al.* 2000). Whereas humans see red, yellow, or red + yellow, birds may see red + yellow, but also red + ultraviolet, yellow + ultraviolet, and red + yellow + ultraviolet—colors for which we have no names. Every object absorbs, reflects, and transmits ultraviolet light along with the other wavelengths in the visible spectrum. UV patterns on glass are often cited as desirable solutions to collisions—visible to birds but not to humans. However, aside from manufacturing complexities, many bird taxa that collide frequently with glass, including raptors, pigeons, woodpeckers, and hummingbirds, may not be able to perceive UV patterns (Håstad and Ödeen, 2014). Additionally, birds are often active in early morning, when UV light levels are low.

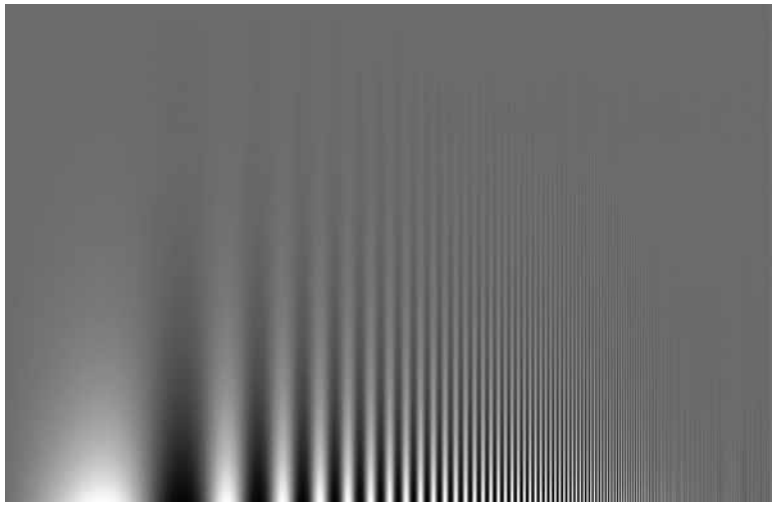
Humans and other primates have relatively flat faces, with eyes close together. The overlap of visual fields means that humans have good depth perception and a tendency to focus on what is ahead. Most birds have eyes at the sides of their heads, giving them excellent peripheral vision but poor depth perception, often limited to the length of their beaks, presumably to judge potential food items. They may be much less intent on what is in front of them (Martin 2011, 2012) but able to watch for potential predators to the side or behind them. Many species' most acute vision is to the side. Without much 3D vision, birds use a mechanism called "visual flow fields" to judge their speed and rate of progress in flight by the passage of environmental features to their sides (Bhagavatula *et al.* 2011). Collisions with glass may be partly a result of birds expecting open air ahead, combined with relatively poor forward vision.

Birds process images faster than humans; where we see continuous motion in a movie, birds would see flickering images (D'Eath, 1998; Greenwood *et al.* 2004; Evans *et al.* 2006). This speed helps many birds maneuver quickly in

Painted Bunting. Photo by Ted Ardley



Based on artwork by Sheri Williamson



Contrast sensitivity is a measure of the limit of visibility for low-contrast patterns. Each person's contrast sensitivity can be measured by the extent to which he or she can see the bars that form an arch in this photograph. The exact location of the peak of the curve varies with one's distance from the image; the area within the arch is larger when one is closer. For a given distance, the area under the arch is smaller for birds. Image courtesy of Izumi Ozawa, Berkeley Neuroscience Laboratory

response to unexpected obstacles as they fly through complex habitats. In one respect however—spatial contrast sensitivity—human vision outperforms avian (Ghim and Hodos, 2006). Contrast sensitivity is "the ability of the observer to discriminate between adjacent stimuli on the basis of their differences in relative luminosity (contrast) rather than their absolute luminances." Birds' lack of contrast sensitivity may be an impediment to creating signals to prevent collisions that are effective for birds but not visually intrusive to humans.

Avian Orientation and the Earth's Magnetic Field

In the 1960s, it was discovered that migrating birds possess the ability to orient themselves using cues from the sun, polarized light, stars, the Earth's magnetic field, visual landmarks, and possibly even odors to find their way. Exactly how this works—and it likely varies among species—is still being investigated. (For a comprehensive review of the mechanisms involved in avian orientation, see Wiltschko and Wiltschko, 2009).

The Earth's magnetic field can provide both directional and positional information. It appears that night-flying migrants, and perhaps all bird species, have magnetic field-detecting structures in the retina of the eye that depend on light for function and provide compass orientation. This magnetic sense is wavelength-dependent. Experiments have shown that the compass is disrupted by long wavelength light but requires low-intensity short wavelength light (Wiltschko *et al.* 2007). This research has taken place only in laboratories, and it is important to determine how it translates to the real world.

In addition, anthropogenic electronic noise, found throughout urban environments, has recently been shown to disrupt magnetic compass orientation in European Robins at very low intensities (Engels *et al.* 2014). This finding may have serious implications for strategies aimed at reducing collisions by reducing artificial night lighting alone and should be a priority for additional work.

A second magnetic mechanism, providing birds with positional information, has been postulated, but its details have not been determined. (For a review of magnetoreception and its use in avian migration, see Mouritsen, 2015.)

Birds and Light Pollution

The earliest reports of mass avian mortality caused by lights were from lighthouses, but this source of mortality essentially disappeared when steady-burning lights were replaced by rotating beams (Jones and Francis, 2003). Flashing or interrupted beams apparently allowed birds to continue to navigate, which has also been found more recently at cell towers with strobe lighting (Gehring *et al.* 2009). The emphasis on tall structures by Lights Out programs ignores the fact that light from many sources, from urban sprawl to parking lots, can affect bird behavior and potentially strand birds in the built environment (Gauthreaux and Belser, 2006). Evans-Ogden (2002) showed that light emission levels of 16 buildings, ranging in height from 8 to 72 floors and indexed by the number of lighted windows observed at night, correlated directly with bird mortality, and

that the amount of light emitted by a structure was a better predictor of mortality level than building height, although height was a factor. Parkins *et al.* (2015) made similar findings.

Mass collision events of migrants associated with light and often with fog or storms have been frequently reported (Weir, 1976; Avery *et al.* 1977; Avery *et al.* 1978; Crawford, 1981a, 1981b; Gauthreaux and Belser, 2006; Newton, 2007). But these are no longer the predominant sources of mortality, possibly because the night landscape has changed radically since early reports of mass collision events at tall structures like the Washington Monument and Statue of Liberty. These and other structures were once beacons in areas of relative darkness, but are now surrounded by square miles of light pollution. While collisions at structures like cell towers continue to take place at night, the majority of collisions with buildings now take place during the day. (Hager, 2014; Kahle *et al.*, 2015; Olson, pers. comm.)

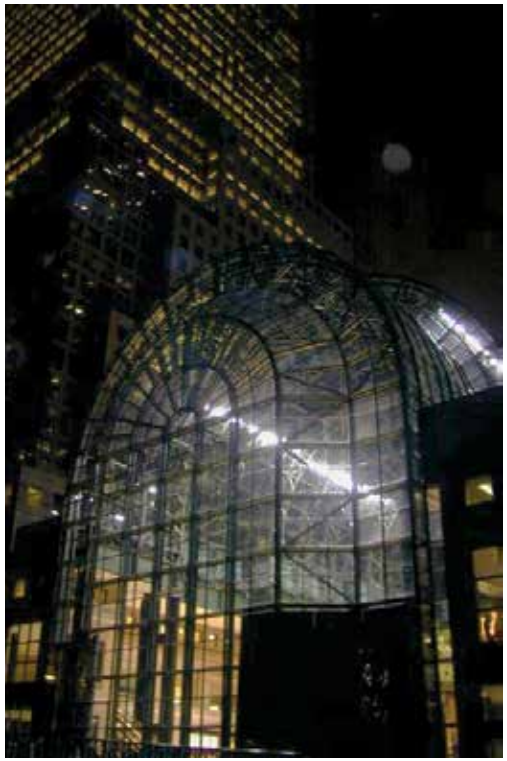
Patterns of light intensity seem to play a role in the distribution of collisions in the built environment, however. Birds may land in patterns dictated by the pattern of light intensity in an area, so the brightest buildings are the most likely to cause collisions early in the day. As birds move through the landscape seeking food, patterns related to distribution of vegetation appear. Studies using radar to map movement of birds through the built environment are starting to appear, but we need information at the level of species and individuals to truly understand how light is impacting birds.

It is often said that birds are attracted to lights at night (Gauthreaux and Belser, 2006; Poot *et al.* 2008). However, we do not have direct evidence that birds are, in fact, attracted to lights; they may simply *respond* to lights they encounter. Gauthreaux and Belser quote Verheijen as suggesting that "capture" might be a better word for birds' response to night lighting. While "capture" does seem appropriate to describe the phenomenon of birds circling drilling platforms, or in the lights of the 9/11 Memorial's Tribute in Light in Manhattan, "disorientation" is a term that covers more of the spectrum of behaviors seen when birds interact with light at night. Gauthreaux and Belser (2006), reporting unpublished data, stated that "exposure to a light field causes alteration of a straight flight path (for example hovering, slowing down, shifting direction, or circling)," and this has been reported by other authors.

Larkin and Frase (1988, in Gauthreaux and Belser, 2006) used portable tracking radar to record flight paths of birds near a broadcast tower in Michigan. Birds showed a range of response, from circling to arcs to linear flight. Haupt and Schillemeit (2011) described the paths of 213 birds flying through up-lighting from several different outdoor lighting schemes. Only 7.5% showed no change in behavior, while the remainder deviated from their courses by varying degrees, from minimal course deviation through circling. It is not known whether response differences are species related.

Bolshakov *et al.* (2010) developed the Optical-Electronic Device to study nocturnal migration behaviors of songbirds. Inspired by the more limited techniques of moon watching and watching birds cross ceilometer light beams, the device uses searchlights to illuminate birds from the ground, while a recording unit documents the birds' movements. With this technique, they can study 1) ground- and airspeed; 2) compensation for wind drift on the basis of direct measurements of headings and track directions of individual birds; 3) wing-beat pattern and its variation depending on

Swainson's Thrush. Photo by Owen Deutsch



The glass walls of this atrium, coupled with nighttime illumination, create an extreme collision hazard for birds. Photo courtesy of New York City Audubon

Canada Warbler. Photo by Ted Ardley

wind direction and velocity. In some cases, species can be identified. Bolshakov *et al.* (2013) examined the effects of wind conditions on numbers of birds aloft and flight trajectories of birds crossing the light beam from the apparatus. They determined that numbers of birds do differ with wind strength, but that birds may be attracted to the light beam under calm conditions. They also found that the light beam disturbs straight flight trajectories, especially in calm wind conditions. Regression models suggest that the probability of curved flight trajectories is greater for small birds, especially when there is little or no moon.

Bulyuk *et al.* (2014) used the same device to compare behaviors of night-migrating passerines under natural nocturnal illumination (at the Courish Spit of the Baltic Sea) with birds passing through an urban light environment (inside the city limits of St. Petersburg, Russia). Songbirds were distinguished as either small passerines or thrushes. The illuminated background caused a decrease in image quality. The shape of flight tracks was compared for the two groups, and a larger proportion of small songbirds changed flight path while crossing the light. This could be explained by flight type or flight speed. The proportion of songbirds changing flight trajectory in the lighted condition was much smaller than under the dark condition.

To understand exactly how light affects birds and what actions must be taken to reduce those effects, we need to know much more. For example, at what range (horizontal and vertical) and under what conditions do birds feel disruption from light, and of what intensity and wavelength composition? How do these factors change their behavior? Does night lighting have any effect on birds departing at the beginning of migratory stages? Do we ever actually see birds changing course to move toward a bright light source?

Light Color and Avian Orientation

Starting in the 1940s, ceilometers—powerful beams of light used to measure the height of cloud cover—came into use and were associated with significant bird kills. Filtering out long (red) wavelengths and using the blue/green range greatly reduced mortality, although we don't know whether the intensities of these two colors of lights were equal. Later, replacement of fixed-beam ceilometers with rotating beams essentially eliminated the impact on migrating birds (Laskey, 1960). A complex series of laboratory studies in the 1990s demonstrated that birds required light in order to sense the Earth's magnetic field. Birds could orient correctly under monochromatic blue or green light, but longer wavelengths (yellow and red) caused disorientation (Rappli *et al.,* 2000; Wiltschko *et al.,*1993, 2003, 2007). Wiltschko *et al.* (2007) showed that above intensity thresholds that decrease from green to UV, birds showed disorientation. Disorientation occurs at light levels that are still relatively low, equivalent to less than half an hour before sunrise under clear sky.

Poot *et al.* (2008) demonstrated that migrating birds exposed to various colored lights in the field responded the same way as they do in the laboratory. Birds responded strongly to white and red lights and appeared disoriented by them, especially under overcast skies. Green light provoked less response and minimal disorientation; blue light attracted few birds and did not disorient those that it did attract. Birds were not attracted to infrared light. Evans *et al.* (2007) also tested different light colors but did not see aggregation under red light. However, they subsequently determined that the intensity of red light used was less than for other wavelengths, and when they repeated the trial with higher intensity red, they did see aggregation (Evans, pers. comm. 2011).

Scientists working in the Gulf of Mexico (Russell, 2005), the North Atlantic (Wiese *et al.* 2001), and the North Sea (Poot *et al.* 2008) report that bright lights of oceanic drilling rigs induce circling behavior and mortality in birds at night. Working on a rig in the North Sea, Marquenie *et al.* (2013), estimated that birds were affected up to five kilometers away. Replacing about half the lights with new bulbs emitting minimal red light reduced circling behavior by about 50%. The authors speculate that completely re-lamping the platform would reduce bird aggregation by 90%. Gehring *et al.* (2009) demonstrated that mortality at communication towers was greatly reduced if strobe lighting was used as opposed to steady-burning white, or especially red lights. At the 9/11 Memorial Tribute in Light in Manhattan, when birds aggregate and circle in the beams, monitors turn the lights out briefly, releasing the birds (Elbin, 2015, pers. comm.). Regular, short intervals of darkness, or replacement of steady-burning warning lights with intermittent lights, are excellent options for protecting birds, and manipulating light color also has promise, although additional field trials for colored lights are needed.

Research: Deterring Collisions

Systematic efforts to identify signals that can be used to make glass visible to birds began with the work of Dr. Daniel Klem in 1989. Testing glass panes in the field and using a dichotomous choice protocol in an aviary, Klem (1990) demonstrated that popular devices like "diving falcon" silhouettes were effective only if they were applied densely, spaced two to four inches apart. Owl decoys, blinking holiday lights, and pictures of vertebrate eyes were among items found to be ineffective. Grid and stripe patterns made from white material, one inch wide, were tested at different spacing intervals. Only three were effective: a 3 x 4-inch grid; vertical stripes spaced four inches apart; and horizontal

Glass panes are being tested at the Powdermill Tunnel, as seen from the outside. Photo by Christine Sheppard, ABC

Susan Elbin tests a bird in the tunnel at the Carnegie Museum's Powdermill Banding Station in southwestern Pennsylvania. Photo by Christine Sheppard, ABC

The tunnel: an apparatus for safely testing effectiveness of materials and designs for deterring bird collisions. Photo by Christine Sheppard, ABC

A bird's-eye view of glass in the tunnel. Photo by Christine Sheppard, ABC

stripes spaced about an inch apart across the entire surface. (A summary of Klem's results can be found at collisions.abcbirds.org).

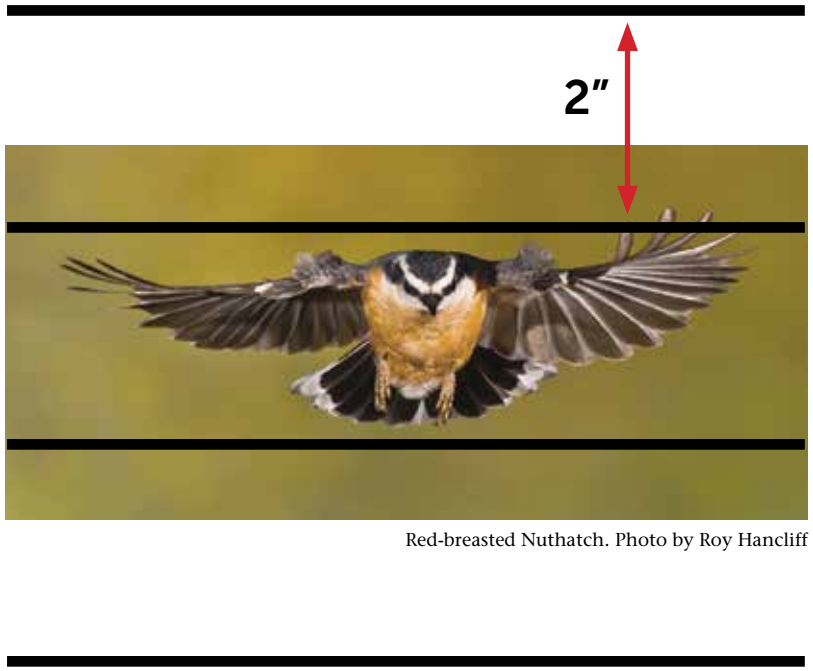
Building on Klem's findings, Rössler developed a testing program in Austria starting in 2004 and continuing to the present (Rössler and Zuna-Kratky, 2004; Rössler, 2005; Rössler, *et al.,* 2007; Rössler and Laube, 2008; Rössler, 2010; Rössler, 2012; Rössler, 2013). The banding center at the Hohenau Ringelsdorf Biological Station outside Vienna, Austria, offered a large sampling of birds for each test, in some instances permitting comparisons of a particular pattern under differing intensities of lighting. This program has focused primarily on geometric patterns, evaluating the impact of spacing, orientation, and dimensions. Birds are placed in a "tunnel," where they can view two pieces of glass: one unmodified (the control) and the other with the pattern to be tested. Birds fly down the tunnel and are scored according to whether they try to exit through the control or the patterned glass. A mist net keeps the bird from hitting the glass, and it is then released. The project focuses not only on finding patterns effective for deterring collisions, but also on effective patterns that cover a minimal part of the glass surface. To date, some patterns that cover only 5% of the glass have been found to be highly effective. (A summary of Rössler's results can be found at collisions.abcbirds.org).

The tunnel at Powdermill, showing the framework where the background will be mounted. Photo by Christine Sheppard, ABC

Building on Rössler's work, ABC collaborated with the Wildlife Conservation Society, New York City Audubon, and the Carnegie Museum to construct a tunnel at Powdermill Nature Reserve's banding station, primarily to test commercially available materials. Results from the first season showed that making an entire surface UV-reflective was not an effective way to deter birds. With UV materials, contrast seems to be important. Glass fritted in patterns conforming to the 2 x 4 rule, however, scored well as deterrents. (A summary of results from Powdermill can be found at collisions.abcbirds.org).

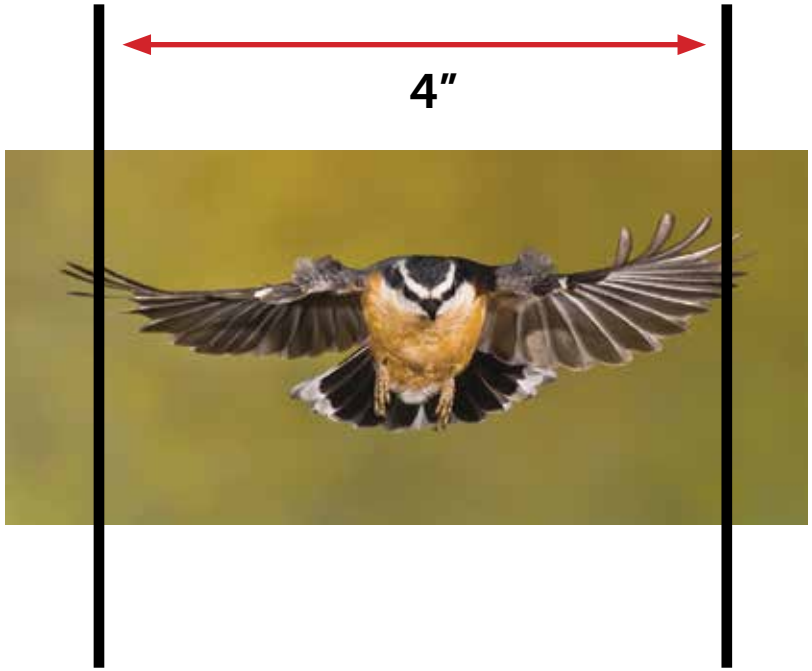
Most clear glass made in the United States transmits about 96% and reflects about 4% of light falling perpendicular to the outside surface. The amount of light reflected increases at sharper angles: clear glass reflects about 50% of incident light at angles over 70 degrees. Light on the inside of the glass is also partly reflected and partly transmitted. The relative intensities of light transmitted from the inside and reflected from the outside surfaces of glass combined with the viewing angle determine whether the glass appears transparent or mirrors the surrounding environment. Patterns on the inside surfaces of glass and objects inside the glass may not always be visible. These changeable optical properties support the argument that patterns applied to the outer surface of glass are more effective than patterns applied to the inner surface. Efforts have been made to model freestanding glass, glass installed on a building, and reflections on glass in some trials. (The testing protocol for freestanding glass, developed at Hohenau, and the testing protocols used at Powdermill can be found at collisions.abcbirds.org).

Horizontal lines with a maximum spacing of 2 inches



Red-breasted Nuthatch. Photo by Roy Hancliff

Vertical lines with a maximum spacing of 4 inches



The 2 x 4 Rule

Research on songbirds, the most numerous victims of collisions, has shown that horizontal lines must be two or fewer inches apart to deter the majority of birds. Vertical spaces must be four or fewer inches apart. This difference presumably has to do with the shape of a flying bird. (Narrower spacing is required to deter collisions by hummingbirds.) Schiffner *et al.* (2014) showed that budgies have a very precise understanding of their own physical dimensions. Trained to fly in a tunnel, the birds were then challenged to pass through ever narrowing gaps. They were able to assess the width of the gaps relative to their body size and adjust their flight behavior accordingly. It seems likely that this is a general avian trait, useful for navigating complex environments at flight speed. Bhagavatula *et al.* (2011) used the same tunnel setup to investigate how optical flow cues guide flight. It appears that birds balance the speeds of images perceived by both eyes, in this case, images to the birds' sides. This reinforces the suggestion of Martin (2011) that humans experience the world as something ahead of them, while for birds in flight, what is ahead of them is not necessarily their primary focus.

Evaluating Collision Problems—A Toolkit for Building Owners

American Woodcock are often victims of collisions. This bird hit a window in Washington, D.C., in March, 2011, and was recovered by ABC's Jason Berry. Photo by Dariusz Zdziebkowski, ABC

Often, only part of a building is responsible for causing most of the collisions. Evaluation and documentation can help in the development of a program of remediation targeting that area. Remediation can be almost as effective as modifying the entire building, as well as less expensive. Documentation of patterns of mortality and environmental features that may be contributing to collisions is essential. Operations personnel are often good sources of information for commercial buildings, as they may come across bird carcasses while performing regular maintenance activities. People who work near windows are often aware of birds hitting them.

Regular monitoring not only produces data on the magnitude and patterns of mortality, but also provides a baseline for demonstrating improvement. The best monitoring programs feature consistent effort, careful documentation of collision locations, and accurate identification of victims. Effective monitoring should document at least 18 months of collisions before mitigation is attempted, unless collision rates are especially high. (Resources for monitoring, from simple to sophisticated, can be found at collisions.abcbirds.org).

Solutions

Many factors come into play in selecting how to make glass safe for birds. The table below compares common solutions according to their effectiveness, appearance, relative cost, ease of application, longevity, and required maintenance. Effective patterns on the exterior surface of glass will combat reflection, transparency, and passage effect. Within the 2 x 4 guidelines, however, considerable variation is possible when devising bird-friendly patterns. We recommend that lines be at least ¼-inch wide, but it is not necessary that they be only vertical or horizontal. Contrast between pattern and background is important, however, and designers should be aware that the background—building interior, sky, vegetation—may change in appearance throughout the day.

This security grille creates a pattern that will deter birds from flying to reflections. Photo by Christine Sheppard, ABC

COMPARISON OF RETROFIT OPTIONS

Material	Effectiveness	Cost	Application	Appearance	Longevity	Upkeep
Seasonal, temporary solutions	*****	$	*	*	na	na
Netting	*****	$$	**	***	****	***
Window film	*****	$$$	****	*****	***	****
Screens	*****	$$	***	****	*****	****
Shutters	*****	$$$	***	****	*****	****
Grilles	*****	$$$	****	*****	*****	****
Replace glass	*****	$$$$$	*****	*****	*****	****
5 stars/dollars =	**highly effective**	**expensive**	**easy**	**attractive**	**long-lasting**	**minimal**

The following questions can guide the evaluation and documentation process by helping to identify features likely to cause collisions and other important factors.

Seasonal Timing

Do collisions happen mostly during migration or fledging periods, in winter, or year round? If collisions happen only during a short time period, it may be possible to apply inexpensive, temporary solutions during that time and remove them for the rest of the year. Some birds will attack their own reflections, especially in spring. This is not a true collision. Territorial males, especially American Robins and Northern Cardinals, perceive their reflection as a rival male. They are unlikely to injure themselves, and temporarily blocking reflections in the offending window (and those nearby) from the outside should resolve the problem. Taping up paper and smearing a soap paste can both be effective.

Weather

Do collisions coincide with particular weather conditions, such as foggy or overcast days? Such collisions may be light-related, in which case an email notification system, asking building personnel to turn off lights when bad weather is forecast, is advisable.

Diurnal Timing

Do collisions happen at a particular time of day? The appearance of glass can change significantly with different light levels, direct or indirect illumination, and sun angles. It may be possible to simply use shades or shutters during critical times.

Fog increases the danger of light both by causing birds to fly lower and by refracting light so it is visible over a larger area. Photo by Christine Sheppard, ABC

Lower-floor windows are thought to be more dangerous to birds because they are more likely to reflect vegetation. Photo by Christine Sheppard, ABC

Location

Are there particular windows, groups of windows, or building façades that account for most collisions? If so, it may be cost effective to modify only those sections of glass. Is glass located where birds fly between roosting or nesting and feeding sites? Are there areas where plants can be seen through glass—for example, an atrium, courtyard, or glass building connectors?

Are there architectural or landscaping features that tend to direct birds toward glass? Such features might include a wall or rock outcropping or a pathway bordered by dense vegetation. Solutions include using a screen or trellis to divert flight paths. Are there fruit trees, berry bushes, or other plants near windows that are likely to attract birds closer to glass? These windows should be a high priority for remediation. The glass itself can be modified, but it may also be possible to use live or inanimate landscaping elements to block the view between food sources and windows.

Local Bird Populations

What types of birds are usually found in an area? Local bird groups or volunteers may be able to help characterize local and transitory bird populations, as well as the most likely routes for birds making short flights around the area. The American Birding Association, *Bird Watchers Digest*, Audubon chapters, and Birding.com are good places to start finding such resources. Universities, colleges, and museums may also be helpful.

Post-Mitigation Monitoring

Monitoring efforts should continue for at least 18 months after mitigation efforts are made, and for at least two peak collision seasons (often the fall in urban areas, but spring and summer may also be peak seasons in more rural locations). Collision rates vary along with local bird populations, so a year of high population and high collisions may be followed by a year of low populations and low collisions, regardless of the effectiveness of any mitigation.

This Ovenbird survived a collision and was recovered alive during a Lights Out monitoring effort in Baltimore, Maryland. Photo by Daniel J. Lebbin, ABC

Use of glass with a highly effective horizontal frit pattern, together with sunshades, earned this retrofitted building on the SUNY Brockport campus the LEED "collision deterrence" credit. Photo by Paul Tankel

References

A dramatic use of glass block characterizes the Hecht Warehouse in Washington, D.C., designed by Abbott and Merkt. Photo by Sandra Cohen-Rose/Colin Rose

Avery, M.L., P.F. Springer and J.F. Cassel, 1977. Weather influences on nocturnal bird mortality at a North Dakota tower. *Wilson Bulletin* 89(2):291-299.

Avery, M.L., P.F. Springer and N. S. Daily, 1978. Avian mortality at man-made structures, an annotated bibliography. Fish and Wildlife Service, U.S. Dept. of the Interior: Washington, D.C. 108 pp.

Bayne, Erin M., Corey A. Scobie and Michael Rawson, 2012. Factors influencing the annual risk of bird–window collisions at residential structures in Alberta, Canada. *Wildlife Research* http://dx.doi.org/10.1071/WR11179

Bhagavatula, Partha S., Charles Claudianos, Michael R. Ibbotson and Mandyam V. Srinivasan, 2011. Optic Flow Cues Guide Flight in Birds. *Current Biology* 21:1794-1799.

Blem, C.R. and B.A.Willis.1998. Seasonal variation of human-caused mortality of birds in the Richmond area. *Raven* 69(1):3-8.

Bolshakov, Casimir V., Michael V. Vorotkov, Alexandra Y. Sinelschikova, Victor N. Bulyuk and Martin Griffiths, 2010. Application of the Optical-Electronic Device for the study of specific aspects of nocturnal passerine migration. *Avian Ecol. Behav.* 18: 23-51.

Bolshakov, Casimir V., Victor N. Bulyuk, Alexandra Y. Sinelschikova and Michael V. Vorotkov, 2013. Influence of the vertical light beam on numbers and flight trajectories of night-migrating songbirds. *Avian Ecol. Behav.* 24: 35-49.

Bulyuk, Victor N., Casimir V. Bolshakov, Alexandra Y. Sinelschikova and Michael V. Vorotkov, 2014. Does the reaction of nocturnally migrating songbirds to the local light source depend on backlighting of the sky? *Avian Ecol. Behav.* 25:21-26.

Codoner, N.A. 1995. Mortality of Connecticut birds on roads and at buildings. *Connecticut Warbler* 15(3):89-98.

Collins and Horn, 2008. Bird-window collisions and factors influencing their frequency at Millikin University in Decatur, Illinois. *Transactions of the Illinois State Academy of Science* 101(supplement):50.

Crawford, R.L, 1981a. Bird kills at a lighted man-made structure: often on nights close to a full moon. *American Birds* (35):913-914.

Crawford, R.L, 1981b. Weather, migration and autumn bird kills at a North Florida TV tower. *Wison Bulletin*, 93(2):189-195.

Cuthill, I.C., J.C. Partridge, A.T.D. Bennett, C.D. Church, N.S. Hart and S. Hunt, 2000. Ultraviolet vision in birds. *Advances in the Study of Behavior* 29:159-215.

Davila, A.F., G. Fleissner, M. Winklhofer and N. Petersen, 2003. A new model for a magnetoreceptor in homing pigeons based on interacting clusters of superparamagnetic magnetite. *Physics and Chemistry of the Earth*, Parts A/B/C 28: 647-652.

Dunn, E.H. 1993. Bird mortality from striking residential windows in winter. *Journal of Field Ornithology* 64(3):302-309.

D'Eath, R.B., 1998. Can video images imitate real stimuli in animal behaviour experiments? *Biological Review* 73(3):267–292.

Elbin, Susan, 2015. Pers. comm.

Evans, W.R., Y. Akashi, N.S. Altman, A.M. Manville II, 2007. Response of night-migrating songbirds in cloud to colored and flashing light. *North American Birds* 60, 476-488.

Evans, W.R., 2011 Pers. comm.

Evans, J.E., I.C. and A.T. Cuthill, D. Bennett, 2006. The effect of flicker from fluorescent lights on mate choice in captive birds. *Animal Behaviour* 72:393-400.

Evans-Ogden, 2002. Effect of Light Reduction on Collision of Migratory Birds. Special Report for the Fatal Light Awareness Program (FLAP).

Fink, L.C. and T.W. French. 1971. Birds in downtown Atlanta—Fall, 1970. *Oriole* 36(2):13-20.

Fleissner, G., E.Holtkamp-Rötzler, M. Hanzlik, M. Winklhofer, G. Fleissner, N. Petersen and W. Wiltschko, 2003. Ultrastructural analysis of a putative magnetoreceptor in the beak of homing pigeons. *The Journal of Comparative Neurology* 458(4):350-360.

