

## Appendix B    NOP Comments

## Appendices

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State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
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EDMUND G. BROWN JR., Governor  
CHARLTON H. BONHAM, Director



November 19, 2015

Mr. Craig Chalfant  
City of Long Beach  
333 West Ocean Boulevard  
Long Beach, CA 92802  
Email: [Craig.chalfant@longbeach.gov](mailto:Craig.chalfant@longbeach.gov)

**Subject: Comments on the Notice of Preparation of a Draft Program Environmental Impact Report for Southeast Area Specific Plan, Los Angeles County, (SCH# 2015101075).**

Dear Mr. Chalfant:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) and Initial Study (IS) for the Southeast Area Specific Plan (Project) Draft Program Environmental Impact Report (DPEIR). The Project area is located on the southeast edge of the City of Long Beach (City), California, within Los Angeles County and bordering Orange County. The area encompasses 1,475 acres consisting of the area south of 7th Street, east of Bellflower Boulevard, east of the Long Beach Marine Stadium and Alamitos Bay docks, south of Colorado Street, and north and west of Long Beach's southern boundary. The Los Cerritos Channel and San Gabriel River run through the Project area toward the Alamitos Bay and Pacific Ocean and are included as part of the Project area.

The Project, as approved, will replace the existing 1,475-acre City Planned Development District 1(PD-1) with a new Specific Plan and conventional zoning on a select few parcels. The Proposed Project would provide comprehensive direction for future development within a 1,466-acre area in the City and conventional zoning would apply to a 9 acre area. The Project area encompasses the entire 1,475-acre area. Existing land uses on the Project area consists primarily of residential, commercial, office, industrial, open space/wetlands, active oil operations in the wetlands area, and undeveloped uses. Industrial and Coastal habitat/Wetlands/Recreation land make up 20 and 19 percent of the existing land use composition, respectively. The Project is also partially located within the State Coastal Zone.

The IS states that the Project area includes sensitive habitat areas including, Sims' Pond Biological Preserve, the Los Cerritos Wetlands, Jack Dunster Marine Biological Preserve, and the Long Beach Marine Stadium, which are considered prime habitats for various biological species.

The following comments have been prepared pursuant to the Department's authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed Project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*, and pursuant to our authority as Trustee Agency with jurisdiction over natural resources affected by the Project (California Environmental Quality Act, [CEQA] Guidelines § 15386) to assist the Lead Agency in avoiding or minimizing potential Project impacts on biological resources.

## Specific Comments

California Endangered Species Act (CESA). The IS describes that the proposed Project area may have the potential to effect several special status species including CESA listed wildlife and plant species and their habitat including but are not limited to: Belding's savannah sparrow (*Passerculus sandwichensis beldingi*); light-footed clapper rail (*Rallus longirostris levipes*); California least tern (*Sternula antillarum browni*); least Bell's vireo (*Vireo bellii pusillus*); Lyon's pentachaeta (*Pentachaeta lyonii*) and; salt marsh bird's-beak (*Cordylanthus maritimus* spp. *Maritimus*).

The Department considers adverse impacts to special status species protected by CESA, and the Federal Endangered Species Act (ESA) for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any state endangered, threatened, candidate species, or state-listed rare plant species pursuant to the Native Plant Protection Act (NPPA; Fish and Game Code §1900 et seq.) that results from the Project prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Take is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as rare, endangered or threatened, or a candidate for listing under CESA, the Department recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from the Department may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the fully mitigated requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

The DPEIR should provide a discussion on the presence or absence of special status species within the Project implementation area, Project impacts, and adequate avoidance and mitigation measures that may include, for example, off site acquisition and protection of occupied habitat. To fully mitigate take of species listed under CESA, or State-listed rare plants under NPPA, further consultation with the Department under CESA and NPPA is recommended.

**Other Special Status Species.** CEQA provides protection not only for CESA listed and candidate species, but for any species including: California Species of Special Concern (SSC) which can be shown to meet the criteria for State-listing; and plants designated as 1A, 1B and 2 of the California Native Plant Society Inventory of Rare and Endangered Vascular Plants of California, which consist of plants that, in a majority of cases, would qualify for listing (CEQA Guidelines Sections 15380 (d), 15065 (a)).

## General Comments

1. Project Description and Alternatives. To enable the Department to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DPEIR:
  - a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas; and,
  - b) A range of feasible alternatives to Project component location and design features to ensure that alternatives to the proposed Project are fully considered and evaluated. The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.
2. Lake and Streambed Alteration Agreements (LSA). As a Responsible Agency under CEQA Guidelines section 15381, the Department has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream, or use material from a streambed. For any such activities, the Project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a Project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency, the Department may consider the Negative Declaration or Environmental Impact Report of the local jurisdiction (Lead Agency) for the Project. To minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA. A notification package for a LSA may be obtained by accessing the Department's web site at [www.wildlife.ca.gov/habcon/1600](http://www.wildlife.ca.gov/habcon/1600).
3. Biological Baseline Assessment. To provide a complete assessment of the flora and fauna within and adjacent to the Project area, with particular emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats, the DPEIR should include the following information:
  - a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]);
  - b) a thorough, recent, floristic-based assessment of special status plants and natural communities, following the Department's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see <http://www.dfg.ca.gov/habcon/plant/>);

- c) floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the neighboring vicinity. *The Manual of California Vegetation*, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008<sup>1</sup>). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
  - d) a complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the Project. The Department's California Natural Diversity Data Base (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. The Department recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at [http://www.dfg.ca.gov/biogeodata/cnddb/submitting\\_data\\_to\\_cnddb.asp](http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp) ;
  - e) a complete, recent assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including SSC and California Fully Protected Species (Fish and Game Code § 3511). Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines § 15380). Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service; and,
  - f) a recent, wildlife and rare plant survey. The Department generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame, or in phases.
4. Biological Direct, Indirect, and Cumulative Impacts. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DPEIR:
- a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address Project-related changes on drainage patterns and downstream of the Project site; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included;
  - b) a discussion regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g.,

preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DPEIR;

- c) the impacts of zoning of areas for development Projects or other uses nearby or adjacent to natural areas, which may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document; and,
  - d) a cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future Projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
5. Avoidance, Minimization, and Mitigation for Sensitive Plants. The DPEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts. The Department considers these communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3 and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2008).
6. Compensatory Mitigation. The DPEIR should include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
7. Long-Term Management of Mitigation Lands. For proposed preservation and/or restoration, the DPEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include, but are not limited to, restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.
8. Nesting Birds. In order to avoid impacts to nesting birds, the DPEIR should require that clearing of vegetation and construction occur outside of the peak avian breeding season, which generally runs from February 1<sup>st</sup> through September 1<sup>st</sup> (as early as January 1 for some raptors). If Project construction is necessary during the bird breeding season, a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for nesting birds within three days prior to the work in the area, and ensure that no nesting birds in the Project area would be impacted by the Project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be a minimum width

of 300 feet (500 feet for raptors), be delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No Project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the Project. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

9. Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from the Project site and permanently moving it to a new location. The Department generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. The Department has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals, and their habitats.
10. Moving out of Harm's Way. The proposed Projects anticipated to result in clearing of natural habitats that support many species of indigenous wildlife. To avoid direct mortality, the Department recommends a qualified biological monitor approved by the Department be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss.
11. Wildlife Movement and Connectivity. The Project area supports significant biological resources and is located adjacent to a regional wildlife movement corridor. The Project area contains habitat connections and supports movement across the broader landscape, sustaining both transitory and permanent wildlife populations. Onsite features, which contribute to habitat connectivity, should be evaluated and maintained. Aspects of the Project could create physical barriers to wildlife movement from direct or indirect Project-related activities. Indirect impacts from lighting, noise, dust, and increased human activity may displace wildlife in the general area.
12. Revegetation/Restoration Plan. Plans for restoration and re-vegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

- a) The Department recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in the near future in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate.
- b) Restoration objectives should include providing special habitat elements where feasible to benefit key wildlife species. These physical and biological features can include, for example, retention of woody material, logs, snags, rocks and brush piles (see Mayer and Laudenslayer, 1988, for a more detailed discussion of special habitat elements<sup>2</sup>).

We appreciate the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to Scott Harris at (805) - 644-6305 or email at: [scott.p.harris@wildlife.ca.gov](mailto:scott.p.harris@wildlife.ca.gov).

Sincerely,



for  
Betty J. Courtney  
Environmental Program Manager I

cc: Ms. Erinn Wilson, CDFW, Los Alamitos  
Mr. Scott Harris, CDFW, Pasadena  
Ms. Loni Adams, CDFW, San Diego  
Mr. Scott Morgan, State Clearinghouse, Sacramento

#### References:

<sup>1</sup>Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2008. A manual of California Vegetation, 2<sup>nd</sup> ed. ISBN 978-0-943460-49-9.

<sup>2</sup>Mayer, K. E. and W. F. Laudenslayer, Jr. 1988. Editors: A guide to wildlife habitats of California. State of California, The Resources Agency, Department of Forestry and Fire Protection, Sacramento, CA.

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7-OFFICE OF REGIONAL PLANNING  
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*Serious Drought.  
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Help save water!*

November 18, 2015

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

**Re: Southeast Area Specific Plan**  
Notice of Preparation of Draft EIR  
IGR No: 151054/EA, SCH#2015101075  
Vic: LA / 1 / 0.591 – 1.973; LA/22/0.00-1.467

Dear Mr. Chalfant:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed Southeast Area Specific Plan. The proposed Southeast Specific Plan is located at the southeast end of the City of Long Beach, within Los Angeles County and bordering Orange County. It would replace the current PD-1 zoning district with a new specific plan and separate 9 acres for conventional zoning area. The new Specific Plan would allow a total of 9698 dwelling units, 2.665 million square feet of commercial/employment uses, and 425 hotel rooms. This would result in a net increase of 5,619 dwelling units, 438, 500 square feet of commercial/employment uses, and 50 hotel rooms.