Fleissner, G., B. Stahl, P. Thalau, G. Falkenberg and G. Fleissner, 2007. A novel concept of Fe-mineral-based magnetoreception: histological and physicochemical data from the upper beak of homing pigeons. *Naturwissenschaften* 94(8): 631-642.

Gauthreaux, S.A. and C.G. Belser, 2006. Effects of Artificial Night Light on Migrating Birds in Rich, C. and T. Longcore, eds, 2006. *Ecological Consequences of Artificial Night Lighting*. Island Press. Washington, DC. 259 pp.

Gauthreaux, Sidney A. Jr. and Carroll G. Belser, 2006. Effects of Artificial Night Lighting on Migrating Birds in Ecological Consequences of Artificial Night Lighting, Catherine Rich and Travis Longcore eds. Island Press, Washington, D.C. 458 pages.

Gehring, J., P. Kerlinger, and A.M. Manville. 2009. Communication towers, lights, and birds: successful methods of reducing the frequency of avian collisions. *Ecological Applications* 19:505–514.

Gelb, Y. and N. Delacretaz. 2006. Avian window strike mortality at an urban office building. *Kingbird* 56(3):190-198.

Ghim, Mimi M., and William J. Hodos, 2006. Spatial contrast sensitivity of birds. *J Comp Physiol A* 192: 523–534

Gochfeld , M.,1973. Confused nocturnal behavior of a flock of migrating yellow wagtails. *Condor* 75(2):252-253.

Greenwood, V., E.L. Smith, A.R. Goldsmith, I.C. Cuthill, L.H. Crisp, M.B.W. Swan and A.T.D. Bennett, 2004. Does the flicker frequency of fluorescent lighting affect the welfare of captive European starlings? *Applied Animal Behaviour Science* 86: 145-159.

Hager, S.B., H. Trudell, K.J. McKay, S.M. Crandall, L. Mayer. 2008. Bird density and mortality at windows. *Wilson Journal of Ornithology* 120(3):550-564.

Hager, Stephen B., 2009. Human-related threats to urban raptors. *J. Raptor Res.* 43(3):210–226.

Hager S.B., Cosentino B.J., McKay K.J., Monson C., Zuurdeeg W., and B. Blevins, 2013. Window Area and Development Drive Spatial Variation in Bird-Window Collisions in an Urban Landscape. *PLoS ONE* 8(1): e53371. doi:10.1371/journal.pone.0053371

Download at: http://people.hws.edu/cosentino/publications_files/PLoS%20ONE%202013%20Hager.pdf

Hager S.B., Craig M.E. (2014). Bird-window collisions in the summer breeding season. *Peer J 2:* e460 https://dx.doi.org/10.7717/peerj.460

Haupt, H. and U. Schillemeit, 2011. Skybeamer und Gebäudeanstrahlungen bringen Zugvögel vom Kurs ab: Neue Untersuchungen und eine rechtliche Bewertung dieser Lichtanlagen. NuL 43 (6), 2011, 165-170.

(Search/spot Lights and Building Lighting Divert Migratory Birds Off Course: New investigations and a legal evaluation of these lighting systems)

Herbert, A.D., 1970. Spatial Disorientation in Birds. *Wilson Bulletin* 82(4):400-419.

Jones, J. and C. M. Francis, 2003. The effects of light characteristics on avian mortality at lighthouses. *Journal of Avian Biology* 34: 328–333.

Kahle, Logan Q., Maureen E. Flannery and John P. Dumbacher, 2015. Bird-window collisions at a west coast urban parkland: analyses of bird biology and window attributes from Golden Gate Park, San Francisco. In press, *PLOS One*.

Kerlinger, P., 2009. How Birds Migrate, second edition, revisions by Ingrid Johnson. Stackpole Books, Mechanicsville, PA. 230 pp.

Klem, D., Jr., 1990. Collisions between birds and windows: Mortality and prevention. *Journal of Field Ornithology* 61(1):120-128.

Klem, D., Jr., 1989. Bird-window collisions. *Wilson Bulletin* 101(4):606-620.

Klem, D., Jr., 1991. Glass and bird kills: An overview and suggested planning and design methods of preventing a fatal hazard. Pp. 99-104 in L. W. Adams and D. L. Leedy (Eds.), Wildlife Conservation in Metropolitan Environments. Natl. Inst. Urban Wildl. Symp. Ser. 2, Columbia, MD.

Klem, Daniel Jr., and Peter G. Saenger, 2013. Evaluating the Effectiveness of Select Visual Signals to Prevent Bird-window Collisions. *The Wilson Journal of Ornithology* 125(2):406–41.

Download at: http://www.muhlenberg.edu/main/academics/biology/faculty/klem/aco/Bird-window.html

Klem, D. Jr., D.C. Keck, K.L. Marty, A.J. Miller Ball, E.E. Niciu, C.T. Platt. 2004. Effects of window angling, feeder placement, and scavengers on avian mortality at plate glass. *Wilson Bulletin* 116(1):69-73.

Klem, D. Jr., C.J. Farmer, N. Delacretaz, Y. Gelb and P.G. Saenger, 2009a. Architectural and Landscape Risk Factors Associated with Bird-Glass Collisions in an Urban Environment. *Wilson Journal of Ornithology* 121(1):126-134.

Klem, D. Jr., 2009. Preventing Bird-Window Collisions. *Wilson Journal of Ornithology* 121(2):314–321.

Laskey, A.,1960. Bird migration casualties and weather conditions, Autumns 1958, 1959, 1960. *The Migrant* 31(4): 61-65.

Lebbin, Daniel J., Michael J. Parr and George H. Fenwick, 2010. *The American Bird Conservancy Guide to Bird Conservation*. University of Chicago Press, Chicago. 447 pages.

Longcore, Travis, Catherine Rich, Pierre Mineau, Beau MacDonald, Daniel G. Bert, Lauren M. Sullivan, Erin Mutrie, Sidney A. Gauthreaux Jr, Michael L. Avery, Robert L. Crawford, Albert M. Manville II, Emilie R. Travis and David Drake, 2012. An estimate of avian mortality at communication towers in the United States and Canada.

Longcore, Travis, Catherine Rich, Pierre Mineau, Beau MacDonald, Daniel G. Bert, Lauren M. Sullivan, Erin Mutrie, Sidney A. Gauthreaux Jr., Michael L. Avery, Robert L. Crawford, Albert M. Manville II, Emilie R. Travis, and David Drake, 2013. Avian mortality at communication towers

The World Trade Center of New Orleans, designed by Edward Durrell Stone, uses a simple bird-friendly strategy; almost all windows have exterior shutters. Photo by Christine Sheppard, ABC

in the United States and Canada: which species, how many, and where? *Biological Conservation* 158:410–419.

Loss, Scott R., Tom Will and Peter P. Marra, 2012. Direct human-caused mortality of birds: improving quantification of magnitude and assessment of population impact. *Frontiers in Ecology and the Environment*, September, Vol. 10, No. 7: 357-364

Loss, Scott R., Tom Will, Sara S. Loss and Peter P. Marra, 2014. Bird–building collisions in the United States: Estimates of annual mortality and species vulnerability. *Condor* 116:8-23.

Loss, S.R., Loss, S.S., Will, T., Marra, P.P. 2014. *Best practices for data collection in studies of bird-window collisions*. Available at http://abcbirds.org/?p=10399

Machtans, Craig S., Christopher H.R. Wedeles and Erin M. Bayne, 2013. A First Estimate for Canada of the Number of Birds Killed by Colliding with Building Windows. *Avian Conservation and Ecology* 8(2): 6. http://dx.doi.org/10.5751/ACE-00568-080206

Muheim, R., J.B. Phillips and S. Akesson, 2006. Polarized Light Cues Underlie Compass Calibration in Migratory Songbirds. *Science* 313 no. 5788 pp. 837-839.

Muheim, R., 2011. Behavioural and physiological mechanisms of polarized light sensitivity in birds. Phil Trans R Soc B 12 March 2011: 763-77.

Marquenie, J., and F.J.T. van de Laar, 2004. Protecting migrating birds from offshore production. Shell E&P Newsletter: January issue.

Marquenie, J.M., M. Donners, H. Poot and Steckel, 2013. Adapting the Spectral Composition of Artificial Lighting to Safeguard the Environment. *Industry Applications Magazine*, IEEE 19(2):56-62.

Mouritsen, H., 2015. Magnetoreception in Birds and Its Use for Long-Distance Migration. Pp. 113-133 in *Sturkie's Avian Physiology*, sixth edition, Colin G. Scanes ed. Academic Press, Waltham, MA, 1028 pp.

Newton, I., 2007. Weather-related mass-mortality events in migrants. *Ibis* 149:453-467.

Newton, I., I. Wyllie, and L. Dale, 1999. Trends in the numbers and mortality patterns of Sparrowhawks (*Accipiter nisus*) and Kestrels (*Falco tinnunculus*) in Britain, as revealed by carcass analyses. *Journal of Zoology* 248:139-147.

Ödeen and Håstad, 2003. Complex Distribution of Avian Color Vision Systems Revealed by Sequencing the SWS1 Opsin from *Total DNA. Mol. Biol. Evol.* 20(6):855–861. 2003.

Ödeen and Håstad, BMC Evolutionary Biology 2013, 13:36. The Phylogenetic Distribution of Ultraviolet Vision in Birds www.biomedcentral.com/1471-2148/13/36

Håstad and Ödeen (2014), A vision physiological estimation of ultraviolet window marking visibility to birds. PeerJ 2:e621; DOI 10.7717/peerj.621

O'Connell, T. J. 2001. Avian window strike mortality at a suburban office park. *Raven* 72(2):141-149.

Parkins, Kaitlyn L, Susan B. Elbin and Elle Barnes, 2015. Light, Glass, and Bird–building Collisions in an Urban Park. *Northeastern Naturalist* 22(1): 84-94. http://dx.doi.org/10.1656/045.022.0113

Poot, H., B.J. Ens, H. de Vries, M.A.H. Donners, M.R. Wernand, and J. M. Marquenie, 2008. Green light for nocturnally migrating birds. *Ecology and Society* 13(2): 47.

Rappli,, R., R. Wiltschko, P. Weindler, P. Berthold, and W. Wiltschko, 2000. Orientation behavior of Garden Warblers (*Sylvia borin*) under monochromatic light of various wavelengths. *The Auk* 117(1):256-260.

Rich, C. and T. Longcore, eds, 2006. *Ecological Consequences of Artificial Night Lighting*. Island Press. Washington, DC.

Richardson, W.J., 1978. Timing and amount of bird migration in relation to weather: a review. *Oikos* 30:224-272.

Rössler and Zuna-Kratky, 2004 Vermeidung von Vogelanprall an Glasflächen. Experimentelle Versuche zur Wirksamkeit verschiedener Glas-Markierungen bei Wildvögeln. Bilogische Station Hohenau-Ringelsdorf [available for download from www.windowcollisions.info].

Rössler, M. and T. Zuna-Kratky. 2004. Avoidance of bird impacts on glass: Experimental investigation, with wild birds, of the effectiveness of different patterns applied to glass. Hohenau-Ringelsdorf Biological Station, unpublished report. (English translation: available from ABC.)

Rössler, 2005. Vermeidung von Vogelanprall an Glasflächen. Weitere Experimente mit 9 Markierungstypen im unbeleuchteten Versuchstunnel. Wiener Umweltanwaltschaft. Bilogische Station Hohenau-Ringelsdorf [available for download from www.windowcollisions.info].

Rössler, M. 2005. Avoidance of bird impact at glass areas: Further experiments with nine marking types in the unlighted tunnel. Hohenau-Ringelsdorf Biological Station, unpublished report. (English translation available from ABC.)

Rössler, M., W. Laube, and P. Weihs. 2007. Investigations of the effectiveness of patterns on glass, on avoidance of bird strikes, under natural light conditions in Flight Tunnel II. Hohenau-Ringelsdorf Biological Station, unpublished report. English translation available for download from www.windowcollisions.info

Rössler, M. and W. Laube. 2008. Vermeidung von Vogelanprall an Glasflächen. Farben, Glasdekorfolie, getöntes Plexiglas: 12 weitere Experimente im Flugtunnel II. Bilogische Station Hohenau-Ringelsdorf (available for download at www.windowcollisions.info).

Rössler M. and W. Laube. 2008. Avoidance of bird impacts on glass. Colors, decorative window-film, and noise-damping plexiglass: Twelve further experiments in flight tunnel II. Hohenau-Ringelsdorf Biological Station, unpublished report. (English translation available from ABC.)

Rössler, M., 2010. Vermeidung von Vogelanprall an Glasflächen: Schwarze Punkte, Schwarz-orange Markierungen, Eckelt 4Bird®, Evonik Soundstop® , XT BirdGuard. (available for download from www.windowcollisions.info).

Russell, K., 2009. Pers comm.

Russell, Keith, 2015. Conversation on August 13.

Russell, R.W. 2005. Interactions between migrating birds and offshore oil and gas platforms in the northern Gulf of Mexico: Final Report. U.S. Dept. of the Interior, Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, LA. OCS Study MMS 2005-009. 348 pp. www.data.boem.gov/PI/PDFImages/ESPIS/2/2955.pdf

Schiffner, Ingo, Hong, D Vo, Panna S. Bhagavatula and Mandyam V Srinivasan, 2014. Minding the gap: in-flight body awareness in birds. *Frontiers in Zoology* 2014, 11:64 http://www.frontiersinzoology.com/content/11/1/64

Sealy, S.G.,1985. Analysis of a sample of Tennessee Warblers window-killed during spring migration in Manitoba. *North American Bird Bander* 10(4):121-124.

Snyder, L.L., 1946. "Tunnel fliers" and window fatalities. *Condor* 48(6):278.

Thomas, Robert J., Tamas Szekely, Innes C. Cuthill, David G. C. Harper, Stuart E. Newson, Tim D. Frayling and Paul D. Wallis, 2002. Eye size in birds and the timing of song at dawn. *Proc. R. Soc. Lond. B* (2002) 269, 831-837. DOI 10.1098/rspb.2001.1941

Van De Laar, F.J.T., 2007. Green Light to Birds, Investigation into the Effect of Bird-friendly Lighting. Nederlandse Aardolie Maatschappij, The Netherlands. 24pp.

Varela, F.J., A.G. Palacios and T.H. Goldsmith, 1993. Color vision of birds. In *Vision, Brain, and Behavior in Birds*, H. P. Zeigler and H. Bischof eds., chapter 5.

Weir, R.D.,1976. Annotated bibliography of bird kills at man-made obstacles: a review of the state of the art and solutions. Department of Fisheries and the Environment, Canadian Wildlife Service, Ontario Region, 1976.

Wiese, Francis K., W.A. Montevecchi, G.K. Davoren, F. Huettman, A.W. Diamond and J. Linke, 2001. Seabirds at Risk around Off-shore Oil Platforms in the North-west Atlantic. *Marine Pollution Bulletin* 42(12):1285-1290.

Wiltschko, W., R. Wiltschko and U. Munro, 2000. Light-dependent magnetoreception in birds: the effect of intensity of 565-nm green light. *Naturwissenschaften* 87:366-369.

Wiltschko, W.,U. Monro, H. Ford and R. Wiltschko, 2003. Magnetic orientation in birds: non-compass responses under monochromatic light of increased intensity. *Proc. R. Soc. Lond.* B:270, 2133–2140.

Wiltschko, W.,U. Monro, H. Ford and R. Wiltschko, 2006. Bird navigation: what type of information does the magnetite-based receptor provide? *Proc. R. Soc. B* 22 November 2006 vol. 273 no. 1603 2815-2820.

Wiltschko, W. and R. Wiltschko, 2007.Magnetoreception in birds: two receptors for two different tasks. *J. Ornithology* 148, Supplement 1:61-76.

Wiltschko, R., K. Stapput, H. Bischof and W.Wiltschko, 2007. Light-dependent magnetoreception in birds: increasing intensity of monochromatic light changes the nature of the response. *Frontiers in Zoology* 2007 4:5. doi: 10.1186/1742-9994-4-5

Wiltschko, R., U. Monro, H. Ford, K. Stapput and W. Wiltschko, 2008. Light-dependent magnetoreception: orientation behaviour of migratory birds under dim red light. *The Journal of Experimental Biology* 211, 3344-3350.

Wiltschko, R. and W. Wiltschko, 2009. Avian Navigation. *The Auk* 126(4):717–743.

For the Langley Academy in Berkshire, U.K., Foster + Partners used louvers to control light and ventilation, also making the building safe for birds. Photo by Chris Phippen Ofis

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The Institut Arabe du Monde in Paris, France, provides light to the building interior without using glass. Photo by Joseph Radko, Jr.

American Bird Conservancy is the Western Hemisphere's bird conservation specialist—the only organization with a single and steadfast commitment to achieving conservation results for native birds and their habitats throughout the Americas. With a focus on efficiency and working in partnership, we take on the toughest problems facing birds today, innovating and building on sound science to halt extinctions, protect habitats, eliminate threats, and build capacity for bird conservation.

AMERICAN BIRD CONSERVANCY

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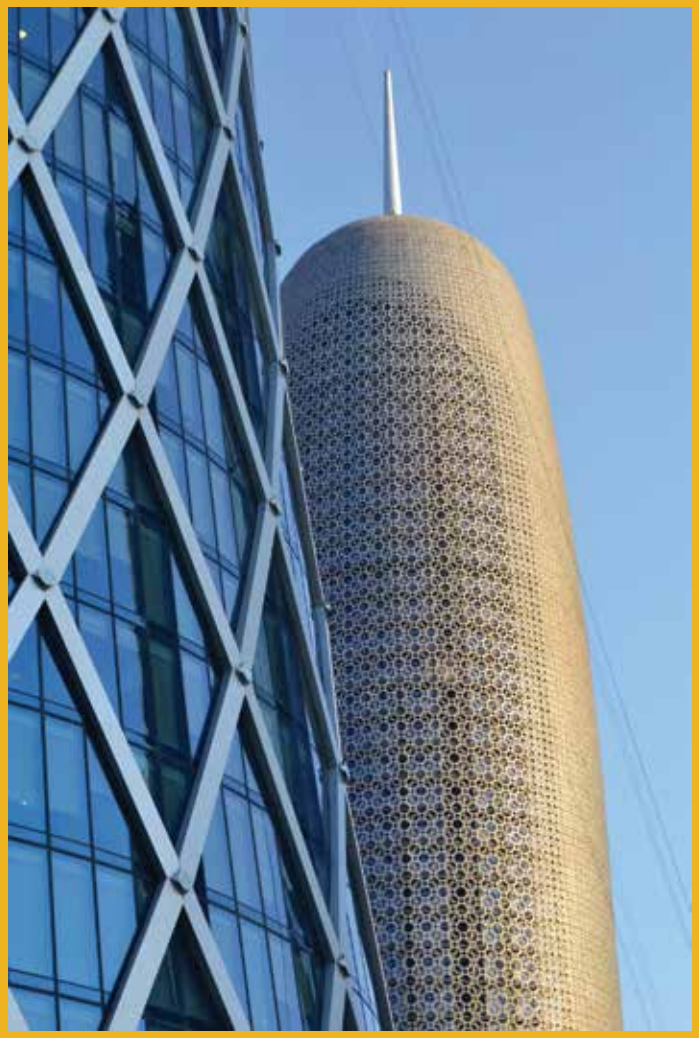
The Orange Cube, a commercial and cultural complex, was designed by Jacob + McFarlane Architects as part of redevelopment of the harbor in Lyons, France. The external skin virtually eliminates threats to birds while permitting natural illumination of the interior and sightlines for those inside. Photo © Nicolas Borel

A2-177

American Bird Conservancy's Bird-Friendly Building Standard

The U.S. Green Building Council's LEED Pilot Credit 55 represents the best current understanding of what constitutes a bird-friendly building. Briefly, a bird-friendly building is one where:

- At least 90% of the material in the exposed façade from ground level to 40 feet (the primary bird collision zone) has a threat score of 30 or less, derived from controlled experiments.
- At least 60% of material in the exposed façade above the collision zone meets the above standard.
- All glass surrounding atria or courtyards meets the above standard.
- There are no "see through" passageways or corners.
- Outside lighting is appropriately shielded and directed to minimize attraction to night migrating or nocturnal birds.
- Interior lighting is turned off at night if not in use and designed to minimize light escaping through windows during night operation.
- Landscaping is designed without features known to increase collisions.
- Actual bird mortality is monitored and compensated for (for example, in the form of habitat preserved or created elsewhere, mortality from other sources reduced, etc.).



The Burj Qatar, designed by Jean Nouvel, was named Best Tall Building Worldwide in 2012. The façade, created with multi-layered screens, expresses local culture while providing protection from high temperatures and sand. Photo by Marc Desbordes

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David Chipperfield's expansion of the Anchorage Museum has a surface of mirror glass, made bird-friendly by a frit pattern that conforms with 2 x 4 recommendations. Museum staff confirm that while collisions do occur in the area, the museum sees few, if any. Photo by Larry Vincent

Air pollution poses significant threat to birds

We've all heard about how air pollution can threaten human health, but how does it impact birds?

It shouldn't come as a surprise that birds, which share the air that we breathe, are afflicted by the same respiratory problems as humans when exposed to air pollution. In addition, field studies have shown that the effects of air pollution can extend to bird habitats as well, changing the landscape in subtle but important ways.

Direct effects on birds

- Ground-level ozone and nitrogen oxides, two of the most common air pollutants in California, are powerful oxidants that can cause direct, irreversible damage to birds' lungs. Long-term exposure can lead to inflammation, ruptured blood vessels, and lung failure.[1]
- Birds are exposed to more extra-fine airborne particles – or particulate matter – than humans because birds have a higher breathing rate and spend more time in the open air.
- Studies have shown that long-term exposure to polycyclic aromatic hydrocarbons (PAHs), toxic chemicals commonly emitted by traffic, may cause reduced egg production and hatching, increased clutch or brood abandonment, and reduced growth in birds. A study in Spain found that blackbirds exposed to long-term air pollution were found to have significantly lower body weights. [2, 3]
- PAHs have also been found to cause DNA mutations in Double-crested Cormorants in Canada, which can then be passed to their offspring.[4]
- Songbirds exposed to long-term air pollution were found to have lower red blood cell counts and other significant differences in their blood composition, according to a study.[3]

Banner photo by Kim Seng. Above photo of Allen's Hummingbird by Nagarajan Kkanna.

Direct effects on bird habitats

- Ground-level ozone (O3) directly damages the trees and plants that birds rely upon for feeding, nesting, and shelter.[5]
- Increased ozone levels over time may reduce species diversity, alter water and nutrient cycles, and pave the way for invasive plant species.[6]
- Accumulation of nitrogen oxides and sulfur oxides causes soil and water to become more acidic. Soil and water acidification may reduce the abundance or the nutritional value of birds' food sources.[7]

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Audubon CALIFORNIA

Footnotes:

1. Rombout, P.J., Dormans, J.A.A., van Bree, L., and Marra, M. 1991. Structural and biochemical effects in lungs of Japanese quail following a 1-week exposure to ozone. Environmental Research, 54(1):39-51. http://www.ncbi.nlm.nih.gov/pubmed/2004636.
2. Albers, P.H. 2006. Birds and polycyclic aromatic hydrocarbons. Avian and Poultry Biology Reviews, 17(4):125-140. http://pubs.er.usgs.gov/publication/5224791.
3. Llacuna, S., Gorriz, A., Riera, M., and Nadal, J. 1996. Effects of air pollution on hematological parameters in passerine birds. Archives of Environmental Contamination and Toxicology, 31:148-152. http://link.springer.com/article/10.1007%2FBF00203919.
4. King, L.E., de Solla, S.R., Small, J.M., Sverko, E., and Quinn, J.S. 2014. Microsatellite DNA mutations in Double-crested Cormorants (Phalacrocorax auritus) associated with exposure to PAH-containing industrial air pollution. Environmental Science & Technology, 48:11637-11645.
5. Environmental Protection Agency. http://www3.epa.gov/ozonepollution/ecosystem.html
6. Elton, E.E. 2008. Elevated ozone levels may lead to strengthened invasive species in urban forests. Urban Habitats, 5. http://www.urbanhabitats.org/v05n01/ozone_full.html.
7. Lovett, G.M., Tear, T.H., Evers, D.C., Findlay, S.E.G., Cosby, B.J., Dunscomb, J.K., Driscoll, C.T., and Weathers, K.C. 2009. Effects of air pollution on ecosystems and biological diversity in the eastern United States. Annals of the New York Academy of Sciences, 1162:99-135.

Sent: Tuesday, July 26, 2016 8:26 AM
To: Craig Chalfant
Subject: Southeast Area plan

Development Services Department

Craig Chalfant

How can anyone think that this project is good for Long Beach residents????? When was the last time you drove on 2nd street from Belmont Shore to Studebaker road at 5:00 PM.

Its like being on the 405 freeway at peak traffic hours. The proposal would allow 9,518 new dwelling and approximately 15,000 people. That is mind boggling to me that you would even consider such a

R27-1

thing. At the minimum, that would be 2 cars per household and most likely more, not counting recreational vehicles, boats, travel trailers,.etc. How is this going to impact our schools, they are already

overcrowded. Where do we get the teachers to meet the needs of the new children. As more and more young people are living with their parents longer, this also will mean more cars, and of course more

traffic!

Please re-consider the impact of this project on the people who now live in Long Beach, and what it will mean to the future of our city. Please don't allow our wet lands to be destroyed, we need them to protect the wild life and for future generations to enjoy!

Sincerely,

Leon Crawford

Long Beach Resident and third generation Californian

From: Thomas Curwen
Date: August 26, 2016 at 11:02:07 AM PDT
To: christopher.koontz
Subject: SEASP

Dear Mayor Garcia, Councilwoman Price and members of the Long Beach Planning Commission,

I am a resident of Alamitos Heights and was unable to attend the Aug. 18 SEASP study session. I would like to take a moment and register my concerns about the current proposals.

Traffic, congestion and density. Need I say more? I wish I could be more nuanced in my disappointment with the plan, but 5,500 residential units, a 400-room hotel and nearly 575K feet of commercial area is incompatible with current quality of life -- already on the cusp -- on the east side of Long Beach. Completing Shopkeepers Road and improving signal synchronization are small fixes that will be quickly eclipsed by the size of this development. R28-1

For years, residents on the east side have lobbied against development plans for this portion of the city. We have defeated a proposal to build a Home Depot on Studebaker. We have celebrated land acquisitions for the wetlands trust. So I wonder why the city continues to push against these wishes.

I encourage you to go back to the drawing board and come up with a plan that is not such a threat to lifestyle that we currently enjoy. I believe in the future of this city, and it is based on a vision that privileges a few basic necessities -- free-flowing traffic, parks and open space.

Sincerely,
Thomas Curwen
510 Terraine Avenue
Long Beach, CA 90814

From: Thomas Curwen
Sent: Monday, August 29, 2016 6:05 PM
To: Jack Cunningham
Cc: Christopher Koontz; Council District 3; Mayor; Linda Tatum; Craig Chalfant
Subject: Re: SEASP Comment

Thanks, Jack. I'm grateful for the opportunity to weigh in. I wonder if you could share with me Councilwoman Price's stance on the current proposal. Does she like it? Does she feel it's appropriate for the East Side?

Thanks...
On Fri, Aug 26, 2016 at 6:21 PM Jack Cunningham wrote:

Hi Thomas,

Thank you for sending us this message, and for your interest as well as involvement in this issue. This project is currently in its public comment phase so it is important that comments like these make it to the right people for them to be included in the process. For that reason I have included Craig Chalfant in this email as he is who comments like this are meant to be directed to.

Thank you again for you interest in this, and please feel free to reach out to our office any time,

Jack Cunningham

Sincerely,

Jack Cunningham

District Office Director

Office of Councilwoman Suzie Price, 3rd District

Office: 562.570-6300 | Field: 562.570-8756 | Fax: 562.570-6186

Website: www.suzieAprice.com

From: Janice Dahl
Date: September 18, 2016 at 11:19:12 PM PDT
To: christopher.koontz
Subject: SEASP DEIR Response

Christopher, will you please confirm receipt of my letter.

Thank you,
Janice Dahl
Janice Dahl
6212 E Vista Street
Long Beach, CA 90803
(562) 594-0902

September 18, 2016

Subject: SEASP DEIR

Christopher Koontz
City of Long Beach Development Services
333 E. Ocean Blvd., 5th Floor
Long Beach, CA 90802

Dear Mr. Koontz;

I have lived in Long Beach my entire life and have lived in University Park Estates for 22 years. During that time I was president of our neighborhood association twice, and I was the original plaintiff who sued Tom Dean and Home Depot over the Home Depot Design Center that was to be located on Studebaker Road…as you know, they lost. Here we are again, another horrible project with no realistic consideration of the residents. And even less consideration of the impacts on the environment and the wetlands.

Seven story buildings will not enhance the quality of anyone's life. More than doubling the population will not enhance the quality of anyone's life. The proposal of riding bicycles as mitigation for gridlock traffic is ridiculous and not a solution. Then there's the unimaginable pollution from this proposed development. Oh, and the water, we're in a drought yet the city can find water for another 8,648 new residents; really? R29-1

I was an advocate for updating SEADIP but I never thought that the city would dream-up such a horrible plan as SEASP. When stepping back and taking in the big picture SEASP is infill development. In the end, our peaceful seaside community will become another urban planning blunder.

Respectfully,

Janice Dahl

September 13, 2016

Craig Chalfant, Senior Planner, Long Beach Development Services
333 W. Ocean Blvd., 5th Floor
Long Beach, CA 90802,

A personal comment.

Dear Craig,

We have chatted at previous meetings and I'm pleased to do so again. Please excuse me for iterating what follows, as you may very well have these things in mind.

I understand the Seaport Marina Hotel is moving along with plans to demolish and replace it with commercial development, which is understandable. I'm sure your evaluation of the plans for the hotel property will thoroughly assess the plans impact on mobility. Any degree of degrading should be made very public. Wouldn't it be lovely if the darn traffic weren't already such a problem?

R30-1

The reporting of mobility effect, of course, should be an integral part of the planning for any future development proposals in this area.

Because there are two possible traffic mediations cited, it appears prudent to implement these mediations before any finalizing of plans – we would at least know where we stand traffic wise.

I just reviewed Santa Monica's notorious traffic reputation. This is probably a critical moment for us in this regard. Hopefully we don't bestow on our children Santa Monica's reputation.

Best regards,

Howard

Howard

W. Howard Davis
93 Vista del Golfo
Long Beach, CA 90803-4158
Phone 562 433-3717
ejdolls@aol.com

From: DENNIS DIGIOVANNI
Sent: Sunday, August 28, 2016 9:03 PM
To: Craig Chalfant
Cc: Suzie Price
Subject: traffic and land usage

Dear Craig,

I am righting in reference to the proposed land usage at the intersection of P.C.H. and 2nd St. I think most would agree that the property is underutilized and obsolete, but as a local home owner, I am concerned about increased traffic at that intersection. North bound traffic on P.C.H. trying to turn West onto 2nd St. often end up blocking the intersection and impede the South bound P.C.H. traffic. Additionally, the West bound traffic approaching P.C.H. from Studebaker is often backed up requiring several traffic signal cycles in order to cross the intersection. High density development on that large parcel of land would make that intersection impassable. R31-1

Thank you for your time. Dennis DiGiovanni

Original Message-----
From: tami donald
Sent: Monday, August 29, 2016 9:24 AM
To: Craig Chalfant
Subject: SEASP, SouthEast Area Specific Plan

We need to protect the wetlands! Why not make that entire area a public park that can be enjoyed by the residents. It would add so much to the city to have a nature reserve and park in that area. The traffic that 5,619 additional dwelling units would bring would make it impossible to drive anywhere in the area and would turn our community into one large over-developed nightmare. Don't sell out to developers, please. R32-1

Tami Donald
Belmont Shore

From: Charley Durnin
Sent: Saturday, July 23, 2016 1:22 PM
To: Craig Chalfant
Cc: Suzie Price
Subject: Seasp or Seadip

At first run through the draft EIR I was very impressed with the thought and incorporation of a lot of ideas. I hope that in the end we can have a document that will allow development without a lot of repeat work for permitting as the city accomplished with Douglas Park which has been very successful. My biggest concerns is with traffic disruption while the development construction occurs.… For that reason alone we have to solve the traffic circulation before any construction occurs. I still believe the extension of Studebaker is the best solution but barring that we have to have the Shopekeeper extension in place and in a fairly straight line.. I am pleased that the Planning Commission did not allow the Market Place to sell off individual lots which now allows an easier process to allow for a road around the Market Place property as well as internal roads.First and for most is acknowledging the traffic problems and doing something about them in advance of the development R33-1

From: Jonathan Eldridge
Date: August 1, 2016 at 11:24:08 PM PDT
To: christopher.koontz
Subject: SE Area SP EIR Comment

Hey there Chris,

I saw I missed the NOP comment period, and didn't see a specified comment period for the DEIR.

It appears that the consultant providing the noise analysis for the DEIR accidentally used the FHWA RD-77-108 noise model that has been outdated for approximately 18 years and is explicitly restricted for use by the FHWA (the agency which designed it - and subsequently designed the current model: TNM).

I worked in the CEQA/NEPA industry for approximately 10 years as a technical specialist and can tell you that the only reason this model is in use is to cut corners and save money. There is no agency actively regulating noise (unless Federal or State project - and both FHWA and Caltrans would never let this slide) so consultants and agencies choose to use an inappropriate model to save money on the front end of projects at the expense of local residents and businesses. R34-1

I hope you are able to have your consultants revisit the noise analysis and update it using an appropriate model that isn't restricted by the agency which designed it.

Thanks for your time!
JE

P.S. Here are a couple quick references I gathered for you to review.

According to the FHWA (who created both the RD-77-108 and the newer TNM model which it recommends for all environmental review documentation):

"Prior to the release of the FHWA TNM, the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108), or "108 model," was in use for over 20 years. Although an effective model for its time, the "108 model" was comprised of acoustic algorithms, computer architecture, and source code that dated to the 1970s. Since that time, significant advancements have been made in the methodology and technology for noise prediction, barrier analysis and design, and computer software design and coding. Given the fact that over $500 million were spent on barrier design and construction between 1970 and 1990, the FHWA identified the need to design, develop, test, and document a state-of-the-art highway traffic noise prediction model that utilized these advancements. This need for a new traffic noise prediction model resulted in the FHWA TNM. R34-2

The core vehicle noise emissions database for the "108 model" was collected in the mid 1970s. Because of the age and associated limitations with this database (e.g., no data for vehicles on grade or vehicles subject to interrupted-flow conditions), it was essential that a state-of-the-art,

nationally representative database be developed for the FHWA TNM." (http://www.fhwa.dot.gov/environment/noise/traffic_noise_model/)

And according to Caltrans:

"The FHWA TNM was released on March 30, 1998. FHWA mandated that all new federal-aid highway projects that begin after January 15, 2006, be evaluated using TNM." (http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf)

R34-2 (cont.)

Granted, the project may not be getting any Federal dollars, it is clear that the agency which designed both noise models expressly prohibits the use of the old, outdated model as it is extremely old, and there is a significantly better model available (TNM).

Letter R35

From: Michael Ferrara
Sent: Monday, September 19, 2016 4:56 PM
To: Craig Chalfant
Subject: SEASP Letter

Afternoon,
Please find attached my letter in support of the SEASP.

Thanks and have a great day,
Mike Ferrara
Mr. Craig Chalfant
Senior Planner
Long Beach Development Services
333 W. Ocean Blvd., 5th Floor
Long Beach, CA 90802
craig.chalfant@longbeach.gov

Dear Mr. Chalfant,

I am a young professional living in Long Beach, and I would really like to see our City do more towards incentivizing the creation of pedestrian and bike friendly corridors. The Southeast Area Plan update would really go a long way towards making that a reality while providing the opportunity for some mixed-use development in the area.

Currently, the commercial corridor within that area makes poor use of the waterfront and provides little accessibility, which would be greatly improved under the new plan.

The Draft Environmental Impact Report for SEASP has done a good job of answering any questions I had about the update as well as assuaging potential concerns. R35-1

I know that there are some members of the community that oppose an increase in density or new residents to the area. However, there are plenty of young people such as myself that are interested in seeing positive growth for our community. Long Beach is a wonderful place to call home, but it still lacks many of the amenities that would really improve the area. SEASP is certainly a step in the right direction.

Thank you for your time and consideration. Please approve the DEIR and the proposed SEASP update.

Sincerely,
Michael Ferrara

Letter R36

From: John Fries
Sent: Monday, September 19, 2016 4:34 PM
To: Craig Chalfant
Subject: DEIR for SEASP

Dear Mr. Chalfant:

I wish to comment on the DEIR for the SEASP.

The DEIR inadequately discusses alternatives required to be considered.

I will include my comments in separate categories. First as to HEIGHT: I am personally opposed to the height limitations (more like the lack of limitations) in SEASP. I believe aesthetically, we would be better with a two or three story restriction. I attended many of the meetings held before the SEASP plan was published. In my experience, discussion was limited, and at two meetings, absolutely shut down by city personnel or hired meeting expediters. It seems the city staff and hired planners decided on their own to allow taller buildings. In addition to aesthetics, there are substantive reasons for objecting to the new height allowances. I saw nowhere in the DEIR adequate reference to the effect of the new height on bird flight paths in areas adjacent to the wetlands. I often see birds flying over the area near the wetlands, between the bay and the wetlands. These paths will be blocked by tall buildings. It is my understanding that negative effects like these must be considered in the DEIR, and mitigated or avoided. R36-1

Next as to TRAFFIC and DENSITY. All parts of SEASP contribute to a worsening of traffic, from more than doubling the current number of residences, from a large number of projected hotel rooms, and from large amounts of retail space. The DEIR acknowledges negative effects to traffic, but does not properly consider alternatives to the high level of density allowed by SEASP. The alternatives to be considered ought to include lower levels of density, even to the level of the current SEADIP, if effects cannot be properly mitigated or avoided. In community meetings we were repeatedly told that higher density was necessary to allow developers to provide amenities. The amenities so provided are scant consolation for sitting in traffic. Further, any one owning the property now knew the level of development allowed when they purchased. We do not need to allow unreasonably density and resulting traffic problems. R36-2

Next as to AIR QUALITY. The increase level of traffic will inevitably contribute more air pollution as more cars idle in traffic for longer periods of time. Where is the analysis of these effects, and where is the mitigation proposed. What I read in the DEIR is simply an acknowledgment that it will be worse. The DEIR should address (and CEQA requires) that alternatives and mitigation be considered. R36-3

CONCLUSION. I believe the city still has a lot of work to do, and changes to make in the SEASP. I look forward to a new and improved DEIR.

Sincerely, John Fries, 259 Bennett Ave., Long Beach, CA 90803

Sent: Monday, September 19, 2016 5:20 PM
To: Craig Chalfant
Subject: SEASP DEIR Feedback/Comments

Hello Mr. Chalfant,
I am a 30 year resident of southeast Long Beach (Belmont Shore the whole time) and a member of the BSRA. I am very much in favor of restoring the wetlands and making the Westminster Ave and Studebaker entrances to Long Beach clean, visually attractive, and inviting. Because right now--as it has been as long as I've lived here--it's an embarrassment and does not represent our city fairly.
A few short feedback points from the DEIR:
1) First, and most importantly, I believe that if there is a hotel or multi-family housing structure built in the area (especially at the corner of PCH and 2nd St) the building should not be over five stories. Several of my neighbors and I have discussed this for years and while not everyone agrees as to what the entire SEASP area should feature, we all agree that a building taller than 5 stories would ruin the overall aesthetic of the area. One item we often discuss is how ugly the VA Hospital tower is at Bellflower and 7th. We don't think we should have another sore thumb-like tower at PCH and 2nd. So again, five stories...max. Please! R37-1
2) Very important to have a low, "invisible" parking structure (because we all know there will be a need for a parking structure) off the street. It should not be placed next to 2nd St or next to PCH; it should be back toward Shopkeeper Rd. Unfortunately, the parking structures on Shoreline Drive downtown are the first things anyone sees on both sides of the street when coming south on the 710 Fwy into downtown. Horrible. R37-2
3) Pedestrians don't use PCH in this part of town. That said, simple sidewalks are all that's necessary for those very few people who do. No need for pedestrian plazas, etc in this part of town because of the lack of significant nearby housing. The people aren't there! R37-3
4) Simple bike lanes are necessary on PCH and on 2nd St. Please don't add bike lane curbs and bike signals (like in downtown LB). Doing so creates urban blight and spends a lot of unnecessary money for so few bike riders. Overall, I would vote for the Reduced Building Height Alternative Plan because a building in the SEASP Plan at a height at 5-7 stories is just not right and would ruin SE Long Beach! R37-4
Thank you,
Andrew Garber
Belmont Shore

-----Original Message-----
Sent: Sunday, July 24, 2016 1:01 PM
To: Craig Chalfant
Cc: Council District 3; Jack Cunningham
Subject: SEA DIP EIR Report Noice --Feed back:

Though certainly there will be more feed back in coming
weeks---HOWEVER--
One of the more striking concepts being advanced is Staff's suggested removal of certain section(s)currently under Egis of SEA DIP===ie the areas near entrance to Marine Stadium--extending--westward to lands abutting Colorado Lagoon--ie-that directly across from the 1932 Boat House. R38-1

Suggested removal of such-suggest we have people on Staff-who should be looking for a job-perhaps in Los Angeles.

Laurence B. Goodhue
Long Beach, 90803

--

From: Pete Grant
Sent: Friday, September 16, 2016 2:59 PM
To: Craig Chalfant
Subject: RE: SEASP/DEIR

Dear Mayor Garcia and City Council Members:

I am writing in strong support of SEASP. As a Belmont Shore resident who commutes through the Second Street and PCH daily I am excited for the benefits and amenities it will bring Long Beach.

It is clear to me the plan's positive impacts on Long Beach outweigh any challenges it presents. Creating much needed housing, redeveloping blighted land, generating revenue for city services, and restoring degraded open space are the very reasons we must embrace plans like SEASP.

For decades our community has failed to address the Southeast Area. We have to stop doing nothing simply because doing something is hard. For the vast majority of your constituents, those who want our leaders to shape change so it benefits our community, SEASP represents a measured and responsible approach to building a better Long Beach. R39-1

Please don't let loud voices belonging to those for whom everything is impossible dissuade you. Rather fight for what SEASP makes possible: a thoughtful, balanced approach to planning; restoring the area's natural splendor; creating new view corridors; connecting the waterfront to the community; and improving public access to coastal resources.

Finally, thank you for serving our community and for the city's excellent work on SEASP. Your efforts to engage the residents in visioning and developing the plan has made it much stronger and easier to recommend.

Sincerely,

Peter Grant

Long Beach

-----Original Message-----
From: richard hardt
Sent: Tuesday, September 06, 2016 6:01 AM
To: Craig Chalfant
Subject: No SEASP

Mr. Chalfant,

What is the city thinking to even consider this? The traffic at 2nd and PCH is already a disaster. And where are they going to cram the 5,000+ additional residences. This is all about money and greed, with no concern for the quality of life for those of us already living there, Please stop this awful project in its tracks. R40-1

Rich Hardt
Long Beach resident

From: Lynne Harkins
Sent: Monday, September 19, 2016 9:34 PM
To: Craig Chalfant
Cc: Christopher Koontz
Subject: Comments on SEASP-DEIR

From:
Lynne Harkins
property owner
6844 Bacarro St.
Long Beach, CA 90815

To:
Craig Chalfant
Senior Planner
City of Long Beach Development Services

Dear Mr.Chalfant,

Thank you for this opportunity to comment on the DEIR for the SEASP.

Frankly, I hadn't intended submitting comments. Since I had time to take a look, however; I am really taken aback by this proposal for 5400 new residential units and about 8600 more people on this 86 acre block. It doesn't seem possible that it could have other than very significant adverse impacts on the wetlands and surrounding communities! The plan proposes adding so much to building height &density that it will, in turn, result in potentially difficult to nightmarish traffic problems with impacts on Seal Beach, as well as all the way to 7th St, 2nd St/Naples & Belmont Shore; also up Studebaker Rd and the 405/22/605 freeways. As a consequence, air quality standards exceedances occur, harming both the vitality of the sensitive wetlands and the health of all living things, including people. R41-1

Having lived off Studebaker Rd, across 7th St from this Southeast area and its power plant, it's been not uncommon over the years to find R41-2

residues/particulate pollution from that power plant on outdoor surfaces such as cars. Now, it looks as if any air quality improvements with regard to the power plant would be negated by this proposed level of development, with its attendant increases in vehicular pollution. R41-2 (cont.)

With the loss already of about 95% of our CA wetlands, it strikes one as unacceptable to preserve what remains of these wetlands, do some restoration... and, then, allow new, expanded land uses which can degrade those very wetland areas. It's not just the marine life habitat values and water quality functioning of the wetlands that stand to be impaired by the proposed level of development, it's also access and use for recreation and enjoyment for people who now live in the area. One very important recreation is enjoyment of nature, especially in an urban setting, and there's an exceptional opportunity here to greatly enhance such experiences, along with wildlife habitat, in this San Gabriel River estuary. It is noteworthy that: R41-3

Los Cerritos Wetlands is a National Audubon Society Important Bird Area, included in the area defined as "Orange Coast Wetlands"
which stretches from Los Cerritos Wetlands to Santa Ana River (Banning Ranch) and Newport Bay. It's all

connected! (more information about the "Orange Coast Wetlands" IBA at ***http://netapp.audubon.org/IBA/Site/205*** R41-3 (cont.)

Many, besides myself, hold the view that all of these remaining Southern California wetlands areas are such valuable ecosystems
that they must be accorded full and long overdue protections, along with restoration and expansion.
In that light, the SEASP would best serve the public's interest if it were altered in ways that reflect the need for stewardship of Los Cerritos Wetlands: that it be a first priority focus for land use planning. R41-4

Improvements to the DEIR plan for SEASP would include:
1) Lowering the building height (no greater than 3 stories and not many of those)and density; R41-5
2) Reducing residential units/population increase by at least half R41-6
2) Better analysis and reduction of negative impacts of traffic R41-7
3) Absolutely no loss of wetlands and certainly no road extensions thru wetlands. R41-8
4) Bird safe glass all the way to the bottom floors of buildings and plenty of space between buildings for bird flight, R41-9
5) A lights-out program at night to avoid night light impacts to the wetlands/wildlife R41-10
6) Making this area an entry-way to Long Beach that showcases and uplifts the natural estuary/wetlands treasures, rather than the building profiles. R41-11

Thank you for considering my comments.

Sincerely,

Lynne Harkins
Mailing address:
PO Box 606
Cambria, CA 93428

Letter R42

August 16, 2016

Councilwoman Suzie Price
Nieto Avenue
Long Beach, CA 90803

Dear Councilwoman Price,

This letter is to express our strong concerns about possible zoning changes to the southeastern part of Long Beach. The August 6 article in the LA Times painted a bleak picture of what could happen if more homes, retail shops, and large hotels are added to the property adjacent to Pacific Coast Highway and Second Street. Our concerns include:

1. Increased development will cause more traffic in an already busy and often congested area. Think of families driving to Long Beach to enjoy nearby beaches, parks or restaurants and suddenly faced with gridlock. Denser development could make traffic so unbearable as to negatively impact businesses along 2nd Street.
2. Upscale shopping malls, alluded to in the Times article, is not a wise use of the area given the small town atmosphere in southeastern Long Beach.
3. Taller buildings and hotels would change the character of what makes this gateway to Naples and Belmont Shore so special. R42-1
4. What message will denser development in the southeastern section send to developers eyeing other unique areas of our city?
5. Finally, instead of overdeveloping an already busy area, why not look at zoning changes as an opportunity to add much needed greenbelts and open areas to our city?

Please understand we are not opposed to all change or development in the area. However, we strongly oppose zoning changes which would lead to significantly more homes, increased traffic, tall and unsightly buildings, and a larger carbon footprint. We strongly support adding more greenbelts perhaps by getting developers with responsible and balanced plans to concede land for public use. Thank you for listening to our concerns.

Sincerely,

Bill and Margie Hearn

Bill and Margie Hearn
344 Monrovia Ave.
Long Beach, CA 90803

Letter R43

-----Original Message-----
From: Mary Hochman
Sent: Sunday, September 18, 2016 11:31 PM
To: Craig Chalfant
Cc: Mayor
Subject: SEASP (SEAD/P)

I am submitting comments about the SEASP... in concert with other concerned stakeholders of the plan. For almost 40 years, I have driven 2nd Street to visit friends at their nearby homes or to meet them at restaurants, and I have patronized many commercial businesses adjacent to or near PCH and the Golden Sands Hotel, as well as farther south in Seal Beach.

1. I am especially concerned that with the over 8,000 additional residents and over 500 employees of commercial businesses that the Plan expects, additional traffic will result in unanticipated traffic congestion, air pollution, sound pollution, and light pollution, as well as an increase in accidents and injuries to drivers and passengers as well as pedestrians. Also, personal injury claims and poor city planning could result in additional future financial obligations for the City. In addition, the Plan does not give adequate thought to how the mix of regular-width automobile lanes, bicycle lanes, and parking spaces will actually function. What might look adequate on paper does not mean that the system will be safe or practical. R43-1

2. I am also especially concerned that the Plan does not ensure the future viability of the Los Cerritos Wetlands and ignores recommendations of the LACA discussed on the LACA website. For example, the LACA does not support the use of bird safe glass because it only lessens strike kills and should not be used as "a reason to be ok." Also, the Plan allows for exceptions to the 100 feet set back to allow for a 25 foot set back for the Wetlands. Such a reduced set back does not protect the Wetlands habitat. Plus, light pollution caused by 5 to 7-story buildings or from units within those buildings can confuse birds and cause their injury or death. In addition, air pollution generated by additional vehicles and residents will be deleterious to birds and other animals as well as to people. R43-2

Thank you for your consideration.

Sent from my iPad Air

Letter R44

Mr. Craig Chalfant
Senior Planner
Long Beach Development Services
333 W. Ocean Blvd., 5th Floor
Long Beach, CA 90802
craig.chalfant@longbeach.gov

September 14, 2016

Dear Craig,

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the SEASP. As a fourth generation Long Beach resident and business owner, I support the proposed plan update. We live less than one mile from the intersection of 2nd Street and PCH. I welcome the opportunity to have first class development, preserve the wetlands and create a beautiful gateway into Long Beach.

Many of the current development standards for our area were established decades ago and are in need of significant updates. Since SEADP's original adoption, much has changed – including technology, housing and building standards, work culture as well as environmental regulations. Thus, I appreciate that the SEASP draft reflects the community input from numerous community workshops and the City's desire to exhaust all possible opportunities for our area. I support the vision of the plan to create a well-functioning, connected community that will enhance the residents' quality of life.

Based on everything I have seen and read on the matter, I am confident that SEASP would provide a comprehensive and well-designed community for many generations to come. I also believe this will be a widely-touted plan as it balances the need for smart development with the need to protect and preserve our immense natural resources. I believe that the Draft Environmental Impact Report does a thorough job analyzing the effects of the plan's buildout and provides features that can be employed to mitigate adverse impacts. R44-1

I realize that some might feel the project is too aggressive and dense. I understand their concerns, but I view the positive benefit to the surrounding area, and the City at large, outweighs these concerns. Most of our residential areas and adjacent neighborhoods are fully built out. SEASP doesn't change the character of those neighborhoods – it actually protects them while enhancing the community core.

We need to bolster the local economy and bring new job opportunities to the area. This plan would provide residents new choices on where to live, shop and dine.

I respectfully request that the SEASP be adopted and its EIR certified.

Sincerely,

Jeff Hoffman
238 Campo Drive
Long Beach, CA 90803

cc: Mayor and City Council

-----Original Message-----
From: Carol Holden
Sent: Friday, July 22, 2016 1:13 PM
To: Christopher Koontz
Subject: SEADIP

Planned "development" in East LB. Doesn't anyone understand we do not need more population? Wet lands, yes. But like always. $ talks. Shame on all of you to try to push this once again....along with your "roundabouts" which, those of us are impacted by DO NOT want. Let alone, they are not safe. We tried once to talk to "our council person". Deaf ears. Don't mind the people impacted by all this. Cow-tow to the city council and the mayor. They don't have a clue.....WOW R45-1

Sent from my iPad

From: Glenn Ihrke
Sent: Thursday, September 15, 2016 3:48 PM
To: Craig Chalfant
Cc: Council District 3
Subject: SEASP Draft Plan

I live along Marine Stadium so the SEASP Draft Plan has a very meaningful impact on my family. Unfortunately, that impact would be a big negative to all of us living in the targeted area. While the Seaport Hotel is an eyesore and should have been addressed years ago, what the plan would allow presents far more problems. R46-1

1) Traffic Congestion?
Unless I missed them, there are no real plans included in the Draft to relief the traffic issues at the PCH & 2nd Street intersection. This intersection is a nightmare now with traffic backing up over the bridge on 2nd and taking multiple lights to get through the intersection even in non-rush hour times. I can't image what it would become with the kind of additions allowed in the Draft Plan are ever implemented. There simply is no place to add more lanes or alternative parallel streets to relieve the congestion. Welcome to Long Beach visitors. Be prepared to sit for 30 minutes to get past the first intersection. R46-2

2) Shopping Needs?
How many more retail stores do we really need in this area? There are already two shopping malls on the corner of PCH and 2nd Street and neither of them are filled to capacity. Additional shopping alternatives will most likely kill one or both of them creating a new eyesore to replace that wreck of a hotel on one corner. R46-3

3) Housing Density?
All 18 of the existing neighborhoods in the SEASP area total less than 4,100 units. The new 'Mixed Use' are will be able to hold 5,619 dwelling in just 86 acres! Really? Is there any realistic study that shows that kind of demand? That is a density of 64 dwellings per acre. While that maybe a developer's dream, the impact will be incredible. In addition, it will severely effect the values of housing that already exist, like my house. See traffic congestion above.

Why can't we work towards an enterprise in the area commensurate with the present zoning? The SEASP Draft looks like it was dreamed up by the greedy property owners and developers. Where is their plan to ease traffic issues? Who pays for any improvements? Do they have any studies that show the demand need to build housing to the proposed density beyond their bottom lines? More retail? Really? R46-4

I can't imagine the majority of people who live in the impacted area are not opposed to this crazy city planning except for the developers and property owners. My suggestion is that you hold this meeting in the parking lot of the hotel wreck during the late afternoon with the current traffic congestion as a backdrop. I would trust in how the panel would vote then.

Please help us.
Glenn Ihrke
5305 E. Appian Way
Long Beach, CA 90803
562-708-1132

Letter R47

From: Bryan Jones [mailto:bryanjones@altaplanning.com]
Sent: Monday, September 19, 2016 4:59 PM
To: Craig Chalfant
Subject: Review of the SEASP

Hi Craig,

We look forward to helping the City of Long Beach to achieve the vision of "the most bicycle friendly city in America".

Attached please find a review of the SEASP. We provided recommendations for consideration and incorporation to enhance active transportation within the SEASP plan area and along the PCH. R47-1

Please let me know if you have any questions or would like to discuss further some of the ideas or concepts and how they could be beneficial to the SEASP and the City of Long Beach.

Bryan

Bryan Jones, PE, AICP, LCI | Principal
Regional Engineering & Complete Streets Leader
Alta Planning + Design, Inc.
233 A Street, Suite 703
San Diego, CA 92101
Mobile Phone: 510.789.5823
Direct Phone: 619.269.5982 extension 5
www.altaplanning.com
Creating active, healthy communities

Monday, September 19, 2016

Mr. Craig Chalfant
Senior Planner
Long Beach Development Services
333 W. Ocean Blvd., 5th Floor
Long Beach, CA 90802
Craig.chalfant@longbeach.gov

Re: SEASP Active Transportation and Active Communities

Mr. Chalfant,

Alta Planning + Design respectfully submits this technical letter regarding active transportation and creating active communities for the Southeast Area Specific Plan (SEASP) Draft Environmental Impacct Report (DEIR). The SEASP DEIR is currently out for 60-day public comment which closes on September 19, 2016. Two SEASP documents were reviewed: R47-1 CONT'D

- Southeast Area Specific Plan, City of Long Beach, Hearing Draft Updated July 2016, and
- Southeast Area Specific Plan Draft EIR, City of Long Beach, July 2016.

The SEASP DEIR identifies area-wide transportation system issues, opportunities, and constraints based on existing and future development scenario analysis and public input. The analysis provides a basis for determining general and specific transportation system needs and recommendation for improvement.

This letter expands on the SEASP DEIR recommendations related to active transportation and creating active communities to focus on better moving people for a more connected, healthy, sustainable, and prosperous environment where everyone has an opportunity to thrive within the SEASP.

Creating a Vision for the Future that is Bigger than Ourselves and Inspires

Daniel Burnham once said, "Make no little plans. They have no magic to stir one's blood and probably themselves will not be realized. Make big plans; aim high in hope and work; remembering that a noble, logical diagram once recorded will never die, but long after we are gone will be a living thing, asserting itself with ever-growing insistency." Daniel created the visionary and inspiring plan for Chicago in 1906 that was the first comprehensive plan for the controlled growth of an American city, and an outgrowth of the City Beautiful movement. The plan included ambitious proposals for the lakefront and river and declared that every citizen should be within walking distance of a park. We believe the City of Long Beach with this specific plan has the opportunity to truly create a gateway to Long Beach. A special place for people and businesses to truly thrive in a connected and prosperous neighborhood and community. The PCH corridor has the potential in ten, twenty, fifty and one hundred years (as is the case in Chicago), as the public space,

transportation systems, and street itself transforms and the buildings and land uses transform along it, to be the gem of Long Beach. However, to create this big, noble plan that will exist and thrive well after we are gone, we have to think beyond what we already know or have done and envision what it could be. We have to consider the entrepreneurial and innovative spirit of Long Beach. We have to consider public, private, and inter-governmental agency partnerships that may not exist today when it comes to our transportation systems and land uses. R47-1 CONT'D

Long Beach is a city that has repurposed itself through the years to be more relevant and better serve the ever changing and dynamic needs of the people and community. Long Beach is a city that put on the side of its City Hall the bold vision statement "Long Beach, the most bicycle friendly city in America". Sometimes we have to say what we want to be in the future before we are that place, so that we can strive for that belief and vision. Today, PCH is a corridor that tries to move cars. It is largely focused on serving "commute trips" during the AM and PM peak hours. Yet to some it arguably fails at doing what it was designed to do and when it does fail the choices and options are limited for mobility and access. Right now the PCH is a corridor that we often define as "transportation through a community, rather than a community through transportation". When we build corridors through a community they often disconnect the fabric and potential of the community. When we build corridors for cars first and then provide accommodations for people we never truly serve the people. So just as the City proclaimed "the most bicycle friendly city in America", we too need to create a vision statement for the PCH in the future. What could that vision statement be that aspires to inspire us and stretches us beyond how it functions today? What could a vision statement be that allows for us to create a great community through transportation?

Caltran's new Mission Statement is an Opportunity to Redefine Success of the PCH

On September 15, 2014, Caltrans announced a new mission statement "Provide a **safe**, **sustainable**, **integrated** and **efficient transportation system** to enhance California's **economy** and **livability**." This is a very different mission than the previous mission statement "Caltrans improves mobility across California" as R47-2

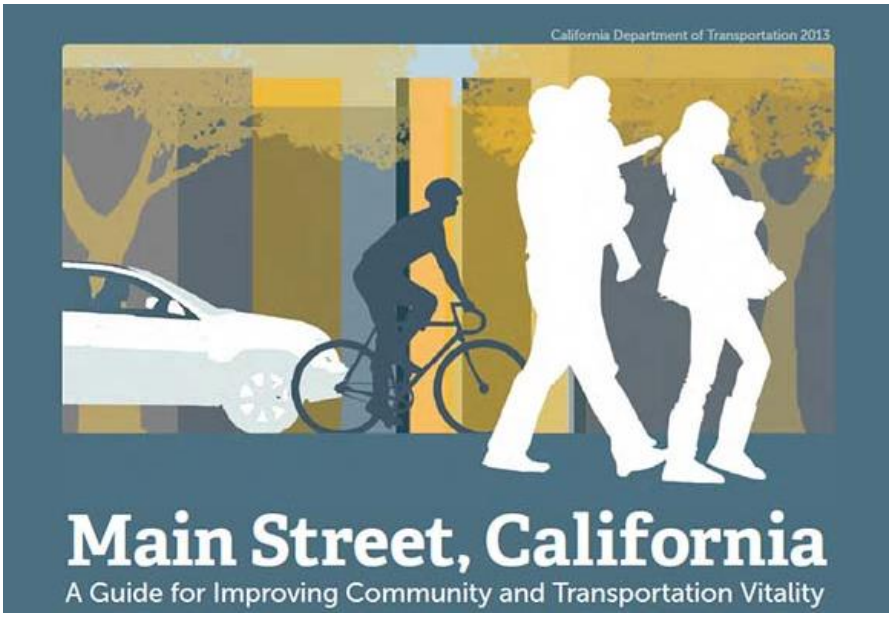
the new mission is focused on providing a transportation system that enhances economy and livability through four key criteria safe, sustainable, integrated, and efficient. This transformation in mission is an incredible opportunity that allows the City of Long Beach and the State of California Department of Transportation to redefine how they define and evaluate success of the Pacific Coast Highway. So the question should be asked, what metrics were developed, prioritized and used to determine if the proposed design of the Pacific Coast Highway will be safe, sustainable, integrated, and efficient to enhance the economy and livability? How were those metrics determined, vetted, prioritized and weighted with the community? How were those metrics visually represented so that people in the community can truly experience and feel the difference between words in policies and what they will mean to them with implementation of this specific plan?

R47-2
CONT'D

Caltran's Complete Street Policy and Main Street Guide

The Pacific Coast Highway has a great opportunity to be designed as a Main Street destination and gateway. Caltrans Complete Street principles and the Main Street Guide are critical to the success of the PCH's performance as many of the California State Highways that also function as main streets through communities are challenged with balancing the public's need for roadways that provide local, regional and statewide connections, with local needs for a vibrant community street. Just as mobility is essential to California's economic and civic vitality, the planning, design and operation of main streets is tied to the prosperity of local communities. Well-conceived main streets function efficiently as multimodal transportation facilities, and are important civic spaces that support vibrant community life and ecological health. Prudent investments to provide multimodal travel options are a crucial strategy for reducing greenhouse gas emissions and other environmental impacts associated with single occupancy driving habits. Incorporating principles of livability and sustainability into main street projects can help balance the need for an efficient multimodal transportation facility with local needs for a main street that functions as the heart of the community. Some design solutions highlighted in Main Street will be familiar or slight variations of traditional strategies, while others will entail a new and broader vision of how main streets can benefit travelers and the local community. Use of the Main Street Guidelines does require specific design and posted speeds.

Caltrans Deputy Directive-64-Revision 2: Complete Streets- Integrating the Transportation System (DD-64-R2) is an administrative update of the State's complete streets policy signed in October 2014. The policy content remains the same as DD-64-R1 from 2008 and reaffirms Caltrans commitment.



http://www.dot.ca.gov/hq/LandArch/16_livability/main_street/index.htm
http://www.dot.ca.gov/hq/tpp/offices/ocp/complete_streets_files/CS_Brochure_6_pages_1.pdf
http://www.dot.ca.gov/hq/tpp/offices/ocp/docs/CSIAP2_rpt.pdf

Should we be using LOS methodology when we now have VMT that is better at assessing and disclosing environmental impacts?