Pacific Coast Highway (SR-1) and 7<sup>th</sup> Street (SR-22) are within the Specific Plan area. Interstates 405 (I-405) and 605 (I-605) also provide regional access to the proposed specific plan area. Caltrans is concerned with potential increase in traffic volumes directed to the State facilities, as it might exacerbate existing congestion.

We note that a traffic impact analysis (TIA) will be conducted to assess the future traffic conditions compared to existing conditions and future cumulative scenarios. Please consult with Caltrans to obtain concurrence as to the limits of the study area and methods of analysis. Caltrans requests that the traffic engineer use the Highway Capacity Methodology (HCM 2010) for analyzing the State facilities. Please refer traffic engineers to follow the Caltrans Guide for the Preparation of Traffic Impacts Studies, which is accessible online at: [http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa\\_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf)

The TIA should include evaluation of potential traffic impacts to the regional transportation system including SR-1, SR-22, I-405 and I-605 intersections, nearest on-and-off ramps, and mainline. Vehicle queues to mainline freeway lanes should be avoided. Please include mitigation improvements if the off-ramp storage is projected to exceed capacity.

Listed below are elements of what Caltrans generally expects in a traffic impact study:

- Presentations of assumptions and methods used to develop trip generation, trip distribution, trip assignments, and choice of travel mode. Travel modeling should be consistent with other regional and local modeling forecasts and with travel data.
- Analysis should include a) traffic from the project(s) under consideration, b) cumulative traffic from all approved developments in the area, c) cumulative traffic from developments in area that may potentially be approved in the future, and d) traffic growth other than from the project and developments. Any assumptions of vehicle trip reductions due to existing uses, internal captured trips, pass-by trips, or transit usage needs to be justified.
- Analysis of AM, and PM peak-hour volumes for both existing and future conditions in the affected area. Future conditions should extend to the horizon year build-out year of the Specific Plan.
- Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts, including a description of transportation infrastructure improvements, financial costs, funding sources and financing, sequence and scheduling considerations, implementation responsibilities, controls and monitoring. Fair share contributions towards future improvements is considered an acceptable form of mitigation. (See Caltrans' Traffic Impact Study Guide for a suggested formula). The City should consider vehicle demand-reducing strategies, such as, incentives for commuters to use transit, park-and-ride lots, discounts on monthly bus and rail passes, shuttle buses, vanpools, etc.

Although the lead agency is required to comply with Los Angeles County Congestion Management Program (CMP) standards and thresholds of significance, Caltrans does not consider the CMP criteria to be adequate for the analysis of transportation impacts on State facilities. The 2010 CMP Guidelines, Appendix D, states that Caltrans should be consulted for the analysis of State highway facilities.

In the spirit of mutual cooperation, Caltrans staff is available to work with the project's traffic engineers in an effort to evaluate traffic impacts, identify potential improvements, and discuss possible strategies to assist the City in establishing a funding mechanism to help mitigate future impacts in the area.

If you have any questions regarding these comments, please feel free to contact Elmer Alvarez, Project Coordinator at (213) 897-6696 or electronically at [elmer.alvarez@dot.ca.gov](mailto:elmer.alvarez@dot.ca.gov).

Sincerely,



DIANNA WATSON  
IGR/CEQA Branch Chief  
Caltrans District 7

cc: Scott Morgan, State Clearinghouse



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE  
Chief Engineer and General Manager

November 23, 2015

Ref File No.: 3491574

Mr. Craig Chalfant, Senior Planner  
Development Services Department  
City of Long Beach  
333 West Ocean Boulevard, 5<sup>th</sup> Floor  
Long Beach, CA 90802

Dear Mr. Chalfant:

## **Comment Letter for the Southeast Area Specific Plan**

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on October 22, 2015. The proposed project area is located within the jurisdictional boundaries of District No. 3. We offer the following comments regarding sewerage service:

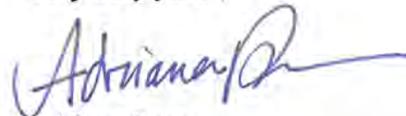
1. The Districts own, operate, and maintain the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the City of Long Beach (City) except to state that presently no deficiencies exist in Districts' facilities that serve the City. For information on deficiencies in the City sewerage system, please contact the City Department of Public Works and/or the Los Angeles County Department of Public Works.
2. The Districts should review individual developments within the City in order to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project. Please forward information on projects within the City to the undersigned.
3. The wastewater generated by the proposed project area will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 mgd and currently processes an average flow of 263.1 mgd.
4. In order to estimate the volume of wastewater a project will generate, go to [www.lacsd.org](http://www.lacsd.org), Wastewater & Sewer Systems, click on Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link for a copy of the Districts' average wastewater generation factors.
5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is

a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://www.lacsd.org), Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.

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

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

Very truly yours,



Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar



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

November 19, 2015

Ms. Angela Reynolds, AICP  
Deputy Director, Deputy Director, Development Services  
City of Long Beach Development Services  
333 West Ocean Boulevard  
Long Beach, California 90802

**Re: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Southeast Area Specific Plan, Long Beach, California**

Dear Ms. Reynolds:

The Long Beach Unified School District (LBUSD) appreciates the opportunity to comment on the reference Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the proposed Southeast Area Specific Plan (Project). We understand the City of Long Beach is the lead agency for the Project under the California Environmental Quality Act (CEQA) .

## **OVERVIEW**

Long Beach Unified School District was originally established in 1885 with fewer than a dozen students meeting in a borrowed tent and is now fully responsible for providing school facilities and public education services to approximately 88,000 students in 95 public schools in the cities of Long Beach, Lakewood, Signal Hill, and Avalon on Catalina Island. It is the third-largest school district in the state of California and employs more than 8,000 teachers and staff, making it the largest employer in the City of Long Beach.

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

## **COMMENTS**

### **Proximity to Schools**

The District requests that the DEIR identify the location of all LBUSD schools nearby, evaluate potential impacts from the proposed project to those school properties and develop appropriate mitigation measures as necessary.

One LBUSD is within the Project boundaries.

Kettering Elementary School: 550 Silvera Avenue, Long Beach

Three LBUSD school properties are located within 0.25 mile of the Project. These three schools, and their distance and direction from project area boundary, are listed below.

Lowell Elementary: 5201 E Broadway, Long Beach; 315 feet southwest

Rogers Middle School: 365 Monrovia Avenue, Long Beach; 525 feet west

Wilson High School: 1900 E. 21<sup>st</sup> Street, Signal Hill; 0.4 mile northeast

## CONCLUSION

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

If you have any questions please contact Dori Arbour at LBUSD at (714) 598-5456.

Sincerely,



Dori Arbour  
Facilities Consultant  
Long Beach Unified School District  
darbour@lbschools.net



**Metro**

Los Angeles County  
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November 16, 2015

Craig Chalfant  
City of Long Beach  
Development Services Department  
333 West Ocean Blvd. Long Beach, CA 90803  
Los Angeles, CA 90012

**RE: Southeast Area Specific Plan- City of Long Beach- Notice of Preparation of a Draft Environmental Impact Report**

Dear Mr. Chalfant:

Thank you for the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report for the proposed Southeast Area Specific Plan located on the Southeast edge of the City of Long Beach. The proposed project would replace the current 1,475-acre PD-1 zoning district with a new Specific Plan covering 1,466 acres and remove nine acres from the PD-1 boundaries to convert to conventional zoning. Land use designations would include: Single Family Residential, Mobile Homes, Multi-Family Residential, Commercial-Neighborhood, Mixed Use Community Core, Mixed Use Marina, Industrial, Public, Coastal, Habitat/Wetlands/Recreation, Open Space/Recreation, Right-of-Way (ROW)/Caltrans, Dedicated ROW (not built), and Channel/Marina/Waterway. Build out of the Specific Plan would allow a total of 9,698 dwelling units, 2,665,052 square feet of commercial/employment uses, and 425 hotel rooms. This would result in a net increase of 5,619 dwelling units, 438,292 sq-ft of commercial/employment uses, and 50 hotel rooms. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Metro bus line 577 operates on E 7<sup>th</sup> St, in the vicinity of to the proposed project area. Although the project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus services that are present. Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may impact Metro bus lines at least 30 days in advance of initiating construction activities. For closures that last more than six months, Metro's Stops and Zones Department will also need to be notified at 213-922-5188, 30 days in advance of initiating construction activities. Other municipal bus operators may also be impacted and should be included in construction outreach efforts.

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

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

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

If you have any questions regarding this response, please contact Elizabeth Carvajal at 213-922-3084 or by email at [DevReview@metro.net](mailto:DevReview@metro.net). LACMTA looks forward to reviewing the Draft EIR. Please send it to the following address:

LACMTA Development Review  
One Gateway Plaza MS 99-23-4  
Los Angeles, CA 90012-2952

Sincerely,



Elizabeth Carvajal  
Transportation Planning Manager

Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

# GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

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

## D.1 OBJECTIVE OF GUIDELINES

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

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

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

## D.2 GENERAL PROVISIONS

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

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

### D.3 PROJECTS SUBJECT TO ANALYSIS

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

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

### D.4 STUDY AREA

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

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

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

### D.5 BACKGROUND TRAFFIC CONDITIONS

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

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

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

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

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

## D.6 PROPOSED PROJECT TRAFFIC GENERATION

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

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

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

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

## D.7 TRIP DISTRIBUTION

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

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

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

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

## **D.8 IMPACT ANALYSIS**

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

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

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

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

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

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

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

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

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

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

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

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

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

## D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

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

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

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

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

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

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

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

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**D.10 REFERENCES**

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

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November 18, 2015

Mr. Craig Chalfant, Senior Planner  
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City of Long Beach  
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*Via email [craig.chalfant@longbeach.gov](mailto:craig.chalfant@longbeach.gov)*

Re: Notice of Preparation and Scoping for the Southeast Area Specific Plan

Dear Mr. Chalfant:

We submit these comments on behalf of the Los Cerritos Wetlands Land Trust (LCWLT). LCWLT has spent more than a decade educating and advocating for the protection and restoration of southeast Long Beach's Los Cerritos Wetlands. Accordingly, the Land Trust has been extremely involved with administrative processes for projects proposed in and near the wetlands. We appreciate your providing us notice of the scoping process being conducted for the City's comprehensive SEADIP Update (Project). During the administrative process for the 2<sup>nd</sup> + PCH Project, LCWLT encouraged the City not to overrule SEADIP with variances and exceptions but to instead engage in a comprehensive update of the Southeast Area Development and Improvement Plan (SEADIP) that will protect the quality of life and open space of southeast Long Beach. LCWLT supports the identified SEADIP priorities regarding traffic, wetlands enhancement, view protection, and bike and pedestrian transportation options. If implemented, the City's vision for SEADIP – "a livable, thriving, ecologically diverse and sustainable coastal gateway and destination in the City and Southern California region" -- would benefit residents and visitors of Long Beach, alike.