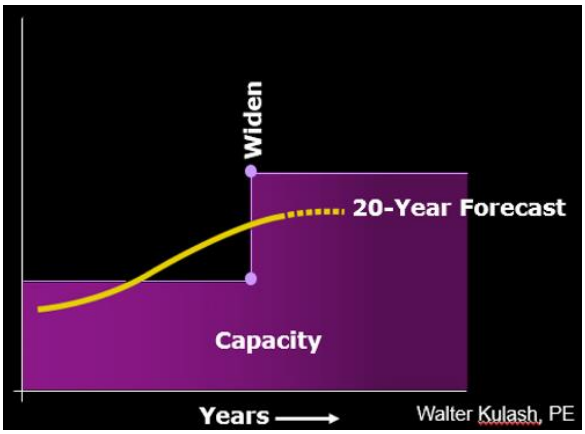
The transportation profession learned through the last five decades that LOS often identified congestion as a significant impact for which its mitigation was focused on relieving congestion by widening roadways and intersections, which created new significant impacts that were never evaluated when it comes to public health, safety, and ecological/environmental [Greenhouse Gases] not to mention the financial liability of maintaining the roadway. As a result, the Governor's Office of Planning and Research has redefined the California Environmental Quality Act when it comes to evaluating the impacts of transportation on the environment. This is based on legislation adopted with SB 743. The Level of Service (LOS) methodology is being phased out as a criteria of CEQA to determine a significant impact and Vehicle Miles Travelled (VMT) is being introduced. Since this Specific Plan is for the future, why is the past analysis methodology being used versus the new methodology? How do these two methodologies relate to (or counterproductive to) each other and would the results or recommendations of the plan change if VMT were used to evaluate the environment impacts of the corridor and specific plan from a land use and transportation perspective? How could the density of housing and choices and options in transportation and land uses further reduce the VMT for this corridor, specific plan, the City of Long Beach, and the Los Angeles and Orange County regions? R47-3

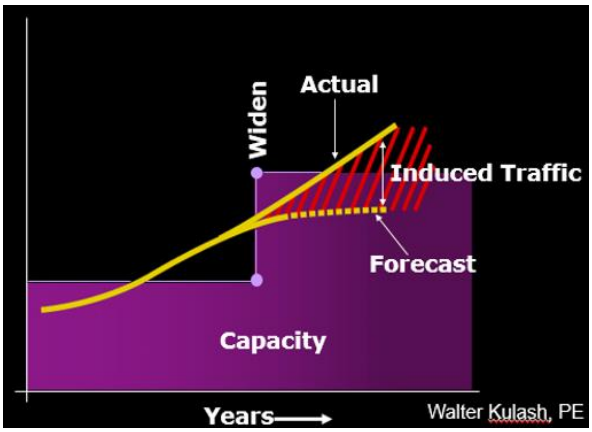
LOS and its impact on Induced Demand

The Pacific Coast Highway and for that matter most roadways were not always sized the way they exist today. And most of the sizing of our roadways is because the evaluation system LOS, an agency's LOS thresholds, and projected travel demand modeling forecasts which are often in sync with each other to create new roadway widening construction projects that are expensive without often evaluating the R47-4

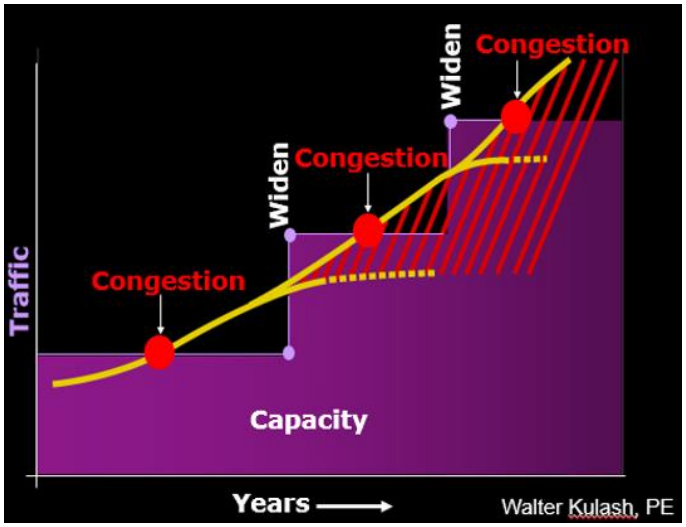
widening on whether it addresses the issue of reducing congestion. And in fact, through research, we know wider streets do not reduce congestion and more often than not induce demand. We also know, through many roadway right sizing projects that taking travel lanes away to provide mobility and connectivity transportation system choices options that enhance walking, biking, and transit often do not create significantly more congestion as people make choices based on what is available to them, convenience, costs, reliability, predictability, and comfort. R47-4 CONT'D

In addition, many specific plans start with a land use concept or multiple alternatives and then evaluate and identify the impacts of a land use concept on the vehicular circulation without evaluating the impact on people walking and biking. Yet how the land use is designed and integrated with transportation choices with multiple feedback loops is critical to how people will move and connect within the land use.





The picture below is how an agency with LOS policies to size roadways can quickly have a six lane roadway with congestion for which widening the roadways was intended to relieve. And the LOS policies are often not evaluated to other active transportation and sustainability goals of the same agency planning documents because historically LOS was a criteria for environmental assessment within the CEQA guidelines. And through agency culture and practices was "prioritized" even though the planning documents or elected officials did not specifically say it was the most important policy to achieve at the expense of all other policies in the planning document.



Dr. Susan Handy of UCDavis' Institute of Transportation Studies and National Center for Sustainable Transportation in October 2015 published her research entitled "Increasing Highway Capacity Unlikely to Relieve Traffic Congestion" which was funded by Caltrans. R47-4 CONT'D

http://ncst.ucdavis.edu/wp-content/uploads/2015/10/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf

How can the street cross-sections, parking, and transportation demand management strategies help reduce the impact of induced demand? They all have just a paragraph or two but did not elaborate on how they can serve the planning area to truly reduce the environmental and financial impacts.

Transportation and its Impact on other Community Values

For instance, if the community provided input and direction that they did not want to impact wetlands and they didn't want to reduce the number of travel lanes yet, they wanted placemaking this creates challenges as these three goals are not mutually exclusive and as a result they need to be prioritized and further understood how they could negatively impact the ability to accomplish each of those assumptions or goals. R47-5

A good example of a document that reflects on the relationships between the Visions, Goals, and Policies of Transportation and its impact on other policies that focus on Quality of Life, Urban Form, Local Economy, Public Health, Costs of Transportation and the Environment is the City of Davis. A city that is identified as a Platinum Bicycle Friendly Community. A city that strives to designs streets that do not to have high speeds and high volumes for vehicles. Davis is a city that reflects how 6 lane roadways will impact a sense of place for people and community. In fact, they do not have a street classification of more than four travel lanes. While the City of Long Beach is much bigger than Davis, this planning area is not.

Sample policies from the City of Davis

Policy TRANS 1.3 (Goals: 1,2,3,4). Encourage higher intensity residential, commercial, and mixed-use development near existing activity centers and along corridors well served by non-motorized transportation infrastructure and public transportation (See Activity Centers, Map 2).

"Activity center" is a mixed use area with a concentration of commercial and other land uses. An activity center typically functions as the node, focus and identity of a neighborhood, community or city and varies in size. An activity center may be the downtown core, a community and neighborhood shopping center, and an area of mixed land uses. Generally, more dense and intense land uses should be closest to an activity center. An activity center is served by, and is connected to, other activity centers by transit. (source: combined from various sources) Standard a. Residential and commercial developments and redevelopment projects should achieve transit-supportive densities within ¼-mile of multi-modal corridors. Such densities would consist of ten (10) units per acre or greater, if compatible with neighborhood context.

d. The following Levels of Service (LOS) are acceptable for automobiles for major intersections (see Glossary for definition of "Major Intersections"):

- 'D' during non-peak traffic hours.

- ‘E’ during peak traffic hours.
- ‘F’ during peak traffic hours in the Core Area and Richards Boulevard/Olive Drive area.
- ‘F’ during peak traffic hours in other areas if approved by City Council.

e. In each direction, Davis streets shall have no more than two through automobile lanes plus a single left-hand turning lane, even if this requirement reduces level of service. Additional turning lanes may be added for safety or design considerations.

What would be the impact (positive or negative) of only two lanes each way on PCH, respecting a similar policy implemented by the City of Davis who is a platinum level bicycle friendly community?

http://community-development.cityofdavis.org/Media/Default/Documents/PDF/CDD/Planning/Plans-Documents/GP/004-02-Transportation.pdf

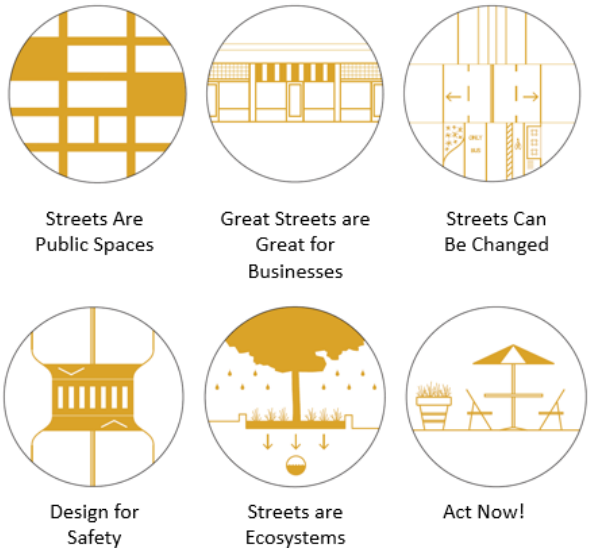
What can we expect of a street?

We used to design a street to provide speed, safety, and mobility for cars. We now know that how a street is designed can have profound impacts on R47-5 CONT'D

- Multi-Modal Options,
- Public Health/Safety,
- Economic Development,
- Environmental Quality,
- Community Building/Livability, and
- Equity.

We did not read in the plan how it addressed these higher capabilities that a street can provide to a planning area and these are critical to long term success and sustainability of a plan. There are a number of resources recently developed to help facilitate the potential of our streets and transportation systems. Some of the documents are featured below.

R47-5
CONT'D



Designing the Corridor rather than Sizing it

R47-6

As Fred Kent from Project for Public Spaces says "If you design for cars and traffic, you will get cars and traffic. If you design for people and places, you will get people and places." The Level of Service methodology is often used to "size" a roadway based on future regional vehicle oriented traffic model projections, however LOS fails to actually design a street to focus on creating a sense of place and experience for people and businesses with a goal of a more connected, healthy, sustainable, and prosperous community. LOS provides for demand of vehicle traffic rather than managing the demand and creating choices and options to mobility and access. As a result, the Level of Service methodology often creates "induced demand". How is this plan focused on managing the demand of vehicles and providing choices and options rather than providing for the demand via travel lanes and Level of Service analysis? What would need to occur or could occur in the context of Long Beach and this plan through design of land use and transportation to reduce the number of peak hour vehicle trips? Mixed use development? Walkable and bikeable development? Health and Prosperity oriented development? Transit oriented development? Shared transportation and transit systems?

R47-6
CONT'D

Holistic view of how to address transportation needs

Dr. Shaheen, co-director of the Transportation Sustainability Research Center at the University of California Berkeley, has studied the future of transportation for two decades. She suggests that "government would do well to take a more holistic view of how to address transportation needs. Much of the focus today is on the commute." And she goes on to say "commuting is far from being the most common type of transportation need Americans have. By her measurement, commuting accounts for 16 percent of all trips. Family and personal errands account for 42 to 46 percent, and social and recreational activities account for about 27 percent. So transportation officials need to have an answer for those needs as well" as they account for nearly 2/3rd of all trips. "Perhaps the commute isn't the thing we really actually should be thinking about," She said. How is this plan addressing, evaluating and accounting for family, personal, social, and recreational trips? How can an integrated land use and transportation plan focused on creating a sense of place for people and businesses to thrive in a connected and prosperous environment allow for family, personal, social, and recreational trips to be accomplished in something other than a personally owned vehicle that consumes so much land for parking storage (at the start of a trip and end of a trip) when the vehicle is not being used a significant portion of the day?

Shaheen said that "services like car2go and ZipCar offer people a way to rent [use] a car as opposed to owning one…and that can have a real impact on how people get around. Examining five cities across North America, she found that each car2go replaced between seven and 11 vehicles, leading to a drop in both vehicle miles travelled and greenhouse gas emissions."

Shaheen also made mention if "you make a 10 percent shift [off the highway] in a peak period, you're going to increase traffic flow dramatically, so if I get 10 percent of people to sell their car [or not use their car], that's going to be enough to tip these modes in favor of VMT reductions, [greenhouse gas] reductions overall, for the whole system." What is this plan doing to focus on reducing car ownership and providing and/or encouraging other options and choices to mobility? What is this plan doing to provide reliable and frequent transit mobility services (public or private or shared)? How have the land use, parking, and transportation policies and implementation strategies been designed to help facilitate a reduction in peak hour, personally owned, and single occupant vehicle trips, which is the most expensive and least efficient form of transportation to utilize and provide from a land use/space, environmental/ecological, public health/safety and financial (individual, business, and government agency) perspective? R47-6 CONT'D

http://www.govtech.com/fs/Still-Waiting-for-the-Transportation-Revolution.html

Using Technology and Shared Mobility to Improve Transit

Los Angeles; Urban Mobility in the Digital Age

LA's big plan to change the way we move. The city is the first in the nation to reveal how it will make shared, self-driving vehicles a key part of our public transit future. How were technology and shared driving vehicles incorporated into the plan to enhance mobility of the future? R47-7

http://www.urbanmobilityla.com/strategy/

http://la.curbed.com/2016/9/9/12824240/self-driving-cars-plan-los-angeles

Evaluating this Specific Plan for Access to Jobs or Recreational/Errands Destinations via Transit or Walking/Biking

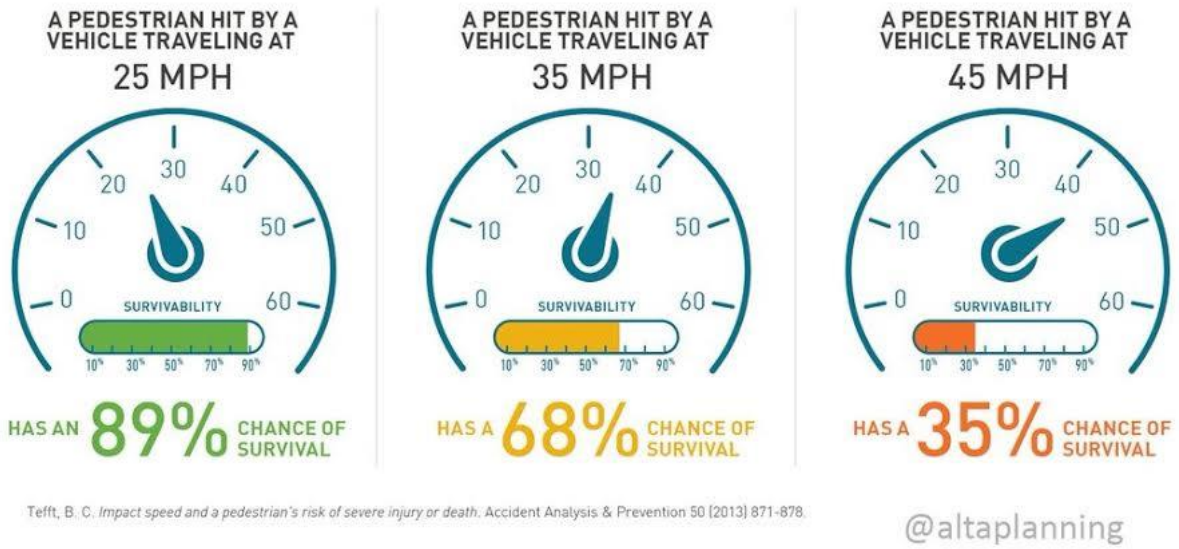
Since we have historically designed our transportation system for single occupant personally owned vehicles, one metric that could be used to evaluate the success of the specific plan area is to identify a goal for what percentage of the jobs in the region could be accessed within 30 and 60 minutes via use of transit or how many jobs and the types of jobs that could be accessed within a 10-15 minute walk or 20-30 minute bike ride. Access to jobs and the types of jobs that can afford to live within the planning areas is an important component that rarely gets measured or evaluated and as a result does not get improved. Will this planning area be importing people to work or exporting people to work based on job types and cost of housing? Will people be able to live, work, and play within this specific plan area? If not will there be special accommodations or mobility options to bring people to work and play within this area?

Reducing Vehicle Trips through Programs and Mobility Management

Santa Monica, California, another beach tourism and business commerce community has adopted policies focused on reducing vehicle miles travelled, reducing net new vehicle trips from new development, and providing incentives, choices, and options for people making existing vehicle trips to reduce the number of vehicle trips. Were any of these policies reviewed, applied and/or evaluated in the context of this plan? Was a Transportation Demand Management program identified or created to identify how to reduce vehicle trips while allowing a greater density of land use or sense of place? R47-8

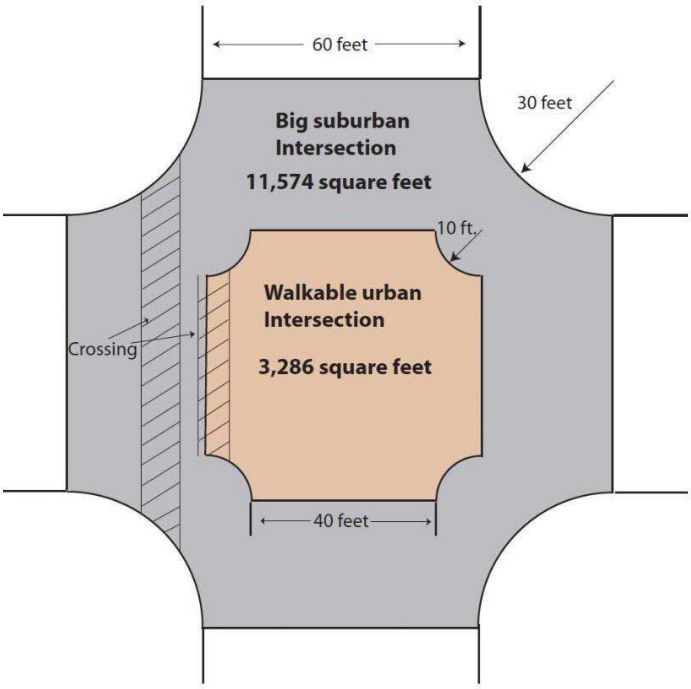
Speed of Vehicles

Speed of vehicles is one of the key contributors to severity of collisions and safety of a roadway. How is the Pacific Coast Highway being designed to enhance safety by reducing the vehicle speeds through design that results in 24 hour enforcement of speeds through design so to not create additional burden on law enforcement agencies to enforce speed limits. After all motorists are not able to drive the posted speed limit during peak periods yet during off peak periods they are easily able to exceed the posted speed limit. Why not design a roadway so that when a human being makes a poor decision or mistake that the results do not have to be a fatality or severe injury? What is the intended speed limit for PCH? What is the impact (positive or negative) of safety, efficiency, economic prosperity, sustainability, integration, connectivity, livability if the speed was not faster than 30-35 miles per hour? R47-9



Crossing Distance and Exposure of the Most Vulnerable Users

Crossing distance and exposure of people walking across a roadway with wide roadways designed to facilitate peak hour vehicle commute traffic volumes has a negative impact on facilitating a welcoming and safe environment to encourage people of all ages and abilities to choose to cross the street. In addition, the greater the distance a person has to cross it has a negative impact of traffic signal operations and cycle lengths causing unnecessary delays to motorists on coordinated corridors. The greater distance a person had to cross also has a negative impact on first and last mile access to transit and making connections between transit providers. R47-10

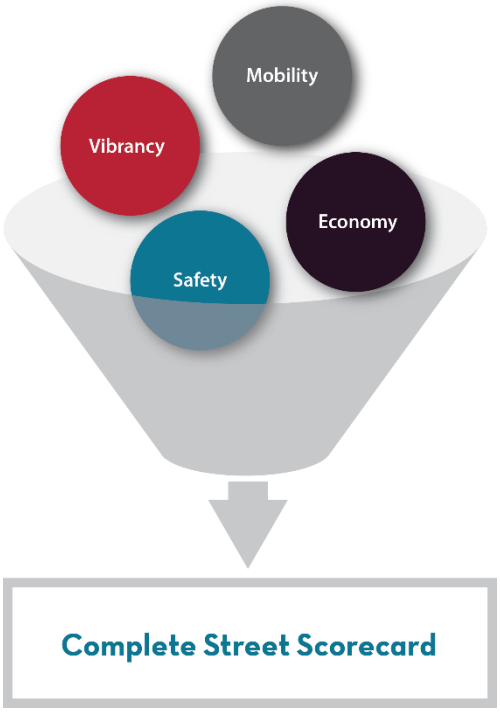


R47-10
CONT'D

Right Sizing a Street

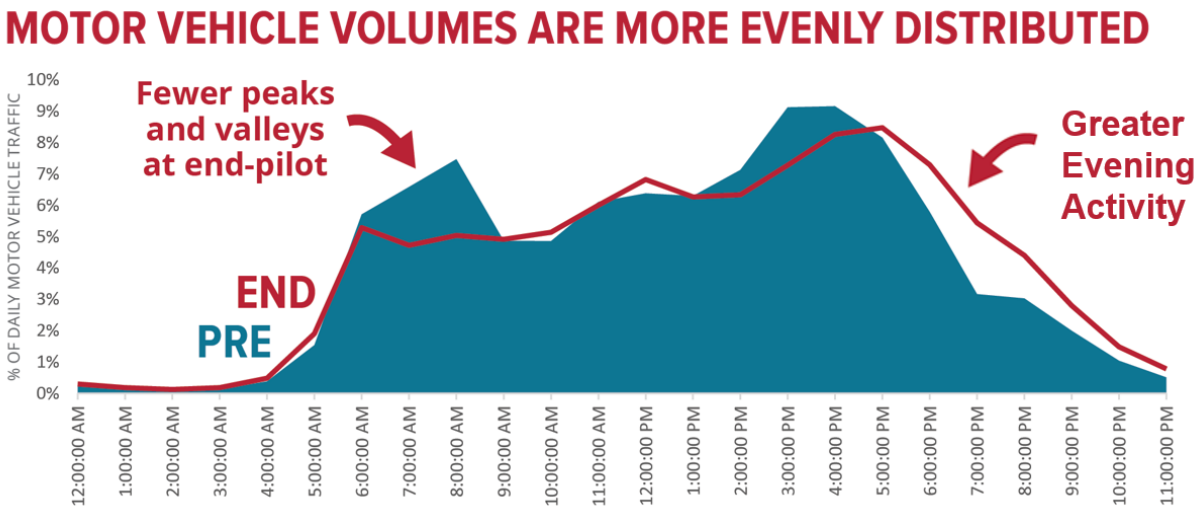
In Morgan Hill, they did a 6-month pilot project to evaluate "right sizing" their main street. Their main street was a former Caltrans right-of-way known as Monterey Road/Highway 101 before it was relinquished to the city when a parallel Freeway 101 was constructed. In 2015 they removed one travel lane in each direction and replaced them with a buffered bike lane in each direction. The corridor went from four lanes to two lanes in support of the city's goal "Drive to Downtown, Not Through Downtown". They had four key areas to measure success of the Complete Street corridor before, during, and at the end of the pilot which included Mobility, Vibrancy, Economy, and Safety. These four key areas were further divided into 16 performance metrics that created a complete street scorecard.

In addition to reducing the number of travel lanes that a person has to cross reducing all lanes widths to 10-10.5' would be ideal. Lane widths often have been found to have safety improvements and the ability to reduce motorists' speeds. If 10-10.5' lanes are the maximum needed what impact would streets have with this as the standard?



R47-10
CONT'D

What the City of Morgan Hill found with their road diet is about the same amount of vehicles made it through the corridor but it provided space for others to also utilize the corridor including people walking, biking, and businesses with their outdoor dining. The blue graph was the vehicle traffic prior to the road diet and the red was after five months of the pilot project. The percentage of people using the public right-of-way increased substantially by creating space for people to move and connect to and through downtown on their main street.



More information about this case study can be found at this link

https://morgan-hill.legistar.com/LegislationDetail.aspx?ID=2397340&GUID=96FF9513-BF4B-49FF-BD64-BB93B00BD0ED

Rethinking Corridors and how we Move

From one coast to another in the United States communities are rethinking how corridors move and connect people and serve communities. Both of the projects below purposefully transformed previous vehicle oriented corridors to create a sense of place and access/mobility/connectivity for moving people. Both are graphically and rendering rich as to show rather than tell through text the intent of the plans.

Charleston, South Carolina; Rethink Folly Road was an eight mile corridor project connecting the City of Charleston with the Town of Folly Beach in 2015 that involved a State Department of Transportation that owned the corridor, four local agencies that had authority over land use, a transit district, and a metropolitan planning agency. Through a community charrette process the guideposts for the project were identified to be Safe, Connected, Green, Valuable, and Synced. To accomplish these guideposts the project had to identify a need to "Change the Rules & Change over Time". R47-10 CONT'D

http://www.doverkohl.info/reports/RethinkFollyRoadPublicReviewDraft081415
http://www.doverkohl.info/reports/RethinkFollyRoadPublicReviewDraft081415Appendix

San Diego, California; Pershing Bikeway is a 2.5 mile corridor project connecting Downtown San Diego to the North Park community through one of the nation's top five urban parks Balboa Park. The project goals are to Enhance Safety for All Roadway Users, Connect North Park to Downtown, Create Space for All Roadway Users, Connect Neighborhoods with Balboa Park. To accomplish these goals and turn the many challenges along this corridor into opportunities the project has to design for lower and safer speed limits, balance the roadway to maintain comfortable travel for everyone, improve neighborhood connectivity through intersection and crossing improvements, create a space for all to enjoy, and improve neighborhood connectivity through slowing vehicle speeds.
http://www.keepsandiegomoving.com/RegionalBikeProjects/PershingBikeway_involved.aspx
http://www.keepsandiegomoving.com/RegionalBikeProjects/PershingBikeway.aspx

Parking

There should be a concern about the approach (or lack thereof) to parking in Section 6.3. While the plan identifies that many traditional driving modes, habits and patterns will evolve over the lifetime of the plan, it falls short of identifying ways to purposefully design and/or evaluate current Long Beach Municipal Code requirements with respect to the State-of-the-Practice for parking and transportation demand management. Once again, if the area is designed for cars, traffic and parking you will get cars, traffic and parking. The SEASP has so much more potential than the status quo when it comes to cars, traffic and parking. The SEASP could help identify ways by which to encourage and incentives private development and public parking projects to utilize TDM and shared parking strategies so as to reduce transportation, land use, ecological and financial impact of providing too much parking. R47-10~1

Street Classifications and Sections

In Section 6.6 there seems to be a disconnect between the street cross-sections, street widths, building heights, and building set-backs. There also seems to be a disconnect between balancing the space for automobile travel and people travel. It appears that the number of travel lanes were identified first based on land use alternative analysis (as there appear to be no compromises or sacrifices to number of travel lanes in order to create a sense of place and complete street within the public right-of-way) and then the remaining space was allocated to "non-automotive" uses.

The minimum bike lane width of 5′ for Figure 6-7 Pacific Coast Highway is used whereas the maximum travel lane width of 12′ is used for the outside travel lane and a 14′ median exists. This design "accommodates" but does not create a preferred design for people that ride bicycles. We recognize that some travel lanes widths were reduced to 10.5′ but with a 3′ raised physical separation between the bike lane and outside travel lane this allows for mirrors to hang over without hitting adjacent vehicles or bike riders. In addition, the Class IV Separated Bikeway could be raised to sidewalk level (pictures below). R47-10~2

R47-12
CONT'D

Strive for Connectivity

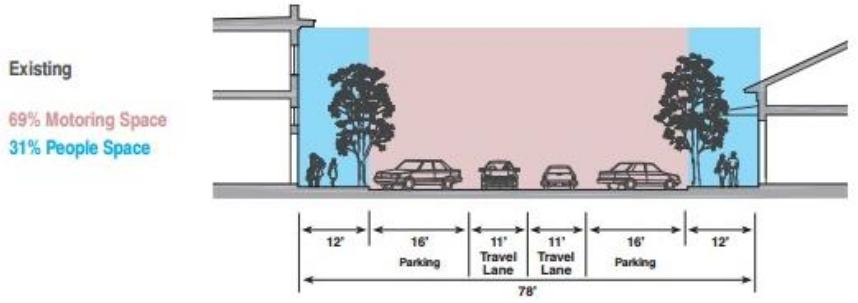
Connectivity is key. It is difficult to ask one street to do all things for all people especially if it is a vehicle oriented or vehicle priority street. A vehicle oriented street will become a barrier to connectivity. Bigger, wider, and faster streets strangle the potential for connectivity.

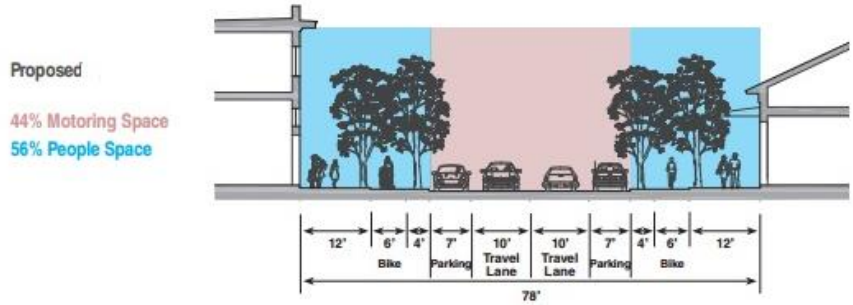
- Measures should be taken to design and reduce the width of the roadway. One way to measure success of a balanced complete street and one focused on creating a sense of place is to evaluate the cross-section width of the street and the percentage that is dedicated to moving people versus moving and parking cars. Sidewalks, bike lanes, and separated bikeways are included in the space for moving people whereas parking lanes, travel lanes, landscape medians between travel lanes, and turning lanes are all included in the calculation for moving and parking cars. The goal for a successful complete street should be to strive for at least a 50% split in cross-section width allocated to the people versus cars. Below are two examples of roadways reconfigured for people space.

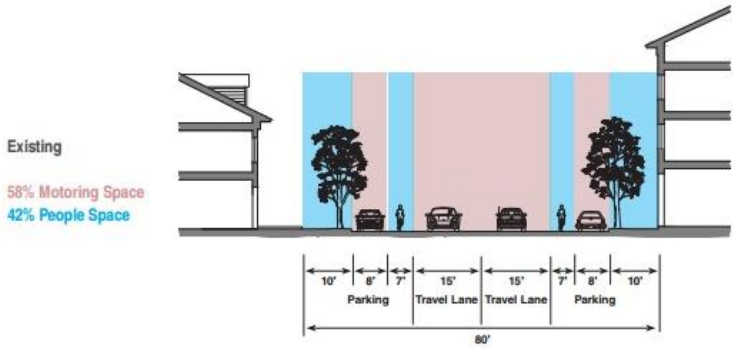
  Most corridors do not lack available right-of-way or would not negatively impact adjacent development along the corridor. It is how the right-of-way is allocated to various modes of transportation. In many communities and along many corridors the public right-of-way and space dedicated to the automobile (parking) equates to 35-65% of the surface space. There are ways to transform this public space to better create a sense of place. The cover picture of the Southeast Area Specific Plan, City of Long Beach, Hearing Draft Updated July 2016 is a great an example of surface space allocated to the automobile both within the public and private space.