The Project proposes to replace the 1977 Southeast Area Development Improvement Plan (SEADIP), which encompasses 1,475 acres in southeast Long Beach with a new specific plan covering 1,466 acres. This SEADIP Update would serve as the zoning for the Project area and establish development standards, regulations, infrastructure requirements, design guidelines, and implementation programs with which subsequent development would have to be consistent. The SEADIP Update is being funded by a Sustainable Communities Planning Grant, and will include an amendment to the City's local coastal program (LCP) and a wetlands delineation study.

LCWLT is concerned with proposals discussed in the Initial Study to double the population of the SEADIP area. Currently, the area houses 4,079 dwelling units and 6,486 people, which the SEADIP Update would increase to 9,698 dwelling units and 15,420 people. (IS p. 17.) More residents and homes will result in greater traffic in an already-congested portion of the City, with significant impacts on air quality and additional pressure on the integrity of the wetlands.

### **I. An EIR Must be Prepared.**

When a project may have a significant impact on the environment, the California Environmental Quality Act (CEQA) requires the preparation and certification of an EIR, not an MND. “[S]ince the preparation of an EIR is the key to environmental protection under CEQA, accomplishment of the high objectives of that act requires the preparation of an EIR whenever it can be fairly argued on the basis of substantial evidence that the project may have significant environmental impact.” (*No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75.) The fair argument standard is a “low threshold” test for requiring the preparation of an EIR. (*No Oil, supra*, 13 Cal.3d 68, 84.) The Initial Study acknowledges that traffic congestion, air quality and impacts on the Los Cerritos Wetlands and other natural habitat will have to be addressed and likely mitigated. The LCWLT agrees with the City that preparation of an EIR is the proper way to address and mitigate these potential environmental impacts under CEQA and appreciates its preparation of a Notice of Preparation and holding of a Scoping Meeting to solicit community input on the SEADIP Update.

### **II. Careful and Complete Studies are Needed to Determine the Baseline for CEQA Analysis.**

The adequacy of the CEQA analysis contained in the SEADIP EIR will hinge on the accuracy of baselines used for environmental analysis. An accurate baseline is required to ensure that the Project’s likely environmental impacts are neither exaggerated nor obscured. Mere projections of baseline information are insufficient for baseline analysis. (*Fairview Neighbors v. County of Ventura*, (1999) 70 Cal.App.4th 238; *Save Our Peninsula Committee v. Monterey Bd. of Supervisors*, (2001) 87 Cal.App.4th 99 [CEQA “requires that the preparers of the EIR conduct the investigation and obtain documentation to support a determination of preexisting conditions.”]). Further, *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931 states that recitation of raw data without explanation of how such levels were derived or maintained “does not provide an adequate description of the existing environment.” *Citizens for East Shore Parks v. State Lands Commission*, (2011) 202 Cal.App.4th 549 held the proper baseline for analysis of environmental impacts is “what [is] actually happening,” not what might happen or should be happening.

The baseline is particularly important for evaluating traffic impacts. Traffic data for “current conditions” should be collected on a variety of days that are truly representative of the great congestion that plagues Pacific Coast Highway and other thoroughfares of the SEADIP area. Data collection should not be restricted to periods of artificially low vehicular congestion (i.e., CSULB breaks, holidays).

### **III. Biological Resources Analysis Must Discuss Impacts to Wetlands, Sensitive Species, and Habitat.**

LCWLT is pleased that the City plans to analyze the SEADIP Update’s potential biological impacts. Considering that all of the proposed development allowed by the SEADIP Update would occur in close proximity to the Los Cerritos Wetlands, and in areas surrounded by waterways, it is imperative that the environmental review document discloses, analyzes, and mitigates any potentially adverse impacts on local wetlands and waterways. Surveys of freshwater wetlands habitat must be performed during the wet season (November-March). Surveys of tidal habitat must be performed during the summer (July-September). If alternative Project configurations are required to “avoid or substantially lessen” those impacts, the environmental document should discuss these alternatives, as well. (Pub. Resources Code s. 21002.) Any impacts to these wetlands would have corresponding impacts on species that inhabit these waterways, including the eggs and larvae of oceanic species that use wetlands as nurseries. Impacts to water quality due to the stirring up of sediment or pollutants contained in sediment, runoff from construction materials stored on the shore, or other sources may also impact the regulatory status of waterways that are already listed as impaired on the 303(d) list. If any of these impacts may occur, they must be disclosed in the environmental review document.

LCWLT looks forward to the City’s EIR analysis of the Project’s potential impacts on sensitive species such as the western yellow-billed cuckoo, Belding’s savannah sparrow, bank swallow, tricolored blackbird, light-footed clapper rail, California least tern, coastal California gnatcatcher, least Bell’s vireo, Santa Ana sucker, and others. (IS p. 37.) Field work assessing the populations of these species in the SEADIP area must occur during the appropriate seasons (e.g., February-July for Belding’s savannah sparrow, May-August for the California least tern).

LCWLT encourages the City to limit development within the Project to areas that will avoid displacement of species and adverse modification of habitat. LCWLT also appreciates the City’s acknowledgement of the Project site’s importance as a wildlife corridor, migration route, and nursery. (IS. p. 38.) We hope that the SEADIP plan will provide for appropriate wildlife buffers or a buffer policy that can be applied to future

development.

Given that the SEADIP Update expects the area's residential density to more than double, the EIR must also address the impacts of residential runoff, pets, and increased nighttime lighting and glare on biological resources. All buildings should meet "dark sky" standards. One of LCWLT's greatest concerns about the prior 2<sup>nd</sup> + PCH proposal was the impact that the proposed 6 to 12-story glass tower would have on birds that might crash into reflective surfaces during the day or deviate from migratory paths as a result of residential light emissions at night. The development standards included in SEADIP should include standards requiring bird-friendly buildings, such as those adopted by the City of San Francisco. (See, <http://www.sf-planning.org/index.aspx?page=2506>, also Standards for Bird Safe Buildings, Attached.)

LCWLT also notes that the Initial Study provides for a wetlands delineation study for the SEADIP area. This study must comply with all related EPA guidance to ensure that wetlands are properly delineated for future regulation and conservation. It is critical that the SEADIP Update be consistent with the Conceptual Restoration Plan developed by the Los Cerritos Wetlands Authority.

#### **IV. Greater Detail About Development Standards Must Be Provided in the EIR.**

The SEADIP plan will include specific development standards governing setbacks, densities, heights, buffers, usable open space, parking, right-of-way configuration, and the mixing of land uses. Design guidelines contained in SEADIP will apply to landscaping, architectural styles and materials, lighting and public spaces. Very little information about these standards, and how they would change under the updated plan, is provided by the Notice of Preparation and Initial Study. More information about these standards must be provided in the EIR so that the public and decision makers can properly evaluate any environmental impacts of the new SEADIP plan.

This is particularly important with regard to standards governing building height. Currently, SEADIP limits buildings to 35 feet in height. Although not discussed in the initial study, any increase in this height limit may result in impacts to views and view corridors, which could have significant aesthetic impacts and impacts due to light pollution, but also to biological resources if increased building heights impact birds travelling to and from the Los Cerritos Wetlands. The potential for impacts due to changes in building standards, such as height, must be disclosed, analyzed, and mitigated in the EIR.

## **V. Traffic and Congestion Impacts Must be Analyzed.**

LCWLT is also pleased that the City plans to address traffic and congestion impacts in the EIR. Doubling the area's population will certainly result in increased traffic in this already-congested area of the City. During the City's analysis of traffic impacts, LCWLT urges the City to keep in mind the SEADIP concepts to increase walkability and bikeability that were discussed during early public meetings. These include protected bike lanes, stormwater absorbing swales, and attractive and safe pedestrian sidewalks.

Obviously, an increase in the area's population will result in impacts to specific intersections. Accordingly, impacts to all nearby intersections must be analyzed in the EIR. An environmental document must analyze a project's reasonably foreseeable impacts. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1998) 47 Cal. 3d 376, 393.)

Moreover, CEQA requires an analysis of the "whole of an action, which has the potential for physical impact on the environment." (CEQA Guidelines, § 15037.) If the Project will require or induce any other road local road improvements, these must be disclosed, analyzed, and mitigated in the environmental document. LCWLT is particularly concerned about any increases in traffic that would increase pressure on roads surrounding the Los Cerritos Wetlands or that would lead to the expansion of Studebaker Road through the wetlands. Instead, LCWLT encourages the City to adopt policies in the new SEADIP that would prohibit the future extension of Studebaker Road through the Los Cerritos Wetlands.

A Project's inconsistencies with local plans and policies constitute significant impacts under CEQA. (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 783-4, 32 Cal.Rptr.3d 177; see also, *County of El Dorado v. Dept. of Transp.* (2005) 133 Cal.App.4th 1376 (fact that a project may be consistent with a plan, such as an air plan, does not necessarily mean that it does not have significant impacts).) These inconsistencies must be discussed in an EIR. (14 CCR § 15125(d); *City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal. App. 4th 889, 918; *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal. App. 4th 859, 874 (EIR inadequate when Lead Agency failed to identify relationship of project to relevant local plans).) Accordingly, the SEADIP Update must be consistent with the City's Mobility Element, which designates many roadways in SEADIP as opportunities to implement new pedestrian, transit or bike facilities and traffic calming measures. Any deviation from the Mobility Element must be disclosed, analyzed, and properly mitigated in the EIR.

## **VI. The Air Quality Analysis Must Include a Health Risk Analysis that Employs the Newest Standards to Analyze Potential Impacts on Sensitive Receptors.**

The Office of Environmental Health Hazard Assessment (OEHHA) adopted a new version of the Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments (Guidance Manual).<sup>1</sup> As discussed in Section 8.2.10 of the Guidance Manual, “[t]he local air pollution control districts sometimes use the risk assessment guidelines for the Hot Spots program in permitting decisions for short-term projects such as construction or waste site remediation.”

Likely construction impacts must be analyzed with an HRA. Agency guidance indicates that new OEHHA methodology will substantially increase the estimated significance of toxic air contaminants. Because the new OEHHA methodology includes a number of conservative assumptions about potential impacts to infants and children, short term construction emissions could lead to significant HRA results. For example, SCAQMD staff estimate that a six-month construction project for a typical one-acre office project could cause a significant HRA impact.<sup>2</sup>

The SEADIP Update encompasses 1,466 acres of the City of Long Beach and proposes the construction of 5,619 new houses (with a resulting increase in 8,934 residents), 438,292 square feet of commercial space, and an additional 50 hotel rooms. The construction that this will entail will result in significant construction and operational air quality impacts, which must be carefully calculated, analyzed, and mitigated.

The EIR should analyze health risk impacts at congested intersections. The analysis should not be limited to carbon monoxide emissions, but rather should include ambient concentrations of criteria pollutants (which can cause localized health impacts from vehicle emissions) and toxic air contaminants. This is critical for intersections such as that of Second Street and Pacific Coast Highway.

Numerous studies have identified asthma impacts associated with diesel particulate matter exposure. The EIR should analyze the impact of such exposure from construction and operations on nearby residences, including offsite traffic.

## **VII. Greenhouse Gas Emissions Must Be Analyzed.**

The project’s construction and operations would result in new GHG emissions that

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<sup>1</sup> See [http://www.oehha.ca.gov/air/hot\\_spots/hotspots2015.html](http://www.oehha.ca.gov/air/hot_spots/hotspots2015.html).

<sup>2</sup> See SCAQMD Staff presentation, Potential Impacts of New OEHHA Risk Guidelines on SCAQMD Programs, Agenda Item 8b, <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2014/may-specsess-8b.pdf>.

need to be evaluated for significance and thoroughly mitigated. GHG emissions, including those generated by the new trips to and from 5,619 new dwelling units and 438,292 square feet of new commercial space, need to be evaluated for significance. GHG emissions from construction need to be evaluated for significance as well.

The Project would generate both direct and indirect GHG emissions via the following emissions sources, including:

- 1) Construction: Emissions associated with dust control (water), construction debris disposal, and construction-related equipment and vehicular activity;
- 2) Transportation: Emissions associated with Project-generated vehicular operations;
- 3) Building Operations: Emissions associated with space heating and cooling, water heating, and lighting;
- 4) Water: Emissions associated with energy used to pump, convey, treat, deliver, and re-treat water; and
- 5) Solid Waste: Emissions associated with waste streams (embodied energy of materials).trips, energy use, water use, construction.

The proposed project would generate and contribute to cumulative increases in sources of GHGs.

As the SEADIP Update process is being funded, in part, by grants aimed at future planning for sea-level rise and greenhouse gas emission reduction, LCWLT trusts that the City's EIR will fully evaluate and implement strategies in the SEADIP Update that offset any projected increases in GHG emissions due to the Project. These strategies and mitigation measures should include policies consistent with the Mobility Element and its emphasis on increasing walkability and bikeability in the SEADIP area.

### **VIII. Alternatives to the Project Should Be Evaluated in the EIR.**

CEQA prohibits approval of projects with adverse environmental impacts if there are feasible alternatives. (Guidelines § 15021, subd. (a)(2).) The CEQA Guidelines require an agency to “[d]isclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.” In order to implement this policy, the Guidelines specify that:

A public agency may approve a project even though the project would cause a significant effect on the environment *if* the agency makes a fully informed and *publicly disclosed decision* that: (a) There is no feasible way to lessen or avoid the significant effect....”

(Guidelines § 15043, emphasis added.)

The City has a duty under CEQA to evaluate a reasonable range of alternatives to the SEADIP Update as currently proposed. (*Laurel Heights I, supra*, 47 Cal.3d at 400.) The City “bears the burden of *affirmatively demonstrating* that . . . the agency’s *approval* of the proposed project *followed meaningful consideration of alternatives* and mitigation measures.” (*Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 134, emphasis added; accord *Village Laguna of Laguna Beach v. Board of Supervisors* (1982) 134 Cal.App.3d 1022, 1035.) As the Court has said, while an EIR is “the heart of CEQA”, the “core of an EIR is the mitigation and alternatives sections.” (*Citizens of Goleta Valley v. Bd. Of Supervisors* (1990) 52 Cal.3d 553, 564.) Preparation of an adequate EIR with analysis of a reasonable range of alternatives is crucial to CEQA’s substantive mandate to “prevent significant avoidable damage to the environment” when alternatives or mitigation measures are feasible. (Guidelines § 15002(a)(3).)

While “[a]n EIR need not consider every conceivable alternative to a project, ‘it must consider ‘a reasonable range of *potentially* feasible alternatives...’” (Guidelines § 15126.6(a), emphasis added.) “The range of feasible alternatives [for an EIR] shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.” (Guidelines § 15126.6 (f).) “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (Guidelines § 15126.6(b).)

The EIR should focus on a good faith analysis of real alternatives to the SEADIP Update’s current proposals.

## **IX. Mitigation of Any Potentially Significant Impacts is Required.**

Finally, LCWLT seeks to ensure that any direct, indirect, or cumulative impacts of the SEADIP Update are fully mitigated as required by CEQA. This will require an environmental review process that fully discloses the Project’s likely significant environmental impacts and provides a thorough discussion of alternatives and mitigation measures designed to “avoid or substantially lessen” those environmental impacts as

required by Public Resources Code § 21002. Any mitigation measures developed must be concrete and enforceable. (Pub. Res. Code 21081.6(b); *Lincoln Place Tenants Ass'n v. City of Los Angeles* (2007) 155 Cal. App. 4<sup>th</sup> 425, 445 [“mitigation measures must be feasible and enforceable”]). Additionally, the environmental review document prepared for CEQA compliance must evaluate the efficacy of the mitigation measures proposed, as well as any significant environmental impacts that the mitigation measures may cause. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645; Guidelines s. 15126.4.)

**Conclusion.**

Thank you again for soliciting feedback from LCWLT as you begin the environmental review process for the first comprehensive update to SEADIP in nearly 40 years. The LCWLT appreciates the City’s acknowledgement in the Initial Study of the Project’s potentially significant impacts and its stated commitment to mitigating any significant adverse impacts that are identified in the EIR. We look forward to the release of a full environmental impact report that thoroughly evaluates the Project’s potential impacts on wetlands and consistency with the City’s Mobility Plan and its laudable objectives. Please contact us if you have any questions about these comments.

Sincerely,



Michelle N. Black

Attachment:

1. Standards for Bird Safe Buildings, City of San Francisco



SAN FRANCISCO  
**PLANNING**  
DEPARTMENT

# Standards for **Bird-Safe Buildings**

SAN FRANCISCO PLANNING DEPARTMENT | ADOPTED JULY 14, 2011



# Adopted July 14, 2011

By the San Francisco Planning Commission



SAN FRANCISCO  
**PLANNING**  
DEPARTMENT

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# PREFACE: Purpose of the Standards

Photo by Robert Lewis



Varied Thrush

Photo by Robert Lewis



Anna's Hummingbird

*“The wide variety of native birds that thrive in urban areas underscores the importance of these artificial habitats to the survival of many bird populations. Creating greenspace in urban environments, landscaping with native plants in backyards and parks, adopting architecture and lighting systems that reduce collisions, and keeping pets indoors will provide the greatest benefit to breeding birds and migrants seeking safe places to rest and find food during their spectacular journeys.”*

- 2009 State of The Birds Report by the United States Government US Department of Interior

Pigeons and sparrows are readily visible in San Francisco. These ubiquitous city birds are not shy about sharing our urban spaces. But the casual observer may be shocked to learn that our City's birds are much more diverse. There are about 400 species of birds in San Francisco; remarkably, this is nearly half the species in all North America (Kay 2009). For those who look, the shyer species are just around the corner. This is due in part to the diverse habitats of the Bay Area and its position on the coastal migration path, the Pacific Flyway. Some birds are well-adapted to urban life, and they may remain here as year-round “residents.” Others are migratory, passing through the City southward in autumn en route to their winter feeding grounds, then returning northward in spring to establish territories in summer breeding grounds.

There are special problems posed for birds living in or flying through cities. Over 30 years of research has documented that buildings and windows are the top killer of wild birds in North America (Banks 1979; Ogden 1996; Hager et al. 2008; Klem 2009; Gelb and Delacretaz 2009). Structure collision fatalities may account for between 100 million and 1 billion birds killed annually in North America (United States Fish and Wildlife Service 2002; Klem 2009). According to the leading expert, Dr. Daniel Klem Jr., this toll strikes indiscriminately culling some of the healthiest of the species. “From a population standpoint, it’s a bleeding that doesn’t get replaced,” he stated, estimating that between one and five percent of the total migratory population die in window crashes annually (Klem, 2009). Many of these are endangered or threatened species whose populations are already declining due to habitat loss, toxin loads, and other severe environmental pressures.