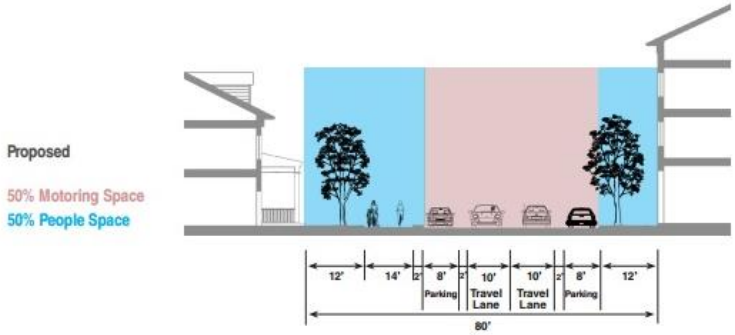
R47-13

R47-13
CONT'D







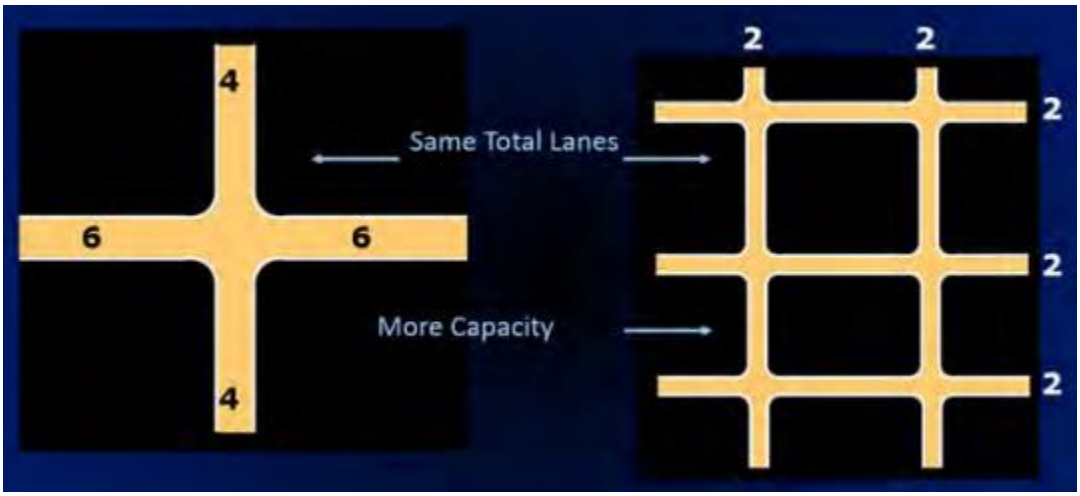


- Measures should be taken to have street cross-sections that show the buildings and integration and overlap between the public space and private space such as amenities of "flexible space", street trees curb cafes/parklets, and outdoor dining.
- Measures should be taken to reduce the speed of the corridor through design. Speed of a street also becomes a barrier to the use of a street by people and businesses. Speeds in excess of 30 MPH

often create safety and noise challenges (real and perceived). However, perception of safety challenges becomes reality. In addition, higher speeds impact noise pollution within a community. This can impact the vibrancy of the corridor.

- Measures should be taken to provide enhanced choices and options to mobility that promote connectivity.
- Measures should be identified to increase headways and expand services for transit (fixed wheel, rail, light rail, shared services and streetcar) to provide a better more reliable transit service to help connect with the rest of the region. In addition, providing dedicated space during peak congestion helps with reliability and travel times for transit. Increased density of jobs, housing and attractive destinations help provide the customers for transit. Design of the streets, buildings, parking management strategies (parking maximums, paid parking, time restricted parking, and parking enforcement) a Transportation Demand Management support the use of transit by customers. It is important to discuss topics holistically and not in silo'd sections/chapter and provide recommendations to support and enhance transit use, services and access through purposeful design.
- Measures should be taken to minimize surface parking for vehicles.
- Measures should be taken to describe walking and biking as something other than an "alternatives" to the car. Both of those modes existed before the automobile and a plan should strive to exceed the use "alternative" or "accommodate" terminology, if the plan truly wants to be a people oriented and human scale plan. Especially for a city that has "Long Beach, the most bicycle friendly city in America" on its City Hall. R47-13 CONT'D
- Measures should be taken to increase bicycle facilities with the plan area so that they are equal or greater than vehicle center lane miles. And for roadways with speeds greater than 30 MPH strive for first Class IV Separated Bikeways or second Class II Buffered Bike Lanes.
- Measures should be taken to enhance the amenities and destinations within walking and biking distance 5-10 minutes for either mode so that family, personal, social, and recreational trips can be accomplished in something other than a personally owned vehicle. This often requires a close connection and often blurred lines between place (private and public), businesses, homes, streets through thoughtful design and density.
- Measures should be taken to create memorable, positive experiences along the PCH corridor where people are free and welcome to see, feel, say and do as that is where great community exists because it is people that matter. That is where economic vibrancy exists. That is where people spend time and money.
- Measures should be taken to focus on elements and features to achieve walkable, socially cohesive, economically vibrant, and sustainable corridors and communities like mixed uses (commercial, residential retail, food, recreation, entertainment), high quality pedestrian and bicycle infrastructure, high density, public and private transit, engaging streetscapes (street level facades, trees, benches, surfaces), eyes on and well-lit street frontages, parking maximums and goals to offset need for parking or minimize its impact on space and costs, no walls without windows, buildings in close proximity to the street, buildings and trees that create a room that is proportional to the width of the corridor, parks and open spaces, public spaces, public art, curb cafes/parklets, important destinations, traffic calming, connectivity, human scale, and programming.

- Measures should be taken to provide a healthy and prosperous oriented development environment which has environmental, economic, social and health benefits such as CO2 emission reductions, VMT reduction, minimize sprawl, affordable housing choices and options closer to work, live and play destinations, increased retail sales, high property values per acre versus use, increased tax revenue to provide better maintenance and services, strong market demand, lower medical care costs and expenses, less absenteeism from school/work, heightened access to opportunities for social interactions, crime reduction, healthier population, reduced obesity and chronic disease, and improved productivity.
- Measures should be taken to identify bike parking type, design and location for both short term and long term use for retail, residential, and office users so that people that want to ride a bike know that there is a safe, secure, and visible location to leave their bike that is in close proximity to the front door for short-term uses (to enhance door to door convenience and connectivity).
- Measures should be taken to make the "healthy choice, the easy choice" when it comes to mobility and access.
- Measures should be taken to make the "complete street choice and design, the easy choice and design" when it comes to land use and transportation projects (both public and private).
- Measures should be taken to provide connectivity for people walking and their desired travel lanes including mid-block two stage crossings, easements and access through or between buildings, shorter block lengths, shade and street trees, park benches, and reduced block lengths. If a mega block needs to occur for development create pathways or access through the mega block. R47-13 CONT'D
- Measures should be taken, as opportunities present themselves, to make street connections to take advantage of the potential to create a street grid network, even if only for a few blocks. This allows local trips by foot, bike, and vehicle to utilize something other than the Pacific Coast Highway.
- Measures should be taken to increase intersection density so that one intersection is not asked to do all things for all users, which results in large intersections.



In conclusion, it is important to

- Create a forward thinking, big, bold vision for the future that inspires for generations to come. We have to think beyond what we know today or have always done in the past when it comes to design and evaluation of how we define success. R47-14

- Integrate Caltrans new mission into the design of the Pacific Coast Highway focused on Main Street guidelines and enhancing the livability and economy rather than moving cars through the SEASP.
- Design the Pacific Coast Highway with a focus on creating an enhanced multi-modal transportation system and network moving and connecting people rather size it for cars and accommodating people.
- Utilize all available transportation resources as the transportation and landscape architecture/urban design professions have made more progress in the state-of-the-practice to move people and create active communities in the last decade than the previous five decades combined.
- Measure what counts because what is counted will be managed and achieved.
- Reconsider the use of Level of Service for determining transportation environmental impacts and sizing of the corridor.
- Approach transportation from a holistic and balanced approach for all roadway users of all ages and abilities while also considering and preparing for technology and new mobility solutions.
- Be purposeful to reduce speeds and crossing distances (exposure for people walking) across a street and allocate a much greater percentage of the public right of way to the mobility of people over cars.
- Rethink Street Cross-sections, Parking and TDM strategizes so that you are not inducing vehicle demand and as a result creating congestion through design.
- Adopt an approach of changing the rules (for defining and measuring success) and changing over time (incremental change, focus on what you can do now and later as you continue to measure and monitor performance metrics that align with community and mobility needs and values).

R47-14
CONT'D

Sincerely,

Alta Planning + Design

Bryan D. Jones, PE, AICP, LCI
Principal, Regional Engineering & Complete Streets Leader

About Alta Planning + Design

Alta Planning + Design is North America's leading multi-modal transportation firm that specializes in the planning, design, and implementation of bicycle, pedestrian, complete street, greenway, park, and trail corridors and systems. We are highly recognized for our unique, advanced, and progressive community based and focused active transportation solutions that turn real and perceived challenges into opportunities. Our team of planners, designers, landscape architects and professional engineers work to help communities identify and define needs, build support, prioritize improvements, and implement a wide range of projects. We strive to make biking, walking, and mass transit an integral part of daily lives and choices. We are committed to transforming communities with one trip, one step, one street, park, trail, and intersection at a time.

Letter R48

-----Original Message-----
From: Debi
Sent: Monday, September 19, 2016 2:13 PM
To: Craig Chalfant
Subject: DEIR SEADPu

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The DEIR for SEADP is inadequate and should be denied due to lack of consultation with California Native American tribes, including tribal groups with cultural and spiritual connections to the area.

The DEIR for SEADP should be rejected, as it will result in the destruction of both cultural and biological resources of the area, which includes the Los Cerritos Wetlands, eligible for both Tribal Cultural Landscape status, and National Register of Historic places. R48-1

Thank you for your consideration in this matter.

Thank you,
Debi Jones

Sent from my iPhone

Letter R49

From: Gordana Kajer
Sent: Sunday, September 18, 2016 12:10 PM
To: Craig Chalfant
Cc: Suzie Price
Subject: SEASP Draft DEIR Comments 091816

My comment letter concerning the SEASP Draft EIR is attached.
Thank you.

GORDANA KAJER
Customs Compliance & Duty Drawback
T: 562.438.9161
F: 562.438.9491

GK
international services

September 18, 2016

To: City of Long Beach
Attn: Craig Chalfant (craig.chalfant@longbeach.gov)

Re: Southeast Area Specific Plan Draft EIR

Dear Mr. Chalfant,

The conclusion made in Section 5 (Environmental Analysis – AESTHETICS) for this project, specifically views from 2nd Street as noted on Page 5.1-13, are not supported by greater height and density for buildings being proposed in this Project. R49-1

I drive along 2nd Street a number of times per week, traveling east across Naples Island over the bridge to the intersection of Pacific Coast Highway and 2nd Street, and consider the views to be visually prominent and significant for the area. As the commercial buildings currently located in the Project area are no higher than 3 stories, drivers on most days experience a clear, beautiful view of the San Gabriel Mountains and views south, along Pacific Coast Highway, that often include Saddleback Mountain in eastern Orange County. R49-2

From the DEIR, Page 5.1-13:
"Distant views of the San Gabriel Mountains are already limited and would not be further obstructed since the alignment of the roadway (and related eastward sightline) would be maintained." This statement refers to 2nd Street which traverses an east- R49-3

west direction across the Project area. The views are "not already limited" as drivers have a clear, exceptional view towards the east of the San Gabriel Mountains from the 2nd Street bridge and the DEIR fails to address view impacts that the potential height of new buildings (5-7 stories high) would have on this scenic view. The views have not been physically modeled or otherwise illustrated, and the public has had no opportunity to compare the current view (with a maximum of 3 story height) with any alternative scenic view that reflect 5-7 story high buildings that could potentially be built on the current site of the Seaport Marina Hotel (southwest corner of 2nd Street and PCH), the Marketplace and Marina Shores shopping center. R49-3 (cont.)

The DEIR has failed to identify and analyze the effects of 5-7 story buildings on the scenic views from 2nd Street into the Project area and erroneously concludes (Page 5.1-14) that "scenic views from major roadways traversing the Project area would be unchanged or improved…" as it fails to address the impacts 5-7 story high buildings being proposed for the Project against the height restrictions of the current condition which are commercial buildings no higher than 3 stories. R49-4

Mitigation of the negative impacts of 5-7 story buildings on current scenic views currently available to the public on 2nd Street traveling east can be easily implemented by restricting the height of future buildings in the Project area to no higher than 3 stories. R49-5

Sincerely yours,

Gordana Kajer
235 Loma Avenue
Long Beach CA 90803
Ph: 562-438-9161
Email: gordana.kajer@verizon.net

Letter R50

From: James Kirkham
Sent: Monday, September 19, 2016 10:43 AM
To: Craig Chalfant
Subject: SEASP

No project-development. Too crowded already. Give Earth and all its' inhabitants a chance. R50-1

Sent from my T-Mobile 4G LTE Device

Letter R51

From: Robb Korinke
Sent: Monday, September 19, 2016 12:30 PM
To: Craig Chalfant
Subject: SEASP Support

Craig,

Please see the attached letter in support of the the South East Area Specific Plan. As a 3rd District resident i'm writing to urge support of the project.

Thank You.
Robb.

Robb
Korinke

Long Beach Planning Commissioners,

As a homeowner in our 3rd District and an employer in Long Beach, I am writing this letter to support the South East Area Specific Plan. This plan is an important step to helping our city grow and providing new opportunities to live, work and enjoy Southeast Long Beach.

I believe the ideas laid out in this plan will help our community thrive. SEASP strikes the right balance of economic development and environmental protection, and is exactly the kind of project we should be promoting.

R51-1

SEASP will preserve 59 acres of wetlands. This is a win-win for our city and will help activate our beautiful – and underutilized -- surrounding natural environment. Improvements to bike lanes and crosswalks encourage citizens to get out and enjoy the fresh air and sunshine and leave their cars at home.

The modifications to the waterfront and overall design of this project are exciting and make a lot of sense and I wish to commend the City on a thorough investigation of the potential environmental impacts of the proposal. This update presents a once-in-a-lifetime opportunity for our community to invest in a greener and more prosperous Long Beach. I strongly urge your support of the SEASP update and approval of the EIR.

With thanks,

Robb Korinke

Sent: Sunday, September 18, 2016 1:38 PM
To: Craig Chalfant
Subject: seadip

i am in favour of developing the blight that consumes pch & 2nd BUT will expect the wetlands to be preserved at all costs! also, the traffic going into belmont shore will be impossible & mitigating it will be challenging. aside from dealing with pch & 2nd traffic, i would suggest removing the bike lanes thru naples and into belmont shore as one way to keep traffic flowing and return of the original lane. with the amount of traffic we now have and expecting more with this development...we need the lane back! please do not forget the residents in belmont shore. jann kronick-gath R52-1

From: Bob Lane [mailto:bobhoffmanlane@gmail.com]
Sent: Saturday, September 17, 2016 10:03 AM
To: Craig Chalfant
Cc: Mayor; Council District 1; Council District 2; Council District 3; Council District 4; Council District 5; Council District 6; Council District 7; Council District 8; Council District 9
Subject: Support for SEASP blueprint plan

Hello Craig,

Please accept my attached letter in support of the proposed SEASP plan.

Best regards,

Bob Lane
Naples

Craig Chalfant
Senior Planner
Long Beach Development Services
333 W. Ocean Blvd., 5th Floor
Long Beach, CA 90802
craig.chalfant@longbeach.gov

September 17, 2016

Dear Craig,

Please accept this as public comment related to the draft Southeast Specific Plan (SEASP) and the draft Environmental Impact Report (DEIR). As a Naples resident and business owner I think this blueprint could help bring the type of quality yet respectful development to east Long Beach and the gateway to our great City.

I have closely followed the public process related to the development of SEASP and the preparation of the DEIR. I understand that the DEIR must look at the potential adverse effects of contemplated development, but I offer that from what I read, the impacts are outweighed by the benefits, and in fact, in many cases are positive.

Specifically, I believe that SEASP has incorporated many priorities of the community that were identified at community meetings, through the project website and other available public documents. These priorities include, improving the flow of traffic through the area, preserve views, improve the accessibility and viability of the wetlands, and increase access to public open space. R53-1

Given that this plan is envisioned to serve as a blueprint for development in the area in to the next half-century, it is clear that it must contemplate not only today's conditions, but future projections and opportunities. Such future projections are evaluated in the DEIR which identifies and discusses both impacts and mitigations and in my opinion does a thorough job. It is clear the alternatives would not satisfy the goals of the plan, nor would they result in a more connected, special community. I do understand that there will be traffic impacts associated with some of the development contemplated in the plan, but I also understand that new technology and roadway improvements that are proving successful elsewhere would lend themselves to our community needs.

For these reasons, I wish to urge the adoption of the draft SEASP and certification of the EIR.

Kind Regards,

Bob Lane

Bob Lane
238 Campo Drive
Long Beach, CA 90803

cc: Mayor and City Council

Letter R54

From: Iris Lovelace
Sent: Monday, September 19, 2016 2:08 PM
To: Craig Chalfant
Subject: Comments on the DEIR for Southeast Area Specific Plan (SEASP)

Dear Mr. Chalfant,

As I understand it, under the new laws and regulations, the Alamitos Energy Center can no longer use ocean water to cool the plant. To replace this system the owners are:

1. Wanting to upgrade to a faster firing natural gas system and
2. Include some larger power storage batteries. These would help get it approved because they make it look like progress is being made toward converting to a zero emission plant. R54-1

I would encourage a larger amount of batteries installed in order to make the transition to a zero emission power plant that much faster. Clearly, the plant should be more battery powered than gas fired. Thank you very much for reading this.

Kindest regards,

Iris G. Lovelace
200 E. Anaheim St, Unit 324, Long Beach CA 90813

District 1
Member of Long Beach 350.org

From: christine martinovic
Sent: Wednesday, September 14, 2016 7:59 PM
To: Craig Chalfant
Cc: Mayor
Subject: DEIR Report - SEASP Project

Mr Chalfant,

As a resident of the Naples Community I am voicing my concerns as related to the SEASP project and the additional impact it will have to the existing congestion problem we have today surrounding 2nd St & PCH.

I'm in favor of enhancing the community on 2nd St and PCH, but I see no mention as to what steps will be taken to improve the current congestion at that intersection today. It's bad enough the lights on PCH and 2nd do not coordinate with the lights on 2nd St, therefore causing cars to be backed up within the main intersection. I've seen people get aggressive with their vehicles in order to get through intersection while other vehicles sit to block to the intersection. It is bad enough our lives are stressful today which brings out the "ugly" in people, but we really need to know how the city will improve the congestion as they move forward with their plans. R55-1
The Naples/Belmont Shore area has grown tremendously in the last 30 years and the traffic situation has only gotten worse. I live on the cross section of 2nd St & Venetia and many times cannot cross the intersection and need to make a right turn so I can do a U-turn in order to get to the other side. I commute to and from work and sometimes it will take me about 10 minutes to get across 2nd St because the lights are not coordinated. Cars are also now backing up on the bridge that comes into Naples too. More cars are coming into our area in which new buildings go up or we have older units that currently do not provide enough parking spaces for those individuals now residing in these places.

I know our community wants to work with the city to see how we can reduce the traffic congestion, but we want to be a part of those discussions so that the City of Long Beach understands the current situation and what we as a community currently face today before proceeding with any projects. I love this community and have lived her for over 34 years. It it is natural that we continue to grow our city and find ways to to improve our neighborhoods as our world evolves, but we also need to know the effect it will have on the surrounding neighborhoods and environments. R55-2

I hope you take these comments and consider our concerns as a community.

Thank you for your time.

Christine Martinovic

Letter R56

From: B. Thomas Mayes
Sent: Monday, September 19, 2016 9:06 PM
To: Craig Chalfant
Subject: SEASP DEIR Comments

Dear Mr. Chalfant,

I have a number of concerns pertaining to the SEASP DEIR. They are as follows:

The high-density plan that permits seven-story buildings will have serious consequences for surrounding neighborhoods and streets. For example, the plan shows a population increase of almost 9,000 people. This will more than double the current population and will put them on only 86 acres.

This additional population load will result in more than 35,000 new trips per day to load up our roads and will cause severe traffic congestion that cannot be corrected. Nine intersections in the SEASP zone will be severely affected by this new traffic load, resulting in almost constant gridlock. By 2035, all of the intersections in the study area will be at service levels D, E, or F. This shows an unconscionable load to place on future generations. R56-1

Furthermore, the F designation (Failed intersection) used in the high-density predictions grossly understates the true effect of traffic increases, because predicted increases are really multiples of the maximum traffic load warranting the F rating. A more realistic rating would be something like F-, or F---. Thus, a no change or reduced density option are obviously preferable to the maximum load option proposed in the DEIR.. The readers of the DEIR are being deceived by this understatement. R56-2

The maximum density plan and its justification seem to be written with the objective of giving developers a healthy profit and providing a much larger tax base for the City. Neither of these criteria was mentioned in the list of amenities that are stated as the basis for the zoning plan. Indeed, the DEIR states that even with the maximum-density plan there is no guarantee that the promised amenities will be obtained. This certainly looks like a “bait and switch” scheme to get the citizens to approve the high-density plan, but I hope this is not the case. R56-3

I believe that the best option for SEASP is to maintain the current three-story zoning plan, or an alternative low-density one that provides solutions to the traffic problems that will be created in East Long Beach and surrounding cities.

Best regards,

B. T. Mayes, Ph.D.
4300 E Theresa St.
Long Beach, CA 90814

From: Kelsea Mazzocco
Sent: Monday, September 19, 2016 3:01 PM
To: Craig Chalfant
Subject: SEASP UPDATE PLAN

Mr. Craig Chalfant and Planning Commissioners,

The Southeast Area Specific Plan Update deserves our attention and support. I hope that as our representatives in the planning process, you too will recognize SEASP for the many advantages that it brings to Long Beach and our region as a whole.

As someone who sells Real Estate and has resided in Long Beach for over 30 years, I am happy to see a plan put forth that considers what is right for our city and residents. Updating our area's outdated planning guide will help to improve the overall quality of life for residents and businesses alike. It allows for the design of an area that is visually appealing and dynamic - just what we were missing in this part of Long Beach.

R57-1

I am glad that the team selected by the City has worked closely with our community in addressing our concerns and making sure that the needs of residents were put first and foremost in planning considerations. The Draft Environmental Impact Report (DEIR) has done a good job of analyzing any possible impacts as well as ways to mitigate them.

Please move toward approving the DEIR so that we are one step closer to making this much needed update a reality. I am proud to say that the plans as they stand today represent the very heart of our community, one that we have long been waiting for. Thank you for your time and consideration of this very important matter.

Sincerely,
Kelsea and Phillip Mazzocco
Sonnocco Real Estate Group

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Kelsea Mazzocco Realtor, Sonnocco Real Estate Group
3626 Long Beach Blvd
Long Beach CA 90804
Mobile. (562) 714-9815
Email. kelsea.mazzocco@gmail.com
BRE # 01317623

Letter R58

-----Original Message-----
From: Donna Medine
Sent: Sunday, August 28, 2016 8:04 PM
To: Craig Chalfant
Subject: new development

My husband and I have lived in Long Beach for 20 years, and have recently retired here. We love the area, and can't imagine living anywhere else. The one thing missing from the East Long Beach area is a thriving, upscale area of retail shops. Whenever we shop, we end up in Costa Mesa or Newport Beach. We would rather those tax dollars stayed in our area, but there is nowhere to shop…not even a single department store in the entire area. We hope your development includes some places to shop for those of us who must leave the area to find what we need. R58-1

Thanks,
Donna and Joe Medine

-----Original Message-----
From: Jeff Miller
Sent: Monday, September 19, 2016 11:41 AM
To: Craig Chalfant
Subject: SEASP draft EIR comments

Mr. Craig Chalfant
Senior Planner
City of Long Beach
333 West Ocean Boulevard, 5th Floor
Long Beach, CA 90802

Please accept these statements as my response to the Draft Environmental Impact Report (DEIR) for the proposed SEASP. Please acknowledge receipt of these comments by your reply to this email message. Thank you.

These following examples are sufficient reasons to deny the proposed SEASP:

Re aesthetics: The impacts to the quality of life issues, such as visual aesthetics, noise, air quality degradation, and potential harm to wildlife are unacceptable. For example, under the existing zoning height regulations, there exist views of open sky, tall trees, sailboat masts, and distant mountains, all of which are desirable and important features of visual aesthetics. The increase in building heights and densities in the proposed SEASP would impair or eliminate some of these views and offer instead extremely limited "view corridors". It is unacceptable to degrade "views" and offer instead more restrictive "view corridors". R59-1

On DEIR Page 5.1-13 it is stated "Distant views of the San Gabriel Mountains are already limited and would not be further obstructed..." This statement is false: Increased building height would in fact obstruct the existing views of the San Gabriel Mountains from Second Street. Likewise, the statement on DEIR Page 5.1-14, "Scenic views from major roadways traversing the Project area would either be unchanged or improved" is false, for the same reason. R59-2

The various instances of reduced air quality described in DEIR Impact 5.3, which are stated as "significant and unavoidable", are not acceptable. R59-3

The various instances of increased traffic described in DEIR Impact 5.16, which are stated as "significant and unavoidable", are not acceptable. Additionally, the possible mitigations suggested are either unworkable, likely to be ineffective, would not be permitted, or are too far in the future or too uncertain to be acceptable. R59-4

These examples are sufficient reasons to deny the proposed SEASP. Instead, I request you approve the "No Project/No Development Alternative". R59-5

Jeff Miller
PO Box 3310
Long Beach, CA 90803

Sent: Monday, September 19, 2016 6:07 AM
To: Craig Chalfant
Subject: SEASP comments

Good morning Mr. Chalfant,

I live in Belmont Shore and am very concerned about traffic with this new SEADIP plan.

How come intersections in Belmont Shore weren't part of the traffic study? Previous project EIRs like Second + PCH studied traffic impacts at Bayshore and Second Street, and the existing conditions then said that the intersection was an F, and required mitigation. Since more cars are expected with the SEASP stuff, shouldn't this intersection have been studied so that traffic mitigation could be proposed? R60-1

How come you didn't take traffic counts on the summer weekend? Everyone knows that weekend traffic is worse then weekday traffic during the summer. R60-2

How come you didn't take traffic counts during the week when school was in session? R60-3

Traffic is very bad in the area and this will make it much worse. This proposed plan is unacceptable and should be downsized to avoid traffic impacts. R60-4

Jim Miller
Belmont Shore

Letter R61

From: La Vonne
Sent: Monday, September 19, 2016 10:15 AM
To: Craig Chalfant
Subject: SEASP DEIR

The project will be a disaster to that intersection in terms of traffic, quality of life and preservation of the fragile wetlands. R61-1

Thank you,
La Vonne Miller
Long Beach, 90807

Letter R62

From: SUSAN MILLER
Sent: Friday, September 09, 2016 4:28 PM
To: Craig Chalfant
Subject: Comments on SEASP/DEIR

The DEIR is flawed, misleading and lacking Common Sense. Common Sense is recognized by the Supreme Court. The primary point of conserving the Los Cerritos Wetlands is forgotten, violated and pushed aside in favor of development by the DEIR. The DEIR does not give consideration or mitigation for disturbing/urbanizing the wetlands. The Plan needs to protect, nurture, respect and save the Wetlands. Those basic elements are minimized by this plan. R62-1

To thrive, native grasses/plants can not be walked upon nor disturbed for walkways to allow human intrusion into a preserved wetlands. For wildlife to thrive, they need barriers from human encroachment, not concrete walkways for people to meander through the wetlands to gawk at the wildlife and birds like the wetlands is a zoo. With the impact of Sea Level Rise predictions for this area, it is not an area that should be developed. Let nature take it's course without human intervention. Humans have had a profoundly adverse impact on the environment. R62-2 R62-3

California State Code: Title 14, Chapter 1, Section 251.1 Harassment of Animals
Except as otherwise authorized in these regulations or in the Fish and Game Code, no person shall harass, herd or drive any game or non-game bird or mammal or furbearing mammal. For the purposes of this section, harass is defined as an intentional act which disrupts an animal's normal patterns, which includes, but is not limited to breeding, feeding or sheltering.

In addition, please refer to the following link:
http://birding.about.com/od/birdbehavior/a/Bird-Senses.htm : Per link, **Sight:** Birds have a thicker retina than humans and their eyes are larger in proportion to their head size. They have much denser rods and cones packed on the retina, giving them superior vision in both black-and-white and color. The range of colors birds see is not much greater than humans, but some species, such as hummingbirds, can see ultraviolet colors.
Where birds' eyesight really excels is in the perception of motion and detail – birds can see 2-3 times better than humans in that respect. In many birds, the eyes are positioned further apart on the head, giving them a wider field of view, and birds with eyes on the sides of their head
Hearing: Birds hear a smaller frequency range than humans, but they have much more acute sound recognition skills. Birds are especially sensitive to pitch, tone and rhythm changes

The plan violates/harass the wildlife on land and in the water through developmental intrusion. The buildings heights violate the birds natural flight paths. Common sense is not being used in consideration of the animals and foliage. R62-4

The Plan needs to be vetoed entirely.

Letter R63

-----Original Message-----
From: David Moore
Sent: Saturday, September 10, 2016 11:50 AM
To: Craig Chalfant
Subject: SouthEast Area Specific Plan

Dear Sir,

This project should absolutely be voted down for a number of reasons: traffic congestion is already bad at that corner and will be impossible if this project goes through, what little bit of wetlands and nature we have left should be protected and those of us that own homes in the area have a right to a good quality of life. Don't stack homes and high rises in our area. R63-1

Respectfully submitted,

Dave Moore

Letter R64

From: Wendy Munster
Sent: Saturday, August 06, 2016 5:04 PM
To: Council District 3 <District3@longbeach.gov>
Subject: PCH/2nd St. Development Plans

Dear Ms. Price,

After reading the LA Times article on zoning plans for the area around PCH and 2nd Street, I wish to voice some concerns.

Firstly current traffic at that intersection is often overwhelming. With the addition of thousands of residents and retail shopping, I foresee many periods of gridlock. I live on Bay Shore Avenue and on occasion it takes me 10 minutes to make my way from here past The Market Place.

To illustrate my point, the simple addition of a driveway from 2nd Street into the Gelson's parking lot has had a definite negative effect on traffic flow coming across PCH towards the shore and should, in my opinion, never have been permitted as the lot can easily be entered from Marina Drive. More such alterations can only make the wait to get through this intersection even more unbearable. R64-1

Certainly the Seaport Hotel property is in need of a major upgrade. But construction of buildings of 5 to 7 stories high is not in keeping with the neighboring area. I believe the conversion of the property to retail and residential area would be an improvement. But this must be carefully done on a scale that will not negatively impact surrounding neighborhoods. The possibly addition of up to 8600 new residents is ill-advised.

Finally, having heard you speak at an Audubon meeting, I know that you are environmentally sensitive. The scale of proposed development will quite likely have a negative impact on wildlife and wetlands in the area. Scaling back will help protect our local treasure.

I therefore urge you to oppose plans for large scale / high density / tall building development in this area and opt instead for sensible, smaller scale changes.

Sincerely,

Wendy Munster

383 Bay Shore Av. #201 Long Beach, CA 90803

DR. ROBERT C MYRTLE
105 SIENA DRIVE
LONG BEACH, CALIFORNIA 90803-3923
+1 562 438 4359
Robert.Myrtle@Verizon.Net

September 8, 2016

Suzie Price
Councilwoman, 3rd District
City of Long Beach
333 West Ocean Boulevard
Long Beach, CA 90802

Dear Councilwoman Price:

I am writing about the proposed changes to the SEASP. As the document points out there have been a number of proposals to change the use of the land in and around the SEADIP (or SEASP) boundaries. Each of these efforts has led to significant community concern and resistance to most of the proposals for making changes in the land use in this area. The current proposal notes that "the framework for envisioned changes was tasked with two things: 1) address ongoing community concerns regarding height, traffic, and placemaking and 2) enhance the aesthetics, vitality, economic value, quality of life and amenities afforded by the project area's marina and wetland assets". In my review of the document there seems to be a significant disconnect between what the community values in terms of building height, traffic congestion and flow, quality of life and the aesthetic issues that are of concern to most of the residents in the area and what is being proposed. R65-1

As a point of reference, a number of years ago I was appointed by Mayor Tom Clark to serve on the City of Long Beach's Economic Development Committee. At the time a major concern facing the City was the social and economic impact of the Navy's departure from Terminal Island. With a couple of significant exceptions, the area in and around City Hall has seen a remarkable transformation. Years later I was asked by Councilwoman Jan Hall to serve on a zoning subcommittee to address building codes issues that were creating significant community angst over renovation and remodeling concerns of existing homes in the Naples, Belmont Shore and Peninsula communities. As a result, I appreciate the tensions between "the status quo" and "envisioned futures". R65-2

Most people that I know that live in the Naples, Belmont Shore and Peninsula neighborhoods value the ambiance and life style that makes these communities so unique. We value reasonable economic development efforts. The Belmont Shore commercial district has been transformed over the years and most folks appreciate

the changes that have emerged. Many appreciate the addition of Gelson's, Trader Joes and Whole Foods to the mix of retail shops and businesses and I suspect most would love to see the upgrading of the Seaport Marina Hotel—but not along the lines that have been proposed over the last decade. R65-2 (cont.)