Juvenile residents and migrants of all ages — those least familiar with the urban setting — face the greatest risk of injury or death from the hazards of the city environment. Collision hazards include vehicles, bridges, transmission towers, power lines, and turbines, but the majority of avian deaths and injuries occur from impacts with building components such as transparent or reflective glass. Night-time lighting also interferes with avian migrations. Scientists have determined that bird mortality caused by collisions with structures is “biologically significant” for certain species (*Longcore et al. 2005*). In other words, building collisions are a threat of sufficient magnitude to affect the viability of bird populations, leading to local, regional, and national declines. Night-migrating songbirds—already imperiled by habitat loss and other environmental stressors—are at double the risk, threatened both by illuminated buildings when they fly at night and by daytime glass collisions as they seek food and shelter.

While species that are plentiful may not be threatened by structure collisions, many species that are threatened or endangered show up on building collision lists (*Ogden 1996 and references therein*).

Strategies that improve the urban design quality or sustainability of the built environment may help to make a more bird-safe city. For example, San Francisco has a long-standing policy prohibiting installation of mirrored glass, to meet aesthetic goals. This policy also benefits birds, which mistake reflections for real space and don't perceive the glass as a deadly barrier. The launch of the Golden Gate Audubon Society, Pacific Gas and Electric Company, and Department of the Environment's voluntary Lights Out San Francisco program in 2008 links smart energy policy with bird preservation strategies.

Occasionally policy goals may conflict, and we must balance the benefits and costs of one policy against the other. For instance, gains in energy and resource conservation provided by wind generators could also have negative environmental impacts if installations of those wind farms increase mortality among flying animals.

Photo courtesy New York Audubon's "Bird-Safe Guidelines"



A Red-Tailed Hawk may see its reflection as a territorial rival to be driven away, resulting in a collision.

### WHAT THIS DOCUMENT DOES

Annual kills at high-risk structures are foreseeable and avoidable and merit protection (*Klem, 2009*). This publication serves as the Planning Commission's policy document for Section 139 of the Planning Code, “*Standards for Bird-Safe Buildings*.” The controls described within aim to identify high-risk features in an urban setting and regulate these situations to the best of current scientific understanding. In areas where the risks are less well known, the Department does not propose to apply controls but instead recommends project sponsors use the checklist contained in this document as an educational tool to increase their understanding of potential dangers. Qualifications for achieving recognition as a Bird-Safe building are included in the document to acknowledge building owners who voluntarily take measures to help keep birds safe above and beyond the requirements. At this time, the Planning Department also urges local researchers to further explore the issue and for citizens to get involved in local monitoring efforts.

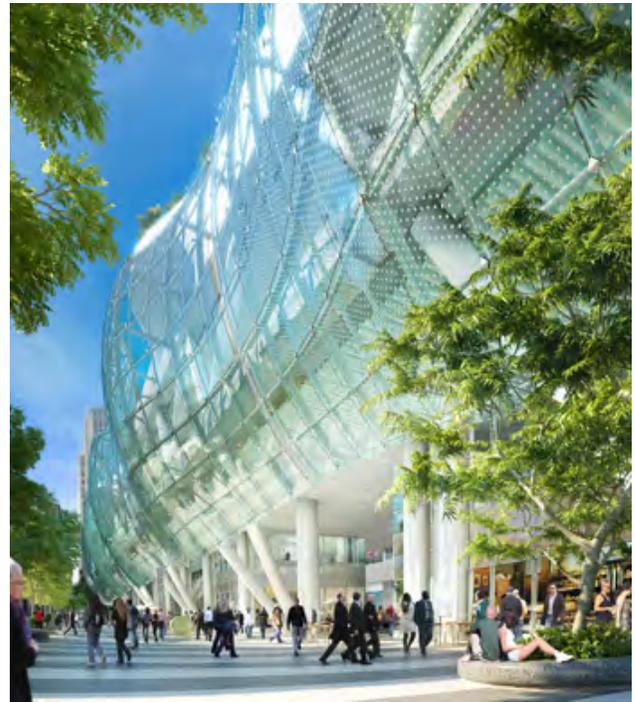
# I. The Issue: Birds, Buildings, People and Cities

## Changing Nature of North America and Building Design

The consequences of our population growth are well-known: sprawling development across the country compounds habitat loss and disrupts vital ecological functions. The rate of sprawl in the United States almost quadrupled between 1954 and 2000. An area of undeveloped land about the size of Connecticut is converted to urbanized landscapes annually in the United States (*U.S. Department of Agriculture 1997*). This loss of habitat exerts great pressures on our wildlife.

Less well-known to the general public are the effects of our specific development forms on wildlife. Buildings and birds have coexisted since people first sought shelter. Early blocky buildings posed little threat to birds as the building elements were quite visibly solid. The advent of mass produced sheet glass in 1902 greatly increased the potential for transparency. The innovation of steel frame buildings with glass curtain walls resulted in transparent high-rise buildings.

After the Second World War, these steel and glass buildings were widely used and became the iconic 20th Century American building. Today, planners and urban dwellers increasingly demand building transparency to achieve street activation and pedestrian interest. As glass surface area increases so do the number of bird collisions. After World War II birdwatchers began documenting major bird-building, single-event collisions that resulted in the deaths of hundreds of birds. The first recorded event occurred on September 10, 1948 when more than 200 birds of 30 species were killed upon collision with the Empire State Building (*McAdams 2003*). Similar events have occurred every decade with notable events killing 10,000 to 50,000 birds at a strike (*Bower 2000*). In 2011, the New York Times reported, that “After 5,000 red-winged blackbirds fell from the sky in Arkansas on New Year’s Eve, many Americans awakened to a reality that had not necessarily been on their radar: many birds die as a result of collisions with buildings” (*Kaufman 2011*). These single-event strikes are often tied to inclement weather, night migration, and brightly lit structures.



ABOVE: The proposed new Transbay Terminal presents a transparent façade with enticing vegetation visible both inside the building and on the roof. The façade is currently planned to include fritted glass.



ABOVE: Many historic buildings such as the old Transbay Terminal present a solid appearance.

While single-event collisions are dramatic, the bulk of bird deaths result from the cumulative effects of a lone, confused bird mistaking glass for a safe flight path. The lone bird strike occurs over and over with conservative estimates calculating that each building kills 10 birds per year on average in the United States (Klem 1990). Poorly designed buildings kill hundreds per year (Hager et al. 2008). Current research finds that earlier estimates of up to 1 billion bird deaths per year due to building collisions were conservative (Klem et al. 2009 and references therein).

New trends in green architecture can either increase or decrease the risk for birds. Green design that facilitates bird safety includes: the avoidance of light pollution, reduced disturbance to natural landscapes and biological systems, and lowered energy use. Green design can also be hard on birds. Green buildings surrounded by lush landscaping may attract more birds. Window reflections of adjacent greenery lure birds to false trees. Green atria inside buildings too may call birds to an inaccessible haven only to have their journey harshly interrupted mid-flight. In 2011, the Chicago Tribune reported that birds were crashing into the FBI's Chicago office, a Platinum LEED Building, at a clip of 10 birds a day during migration (DeVore 2011).

Green building design can go hand-in-hand with bird-safe design. The Green Building Council rating system, LEED, challenges designers to assess the impact of building and site development on

Photo courtesy of Lundberg Design



ABOVE: The City's new bus shelters designed by Lundberg Design use a subtle frit pattern to indicate the barrier. This design, called "SF Fog," is effective in alerting both people and birds to the glass. INSETS show how the frit pattern is more dense at the bottom and dissipates like the City's fog at the top.

wildlife, and incorporate measures to reduce threats. Buildings may be certified as silver, gold, or platinum according to the number of credits achieved. A LEED a bird-friendly pilot may be developed as early as summer 2011, for testing and eventual inclusion into the main LEED structure. There is still room for improvement. In the future, green design should thoroughly consider the impact of design on wild flora and fauna.

BELOW: The California Academy of Sciences showcases many green design features including a green roof set within a lush, green landscape that is a natural respite for birds migrating through the city. Because its use of glass could also pose a collision risk, researchers at the Academy are studying the effects of the building on birds and testing various methods of improving bird safety, including the use of external screens, as shown on page 29.



## The Basics: Birds and Buildings

### BIRDS AND GLASS

Glass is everywhere and is one of the least recognized, but most serious, threats to birds; one that is increasing as humans continue to build within bird habitats across the planet. Clear glass is invisible to birds and to humans, but both can learn to recognize and avoid it. Unfortunately, most birds' first encounter with glass is fatal. They collide at full speed when they try to fly to sky, plants, or other objects seen through glass or reflected on its surface. Death is frequently not instantaneous, and may occur as a result of internal hemorrhage days after impact, far away from the original collision site, making monitoring the problem even more difficult. The two primary hazards of glass for birds are reflectivity and transparency.

#### REFLECTIVITY



Viewed from outside buildings, transparent glass often appears highly reflective. Almost every type of architectural glass under the right conditions

reflects the sky, clouds, or nearby trees and vegetation. Glass which reflects the environment presents birds with the appearance of safe routes, shelter, and possibly food ahead. When birds try to fly to the reflected habitat, they hit the glass. Reflected vegetation is the most dangerous, but birds may also attempt to fly past reflected buildings or through reflected passageways.

#### TRANSPARENCY



During daylight hours, birds strike transparent windows as they attempt to access potential perches, plants, food or water sources and other lures

seen through the glass. "Design traps" such as glass "skywalks" joining buildings, glass walls around planted atria and windows installed perpendicularly on building corners are dangerous because birds perceive an unobstructed route to the other side.



<http://www.princeton.edu/pr/pictures/f-jprinceton/modern/>



Photo by Aviliane Rodgers

TOP: Clouds and neighboring trees reflect in the glass curtain wall of Sherrerd Hall on the Princeton campus making it difficult for birds to distinguish real from reflection.

BOTTOM: A Market Street building with a transparent corner may lead birds to think the tree is reachable by flying through the glass.

**GLAZING CHARACTERISTICS**

Reflective and transparent glass each present hazards to birds (Gelb and Delacretaz 2009).

**REFLECTIVITY**

*Image courtesy of Lightsoutindy.org*



*Photos Courtesy: NY Audubon*

**TRANSPARENCY**

*Image courtesy of Lightsoutindy.org*



**TOP:** Reflections: A bird looking for a perch may mistake the reflected tree for an actual tree.

**BOTTOM:** Transparent glass can be mistaken for a clear flight path.

### GLASS RELATIVE TO BUILDING HEIGHT AND MASSING

Typically, as building size increases, so does the amount of glass, making larger buildings more of a threat. Lower stories of buildings are the most dangerous because windows here are at or below canopy height and are more likely to reflect trees and other landscape features that attract birds. This makes a long, low building more of a hazard than a tall one of equal interior square-footage. However, as monitoring programs access setbacks and roofs of tall buildings, they are finding that birds also collide with buildings at the higher floors. This is an area where more information is needed.

### AMOUNT OF GLASS

Glass causes virtually all bird collisions with buildings. It's logical that as the amount of glazing increases on a building the threat also increases. A study in New York (Klem *et al*, 2009) found a 10% increase in the area of reflective and transparent glass on a building façade correlated with a 19-32% increase in the number of fatal collisions, in spring and fall, when visiting migrants are present.

### REDUCING KNOWN BIRD TRAPS



Windowed courtyards and open-topped atria can be hazardous, especially if they are heavily planted. Birds fly down into such places, and then try to leave by flying directly towards reflections on the walls. Glass skywalks, handrails and building corners where glass walls or windows are perpendicular are dangerous because birds can see through them to sky or habitat on the other side.



TOP: SoMa's Foundry Square presents a full façade of highly reflective glass. While all glass can be reflective, glass manufacturers label glass with standards "reflectivity" ratings.



Photo Courtesy NY Audubon

ABOVE LEFT: This café on Market Street uses a glass wind barrier lined with attractive flowers that may entice birds.

ABOVE RIGHT: This glass walkway allows for a clear sightline through the passage. Without treatment to the glazing, this can create a hazards for birds.

### CLEAR FLIGHT PATHS

Birds have evolved to fly through tree canopies at speed. This ability to navigate tight places is a benefit in most natural settings but may be a liability in the built environment. Early attempts to ward off bird collisions with glass panes included the unsuccessful attempts at placing falcon stickers in the middle of each pane. As the acrobatic bird below demonstrates and as current research has shown, collisions are most effectively reduced when flight paths are eliminated by the breaking of glass swaths to less than either 4" vertically or 2" horizontally (*Sheppard 2010*).



Hand Print Rule: Small birds may try to fly through any spaces that are about the size of a handprint.



<http://zuzutop.com/2009/07/a-job-for-superswallow/>



Exceptional Acrobats: Some birds such as the barn swallow pictured here can easily fly through spaces that are more narrow. This bird is traveling at 35 mph through a 2-inch seam.

We don't know exactly what birds see when they look at glass but we do know that the amount of glass in a building is the strongest predictor of how dangerous it is to birds. Other factors can increase or decrease a building's impact, including the density and species composition of local bird populations, 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 environments. Commercial buildings with large expanses of glass can kill large numbers of birds, estimated at 35 million per year in the US (*Hager et al 2008*). With bird kills estimated at 1-10 per building per year, the large number of buildings multiplies out to a national estimate of as much as a billion birds per year (*Klem et al 2009; Klem 1990, 2009*). As we'll discuss, certain particularly hazardous combinations can result in hundreds of deaths per year for a single building.



Photo by Hendrik Dacquin

BOTTOM A fatal bird-strike leaves behind a print of the bird's plumage as evidence of the force of the impact.

## BIRDS AND LIGHTING



### LIGHT

While recent research suggests that nighttime collisions may be more limited in scope than previously thought (*Gelb and Delacretaz 2009 and references therein*), at night artificial light degrades the quality of migratory corridors and adds new dangers to an already perilous journey. These conditions can be exacerbated by unfavorable weather and San Francisco fog, limiting birds' ability to see navigational markers like the stars and moon. Flood lights on tall buildings or intense uplights emit light fields that entrap birds reluctant to fly from a lit area into a dark one. This type of lighting has resulted in mass mortalities of birds (*Ogden 1996 and references therein*).

Lights disrupt birds' orientation. Birds may cluster around such lights circling upward, increasing the likelihood of collisions with the structure or each other. Importantly, vital energy stores are consumed in nonproductive flight. The combination of fog and light doubly affects birds' navigation and orientation. (*Ogden 2006*)

Besides reducing adverse impacts on migrating birds, there are significant economic and human health incentives for curbing excessive building illumination. In June 2009, the American Medical Association declared light pollution a human health threat and developed a policy in support of control of light pollution.

Overly-lit buildings waste tremendous amounts of electricity, increasing greenhouse gas emissions and air pollution levels, and of course, wasting money. Researchers estimate that the United States alone wastes over one billion dollars in electrical costs annually because poorly designed or improperly installed outdoor fixtures allow much of the light to go up to the sky. "Light pollution" has negative aesthetic and cultural impacts. Recent studies estimate that over two-thirds of the world's population can no longer see the Milky Way, a source of mystery and imagination for star-gazers. Together, the ecological, financial, and aesthetic/cultural impacts of excessive building lighting serve as compelling motivation to reduce and refine light usage (*Scriber 2008*).

Light at night, especially during bad weather, creates conditions that are particularly hazardous to night migrating birds. Typically flying at heights over 500 feet, migrants often descend to lower altitudes during inclement weather, where they may encounter artificial light from buildings. Water vapor in very humid air, fog or mist refracts light, greatly increasing the illuminated area around light sources. Birds circle in the illuminated zone, appearing disoriented and unwilling or unable to leave (*Ogden 2006*). They are likely to succumb to lethal collision or fall to the ground from exhaustion, where they are at risk from predators. While mass mortalities at very tall illuminated structures such as skyscrapers have received the most attention, mortality is also associated with ground level lighting and with inclement weather.

BELOW: Hazards can combine in downtown San Francisco. In this photo beacon lighting, light spillage, and fog mix.



Photo by AriMae Rodgers

While we typically think of birds as early risers, during migration season many species will travel at night. White lights, red lights, skyglow, brightly lit buildings and interiors can distort normal flight routes (*Poot et al. 2008*). The risks vary by species. Songbirds, in particular, seem to be guided by light and therefore appear more susceptible to collisions with lit structures. Migrant songbirds have been documented by multiple sources to suffer single night mortalities of hundreds of birds at a single location (*Ogden 1996 and references therein*).

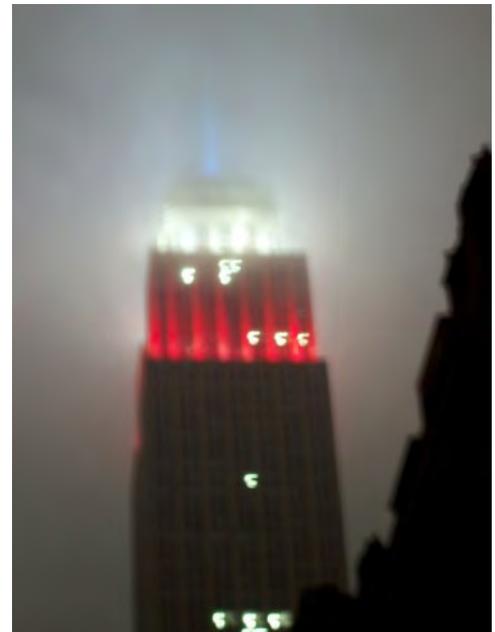


ABOVE: Lighting and Navigation: Birds migrate by reading light from the moon and stars, as well as by geomagnetic signals radiated from earth. Cumulative light spillage from cities can create a glow that is bright enough to obscure the starlight needed for navigation.

LEFT: Beacon Effect: Individual structures may be lit in a manner that draws birds like a moth to a flame. Beacon structures can draw birds towards land that may offer little shelter or food or towards collisions with glass. Once at the structure, birds may be hesitant to leave the lit area causing them to circle the structure until exhausted. (*Ogden 1996*)



RIGHT: Skyglow can be increased during periods of inclement weather. Current research indicates that red lights in particular may disrupt geomagnetic tracking. Red lights required for airline safety would be permitted (above image). Decorative red lighting, such as on the building below in New York, would be discouraged.





Map courtesy of Texas Parks and Wildlife Department.

**OTHER CAUSES OF COLLISIONS:**

**LOCATION: MACRO-SETTING**

San Francisco is on the Oceanic Route of the Pacific Flyway. During migration, birds tend to follow rivers and the coastline. In this way migrants funnel southward together in the fall and disperse northward in the spring.

**VISITING BIRDS**

Migrating birds are unfamiliar with the City and may be exhausted from their flight. Instances of collisions rise during the migratory seasons as birds travel to lower elevations to feed, rest, and use light to recalibrate their navigation. (Hager et al. 2008).

LEFT: Millions of birds – more than 350 species – follow the Pacific Flyway. Of the two primary routes, the Oceanic Route passes through the Bay Area. Spring migration occurs between February through May, and fall migration begins in August and lasts through November. During this time, collisions with buildings can increase notably.



Photos by Eddie Burley.

LEFT: According to the Golden Gate Audubon Society, over 250 species migrate through San Francisco Bay, many of them small songbirds such as warblers, thrushes, tanagers and sparrows that migrate at night and may be more susceptible to collisions with structures when descending for feeding and resting because of unfamiliar territory and confusing signals from the urban environment. Bird photos from left to right are Anna's Hummingbird, Yellow Warbler, and Lazuli Bunting.