However, the proposed plan is a developers' dream and the residents of the area's nightmare. Traffic on Second Street and Pacific Coast Highway is heavy and at peak commuting hours or on weekends or multi-day weekends the congestion is intolerable. In recent years the city has done its best to mitigate or manage some of the growthπ in traffic that has been occurring. Adopting the changes that are being proposed would make the impacted traffic flow approximate "traffic gridlock". As the consultants point out there really aren't any good options for mitigating this. It just cannot be done! R65-3

In the "framework" part of the plan, mention is made of the importance of aesthetics, height—which was not initially defined, and the quality of life. It is hard to see how a major increase in housing and commercial density can be achieved without a significant increase in height, leads to improvements in the quality of life for anyone living in the area.. As someone who spends at least an hour a day running—both Pacific Coast Highway and Second Street as part of my fitness routine—traffic noise, automobile and truck emissions, and the behaviors of drivers (including bicyclists) to get to where they are going, trying to make traffic lights, or ease their way into parking lots just does not create the ambiance I associate with quality of life. If the proposed plan was adopted, it is impossible to envision these changes making things better. All of this makes you wonder "what are our policy makers thinking?" R65-4

Historically, when confronting issues facing society we ask the question "Cui Bono". Since the benefits seem to be skewed to those seeking higher density, a debasement of our social and ecological environment, which are contrary to the desires of the residents, the relevant question becomes "Cui Prodest". It is clear from all I have read that the beneficiaries are mainly the developers and the costs are borne by the community—especially those most immediately impacted by this proposal. As our representative and as someone who claims to be "Bringing Imaginative Leadership" to the 3rd district is this your view of "Imaginative Leadership"? If this is your vision of "Imaginative Leadership" I can only conclude "let the nightmares begin".

Respectfully,

Robert C. Myrtle, DPA

-----Original Message-----
From: Ronald W. Novotny
Sent: Thursday, August 18, 2016 3:54 PM
To: Craig Chalfant
Subject: RE: 2nd and PCH Development

Yes, I would. It takes me 3 lights to cross PCH coming home as it is and the area cannot bear a massive amount of new traffic due to this development. R66-1

Ronald W. Novotny | Of Counsel
Atkinson, Andelson, Loya, Ruud & Romo
12800 Center Court Drive, Suite 300, Cerritos, California 90703 Direct (562) 653-3846 * Fax (562) 653-3655 | vcard | bio | website | subscribe

-----Original Message-----
From: Craig Chalfant
Sent: Monday, August 08, 2016 8:16 AM
To: Ronald W. Novotny
Subject: RE: 2nd and PCH Development

Thank you for your interest in this project. Please let me know if you would like to be included on the mailing list for all future public notices on project proposals for this site.

-----Original Message-----
From: Ronald W. Novotny
Sent: Monday, August 08, 2016 8:11 AM
To: Craig Chalfant
Subject: 2nd and PCH Development

Our Councilmember Suzie Price recommended that we write you regarding our concerns about the proposed project.

At present it takes twice as long for me to drive home from my law firm in Cerritos to my home in Belmont Park. It's often a parking lot driving west on 2nd street from Studebaker, with it taking at least three light changes after the last stop signal to get past PCH. I am not willing to trade far worse traffic for the chance of visiting a high-end store where the hotel is now, and therefore strongly oppose the kind of massive retail office and housing complex that is being proposed. R66-2

Ronald W. Novotny
288 Pomona
Long Beach

Letter R67

From: Patrick Osullivan
Sent: Sunday, September 18, 2016 9:02 AM
To: Craig Chalfant
Subject: Save Los Cerritos Wetlands!

Dear City of Long Beach,

Please save and protect the Los Cerritos Wetlands by not permitting further development, increases in building height or density, or traffic in the area. R67-1

Thank you,

Patrick O'Sullivan

Cell: 714.240.8084

From: Diane Paull
Sent: Friday, July 22, 2016 12:33 PM
To: Craig Chalfant
Subject: SEASP

Dear Craig,

Thank goodness I can email you directly. In the ongoing process of tracking the process of SEADIP/SEASP I have attended meetings, tried to access the webpage and written my councilperson Suzie Price.
While the process continues to declare the priorities of the wetland, traffic, noise and density I continue to be confused by the hight suggestion of 5-7 stories.
In the meetings the architectural ideas of set backs, green space, accessibility are all addressed. I continue to wonder why the height limit continues to be 5-7 stories. R68-1
There is a big difference between 5 and 7 stories that affect all of the priorities that have been mentioned.
I know there will have to be a variety of compromises. For me five stories is already a compromise.
Is it possible to have it be 5 stories -- and not allow all the negative aspects of 6 or seven stories -- density - wetlands -- noise and traffic will already be impacted enough with 5 stories.

Thank you,
Diane Paull

From: Amy Pearson
Sent: Sunday, September 18, 2016 3:43 PM
To: Craig Chalfant
Subject: SEASP

Hi, Mr. Chalfont.

I have attached my letter regarding the proposed zoning changes (they cannot go through!).

Thank you.

Amy Pearson
Independent Beauty Consultant
Mary Kay Cosmetics
AmyPearson@marykay.com
www.marykay.com/AmyPearson

Dear Mr. Chalfont,

My name is Amy Pearson and I am a life-long resident of Alamitos Heights.

There are no words to convey how strongly I am opposed to the new zoning proposal.

This area simply CANNOT take any more people! This area simply CANNOT take any more traffic! R69-1

2nd and PCH is one of the worst intersections in this area, if not the city. There is NO mitigating traffic. It is hard enough to get to/from this area as it is. Why would adding 6,000+ people be a good idea in anyone's imagination (other than money).

We do not need five, to seven, story buildings on 2nd/PCH, nor anywhere between 2nd St and Loynes. The current SEADIP zoning regulations are just fine. They do not need to be changed.

I cannot argue against replacing the existing Seaport Marina hotel. But not with hotel and residential units and certainly not with anything higher than what the current zoning regulations allow (three stories, I believe.).

A nice boutique hotel with a restaurant, or two, and maybe some shops would be nice. Three stories, MAXIMUM. NO way should anything higher than that be allowed.

This area is NOT downtown LA. It is NOT Santa Monica. It is NOT downtown Long Beach along Ocean Blvd. I remember when one could actually see the ocean from the street. All I see are buildings.

I enjoy the current views of the sun, sky, water and trees. I don't want that replaced with concrete buildings.

I am more concerned with MY quality of life than the pocketbook of any developer who will come in to destroy this area, then leave this mess with his millions of dollars while we residents suffer the consequences that are forced upon us.

I'm more concerned with the wetlands than the developers pocketbook.

Just a few years ago when PCH was widened should have been enough to show people what a mess this will be. I remember sitting on PCH south of Loynes trying to get to Ralphs in Marina Pacifica. That would be a daily occurrence should this absurd proposal go through.

My family and I go to Ralphs several times a week. I use PCH several times a week for errands and other activities south of 2nd Street. This new proposal will add too much time sitting in a car. Life is too short for that.

Currently, when driving north on PCH, I try to avoid PCH/2nd due to traffic. I will use Marina Drive to 2nd to Appian Way. R69-1 (cont.)

This new proposal will drive traffic to other, normally slow and quiet streets, in order to avoid the mess on PCH/2nd. It already does for and I know I'm not the only one. It will only get worse.

I fear Eliot, Colorado and other streets in Alamitos Heights will be some of those streets. They are already used as high-speed highways now (to avoid already-congested 7th Street (which will also get worse.)).

Simply put, MY TIME MATTERS. MY QUALITY OF LIFE MATTERS. My time and quality of life, and that of my family and thousands of other area residents, matters much more than the pocketbook of the developers.

If it ain't broke, don't fix it. Right now, it ain't broke. This area cannot handle the unreasonable increase in density. This area cannot handle the traffic as it is now. It surely cannot handle the unreasonable increase in density.

Do what is right by residents. Do NOT allow this to go through.

Our time matters. Our quality of life matters.

Thank you.

Amy Pearson
Alamitos Heights Resident

From: Randy Peck
Sent: Monday, September 12, 2016 11:08 AM
To: Craig Chalfant
Cc: Suzie Price
Subject: SEADIP comment regarding Seaport Marina property specifically

Craig Chalfant
Senior Planner
Long Beach Development Services

Hi Mr. Chalfant,

I just want to provide my input regarding the new Draft Southeast Area Specific Plan, specifically with regards to the property where the Seaport Marina hotel is located at PCH and 2nd Street. I understand you are accepting public comment until Sept 19.

While I am not opposed to including a mixed-use facility at the location of the Seaport Marina hotel, I am *__extremely__* opposed to granting variances for height and density beyond what is currently allowed.

I am opposed for all of the reasons stated in the Significant Unavoidable Adverse Impacts report, but most especially because of the negative impact on traffic and corresponding population density in the area. WHY would Long Beach continue to entertain a proposal that has so many unavoidable adverse consequences for Long Beach residents? WHAT BENEFIT is there in increasing the population density in this area? For the sake of "growth"? To accommodate developers and the existing property owner? We don't need growth in our community, and we don't need to cater to developers. R70-1

I understand that this will enrich developers and others on a short-term basis, as well as the property owners on a long-term basis, and presumably bring greater tax revenue to the city, but at TREMENDOUS COST to the existing residents. Why grant a variance if you are truly working for the citizens of Long Beach? This would degrade our quality of life, not enhance it.

Shops and restaurants and movie theaters such as are in Marina Pacific and the Market Place are great, and would be wonderful to have at the Seaport Marina location – but I strongly object to adding residential and hotel units that exceed current zoning height and density, and that would create more traffic, more pollution, and provide virtually no benefit to the vast majority of current residents. I am thoroughly confused as to why this is still being considered.

Thank you for your time and consideration.

Randy Peck
5596 E. Bay Shore Walk
Long Beach
562/706-7492

Letter R71

From: Linda Pemberton
Sent: Tuesday, September 27, 2016 12:37 PM
To: Christopher Koontz
Cc: Craig Chalfant
Subject: SEASP Traffic Questions

Hi Christopher and Craig,

Can you provide answers to these questions?

Thanks,
Linda Pemberton

1. Will the SEASP area be serviced by buses that will run every few minutes, reducing traffic congestion? R71-1

2. If the area doesn't have frequent bus service, can it be called Transit Oriented Development? R71-2

3. Which Placetype is correct for SEASP- Mixed Use: Low, Moderate, or Transit Oriented? R71-3

4. Is it true that the City cannot accomplish the Traffic signal synchronization between the City of Long Beach on 2nd Street and 7th Street and Cal Trans on PCH? R71-4

5. Does the City have some examples of where the proposed Traffic Management systems have worked well? R71-5

6. How will the City monitor the outcomes and enforce the requirements of the Traffic Management Systems? R71-6

From: Linda Pemberton **Sent:** Monday, September 19, 2016
2:35 PM
To: Craig Chalfant
Cc: Suzie Price; Heidi Eidson; Christopher Koontz
Subject: SEASP DEIR Comments

Craig Chalfant,

Thank you for the opportunity to comment on the Draft Environmental Report for the SEASP.

Attached please find my comments.

Linda Pemberton
562 477-9774

September 19, 2016
SEASP DEIR COMMENTS
Linda Pemberton
lindajpemberton@yahoo.com

To: Craig Chalfant, Development Services
Cc: Suzie Price, Councilperson 3rd District
Planning Commissioners,
Christopher Koontz, Development Services,

From: Linda Pemberton,

Subject: SEASP DEIR Comments

Thank you for the opportunity to comment on the Draft Environmental Report for the SEASP.

RECOMMENDATION

Please consider the Alternative Intensity Alternative and reduce the height to 4 stories. This will restore the balance between Economic, Social and Environmental interests and provide a more sustainable development plan, provide the public with their priority benefits and lessen the negative impact on air quality and traffic. It will also allow the mitigation strategies a better chance of succeeding.

GAPS IN THE PROPOSED PLAN

How does the Project meet its number one goal of a balancing Economic, Environmental and Societal needs? I don't think it does. The City tells us the financial analysis is hypothetical, the public benefit is speculative, and the impact on Air Quality and Traffic is significant and unavoidable. They show the density and scope of the project has 2 to 4 times more dwellings than market demand, and half the City's overall housing goal for the next 20 years. R71-7

RATIONAL FOR REDUCED DENSITY AND HEIGHT

- This best meets the number one project objective: give equal consideration to social benefits, environmental needs and economic feasibility.
- It would be the best approach to soften the ***significant and unavoidable*** impacts to air quality, greenhouse gas emissions, and traffic.
- It would address the top three priorities of the public who participated in the Outreach Program: traffic, wetland preservation, and views.

PUBLIC / SOCIAL / ENVIRONMENTAL BENEFITS

Clean air and the ability to easily get around town to take care of daily living needs are basic social and environmental benefits. These are more fundamental than all the other benefits offered in the Plan. Protecting the wetlands by surrounding it with less density is more important than allowing housing in numbers beyond the need of the community. The City projects a need for an increase of 11,700 households between 2008-2040 and their Market studies show a housing demand in SEASP between 1,600 – 2,900 dwellings. R71-8

Linda Pemberton
lindajpemberton@yahoo.com

ECONOMICAL FEASIBILITY, FIANCIAL ANALYSIS, PUBLIC BENEFITS

The financial analysis provided for the Plan, by necessity (as explained in conversations and emails by City and Consultant Staff), is hypothetical. It is based on land value estimates and boilerplate calculations for development costs. Then hypothetical public benefits are added in to the formula.

With so much speculation in play, the city provides an overriding conclusion and an appropriate one: the more profit for the developer the more benefits for the public.

The problem with this is that the ranked value of the conceptual "Benefits" offered in the plan are not widely agreed upon. While attractive, they are in conflict with the basic public priorities which are not addressed and are, in fact, exasperated by the Plan. R71-9

The City states that funding for public benefits is "unpredictable" and "not sufficient" in Chapter Nine, Conceptual Draft Plan Implementation. This leads one to believe the Plan could result in the negative impact of density and height at the cost of top public priorities and not still not provide the other benefits promised.

Also missing from the formula is the economic cost to the public and the surrounding communities. How much will increased traffic cost businesses on 2nd street? What is the cost of time lost in traffic for the residents? Traffic costs? The National Transportation Research Group reported in 2014, that Los Angeles drivers, lose over $2,000 a year due to traffic congestion. What is the medical cost for the impact of poorer air quality on residents? These costs should be considered in the equation.

MITIGATIONS

All the mitigations discussed in the Plan will have a much better chance of working with less density. R71-10

CONCLUSION

Please consider the Alternative Intensity Alternative and reduce the height to 4 stories.

Respectfully,
Linda Pemberton

Linda Pemberton
lindajpemberton@yahoo.com

DOCUMENTATION

3.2 STATEMENT OF OBJECTIVES (DEIR)

1. Implement projects within the Southeast Area Specific Plan that give equal consideration to planning, environmental and economic feasibility.

SIGNIFICANT AND UNAVOIDABLE IMPACTS (DEIR)

Air Quality

Impact 5.3-1: Buildout of the Project would generate slightly more growth than the existing general plan; therefore, the Project would be inconsistent with SCAQMD's air quality management plan.

Impact 5.3-3: Long-term operation of the Project would generate a substantial increase in criteria air pollutant emissions that exceed the threshold criteria and would cumulatively contribute to the nonattainment designations of the SoCAB.

Greenhouse Gas Emissions

Impact 5.3-5: Buildout of the Project could result in new source sources of criteria air pollutant emissions and/or toxic air contaminants near existing or planned sensitive receptors. R71-11

Impact 5.7-1: Buildout of the Southeast Area Specific Plan would generate a substantial increase in GHG emissions compared to existing conditions and would have a significant impact on the environment.

Traffic

Impact 5.16-1: Project-related trip generation would significantly impact levels of service for the existing area roadway system

Impact 5.16-2: Project-related trip generation would impact levels of service for the freeway system

Impact 5.16-3: Project-related trip generation in combination with existing and proposed cumulative development would result in designated road and/or highways exceeding county congestion management agency service standards.

PUBLIC PRIORITIES

3.2 PRIORITIES SOUTHEAST AREA SPECIFIC PLAN CONCEPTUAL DRAFT 03/24/2016 | Chapter Three

Through the extensive outreach program, a list of priorities were compiled that were used to develop the vision statement and guiding principles for the Specific Plan. The project priorities are listed below in order of importance to the community.

1. Traffic. Improve vehicular traffic flow and balance new development with roadway capacity.
2. Wetlands Enhancement. Improve accessibility and pursue opportunities to restore wetland viability.
3. View Preservation. Preserve views of the hills and mountains and maintain the scenic environment through control of building placement and height.

HOUSING DOCUMENTATON

Table 5.13-5 Households Forecast – City of Long Beach and Los Angeles County

	2012	2040	Change, 2008-2040	Percent Change, 2008-2040
City of Long Beach	163,800	175,500	11,700	7.1%
Los Angeles County	3,257,600	3,946,600	689,000	21.2%

Source: SCAG 2016.

R71-12

MARKET CONDITIONS AT A GLANCE

Housing

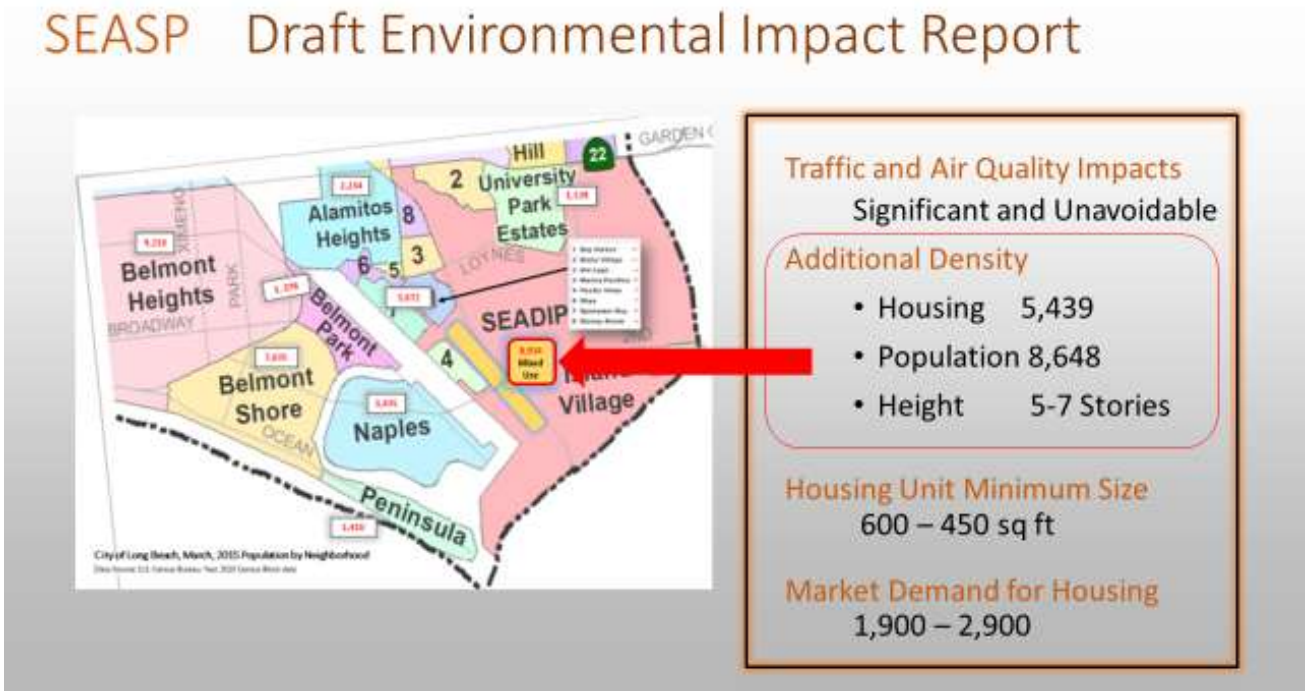
- The southeast area commands higher housing values than the City.
- Housing demand in the market area (which includes the cities of Long Beach, Signal Hill, Seal Beach, Los Alamitos, and unincorporated Rossmoor) is expected to grow by somewhere between 6,500 and 11,000 households by 2035. It is estimated that the SEASP area could capture between 1,600 and 2,900 of those units.

Linda Pemberton
lindajpemberton@yahoo.com

CHARTS BASED ON CITY INFORMATION

DENSITY

The Plan adds a significant increase in density, adding more than double the people in all of the surrounding SEASP neighborhoods in an area 20% the size. It adds another neighborhood larger in population than Belmont Shore with four times the density.



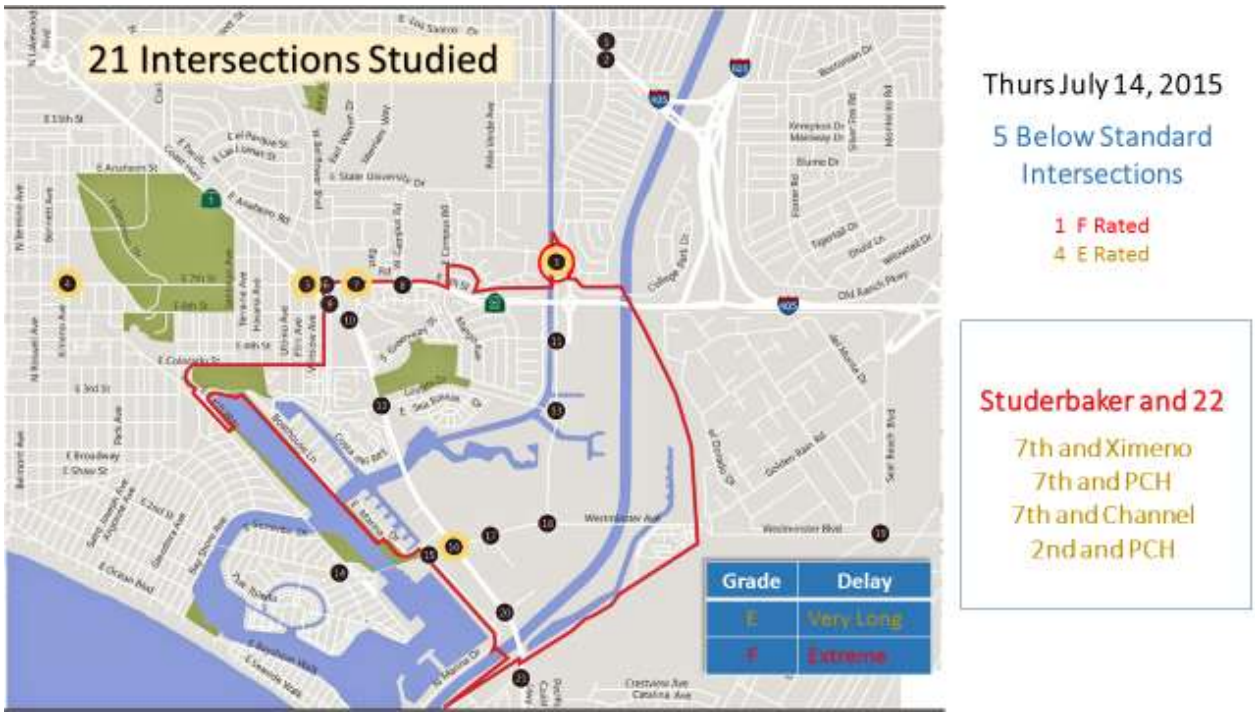
R71-13

Population	Area	Square Miles	Density per Sq Mile
3,435	Naples	.25	13,740
7,635	Belmont Shore	.42	18,179
8.934	**Mixed Use**	**.13**	**68,723**

Data Sources: citydata.com
LB City Data:
SEASP Draft Plan
City of Long Beach Population

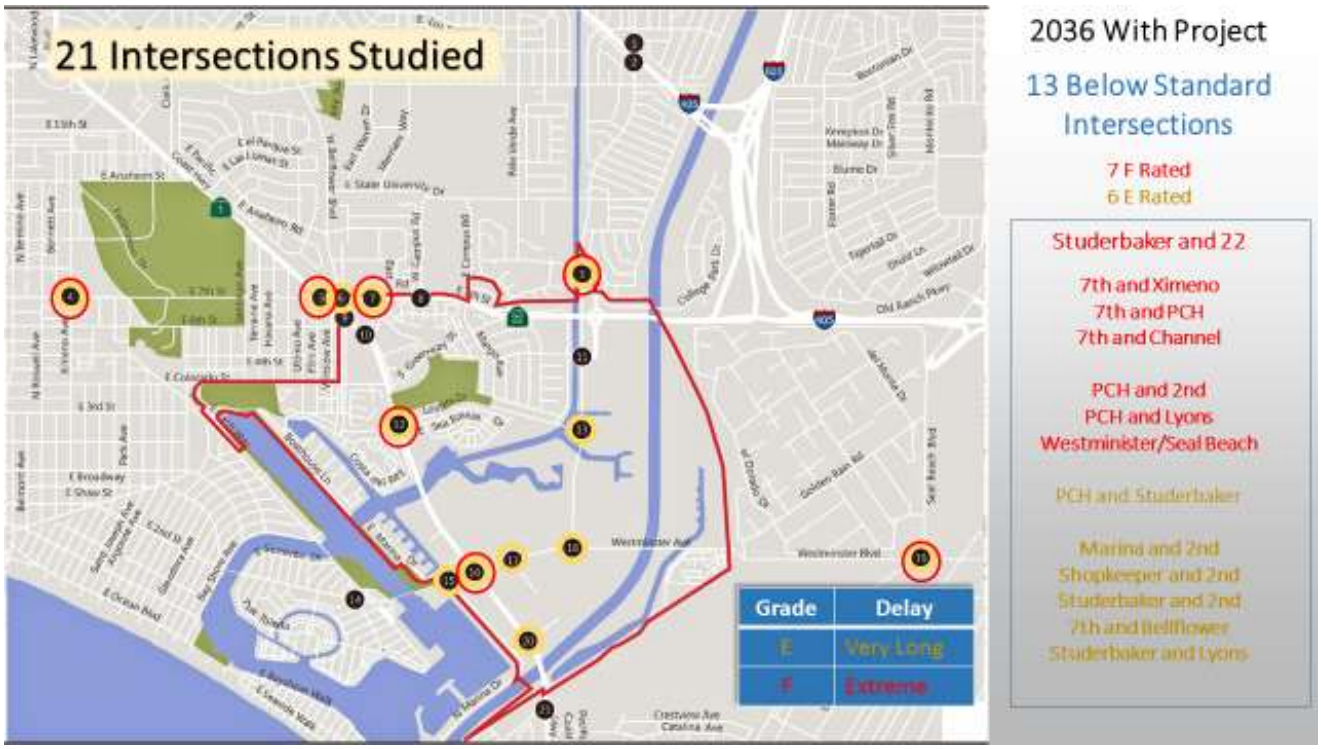
TRAFFIC

5 Below -standard Intersections, Currently



R71-14

13 Below-standard Intersections, with Plan by 2036



Arrived by regular mail today.

From: DoNotReplyDS05KMC754B@longbeach.gov [mailto:DoNotReplyDS05KMC754B@longbeach.gov]
Sent: Friday, September 09, 2016 11:04 AM
To: Craig Chalfant
Subject: Message from DS05KMC754B

Letter R72

6125 East Ocean Blvd. #202
Long Beach, CA 90803
September 1, 2016

The Honorable Suzie Price
Councilmember, Third District
City of Long Beach
333 West Ocean Blvd 14th Floor
Long Beach, CA 90802

Dear Councilmember Price:

Attached is a copy of my comment package on the Draft Environmental Impact Report for the Southeast Area Specific Plan, which was submitted to the Development Services Department. My principal concerns relate to the potential impacts on the environment and traffic, which are recognized as "significant and unavoidable" and without any tangible mitigation.

Long Beach has one Downtown, replete with multi-story buildings along the major streets, which create virtual walls and obscure our coastline. In my opinion, we do not need a second "Downtown" at the east gateway to our City. We need a Specific Plan, which encourages development, but not at the expense of my quality of life and that of many of your constituents.

Thank you for all you, and your staff, do for the Third District and the City of Long Beach.

Sincerely,

Susan G. Phillips

6125 East Ocean Boulevard #202
Long Beach, CA 90803
September 1, 2016

Mr. Craig Chalfant, Planner
City of Long Beach
Development Services Department, Planning Bureau
333 West Ocean Boulevard, 5th Floor
Long Beach, CA 90802

Dear Mr. Chalfant:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR), State Clearinghouse No. 2015101075, for the Southeast Area Specific Plan (Plan).

The Plan presents an ambitious framework for significant future private sector development, which will fundamentally change the character of the southeast gateway to the City of Long Beach. Regrettably, the proposed changes would dramatically add traffic to already overburdened streets and intersections with no tangible mitigation. Likewise, the massing of up to seven-story structures along the Mixed Use Commercial Core could result in a uniquely unpleasing walled corridor similar to what was created decades ago in the downtown area. Long Beach does not need a second Downtown. Belmont Shore/Naples are far more suburban than urban, which is what make those neighborhoods special. This proposed Specific Plan will impart an unnecessary and, to me, and undesirable urban Impact. R72-1

Section 5 of the Draft EIR identifies a number of environmental impacts for which possible mitigation has been deemed ineffective. These impacts have been identified as "...significant and unavoidable..." Many of these impacts will detract from the quality of life of our residents in many ways. Attached are several comments relating primarily to those unmitigated impacts, which I hope will be seriously considered before preparing a Statement of Overriding Consideration. R72-2

The financial benefits resulting from the development contemplated in this Plan should not outweigh the costs to the taxpayers in terms of the negative health effects of reduced air quality; the climatological effects of increased Greenhouse Gas emissions; and, the project area gridlock resulting from the increased traffic, as well as the neighborhood impacts of traffic avoiding the project area. R72-3

Sincerely,

Susan G. Phillips

Cc: Honorable Suzie Price, Councilmember Third District

I am a 20+ -year resident of the City of Long Beach and have resided on The Peninsula for most of that period. The development within the Project Area proposed in the Southeast Area Specific Plan (SEASP), will have a personal impact on our family and the families of thousands of other residents of southeast Long Beach. The following pages include comments on the Draft Environmental Impact Report for the SEASP, which attempt to clarify the personal adverse nature of those impacts; question the supporting rationale for such impactful development; and, underscore the notion that quality of life should not be sacrificed for economic reasons:

EIR Section	Comment	Requested Action	
3 - Project Description	The southeastern boundary of the Project Area bisects East Marina Drive, and the EIR does not address any impacts on the Marina Parking Lot on the west side of Marina Drive. On Sundays, this area is home to one of the largest and most popular Farmers Markets in Southern California, which is frequented by thousands of people. According to the Market managers, the California Coastal Commission has granted use of the area for a Farmers Market "...in perpetuity." I hope that's true.	The EIR should spell out any anticipated impacts on the parking lots on the west side of E. Marina Drive and identify proposed mitigation to facilitate the continuation of the Sunday Farmers Markets.	R72-4
3 – Project Description	In addition to the Farmers Market area, the parking lots along E. Marina Drive provide free parking for customers of businesses located in those parking lots, as well as for the boat owners, who lease slips in the Marina, and their visitors. The SEASP does not address any impact on those parking lots, but does refer to Traffic Management initiatives that could potentially assume oversight of those lots.	The EIR should specifically address any anticipated impacts on the E. Marina Drive parking lots adjacent to the Project Area, including adding paid parking; using the area for the laydown of construction materials; or, otherwise restricting the current use of the parking lots.	R72-5
6 – Significant and Unavoidable Impacts – Impact 5.3 Air Quality – Impacts 5.3-1 to 5.3-3	According to the Environmental Analysis of the Air Quality impacts of the development contemplated in this Plan, the increase in '...criteria air pollutant emissions..." would be **significant and unavoidable**, despite mitigation plans. Southern California has spent decades and countless dollars reducing pollution. The standards established by the South Coast Air Quality Management District for the South Coast Air Basin have been instrumental in the	If none of the proposed Mitigation Measures would sufficiently limit the increase in pollutants and avoid the adverse air quality impacts of the project, the EIR should more clearly articulate the potential impacts, based on health research relating the level of pollution to the increased levels of degraded	R72-6

EIR Section	Comment	Requested Action	
	successes achieved in reducing pollution. The health impacts of the degraded air quality likely to result from SEASP development are frightening and unacceptable.	health in the impacted population.	R72-6 (cont.)
6 – Significant and Unavoidable Impacts – Impact 5.3 Air Quality – Impacts 5.3-4 to 5.3-5	The specific emissions resulting from construction and potential industrial uses of sites in the Project Area were identified as likely beyond the ability of mitigation measures to satisfactorily control, which would result in **significant and unavoidable impacts.**	The EIR should more specifically associate the anticipated emissions with the construction or industrial source and clarify why the benefits of these emissions overrides the health impacts on area residents and workers	R72-7
6- Significant and Unavoidable Impacts – Impact 5.7 Greenhouse Gas Emissions - Impact 5.7-1	California has been among the leaders in the United States in putting in place targets to reduce the impact of Greenhouse Gas emissions on our environment. Even with Mitigation Measures that anticipate extensive uses of alternative fuel vehicles and non-motorized methods of transportation (which are far from certain outcomes) the project would result in over three times the level of Greenhouse gas emissions established as the efficiency target. While this has been identified as a **"significant and unavoidable"** impact, it is also unconscionable to propose a project with that level of non-compliance.	The EIR should detail the level of effort required to achieve the efficiency target of 2.2 MTCO2e/SP and identify the potential impact of the emission levels anticipated as a result of the project.	R72-8
6 – Significant and Unavoidable Impacts – Impact 5.16 Transportation/Traffic Impact 5.16-1	Fourteen intersections in the Project Area, despite Project Design Features and Mitigation Measures, would have **"significant and unavoidable"** impacts during traffic peak hours.	The EIR should estimate the additional delays at each intersection during the peak hours, which are attributable to Project traffic. These delays should be expressed in both percentage and minutes for clarity.	R72-9
6 – Significant and Unavoidable Impacts – Impact 5.16 Transportation/Traffic	The traffic-related impacts of the Project on freeway segments and Congestion Management Program intersections were deemed **Significant and Unavoidable** due	Traffic on the segments of the 405 Freeway, State Road 22 and Pacific Coast Highway during peak hours is currently	R72=10

EIR Section	Comment	Requested Action	
– Impacts 5.16-2 and 5.16-3	to cost factors, the lack of sufficient rights-of-way and the fact that the City did not control the areas.	very congested. The addition of Project-related traffic will only exacerbate that situation. The fact that those thoroughfares are not under the control of the lead agency (City of Long Beach) is immaterial. The EIR should identify the magnitude of the project-related impact in terms of additional project-related vehicles and anticipated delays in percentages and minutes.	R72-10 (cont.)
6 – Significant and Unavoidable Impacts – Impact 5.16 Transportation/Traffic – Project Design Features	The Project Design Features 1-7, with the possible exception of PDF-7 Traffic Light Synchronization (which is already in place) do not address the Southern Californians' love affair with their cars. The creation of a Transportation Management Association, a Transportation Demand Management Plan, Parking Management, Pedestrian Walkways and Bicycle Networks all rely on behavioral modifications. Such efforts have been successful in reducing the speed of traffic, but there is little evidence of similar success in improving the flow of traffic. 2nd and PCH, which is at the core of the Project Area, is already horribly congested. The impact of over 9000 additional vehicles due to residents and workers, in addition to the additional vehicles coming to the new retail businesses is mind-boggling. The alternate routing that would result from the Transportation Demand Management Plan will undoubtedly have a significant, but unquantified impact on the surrounding neighborhood streets. Traffic is the biggest detractor from the SEASP. Unless it can be better mitigated, this project should not move forward.	The Project Design Features in the EIR are largely administrative in nature. They will require additional bureaucracy to create and manage, which will come at a cost to the developers, the new businesses and, in all likelihood, us taxpayers. The cost of these Features should be clearly spelled out in the EIR. The likely impact of the features should also be articulated.	R72-11

EIR Section	Comment	Requested Action	
6 – Significant and Unavoidable Impacts – Impact 5.16 Transportation and Traffic – Project Design Feature - PDF-3 – Reduced Parking Requirements	One compelling component of City of Long Beach Development Projects over the years has been the lack of adequate parking. The fact that the SEASP would consider projects for parking reductions by simply incorporating a set of Transportation Demand Management strategies is mind-boggling. All of the sample list of strategies listed on page 5.16-51 have the same Achilles Heel: They are voluntary. In order for these strategies to contribute to a mitigation of the traffic issue, drivers have to be willing to implement one or more of the strategies. Past experience with other recent developments does not give cause for optimism.	The EIR should specifically identify reasonable and achievable traffic reduction targets for each strategy and describe the impact on project "under parking" if the strategy fails to achieve its goal. If this Plan is approved and developers are afforded the opportunity to get their projects approved with less parking that is currently required by code, the economics of the development will suffer, because customers won't accept a lack of parking.	R72-12
6 – Significant and Unavoidable Impacts – Impact 5.16 Transportation/Traffic – Project Design Feature – 3 (PDF-3) Reduced Parking Requirements	The EIR discusses possible parking structures, subterranean parking, leased or purchased parking stalls, etc. It is not, however, very clear about the impacts, if any, on the existing parking in the Project Area. Customers currently enjoy free parking in the existing shopping centers. Converting those parking lots into paid parking would be a significant impact on those, who frequent the existing businesses.	The EIR should specifically describe any potential impacts on the existing free parking lots in the Project Area. If the option of paid parking is available to future developers, the estimated cost of such parking should be confirmed. Adequate parking is a key to any future economic success of developments in this area.	R72-13
6 – Significant and Unavoidable Impacts – Impact 5.16 Transportation/Traffic – Project Design Feature 6 – Bicycle Network	Encouraging and facilitating the use of bicycles, as an alternative to vehicles, in the Project Area would normally be a good idea. Unfortunately, the only way to get to the Project Area on a bicycle is along the heavily impacted thoroughfares (PCH and 2nd Street) that are already scary. It is highly unlikely that there would be sufficient converts from vehicle to bicycle to have any mitigating impact on the project traffic challenges	The EIR should specifically estimate the potential benefits associated with the inclusion of the proposed bicycle friendly infrastructure, as well as the costs factors. Comparisons should be made to the construction of bicycle lanes in the downtown and the resultant impact on vehicular traffic.	R72-14
6 – Significant and Unavoidable Impacts – Impact 5.16 –	TRAF-1 calls for a traffic study to analyze the timing adjustments needed to improve traffic light synchronization on 2nd Street	The EIR should specifically describe the potential "best case" outcomes of improved	E72-15

EIR Section	Comment	Requested Action	
Mitigations Measures – Impact 5.16-1	through Naples. This study would be paid for by the initial developer under the SEASP. *The intersection of 2nd Street and* PCH is already one of the most highly impacted intersections in the area. If traffic light synchronization could help alleviate the traffic situation, why are we waiting for the study. The additional project-related traffic can only make a bad situation worse.	traffic light synchronization. The cost of the study may not *be worth the expenditure, if* the realistic benefit would be negligible. If that is true, it would be disingenuous to include the study as a mitigation measure.	E72-15 (cont.)
6 – Significant and *Unavoidable Impacts* – Impact 5.16 – Mitigation Measures – Impact 5.16-1	TRAF-2 and 3 call for the inclusion of fair-*share contributions by project developers* to pay for the construction of traffic improvements at several key locations. The EIR does not address the total cost of each improvement; the constructions time to complete the improvements; or, the impact of the construction on the transportation and traffic issues. While the improvements identified may be worthwhile and might potentially reduce the traffic impact, waiting for sufficient fees to be collected before starting the planning, permitting, and construction effort makes very little sense.	The EIR should identify the *cost factors associated with* each of the identified improvements and the approximate planning and construction period for each project, in addition to outlining the various environmental and development hurdles that must be cleared before the construction could commence. The EIR should also identify any additional traffic impacts anticipated during the construction of each improvement.	R72-16
Chapter Five – SEASP Draft 07/2016	Table 5-4 (Building Story Requirements (MU-CC) of the Hearing Draft EIR describes minimum and maximum building heights along the key thoroughfares in the Mixed Use Community Core components of the Project Area. I did not see a similar table in the Draft EIR issued for public comment. The proposed maximum height of 5 stories (with possible exceptions for hotels and residential projects, which would allow 7 stories. The massing of tall buildings along thoroughfares creates a wall-like effect, similar to what one experiences on a drive along Ocean Boulevard downtown. It is not appealing. While building heights improve the return on investment for the	The EIR should clearly state the building height standards proposed in the SEASP and identify the potential impacts associated with the heights. The proposed limits are significantly better than the 12 story limit requested in the development project that led to the crafting of the SEASP, but the impacts will still be significant, and should be more openly discussed.	R72-17

EIR Section	Comment	Requested Action
	developers, they do very little for the residents of Long Beach, who will be left with the outcomes.	

-----Original Message-----
From: Linda Piera-Avila
Sent: Monday, September 19, 2016 2:20 PM
To: Craig Chalfant
Subject: SEADP - reject the DEIR

TO: Craig Chalfant

"The DEIR for SEADP is inadequate and should be rejected due to lack of consultation with affected California Native American tribes, including tribal groups with cultural and spiritual connections to the area. Additionally the fact that a letter sent by Rebecca Robles, representing the United Coalition to Preserve Panhe, clearly requesting participation in the DEIR, was ignored. Both the Cultural Resources section of the DEIR and the archaeological report, contain summaries of Rebecca Robles' letter which are totally false and result in the denial of her right to consultation under CEQA and SB 18. Finally, the DEIR for SEADP should be rejected because it will result in the destruction of both cultural and biological resources of the area which includes the Los Cerritos Wetlands, eligible for Tribal Cultural Landscape status and for listing on the National Register of Historic Places as well." R73-1

Linda Piera-Avila
Santa Monica

Letter R74

September 16, 2016

Maureen Poe
144 Savona Walk
Long Beach, CA 90803

Mr. Craig Chalfant, Senior Planner
Long Beach Development Services
333 W. Ocean Blvd., 5th Floor
Long Beach, CA 90802

Dear Mr. Chalfant,

I have read the SEASP DEIR document and feel the plan is not appropriate for the environmentally sensitive area with the poor traffic flow that is now in existence in that area. The planned project does not meet air quality regulations and would increase traffic with light and sound which cannot be mitigated merely by putting Shopkeeper Rd. through the Wetlands, a treasure to Long Beach and California.

My husband and I are both handicapped and the alternate transportation suggestions to solve the traffic problem which are riding a bike or walking will not provide us with access to the area which is just over the bridge from us. We do try to stay active and do go shopping, but neither forms of transportation would help us or a lot of seniors and families with children. Those who might want to shop would have a hard time by bike or foot to bring their packages home. The congestion that would be caused by the plan would make an F rating at the present even worse. R74-1

The proposal of allowing a population increase of 8,648 with 5439 new residential units in such a small area of 86 acres drastically increases the areas water needs. Today on the NBC news they stated that the biggest reason for the drought in S. California is because there are just too many people living here for too small an area. The “reduced density” alternative does not reduce it enough. By lowering the height limit from the 7 stories proposed or eliminating the new residential, the plan might be a better fit for this area.

At this time I do not support any SEASP revision options as proposed.

Sincerely,

Maureen Poe

From: Hailey Rafter
Sent: Friday, September 16, 2016 3:02 PM
To: Craig Chalfant
Cc: afernandez
Subject: Support for SEADIP from a CSULB Student

Mr. Chalfant and the City of Long Beach Planning Commission:

As a current student at CSULB and resident, I would like to express my excitement and approval of the South East Area Specific Plan Update.

I am excited by the potential for more commercial and residential choices in the area and am looking forward to the new shopping and restaurant options that will accompany the approval of this plan. I am hopeful that SEADIP's encouragement of residential development will provide more housing options that are suitable for CSULB alumni who wish to stay and work in the area after graduation.

One of the deciding factors for me to attend Long Beach is CSULB's proximity to the ocean. I can get to the beach in less than 10 minutes and I love it! I would love to see Southeast Long Beach take advantage of the gorgeous waterfront and for the future residential and commercial developments to showcase it more. R75-1

Watching Southeast Long Beach develop and adapt to better fit the needs of the community is something I look forward to witnessing. I believe the benefits of this update supersede any potential environmental impacts. On that basis I urge city officials to approve this EIR and specific plan update.

Best,

Hailey Rafter
Current Freshmen at CSULB in the Engineering Department

-----Original Message-----
From: Cheryl Rodi
Sent: Monday, August 29, 2016 11:05 AM
To: Craig Chalfant
Subject: SEASP

Hi Craig,

As a resident of Belmont Park, the new SEASP is of interest to me. From perusing the 189 pages of the new plan it appears that the wetlands are going to be well preserved. R76-1

Although I am not in favor of the increased building, it will probably be inevitable no matter how many iterations of this we go through. Is there anyway of ensuring that these large buildings will actually be occupied? I suspect the rents will be high and that is not the preferred character of Belmont Shore/Park. R76-2

I think any plans to "manage" increased traffic in this area are just dreams. We experience traffic jams at rush hours and weekends that were not experienced in the recent past. How will "short cuts" through the neighborhoods be managed? I'm particularly interested in Appian and Bayshore, that in addition to now being bike share streets, are often used as speedway alternatives to the major streets. R76-3

The plan appears well thought out and that everyone's concerns have been discussed. Thanks for your time.

Cheryl Rodi
296 Santa Ana Ave.

-----Original Message-----
From: Ross, Kia
Sent: Monday, September 19, 2016 4:22 PM
To: Craig Chalfant
Cc: Barger, Kristina
Subject: Southeast Area Specific Plan
Importance: High

Hi Craig,

Please see attached my signed letter in support of the proposed Southeast Area Specific Plan.

Best regards,

Ms. Kia Ross, M.P.A.
Administrative Assistant, International Programs CSU Office of the Chancellor
401 Golden Shore, 6th Floor
Long Beach, CA 90802-4210
+1-562-951-4784
mross@calstate.edu
www.calstate.edu/ip

Mr. Chalfant,

My local Jaycee chapter recently presented our members with information on the Southeast Area Specific Plan update, and I was extremely happy to hear that the City of Long Beach is really taking strides to set a blueprint for our future.

I am writing in support of the proposed SEASP update as well as in favor of certifying the Draft Environmental Impact Report. The DEIR was sufficient in outlining any potential impacts related to approving this new and improved SEASP.

While I understand that there are some individuals that have traffic concerns and worries about increasing the density, our City is going to grow no matter what, so it is critical for our leaders to be proactive and propose thoughtful ways to plan for that growth. SEASP would also help to provide guidelines on how future developments have to propose solutions on mitigating traffic issues, which will in essence help to address the concerns before any development occurs. R77-1

This is really a great first step in terms of planning and making better use of the space and natural resources in this area. I cannot overstate how important it is for our City to be forward thinking and thoughtful in terms of development – it is critical to attracting young professionals like myself to our community.

I appreciate your time. Thank you for allowing me this opportunity to share my views.

With thanks,

Mikia Ross, M.P.A
Vice President of Administration
Long Beach Junior Chamber of Commerce

Original Message-----
From: jedd sewwry
Sent: Monday, September 05, 2016 8:46 AM
To: Craig Chalfant
Subject: No to SEASP!

Dear Mr. Chalfant,

To put aside current restriction and allow developers to go above and beyond (literally!) what is allowed smells of some underground dealings. No to this project. Protect the wildlife and the citizens. R78-1

Thank you,

Jeffrey Sanchez

From: Seiff, Kenneth
Sent: Thursday, August 11, 2016 5:43 PM
To: Craig Chalfant
Subject: SEASP DEIR: comments

Dear sirs--Having submitted comments previously to the SEASP Conceptual Hearing Draft some months ago, I note and appreciate these being included in the follow up document. Since there was no response to my comments that I could find in that document, I am now submitting (as attachment to this email) my same comments, with some updates and revisions, as public comment to the DEIR which has been requested. I look forward at some point I hope to be seeing my comments and concerns actually specifically addressed at some point in the process including with the possibility of a follow up response on my part.
Thank you once again for the opportunity to submit these comments. Please contact me for any questions or clarifications, etc. Best regards--Ken Seiff
Kenneth H. Seiff
121 Yale Lane
Seal Beach, CA 90740
cellular: 714-813-8267

4/28/16 (revised 8/11/16)

Kenneth H. Seiff

SEASP Comments: SR-22 Freeway/7th Street/Studebaker Road Interchange

Thank you for this opportunity to submit comments regarding the SEASP (Southeast Area Specific Plan for City of Long Beach. There are a great many important aspects of this plan that deserve very careful consideration especially traffic, environmental, and quality of life—many of these are closely related of course. However, for this submission I am going to limit my comments only to this topic: **The area and roadways at the greater SR-22 Freeway/7th Street/Studebaker Road Interchange.** (This area includes the east and west on- and off- ramp roadway areas and related property, both north and south, by the AES generating facility, of the Studebaker Road bridge over 7th Street/SR-22 Fwy).

There are a great many important issues regarding this area in relationship to the SEASP but in fact these issues have been present going back many years; I submitted multiple comments in these regards with respect to other plans impacting the area (such as SEADIP, previous WCC-West County Connectors Project, 405 Widening Project, etc.) as well as in general regarding the long term need for improvements to the area dating back years to City of Long Beach, City of Seal Beach, and CalTRANS. In the SEASP Conceptual Draft, it is indicated that this area is included and labeled as "ROW/CalTRANS Open Space" (Fig. 4-4). Also, it is noted that the Plan identifies this roadway area as a "Gateway" (pg. 39, Fig. 4-2), "Public View Shed" (pg. 43, Fig. 4-3), and a "Corridor View" (pg. 40, 43, Fig.4-2). A "Gateway" is an arrival point "defined as serving a visual clue that one has entered a special community." "Corridors" are defined R79-1

as serving purposes for mobility (traffic) and significant view opportunities for community enhancement. “Corridor Views” are defined as roadway areas providing special distinguishing features for the area. “Public View Sheds” are described as “a significant factor defining the community character of the area.” On pg. 55, 4.3.13, it is stated, “CalTRANS also oversees the functionality and improvements made to rights-of-way at the SR-22 interchange. As modifications are made to the interchange over time, specialized landscape treatments will be required to create an identifiable and attractive entry into the city.” R79-1 (cont.)

I am appreciative of and agree with the above and would emphasize that implementation of the SEASP planning MUST include efforts to improve this interchange area which has been basically ignored for many, many years. The area is degraded, with deteriorating infrastructure, unsightly, and the roadways are unsafe. We in that part of directly adjacent Seal Beach and the Long Beach communities and business and residential areas, although dependent upon the area and infrastructure for our daily travel and living needs as well as access to freeways and main streets, have been dealing with the hazardous and deteriorating conditions there for years. Although gateway, view, and landscaping improvements are very important, I wish to stress that this roadway and related infrastructure in this area are extremely degraded and impacted, add to traffic congestion (refer to CalTRANS own data) and mobility problems, and in fact is are unsafe in my estimation (inquiry to the AES plan administration could confirm this related to the accidents that occur around the generating plant on the freeway access on- and off-ramps and the poorly designed signals). The roadway pavement decks, the roadway shoulders (totally missing in many areas there), the lighting (essentially absent at the east bound on- and off-ramp area south of the bridge), the drainage, the pavement striping, the signals, and pedestrian features are poorly designed, extremely worn and/or even non-existent in some cases. The bridge is antiquated and completely lacking even basic safety railings and features compared to any other major freeway bridge I have seen on the 405 or 22 in Long Beach or Orange County. (I would be happy to offer to walk the area with anyone who is not familiar with what I am discussing here but just about anyone who drives through the area notices this.) The point I wish to stress here is that although focus on views and landscaping is very important, the actual state of the infrastructure and unsafe traffic situation there seem to make it imperative that the improvements should begin in that direction and should start ASAP. (Even incremental improvements can make a big difference; I would cite the cooperation between Cities of Long Beach and Seal Beach, CalTRANS, and OCTA regarding the project, related to the West County Connectors larger project back some years ago, that did make some much needed improvements in this area north of the bridge at the west bound on- and off-ramps at College Park Drive). Although much could still be done, much was in fact accomplished with that incremental, fairly uncomplicated, and fairly inexpensive by comparison cooperative R79-2

project—I would be happy to offer further information/discussion on that for anyone interested. This perhaps could serve as a model for cooperation among multiple civic and public entities for possible future improvements, perhaps related to the now planned 405 Widening Project, perhaps serving even as "bridge" to a more expansive rehab approach to the area at yet some future date. For that upcoming project (405 Widening) City of Long Beach has already made known (including via a lawsuit to my understanding) that CalTRANS and OCTA should offer much more support to enhance and improve freeway interchanges that will be impacted by the project; the SR-22 Fwy/7th Street/Studebaker Road interchange should not be forgotten in this regard! R79-2 (cont.)

I am not certain as to just why this area has been basically neglected by for so long as far as any even minimal substantive improvements, despite attempts especially from Long Beach city residents over many years in the more distant past. From what I can gather, it seems the civic and governmental entities and agencies have been waiting to see what the City of Long Beach ultimately plans regarding a longer term approach to "the Studebaker Corridor" and of course this has been a lengthy and controversial process. <u>However, the planning has been proceeding again now with SEASP and I note that a CalTRANS representative is a member of the SEASP Community Advisory Committee; I would request that this agency representative be made aware in particular of the concerns and hoped for improvements regarding this specific area in general and in the context specifically of the SEASP process. It is clear that other CalTRANS right of way and responsibility aspects (for example, Pacific Coast Highway through the project area) will likely take center stage and perhaps rightly so, but I believe we locally must not allow this opportunity to once again slip by to finally address the crumbling and deteriorating infrastructure, traffic problems, unsightly appearance, poor design, and safety issues of this intersection and surrounding area.</u> I would welcome the opportunity to offer what I could to assist with anything that might help in that regard from a local resident (for many years) point of view. R79-3

I will end these remarks by noting that I am a resident of the College Park West neighborhood of Seal Beach, literally just over the line from Long Beach in Orange County. However, many know that our ONLY access, in and out, for our neighborhood is on College Park Drive through that part of City of Long Beach and directly connecting to that part of the greater intersection. Further, our sphere of influence and our greater accessibility are dependent upon that intersection and this is exactly similar for the other business and residential areas actually in Long Beach around that area. This IS "the gateway" to our area and that part of Long Beach and is a very important feature of the traffic accessibility from the freeways to the Long Beach VA Hospital, Cal State Long Beach, Belmont Shore areas including the boat launch facilities, 7th Street shopping areas and the other neighborhood and commercial areas close by; hundreds if not thousands of commuters and students pass through the area every day. We (my family) R79-4

own property in Long Beach and as well I have many neighbors at the AES facility and in the local Long Beach neighborhoods (University Park Estates, College Estates, Bixby Hill, Los Altos, Island Village, and etc.) that feel similar and would support these comments. We don't just "pass through"; our families are dependent upon those roads and adjacent areas multiple times per day and it is our "lifeline", literally and especially for those of us who can only get in and out directly through it as I mentioned. It truly would be a shame if the opportunity is missed to finally make some decent and meaningful improvement to this greater intersection and its infrastructure as part of the larger SEASP. I write this to bring this to your attention and plead that, even in the larger and very complex planning with multiple very serious issues related to the SEASP, this area will not even once again be forgotten and/or ignored. R79-4 (cont.)

Thank you again for the opportunity to offer these comments. I am available for further discussions on any of this for anyone who might wish to contact me. I would appreciate hearing anyone else's thoughts on all this and would offer to try to offer whatever I can to assist with any efforts for attention to this issue.

Sincerely—Ken Seiff

Kenneth H.Seiff
121 Yale Lane
Seal Beach, CA 90740
Cellular: 714-813-8267

-----Original Message-----
From: Dave Shukla
Sent: Monday, September 19, 2016 3:23 PM
To: Craig Chalfant
Subject: Comments on SEASP DEIR

Craig Chaffant,

Hello, I'm a resident of the Southeast who will be emailing you later today comments on the DEIR of SEASP. I'm aiming for close of business/early evening. Fair warning and all that.

I would've done so already, but I've just started graduate school at UCLA, and we had placement exams in Maths and Econ earlier this afternoon, so I had to first study for that. R80-1

Most of my concerns are with the AEC proposal, so I promise I will not duplicate the many many written comments and emails you may have received on congestion and other traffic-related impacts re:PCH and 2nd St.

Best,

--

Dave Shukla

-----Original Message-----
From: Dave Shukla
Sent: Monday, September 19, 2016 11:59 PM
To: Craig Chalfant
Subject: Questions re: DEIR of SEASP

Dear Craig Chalfant,

Hello, in the interests of time, this will be brief:

When will there be a public process where the LORS for the industrial sector in SEASP can be discussed? R80-2

If an appropriate such meeting cannot be scheduled prior to the public review of the EIR for the specific plan, are City Staff prepared to discuss docketed comments by the CEC Committee questions on land use in the AEC proposal? R80-3

Why is there such little focus on alternative uses of the industrial acreage, by assessor parcels, and the potential impacts of existing proposals for varied industrial land uses, in the DEIR? R80-4

It would be great to have an appropriate setting to discuss these and related questions when timely and convenient. R80-5

Thank you for the time and effort necessary to have such conversations.

Best,
Dave Shukla

From: Todd R Smith
Sent: Tuesday, September 13, 2016 4:58 PM
To: Craig Chalfant
Subject: Feedback on SEASP Plans

I am concerned regarding the density proposed by the SEASP draft plan. The traffic at 2nd and PCH is already terrible and the proposed traffic mitigation plans are not adequate. R81-1

Additionally, the proposed 5 and 7 story buildings are significantly out of line for this area.

Thank you for accepting my input,

Todd Smith

Letter R82

September 13, 2016

Planning Commissioners
c/o
Craig Chalfant
Senior Planner, Long Beach Development Services
333 W. Ocean Blvd., 5th Floor
Long Beach, CA 90802

Re: Support for South East Area Specific Plan

Dear Planning Commissioners,

As a resident in the South East Area Specific Plan and as Dean of the College of Business Adminsitration at CSULB, I would like to lend my support to the SEASP update and urge the adoption of the Environmental Impact Report.

The SEASP update will be instrumental in ensuring that Long Beach grows along with its residents. From creating Paseos and Plazas to preserving wetlands this EIR will transform the community for the better.

The mixed-use zoning in the EIR will help develop more commercial areas to transform Southeast Long Beach into a retail destination for residents in our neighborhood and beyond. These new developments will encourage tourism to our area and will undoubtedly increase sales tax revenue for the city.

The addition of mixed-use properties will also allow for the creation of a more diverse housing stock. This will equate into more residential options that are conveniently located near commercial businesses and jobs for our growing population to enjoy, including CSULB students and young professionals. R82-1

The SEASP EIR also expresses intent to make Southeast Long Beach more bike and pedestrian friendly. Implementing more bike paths increases mobility by means of transportation other than cars. Doing so not only encourages greener transportation methods but also provides for better safety, livability, and accessibility for residents of all ages. These vehicle alternatives paired with enhanced public transportation would be extremely beneficial for our campus and student body.

The EIR before you introduces several different methods to direct Southeast Long Beach towards a better, more prosperous and greener future. For this reason, I urge our city's leadership to approve this plan.

Sincerely,

Michael E. Solt

Michael E. Solt

From: Michael Solt
Sent: Tuesday, September 13, 2016 3:11 PM
To: Craig Chalfant
Subject: support for SEASP

Hi Craig,

Please find attached my letter of support for the South East Area Specific Plan.

I live at 301 Flint Avenue, so I am a resident with the area the SEASP affects. If you have any questions, please do not hesitate to contact me.

Sincerely,

Michael Solt

Michael E. Solt, D.B.A.
Dean, College of Business Administration
Professor, Department of Finance
California State University, Long Beach
562-985-5307

Letter R83

August 9, 2016

City of Long Beach Development Services
333 West Ocean Boulevard, 5th floor
Long Beach, California 90802
Attn: Mr. Craig Chalfant

SUBJECT: SEASP Draft EIR – Comments

Dear Mr. Chalfant:

I have the following comments on the Draft EIR for the Southeast Area Specific Plan:

The EIR's Transportation Impact Analysis (Appendix J) does not quantify the difference in the order of magnitude of traffic impacts at the Pacific Coast Highway and 2nd Street Intersection, between the Cumulative No Project Alternative and the Cumulative Project Alternative. Table 6-2 page 51 of the Draft EIR shows both at LOS F. Clearly the Project Alternative will have a greater impact than the No Project Alternative. This faulty comparison could lead to the idea that the Project Alternative will have the same impacts at this Intersection as the No Project Alternative, which it doesn't. R83-1

The Specific Plan recognizes that the Pacific Coast Highway and 2nd Street Intersection will continue to be congested, even with proposed improvements. See page 99 of the Specific Plan. The Plan lists three mitigation options:

1. Synchronizing signals;
2. Connecting Storekeeper Road with Studebaker Road and Pacific Coast Highway;
3. Widening Studebaker Road.

R83-2

The potential for grid lock at this Intersection under the Project Alternative is very real. As it now occurs occasionally during rush hour, under its current LOS E status. See Table 3-2, page 24 of the Draft EIR.

Therefor it is strongly recommended that these three conditions be implemented before Specific Plan approved construction begins, along the Pacific Coast Highway Corridor.

Thank you for considering my comments.

Sincerely,

Douglas W. Sprague

Douglas W. Sprague
58 Savona Walk
Long Beach, California 90803
douglas.sprague@aol.com

Copy:

Councilwoman Suzy Price
Third District Council Office
333 W. Ocean Blvd. 14th Floor
Long Beach, California 90802

From: Catherine Steisel
Date: September 7, 2016 at 3:55:00 PM PDT
To: <suzie@suzieaprice.com>
Cc: Loren Miller
Subject: SEASP South East Area Specific Plan

Hello Ms. Price,

I had the opportunity this weekend to review the SEASP, South East Area Specific Plan. While I agree with many items proposed such as the design standards, the wetland buffers etc. I found several areas of great concern. I live in Naples and face the proposed new development. My concerns are listed below. I also have attended numerous meetings where the issues I address were brought up on numerous occasions. It seems that no one listened or cared about these concerns. I am assuming that the developers needs were address over the concerns of the neighbors.

1) **Density** I cannot believe that anyone would recommend adding an additional 5439 homes. Is this correct? Traffic would be a nightmare. This is totally irresponsible. The only reason to recommend high density residential would be for financial reasons benefiting the developer and ignoring the traffic nightmare it would cause. R84-1
2) **Size of the homes.** 600 square feet with certain percentage being 450 square feet. Why? The minimum size of any resident should be 1200 sq. ft. We do not live in Manhattan. Again, this proposal is totally irresponsible and doesn't enhance the neighborhood.
3) **Height of the project**. The maximum number of floors should be four.
4) **Type of Hotel**. If this is truly going to be the gateway to Long Beach, the type of hotel should be high end boutique. I saw where the plan stipulated no motel but did not stipulate the type of hotel. I am concerned that a low end hotel would not benefit the area
5) **Late night music/noise.** As I had mentioned before, I live across from the proposed development on Appian Way. At times, the current hotel has leased out parts of their business to night clubs with music going until 2 AM. Noise and music travel and we can hear the music on Appian Way. Please make sure that no business has late night music or noise.

Thank you for listening to my concerns.