**LOCATION: MICRO-SETTING**

How a building meets adjacent landscape features can be critical in determining the risk to birds. Buildings with large windows located adjacent to extensive vegetation present great hazards. In suburban areas, buildings with these features have been documented to kill 30 birds per year (*Klem 1990; and O'Connell 2001*). This combination may be even more lethal in urban areas. Studies of Manhattan structures with large swaths of glazing adjacent to large open spaces have recorded well over 100 collisions per year (*Gelb and Delacretaz 2009*).

**BUILDING FEATURES**

Well-articulated buildings orient people as well as birds, directing flow of traffic, creating enticing rest areas and adding aesthetic appeal.

RIGHT: Although located in a park setting, the De Young Museum minimizes hazards due to its low amount of glazing and perforated copper façade.

**WEATHER CONDITIONS**

Inclement weather can obscure obstacles and exacerbate skyglow conditions (*Ogden 1996 and references therein*).



[http://izismile.com/2009/09/30/beautiful\\_pictures\\_of\\_san\\_francisco\\_covered\\_with\\_fog\\_10\\_pics\\_1\\_video.html](http://izismile.com/2009/09/30/beautiful_pictures_of_san_francisco_covered_with_fog_10_pics_1_video.html)

## Implications for San Francisco

Three decades of researching bird/building collisions has yielded both many answers and posed new questions. The high number of North American bird deaths and the ecological importance of birds demonstrate that the problem exists on a national level, but it is natural to wonder if the dense nature of San Francisco presents the same compelling pressure for a local response. The short answer is yes—San Francisco has both an important population of birds and a potentially injurious built environment for them. As discussed previously, San Francisco is both home to many birds and is on a major migratory pathway. Locally, there are incidents of celebrated birds such, as the Peregrine Falcon, repeatedly losing their young due to collisions with downtown skyscrapers. With only a few studies currently underway in San Francisco and results not yet

complete, anecdotally, local birders have monitored several buildings and have noted significant numbers of bird injuries and deaths (Weeden, 2010). San Francisco Animal Care and Control staff further reported collecting 938 wild birds over a two year period from May 2008 through June 2010, noting the majority of birds were found during the spring and fall migratory periods. The California Academy of Sciences in Golden Gate Park is spearheading their own research and bird-safe building methods, in a proactive effort to avoid bird fatalities at their facility. In lieu of large-scale local monitoring programs there are a great many studies of dense urban cities that we can further draw upon. These studies demonstrate that birds respond similarly to certain building and environmental features, regardless of geographic location.

### SPOTLIGHT ON A LOCAL CELEBRITY

The Peregrine Falcon population suffered a huge blow to their numbers due to the use of pesticides including DDT beginning in the 1950s. In 1970 the California Peregrine Falcon population was reduced to only two known breeding pairs. The Santa Cruz Predatory Bird Research Group (SCPBRG) participated in the reintroduction of the species and has monitored the Peregrine Falcons nesting in San Francisco and other sites.

Natural cliff dwellers, the species adapted to nesting in bridges and downtown high-rises. As the population increased, Peregrine Falcons were reported in the San Francisco financial district and in 1987 a nest box was placed near a commonly used perch on the PG&E Headquarters Building. In 2003, Peregrine Falcons nested in the downtown for the first time and have been a closely watched since. SCPBRG trained citizens to participate in a group called “Fledge Watch” to increase understanding of how young falcons fare in the city. In 2009, 76 people volunteered for 5 hour shifts monitoring the 36-58 day old Peregrines from sunrise to sunset in either San Jose or San Francisco. The public could also view the falcons from the downtown building nest via a webcam.

According to Glenn Stewart of SCPBRG, “while there have been building collision fatalities, the target nest success of Peregrine Falcons in San Francisco was 1.5 per nest and has been exceeded at 1.6 young fledged per nest.”

It appears that several weeks after fledging, urban Peregrine Falcons recognize glass as a barrier. In the first few weeks when the young are learning to fly they are most at

risk for a collision. In other habitats, falcons face predators like eagles, owls, and when on the ground by bobcats, and coyotes. Like other birds, Peregrine Falcons see in the ultra violet (UV) range.

The architects and designers of the downtown environment did not consider bird building collision as a potential risk. In the future when buildings are being designed and upgraded, the latest information and options should be considered.

- Noreen Weeden, *Golden Gate Audubon Society*



Photo by Glenn Nevill

A native San Franciscan juvenile Peregrine Falcon (deceased offspring of “Dapper Dan” and “Diamond Lil”) perched on sill near reflective glass. All three fledged young from that year (2009) died as a result of building collisions. Two more fledglings died from collisions in 2011.

## LESSONS FROM MAJOR CITIES

Academic researchers and bird-rescue organizations in Chicago, Toronto, and New York City have documented thousands of structure collisions and come to some interesting conclusions.

Perhaps the most established monitoring program of bird-building collisions in a dense city is NYC Audubon's Project Safe Flight in Manhattan. Project Safe Flight documented over 5,400 collisions between 1997-2008. A recent study (*Gelb, Delacretaz 2009*) analyzed this data to determine the critical contributing factors for the structures with the largest number of bird fatalities.

- The study looked at the 10 most deadly collision sites and found the combination of open space, vegetation, and large windows (greater than 1 meter x 2 meter) to be more predictive of death than building height.
- The frequency of collisions is highest along façades that have lush exterior vegetation and either reflective or transparent windows.
- The majority of the collisions occurred during the daytime and involved migrant species.
- High-rise buildings and night lighting presented less risk than windows adjacent to open spaces one hectare or greater in size.
- The majority of collisions are likely due to high-collision sites that feature glass opposite exterior vegetation.
- Urban mortalities may be higher than previously thought. Non-urban studies estimated that high-collision sites would have about 30 collisions per year. At the Manhattan collision sites examined in this study, well over 100 collisions were recorded per year.

The most dangerous building in this study was not a high-rise, but instead was a 6-story office building adjacent to densely vegetated open space.

Studies in Toronto and other eastern and Great Lakes cities have documented tens of thousands of bird fatalities attributable to building collisions. A 10-year study of bird-building collisions in downtown Toronto found over 21,000 dead and injured birds in the city's

downtown core. A 25-year study by researchers from Chicago's Field Museum of Natural History documented a particularly problematic building in Chicago (McCormick Place Convention Center) with over 30,000 dead birds of 141 species. The lights at the McCormick Palace were left on at night until 2000. Anecdotal reports for this building cited an 80% decrease in the number of birds killed, by simply turning out building lights (*Kousky 2004*).

Other researchers have agreed that lights can cause a significant problem, but that turning off lights isn't the only answer (*Shephard, Klem 2011*). As shown in the Manhattan study of ten buildings, daytime collisions were higher and occurred in areas with vegetation opposite glass. Toronto's approach to tackle this dual issue was to provide mandatory construction standards for daytime, while continuing to increase participation in their Lights Out program at night.



Photos courtesy NY Audubon

ABOVE: The windows of Morgan Mail Building in Manhattan are adjacent to green landscaped open spaces, making it the most dangerous for birds in a recent study.



RIGHT: Morgan Mail Building causality.

## Spotlight on San Francisco’s Migrant Birds

Bird collisions with buildings occur year-round, but peak during the migration period in spring and especially in fall when millions of birds travel between breeding and wintering grounds. Migration is a complex phenomenon, and different species face different levels of hazards, depending on their migration strategy, immediate weather conditions, availability of food, and anthropogenic obstacles encountered en route.

Photo by Kristen Weeden



**Nocturnal migrants:** Many songbirds migrate at night, possibly to take advantage of cooler temperatures and less turbulent air, and because they need daylight to hunt insects for food. Generally, these birds migrate individually, not in flocks, flying spread out across

most of their range. Migrants depart shortly after sundown. The number of birds in flight peaks before midnight, then drops. Songbirds may fly as many as 200 miles in a night, then stop to rest and feed for one to three days, but these patterns are strongly impacted by weather, especially wind and temperature. Birds may delay departure, waiting for good weather. They generally fly at an altitude of about 2,000 feet, but may descend or curtail flight altogether if they encounter a cold front, rain, or fog. There can be a thousand-fold difference in the number of birds aloft from one night to the next. Concentrations of birds may develop in ‘staging areas’ where birds prepare to cross large barriers such as the Great Lakes or Gulf of Mexico.



**Diurnal migrants:** Daytime migrants include raptors, which take advantage of air currents to reduce the energy needed for flight. Other diurnal migrants, including shorebirds and water-birds, often fly in flocks and their stopover sites are less dispersed because of their dependence on bodies of water. This means that daytime migration routes often follow land forms such as rivers and mountain ranges, and

birds tend to be concentrated along these routes or ‘flyways’. Not all songbirds migrate at night—species such as robins, larks, kingbirds and others migrate during the day. Birds’ daytime flight altitudes are generally lower than their nighttime counterparts.

Millions of birds, especially songbirds, are thus at risk, as they ascend and descend, flying through or stopping at or near populated areas. As city buildings grow in height, they become unseen obstacles by night and pose confusing reflections by day. Nocturnal migrants, after landing, make short, low flights near dawn, searching for feeding areas and running a gauntlet of glass in almost every habitat: in cities, suburbs and, increasingly, exurbs. When weather conditions cause night flyers to descend into the range of lighted structures, huge kills can occur around tall buildings. Urban sprawl is creating large areas lit all night that may be causing less obvious, more dispersed bird mortality.

- Christine Sheppard, *American Bird Conservancy*

## THE IMPORTANCE OF MACRO-LOCATION (ON MIGRATION PATH) VS. MICRO-LOCATION (WITHIN A PARK-LIKE SETTING) AS A RISK FACTOR

A study of collisions at suburban office parks in Virginia found a large mortality rate for migrant birds even though the office parks were not on a migratory route—suggesting that the combination of mirrored windows and vegetation was more of a collision risk to visiting birds (*O’Connell 2001*). This study also suggests that the location of the building relative to the flyway may be less important than other risk factors such as building design and siting relative to plantings and open space.