Catherine Steisel
6010 Appian Way
Long Beach, CA 90803
562 243-6263

From: Catherine Steisel
Sent: Wednesday, September 14, 2016 3:39 PM
To: Craig Chalfant
Cc: Mayor; Council District 1; Council District 2; Council District 3; Council District 4; Council District 5; Council District 6; Council District 7; Council District 8; Council District 9
Subject: FW: SEASP South East Area Specific Plan

Hello Mr. Chalfant,

I had the opportunity to review the SEASP, South East Area Specific Plan. While I agree with many items proposed such as the design standards, the wetland buffers etc. I found several areas of great concern. I live in Naples and face the proposed new development. My concerns are listed below. I also have attended numerous meetings where some of the issues I address were brought up on numerous occasions by many people. It seems that no one listened or cared about these concerns when drafting this proposal. I am assuming that the developers needs were address over the concerns of the neighbors.

1) **Density** I cannot believe that anyone would recommend adding an additional 5439 homes. Is this correct? Traffic would be a nightmare. This is totally irresponsible. The only reason to recommend high density residential would be for financial reasons benefiting the developer and ignoring the traffic nightmare. We already have traffic problems and adding this many homes would only add to the congestion and make traveling in that area almost impossible.
2) **Size of the homes.** 600 square feet with certain percentage being 450 square feet. Why? The minimum size of any resident should be 1200 sq. ft. We do not live in Manhattan. Again, this proposal is totally irresponsible and doesn't enhance the neighborhood.
3) **Height of the project**. The maximum number of floors should be four.
4) **Type of Hotel**. If this is truly going to be the gateway to Long Beach, the type of hotel should be high end boutique. I saw where the plan stipulated no motel but did not stipulate the type of hotel. I am concerned that a low end/budget hotel would not benefit the area.
5) **Late night music/noise.** As I had mentioned before, I live across from the proposed development on Appian Way. At times, the current hotel has leased out parts of their business to night clubs with music going until 2 AM. Noise and music travel and we can hear the music on Appian Way. Please make sure that no business has late night music or noise.

Thank you for listening to my concerns.

Catherine Steisel
6010 Appian Way
Long Beach, CA 90803
562 243-6263

Letter R85

From: Dianne Sundstrom
Sent: Monday, September 19, 2016 7:01 PM
To: Craig Chalfant
Cc: 'Suzie Price'; Suzie Price
Subject: DEIR comments for SEASP

To: Craig Chalfant, Development Services

Hello Craig,

Attached are my comments on the DEIR for the SEASP.

Thanks for your consideration,

Regards,
Dianne Sundstrom
4507 E Barker Way
Long Beach, CA 90814
562-221-5518

COMMENTS ON THE DEIR FOR SEASP

September 19, 2016

Submitted by:
Dianne Sundstrom
4507 E Barker Way, Long Beach, CA 90814
562-221-5518
Dianne.sundstrom@verizon.net

To: Craig Chalfant, Development Services, City of Long Beach - Craig.Chalfant@longbeach.gov

cc: Suzie Price, Councilwoman, 3rd District, City of Long Beach

Introduction
I have lived in the Belmont Heights area of Long Beach since 2001. I frequent the area identified in SEASP as a transit corridor and as a shopping destination. In general, I believe the SEASP (the Project) identifies a number of improvements that I support. Foremost is the expansion of, and protecting incursion upon, the Los Cerritos Wetlands. However, the proposed plan increases housing and population density to a degree that greenhouse gas (GHG) emissions are significantly increased and air quality significantly reduced. Even with mitigation measures, these impacts would remain significant and unavoidable. R85-1

I have read the DEIR for SEASP and have a number of comments and concerns, as outlined below:

Housing and Population Density

The proposed Project calls for an increase of 5,439 residential units and 8,648 residents. On pages 5.13-4 and 5.13-5, the study states that the expected population growth in Long Beach between 2015 and 2040 is projected to be 11,721. In the same time period, the projected growth in households is 11,700. As calculated, the Project is slated to accommodate 73.8% of the population growth and 43.2% of household growth. R85-1 (cont.)

Comments and Questions:

Why is such a high percent of overall growth being planned for a very small geographic area? Further, the Project does not include low, or even moderate, income housing. Since a fairly high percent of the projected housing requirement will be for low and moderate income residents, how does the Project help the City of Long Beach in reaching its goal of providing affordable housing? R85-2

The DEIR states that increasing residents by 8,648 creates less than significant impacts. How is this possible when such an increase in population creates increased vehicle traffic with resultant increases in GHG emissions and reduced air quality? Please explain. R85-3

Finally, why would the City plan for such density bordering a rich environmental area, the Los Cerritos Wetlands, one of the last remaining coastal wetlands in the state? Please comment. R85-4

Traffic

The DEIR identifies that the Project would increase daily trips by 35,439. These trips will result in a significant impact at 15 identified intersections with the majority at grades E and F. Item 5.16.1.3 states that the traffic study for this DEIR was conducted on one day, July 14, 2015 between 7 am and 9 am and 4 pm to 6 pm. The study states that "July was chosen based on comments received that summer travel patterns in this area are higher than non-summer travel patterns. This was confirmed in coordination with City staff." R85-5

Comments and Questions:

Previous traffic studies for SEADIP (now SEASP), conducted weekday traffic counts during non-summer months and weekend counts during summer months. The study by Meyer, Mohaddes Associates for the City of Long Beach states "in fact, weekday traffic counts are typically collected during the non-summer periods since the volumes tend to be larger……" This statement conflicts with the statement in the current DEIR. Which statement is correct? Why did the City not use previous methodologies in conducting this traffic study? And why was a weekend study not performed?

Is it possible that a more comprehensive traffic study would reveal even more traffic problems than the current study? Please explain. R85-6

Did the DEIR take into consideration the planned widening of the 405? That project will end at the Orange/Los Angeles county lines and will have significant negative impacts on the southeast area of Long Beach from both a traffic and air quality perspective. If this was analyzed, please indicate where those data can be found. If not, this very significant change should be considered. R85-7

Environmental Analysis: Air Quality

Impact 5.5-3: Long-term operation of the Project would generate a substantial increase in criteria air pollutant emissions that exceed the threshold criteria and would cumulatively contribute to the nonattainment designations of the SoCAB. Impact 5.7-1 states that build-out of the project would significantly increase GHG emissions compared to current conditions and have a significant impact on the environment. R85-8

Comments and Questions:

Identified mitigation techniques are highly dependent on changing individual behavior from driving to walking and biking. Table 5.7-8 identifies a number of goals related to the City's Sustainable Action Plan. I would like to know what progress the City has made in meeting these goals. Positive data would

support the feasibility of these mitigation techniques. Specifically what progress has been made in the 12 goals outlined in the Sustainable Action Plan of 2010? Please provide data. R85-8 (cont.)

What impact will an increase in GHG emissions and a reduction in air quality have on living organisms in the Los Cerritos Wetlands, whether they are plants, trees, or animals? Please indicate where the data can be found in the DEIR. If not included, these impacts should be studied. R85-9

I understand the City can issue a "Statement of Overriding Considerations". If this is under consideration, I would ask what benefits have been identified and are they more important than acceptable air quality? R85-10

Environmental Analysis: Biological Resources

Section 5.4.3 identifies that the Project could have impacts on thresholds B1 through B4. Section 5.4.8 states that after mitigation there would be no significant unavoidable impacts to biological resources.

Comments and Questions:

Mitigation measures identified in 5.4.7.2 states projects shall be designed to avoid impacts to jurisdictional wetlands. However, it goes on to say that if wetlands avoidance is not possible, the applicant may create a mitigation bank in the LCWC or elsewhere, if approved. I believe the City should not approve projects that create impacts to the wetlands; at the very least, mitigation should not be allowed outside of the LCWC. Why would we allow the wetlands to be impacted with mitigation occurring outside of our community? R85-11

Summary

Because I place high value on clean air, which is at a premium in Southern California, and the Los Cerritos Wetlands, it is difficult for me to support the Project as outlined in the SEASP Plan and referred to as the Project. However, recognizing that some form of development will occur, I urge the City to adopt the "Reduced Intensity Alternative", for the reasons stated in the DEIR, and limit height to 5 stories. At least one landowner is developing unique and interesting architectural models for development that demonstrates sensitivity to the area. I encourage the City to seek out these models and integrate strict building codes into the final SEASP Plan. Adding a review by an independent third party to all proposed projects would provide another layer of protection in assuring appropriate and eco-sensitive development. R85-12

Respectfully submitted,
Dianne Sundstrom

-----Original Message-----
From: Kristin
Sent: Monday, September 19, 2016 3:32 PM
To: Craig Chalfant; Council District 3; Suzie Price
Subject: Long Beach SEASP

The suggested density and height allowances in the Draft EIR are entirely inconsistent with the existing suburban region. The area is already highly impacted by unmitigated traffic and gridlocked much of the day and night. The Plan includes the two most highly impacted intersections along the Pacific Coast corridor at 2nd St./ PCH and 7th St/ Bellflower/ PCH. R86-1

Increasing the density will destroy fragile wetlands protected in the Los Cerritos Wetlands transfer (2015-16) and the Port of Long Beach Expansion "swap" (1988) and be disastrous for migrating and native species. R86-2

A significant portion of the SEASP plan is subject to isolation with no means of land evacuation should a major disaster occur affecting the 5 bridges that surround a major portion of the area- essentially trapping the citizens within that boundary. R86-3

The SEASPlan height and density is not what Long Beach needs or wants.
I have lived within the boundaries of the proposal for 33 years and stand opposed to acceptance of the plan. R86-4

Sincerely,

Kristin Tarnofsky

From: Regina Taylor
Sent: Monday, September 19, 2016 12:37 PM
To: Craig Chalfant
Cc: Mayor
Subject: SEASP comments

I believe the health of the Los Cerritos Wetlands should be paramount in any SEASP planning as it is among the last of natural wetlands we have along the coast. The present plan fails this criteria in several ways and I request the following suggestions be considered one of which is a requierment of the Coastal Commission.

1) building heights lowered or several buildings eliminated (none should be over 2 stories) as the increase in population results in more congestion on already overloaded roads and major intersections.
2) bird-safe glass should be used thruout construction. R87-1
3) increase spacing between bldgs to allow birds to navigate between them
4) reduce lighting impacts at night to maximum degree possible (down lights only)
5) Maintain at least a 100 foot buffer around the wetlands
6) trails should be kept to the perimeter of the wetlands

Better alternative to all these "mitigating" suggestions would be No Project/No Development Alternative!!!

Regina Taylor
3206 Oregon Ave
Long Beach, CA 90806

From: Christopher Koontz
Sent: Wednesday, August 10, 2016 1:19 PM
To: Craig Chalfant; Nicole Morse
Subject: FW: SEADIP

From: Ray Thorn
Sent: Wednesday, August 10, 2016 1:18 PM
To: Christopher Koontz
Subject: SEADIP

I know there would be benefits to many with the revised SEASP, however there is a real lack of mitigation efforts. Traffic and concentrations are our main concern. Unless you can find a environmentally friendly way to mitigate, **we strongly oppose proceeding with this plan.** R88-1

Thank you,
Ray and Becky Thorn
395 Orlena Ave.
Long Beach, CA 90814

Letter R89

September 18, 2016

3925 Linden Avenue
Long Beach, CA 90807

Christopher Koontz
Advance Planning Officer
City of Long Beach

Dear Mr. Koontz,

I would like to voice my opinion with regard to the proposed revision to the SEADIP area of Long Beach. I'm a long-time Long Beach resident (since 1953) so I know the city well. I currently live in Bixby Knolls but I grew up near the area under discussion. I'm also an Audubon member and a person who is concerned about our environment in general. I would think anyone with kids or grandkids would have the same concern for the world we live in, but I know that's not the case. There are many people who live for the short-term dollar, and it's my impression that it's those who are driving this new plan. R89-1

I just can't understand how we can propose five and seven story buildings along Pacific Coast Highway, especially at the Market Place that abuts the wetlands. If I understand the plan correctly, the taller buildings would require more parking and therefore the widening and extension of the Shoppers Lane. This would in turn require taking up some of the wetlands adjacent to Shoppers Lane, this an area when migratory water fowl are seen in the ponds that form in the winter. If anything, you should be creating a buffer of some kind between the Market Place and the wetlands, not just moving the Market Place into the wetlands. One would also be concerned about run-off from the road and the parking lot. R89-2

Also as I understand it, no real provision is being made for wildlife access between the various natural areas remaining in the area. The ocean, Alamitos Bay, Colorado Lagoon, etc. are all part of an organic whole and should be treated that way. R89-3

This proposed plan will severely impact the adjacent wetlands and completely change the character of that part of town. And of course you are going to severely impact what is already very bad traffic. Why is this being done? Only to serve the interest of a few property owners along that stretch who would profit immensely by the development. I can only hope that you look beyond their immediate economic gain so that we might maintain and augment the quality of life that we have. R89-4

Sincerely,

Lawrence Triesch

Lawrence Triesch

From: Lona Tucker
Sent: Monday, August 22, 2016 2:30 PM
To: Craig Chalfant
Subject: SEASP EIR

Dear Mr Chalfant:

As suspected the EIR came back with major bad news for the proposed SEASP project and more importantly the residents that live here. The scope of this project is vastly beyond housing demand for a small area; it is pure madness with its outlandish increased density, mixed usage, and will result in gridlock adjacent to sensitive wetlands. I am sure you are well aware the intersection at PCH and 2nd is already rated the worst in our city. I use this intersection daily, grocery shopping, restaurants, and highway access. This is not a pedestrian bike friendly area and never will be. R90-1

· **Unmitigated traffic**: Traffic at peak times, weekends (especially summertime) and during special events (Grand Prix, 3rd of July Fireworks, 4th of July, Dragon Boat competitions, speed boat races, Sea Festivals, Long Beach Marathon, Halloween, Naples Boat Parade and other events) makes ingress and egress difficult for residents, visitors, and most important emergency vehicles. Any new development will greatly exacerbate the existing unmitigated traffic, air and noise pollution.

· **Negative impact on property values**: SEASP will negatively impact our home values and hasten to make this area less attractive and less accessible for residents and consumers, including businesses in Naples and Belmont Shore. R90-2

· **Dangerous:** It will create a dangerous situation for Naples Island which is connected to the mainland by only three bridges. The "Gateway to Long Beach" will funnel thousands of more cars a day through the middle of our neighborhood and will create a dangerous situation in terms of safety in emergency situations such as earthquakes, fires, and the paramedic's swift response. Slowing down traffic, adding more lights in an area that is already traffic impacted will mean those that live here are relegated to sit daily in bumper to bumper traffic and rising gas emissions. R90-3

Before it is too late it would be prudent to *first* improve timing of lights, public transportation, and public parking to its utmost before moving forward in any way. Also, we need a current and serious traffic study taking into account the above peak times and special event times.

Cordially, Lona Tucker

Lona Tucker
197 Rivo Alto Canal
Long Beach, CA 90803

City Hall
333 West Ocean Blvd 14th Floor
LB, CA 90802

Dear Councilwoman Suzy Price:

I recently attend the Planning Commission meeting regarding the SEASP EIR. As suspected it came back with major bad news for the proposed SEASP project and more importantly the residents that live here. The scope of this project is vastly beyond housing demand for a small area; it is pure madness with its outlandish increased density, mixed usage, and will result in gridlock adjacent to sensitive wetlands. I am sure you are well aware the intersection at PCH and 2nd is already rated the worst in our city. I use this intersection daily, grocery shopping, restaurants, and highway access. This is not a pedestrian bike friendly area and never will be. R90-4

· **Unmitigated traffic**: Traffic at peak times, weekends (especially summertime) and during *special events* (Grand Prix, 3rd of July Fireworks, 4th of July, Dragon Boat competitions, speed boat races, Sea Festivals, Long Beach Marathon, Halloween, Naples Boat Parade and other events) makes ingress and egress difficult for residents, visitors, and most important emergency vehicles. Any new development will greatly exacerbate the existing unmitigated traffic, air and noise pollution.

· **Negative impact on property values**: SEASP will negatively impact our home values and hasten to make this area less attractive and less accessible for residents and consumers, including businesses in Naples and Belmont Shore. R90-5

· **Dangerous:** Naples Island, which is connected to the mainland by only three bridges. Davies Bridge, PCH and 2nd Street are often gridlocked.
This "Gateway to Long Beach" will funnel thousands of more cars a day through the middle of our neighborhood and create a dangerous situation in terms of safety in emergency situations such as earthquakes, fires, and the paramedic's swift response. Slowing down traffic, adding more lights in an area that is already traffic impacted will mean those that live here are relegated to sit daily in bumper to bumper traffic and rising gas emissions.

R90-6

It would be prudent to ***first*** improve timing of lights, public transportation, and public parking to its utmost before moving forward in any way. Also, we need a current and serious traffic study taking into account the above peak times and special event times.

Along with my neighbors I have opposed two misguided attempts to over-build on the Seaport Marina Property. I sincerely hope you will support your constituents, who live on Naples Island and in Belmont Shore, Belmont Heights and firmly oppose this "profits over people" project.

Cordially, Lona Tucker

Letter R91

(#1)

From: charles f ward
Sent: Monday, August 08, 2016 3:29 PM
To: Craig Chalfant;
Subject: 9500 ADDITIONAL DWELLING UNITS, 14-15 m Added RESIDENTS AND COMMERCIAL IN THE SDP

IS NOT IN KEEPING WITH OUR Naples Is. LIVES. TURN SDP INTO MORE OF A SEA LIFE REFUGE-like the Bolsa Chicca Wetlands. These new wetlands are from: Studebaker Road>2nd & PCH (East and West approx.. 1400 acres. Give special incentives to current land owners for Landscaping as the THUMS oil Islands. A reply is requested C. WARD

R91-1

(#2)

From: charles f Ward
Sent: Tuesday, August 02, 2016 2:44 PM
To: Craig Chalfant
Subject: 9500 ADDITIONAL DWELLING UNITS, 14-15 m RESIDENTS AND COMMERCIAL IN THE SDP

IS NOT IN KEEPING WITH OUR LIVES. TURN SDP INTO MORE OF A SEA LIFE REFUGE. C. WARD

From: Cindy Wederich
Sent: Wednesday, August 10, 2016 10:52 PM
To: Craig Chalfant
Subject: SEASP

Dear Craig,
I was happy to hear that there were plans in the works to redevelop the property around PCH and 2nd street. The mayor made it sound like the idea was to create a pedestrian friendly area like Riverwalk in San Antonio, Texas. Since the area is very close to the water, and abuts the wetlands, it sounded like it could be a wonderful tourist draw, as well as an enjoyable venue for local residents. Is seemed like there was even for potential for educational opportunities to have our students explore restored wetlands. After attending a few meetings on the proposed plan, I must admit, my enthusiasm has waned, and makes me appreciate the wisdom of our predecessors when providing guidelines for development of the area in question that limit buildings to 3 stories, etc. R92-1

Specifically:
1. Pedestrian friendly: It sounded like the idea of requiring pedestrian overpasses has been abandoned due to cost. I was under the impression that the purpose of encouraging developers to come in was so that they could help provide the funds for just this kind of project. R92-2
2. Water: It is clear that we already do not have enough water for the people who are here now, but virtue of the fact that we can only water our lawns 2-3x/week during certain hours, and are frequently encouraged to conserve. When asked where the water would come from to accommodate a larger population, the answer was that new development would not include yards. They did not address where the water for showers, toilets and cooking, etc would come from. Why would we consider adding population, if there is already a water shortage and no plan for increased water availability? Our local newspaper, the Grunion Gazette notes in their July 14th issues, "Despite New Rules, Water Still Scarce", and on June 23rd made note that our water and sewer rates may go up, as water purchasing fees, etc. increase. R92-3
3. Traffic: It seems traffic is already creating frustration for those of us who have to try and exit/enter Belmont Shore/Naples during rush hour. In the past 10 years, the time I need to leave to exit the Shore from my home has doubled during rush hour. It seems unclear how providing the opportunity to double the current population could ameliorate the current congestion. The response was that there may be ways to reroute some roads. If this would truly help, shouldn't we try it first to see if it would actually permit more car volume or not? It sounded like the best that could be offered was mitigating damages rather than actually improving the situation. In addition, while it was stated that commercial development may bring more cars than residential development, is it true that that would increase traffic during rush hour? Or would the car volume be distributed throughout the day? How would increasing resident population impact evacuation routes in the event of an emergency? Frankly, I am concerned for my safety in the event of an emergency. When I attended a workshop on at the Aquarium of the Pacific years ago, city leaders at that time noted that it would be traffic, not lack of water, that would be the only thing that could halt development. Aren't we approaching that limit in this area? R92-4 R92-5
4. Parking: While it is nice that more and more people are discovering the beach at Long Beach and 2nd street businesses, parking has been significantly impacted. It seems to be approaching the tipping point such that my friends no longer want to visit me in the evening because they don't want to deal with trying to find a place to park. The plan does not seem to address the increased parking impact that will likely be an issue if the population increases. R92-6
5. Infrastructure: It seems that we do not have adequate electrical capacity to serve the current population without the possibility of interruption of service. How will making it possible to potentially double the population of the area impact the FLEX alerts we already receive to avoid brown/black outs? (Some weeks I receive calls on a daily to reduce my use of electricity) Also, I didn't see anything that would prepare our school system to handle the potential increase in volume, should developers be allowed to add significant housing development. R92-7
6. Grants: When asked why grants were included in the plan if the purpose of creating options that would be attractive to have developers come in so they would pay for improvements, it was stated that developers would not be expected to address property owned by the city. If that is indeed the case, why R92-8

can't we go ahead with applying for grants without new development? Do they need to be tied together? Do we have to increase population/congestion to get what we want? (Decreased traffic, increased pedestrian options, restored wetlands….) R92-8 (cont.)

7. It seems there is an assumption that the population in the area has to increase. Is it true that we have to develop more to accommodate more people? Don't we have a choice to determine for ourselves how many people a land mass can support before quality of life decreases significantly? Is more better? R92-9

I am pro-redevelopment. I don't believe that re-development has to include new development that would contribute to an already overburdened system. Shouldn't the goal be to make what we have better rather than assuming that "progress" requires that we have to overburden our limited precious resources? Judging from conversations with my neighbors and co-workers, I think the August 4th Grunion Gazette commentary should read "Residents Don't" rather than "Resident Doesn't Like SEASP". R92-10
Please consider other options to redevelop the area without increasing population and traffic. It seems the current plan favors the developers, at the expense, rather than to the benefit of the current resident's quality of life.
Thank you for your consideration.

Sincerely,
Cindy Wederich
121 Argonne Ave.,
Long Beach, CA 90803

From: Alaine Weiss
Sent: Monday, September 19, 2016 2:13 PM
To: Craig Chalfant
Subject: Comments on Draft Southeast Area Specific Plan

Dear Mr. Chalfant:

I have reviewed the Draft Southeast Area Specific Plan (SEASP) Environmental Impact Report (EIR) and attended several meetings on the issues being considered and possible mitigation approaches. I am a resident and homeowner in the adjacent area and am submitting the following comments for consideration.

I have three areas of concern with the Draft EIR and one concern with the process of developing the plan itself, which I will address following my comments on the Draft EIR. My concerns relate to: R93-1

1) Increase in population intensity with its attendant traffic, pollution, noise, and overall urbanization of the area
2) Threat to scarce natural habitat, the Los Cerritos Wetlands
3) Building height which significantly changes the character of this beach and water oriented community

Increase in population intensity with its attendant traffic, pollution, noise, and overall urbanization of the area

The 133% projected increase in population and housing over the current plan would significantly impact the already congested traffic in the area. I will add my strong concern to those expressed by so many others that the increase in time to move through the area in a vehicle, the increased air pollution, and the increase in traffic noise will result in a less-healthy and less attractive community. The character of the area will gradually change from beachside community to an urban coastal community more like others in Southern California. This is not what attracted homeowners such as ourselves to this area. Proposed mitigations do not appear well-thought out. For example, we are happy to see consideration to making the area more pedestrian friendly but are doubtful that the majority of car trips will turn into pedestrian trips since many are passing through en route to employment, school, grocery shopping, etc. People may drive to, park, and walk within the area, but this will not reduce vehicle traffic flow to and through the area. We also heard comments about synchronizing traffic signals and wonder why doing so is dependent on a project. Shouldn't this be done in any event in order to improve traffic flows and reduce pollution from standing vehicles? R93-2

Threat to scarce natural habitat, the Los Cerritos Wetlands

We are so fortunate to have in such close proximity the remarkable natural habitat that is Los Cerritos Wetlands. Although it has been much degraded due to oil operations, we are now in a position as a community to reclaim much of this land and to do our best to restore it for the benefit of all. Doing so will improve the quality of life not only for the plants and animals of the habitat, but for the humans who live near it, visit it, or pass by it on their daily commutes. Its R93-3

existance enhances our community's connection to nature and preserves species whose existence is threatened by continuous development encroaching on coastal wetlands habitat. And even for those without an interest in nature, there are benefits to be had: a natural habitat vista to enjoy as they drive by and cleaner air. R93-3 (cont.)

Building height which significantly changes the character of this beach and water oriented community

We own our home just across the Alamitos Bay from the portion of the Plan area along Marina Drive. New construction over the height of the current Marina Pacifica condiminiums will be visible from our property and that of many Naples homeowners and will have the potential to alter the character of our neighborhood. I don't want to live in an urban,high-rise community and don't want to see one build up around us. Adding significant height to buildings will increase the sense of that we live in an urban environment rather than a coastal community. I would not want to see buildings any taller than the current Marina Pacifica condominiums and would prefer that buildings of any height be set back from the waterways to allow for public access to the Alamitos Bay and marinas. R93-4

Concern regarding the process for developing the SEASP

My concern with the development of the SEASP itself is that, to my knowledge, citizen representation did not include homeowners and residents in areas immediately adjacent to the SEADP / SEASP area. I had been initially pleased to know that area residents would participate in the Plan's development. Only when it was presented did I learn there were no representatives from the Naples community where I reside, nor other areas in the immediately adjacent neighborhoods, e.g., Belmont Shore, Park, and Heights, or Seal Beach. We own our home just across the Alamitos Bay from the portion of the Plan area along Marina Drive. Significant increases in density of population and traffic will alter the quality of life for those of us who already live in a heavy traffic area. I frequently visit neighborhoods such as Venice, CA where it is almost impossible to move on the main thoroughfares many times of the day. I would not want that for our community. Secondly, any new construction will be visible from our property and that of many Naples homeowners and will have the potential to alter the character of our neighborhood. I don't want to live in an urban,high-rise community and don't want to see one build up around us. R93-5

In closing, I assure you that I share the interest of most in improving the southeast area of Long Beach and making it a fitting gateway to the city. We are in a wonderful position to get this right. I believe strongly that doing so means weight be given to the interests and wishes of those who own property and reside within the SEASP area and immediately adjacent areas. These interests should not be outweighed by commercial property developers, although their interests must also be given weight — just not more weight than the collective interests of thousands of long term residents. Or, put another way, the values of quality of life and profit pursuit need to be weighed. How the EIR and, ultimately the Coastal Commission and the City of Long Beach weigh these often competing values will say more about us as a community and a city than a ton of letters. R93-6

Thank you for considering my comments.

Sincerely,
Alaine M. Weiss
92 Via di Roma Walk
Long Beach, CA 90803

From: John Weiss
Sent: Monday, September 19, 2016 2:43 PM
To: Craig Chalfant
Subject: Comments on SEASP Reports

I appreciate the opportunity to comment on SEASP.

In general, I am encouraged by the effort to comprehensively consider the concerns of many constituencies. I look forward to a final plan that will allow viable, quality development of the currently developed areas while improving and sustaining the natural resources and the existing quality of life in SEASP area and adjacent communities (Naples, Belmont Shore, Belmont Park, Belmont Heights, and Alamitos Heights). However, I have some specific concerns that argue for refinement of the SEASP:

1. Traffic

R94-1

The intensity of development will lead to more traffic in the area but there are no provisions for resolving current congestion. The only remediation proposed is that Long Beach work with CALTRANS to better coordinate signals. Signal coordination should be addressed whether or not further development takes place. The offer to request public agencies to perform their roles more effectively therefore is no remediation at all. We should expect public officials to do their jobs and optimize signal coordination - to suggest that this will not be undertaken without SEASP and claim signal coordination as remediation seems an insult to residents, merchants, and commuters in the area.

2. Water & Sustainability

R94-2

Many scientists predict that the current cycle of low precipitation is a new norm. The plan should require developments to provide for new, sustainable sources of water or require remediation such that the development will have a neutral effect on water consumption. The same approach should be taken with other utilities, such as energy and sewer, and with the additional tailpipe emissions.

3. First Responders & Other Public Service Providers / Resources

R94-3

The additional merchants, customers, and residents will require additional police, fire, emergency, and other public services. Development should be conditioned on addressing these requirements.

4. Height

R94-4

The proposed plan allows up to 7 floors / 70 feet. The height limits are too high. The structures should not exceed the height of existing structures in Marina Pacifica and the greatest heights should be allowed only on the North (inland) side of PCH such that heights increase in a stair step manner with lowest height near the water. The tallest buildings should be oriented with the narrow end of the building facing PCH, Marina Drive, and the water so that the buildings do not become a visual or environmental wall.

5. Environment

The effect upon the wetlands and remediation are not fully addressed. Concerns about buffer margins, flyways, and bird-safe structures need to be addressed and built into SEASP. Neither environmental advocates nor developers should be required to fight these issues on a project by project basis. R94-5

I am encouraged by the reports and process to date. With refinements, SEASP is a plan I could support. However, as currently drafted, I cannot support SEASP and request rejection of the plan pending refinement. R94-6

Thank you for inviting and considering my comments. I appreciate it.

John A. Weiss
Long Beach Native and Six Decade Resident
Current Naples Resident and
Owner of Apartment Buildings in 90803

Letter R95

From: Terry Welsh
Sent: Sunday, September 18, 2016 11:27 PM
To: Craig Chalfant; Mayor; Council District 1; Council District 2; Council District 3; Council District 4; Council District 5; Council District 6; Council District 7
Subject: Comments for SEASP dEIR

To City of Long Beach:

My comments on the dEIR are that it should include an attempt to delineate ESHA. While the Coastal Commission makes the final call on ESHA, any local lead agency should make a good faith effort to delineate ESHA (and buffers) in a dEIR. This will have important consequences on where future development can occur, and by having the City of Long Beach take the time to estimate where ESHA is located, it will give all parties a rough estimate on future development constraints. R95-1

The SEASP contains federally listed species such as the Beldings Savannah Sparrow, and several special status species. These are listed on table 5.4-4.

Thank you for your time and consideration.

I can be reached at 714-719-2148.

Terry Welsh
Costa Mesa, California

Letter R96

From: Sara Wescott
Sent: Tuesday, August 09, 2016 1:57 PM
To: Council District 3 <District3@longbeach.gov>
Subject: DEVELOPMENT IN DISTRICT 3

Hello Ms. Price,

My husband and I were very concerned to read about proposed development of the 2nd and PCH area in the L.A. Times this weekend. I am emailing to express my concerns. As a resident and homeowner in Spinnaker Bay, I am very concerned that our city is considering adding a large development on PCH. I feel it is irresponsible to continue to develop our coastal areas when the beautiful area in which we live is so impacted with traffic and congestion that it is changing the quality of life for the current residents. I would hate to see our wonderful city become like Santa Monica where you can barely drive at any time of day or night. With the horrible traffic on the 405, I feel adding such large developments is irresponsible and not considerate of those who live in the area. I disagree with the Chamber of Commerce representative who would rather see more traffic and have better amenities. As a city we have fine amenities. Hotels of five to seven stories in my opinion are not an option. That would allow for people on higher floors to look right in to the backyards of our neighborhoods. R96-1

I urge you to not be neutral on this plan. Please don't give in to developers who want to overbuild the area but instead please consider the lifestyle of those who call this area home.

I will be bringing this information forward to our homeowners association as well.

Thanks,

Sara

Sara Wescott
Assistant Superintendent
Elementary Education
Garden Grove Unified School District

10331 Stanford Avenue
Garden Grove, California 92840
714-663-6333
www.ggusd.us

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-----Original Message-----
From: Karen Yberico
Sent: Monday, August 29, 2016 9:47 AM
To: Craig Chalfant
Subject: Opposition to SouthEast Area Specific Plan

This area cannot take more traffic. There is nothing that this development can do to minimize the massive increase in traffic that will occur. This project should not be allowed to pass. R97-1

Karen Yberico
Long Beach Resident