Photos by Eddie Barthey



By flying at night, migrants like the Orange-Crowned Warbler (NEAR RIGHT) and Western Tanager (ABOVE LEFT) minimize predation, and avoid overheating that could result from the energy expended to fly such long distances. This also enables them to feed during the day and refuel for the night.

Daytime migrants like this Cooper’s Hawk (FAR RIGHT) and the Sharp-shinned Hawk (ABOVE RIGHT) depend on the heating earth for added lift. Riding rising air currents called thermals, these birds take advantage of this lift to rise to the top of one thermal, set their wings in the direction they want to travel and then coast to the next thermal.

## Spotlight on Building Height and Bird Migration

**Upper Levels:****NOCTURNAL MIGRANTS AND FLEDGLING RAPTORS**

While birds' migratory paths vary and with some birds traveling more than 10,000' high, radar tracking has determined that approximately 98% of flying vertebrates (birds and bats) migrate at heights below 1,640 feet during the spring, with 75% flying below that level in the fall. Today, many of the tallest buildings in the world reach or come close to the upper limits of bird migration. Storms or fog, which cause migrants to fly lower and can cause disorientation, can put countless birds at risk during a single evening.



2000'

1600'

**Mid-Levels:****PRIMARY MIGRATION ZONE FOR SMALL BIRDS**

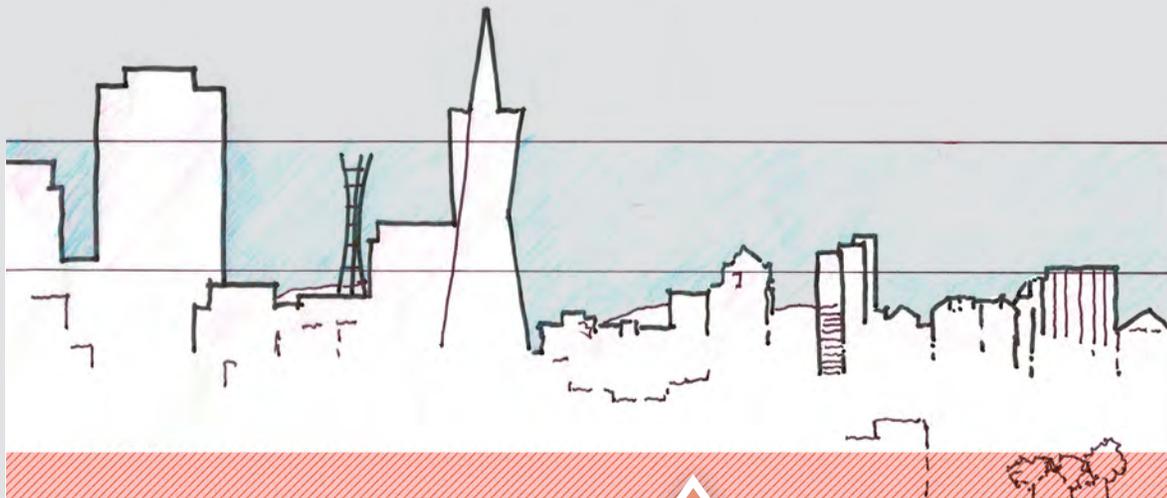
This is the primary migration height for small birds. Migrating birds descend from migration heights in the early morning to rest and forage for food in tree canopies and on the ground. Migrants also frequently fly short distances at lower elevations in the early morning to correct the path of their migration.

1000'

500'

300'

60'

**Bird Building Collision Zone:****INCREASED COLLISIONS FOR LOCAL BIRDS AND MIGRANTS SEARCHING FOR FOOD AND SHELTER**

The most hazardous areas of all buildings, especially during the day and regardless of overall height, are the ground level and bottom few stories. Here, birds are most likely to fly into glazed façades that reflect surrounding vegetation, sky, and other attractive features.

# II. Bird-Safe Treatments

## A Survey of Treatments from Easy to Innovative

Effective bird-safe building treatments exist and have been employed on buildings of significant architectural stature. San Francisco has a local example of such treatments that has been recognized nationally. The new Federal Building is cited as an example of bird-safe building design in United States Representative Mike Quigley's (D-IL) pending bill, "Federal Bird-Safe Buildings Act of 2011" (*House Bill No. 1643*). This bill, if adopted, would require federal buildings to incorporate bird-safe design principals.

Bird-safe design options are limited only by the imagination. Safe buildings may have large expanses of glass but use screens, latticework, grilles and other devices, both functional and decorative, outside the glass or integrated into the glass. There are treatments for existing glass that will reduce mortality to zero. These treatments do provide a view from inside, though often presenting a level of opacity from the outside, a factor that can deter application of these solutions. Glass treatments that can eliminate or greatly reduce bird mortality, while only minimally obscuring the glass itself, are therefore highly desirable and encourage more 'bird-friendly' design.

RIGHT: The south façade sports perforated steel panels that filter sunlight and serve as thermal buffers but also may convince birds that the structure is solid.

BOTTOM: San Francisco's Federal Building's north façade boasts floor-to-ceiling glass buffered behind a grid of metal catwalks and opaque glass fins.

Photos by Kurt Rodgers, SF Chronicle  
<http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2007/02/25/MNG2DOATDN1.DTL>



## GLASS AND FAÇADE TREATMENTS

Reduction of bird strikes with new buildings can be achieved with simple and cost-effective means. Creating a visual signal, or “visual noise barrier,” that alerts the birds to the presence of glass objects can be achieved with relatively little additional cost. Fritting, the placement of ceramic lines or dots on glass, is one method of creating a visual noise barrier. People inside the building see through the pattern, which has little effect on the human-perceived transparency of the window. Fritting can also reduce air conditioning loads by lowering heat gain, while still allowing enough light transmission for day-lighting interior spaces. There is now a commercially available insulated glass with ultra-violet patterns that are designed to deter birds while largely being imperceptible to humans.

### FRITTED AND FROSTED GLASS

Ceramic dots, or frits, are applied between layers of insulated glass to reduce transmission of light. These can be applied in different colors and patterns and can commonly be seen on commercial buildings. At Swarthmore College, external, densely fritted glass was incorporated into the design of the Unified Science Center. Virtually no strikes have been reported at either site. Fritting is a commonly-used and inexpensive solution that is most successful when the frits are applied on the outside surface.

### ANGLED GLASS

While angled glass may be a useful strategy for smaller panes, it is generally not effective for large buildings. Birds approach glass from many angles, and can see glass from many perspectives. Generally, the desired angle for effective treatment is 20-40 degrees. These angles are difficult to maintain for large buildings, however, this strategy may work in low-scaled buildings with a limited amount of glass (Ogden 1996 and references therein; and Klem et al. 2004).



Minnesota Bird-Safe Building Guidelines



Minnesota Bird-Safe Building Guidelines

LEFT: Swarthmore College uses fritting on a large expanse of glass facing an open space.

RIGHT: The Minnesota Central Library's atrium features angled glass, a dramatic architectural feature that reduces reflections of habitat and sky from most angles. The likelihood of fatal collisions at this angle is lessened.

### ULTRA-VIOLET GLASS

The Bronx Zoo uses glass that reflects UV light—primarily visible to birds, but not to people (Klem 2009). This glass may be about 50% more expensive than typical glass but is comparable to energy-efficient glass (Eisenberg 2010).

TOP RIGHT: The Bronx Zoo from the NYTimes.



[http://www.nytimes.com/2010/08/29/business/29novel.html?ref=anne\\_eisenberg](http://www.nytimes.com/2010/08/29/business/29novel.html?ref=anne_eisenberg)

### FILM AND ART TREATMENT OF GLASS

Windows may be used as canvases to express building use through film and art. In certain instances, windows made bird-safe through an application of art may receive funding through San Francisco's One Percent for Public Art Program.

SECOND RIGHT: IIT Student Center, Chicago.



NY Bird-Safe Design Guidelines

### EXTERNAL SCREENS

External screens are both inexpensive and effective. Screens can be added to individual windows for small-scale projects or can become a façade element of larger developments. This time-tested approach precludes collisions without completely obscuring vision. Before non-operable windows, screens were more prevalent. At the other end of the spectrum are solutions that wrap entire structures with lightweight netting or screens. To be effective, the netting must be several inches in front of the window, so birds don't hit the glass after hitting the net.

THIRD RIGHT: The Matarozzi/Pelsinger Building in San Francisco is a LEED Gold building designed by Aidlin-Darling. It has screens over the majority of its façade that protect birds from impact and allow views out for users of the building (left nighttime/right daytime)



Minnesota Bird-Safe Building Guidelines

### ARCHITECTURAL FEATURES

Overhangs, louvers, and awnings can block the view of the glass from birds located above the feature but do not eliminate reflections. This approach should be combined with window treatments to achieve results.

BOTTOM RIGHT: The award winning Aqua Tower, Chicago, uses overhangs and other features that provide bird-safe design as well as energy efficiency.



Steve Hall/Studio Gang

## NETTING

Netting has proven to be a versatile and effective option for bird-safe window treatment. Netting is stretched several inches over windows or entry ways to prevent birds from hitting the glass. Specifically designed netting is almost completely invisible and does not require invasive installation techniques. It can be used for new buildings, retrofits to existing buildings, replacement glass façades, and for preserving original features of historic buildings.

During the spring and fall migrations, agency staff at the FBI building in Chicago discovered at least 10 birds a day crashing into windows outside of their first floor, plant filled indoor atrium. Seasonal netting was installed and bird collision monitors noted a substantial reduction in bird strikes, without compromising the look of the building or the ability to see into or out of the lobby (DeVore 2011).

Netting has also been used successfully to treat historic buildings, where it's critical to maintain the original character of the building. Prestigious historic preservation awards have been earned for netting work on famous buildings such as the American Museum of Natural History and the US Department of Justice. Other historically significant structures with netting include New York Metropolitan Opera, Independence Hall, and even Alcatraz Prison.



Heather Charles, Chicago Tribune

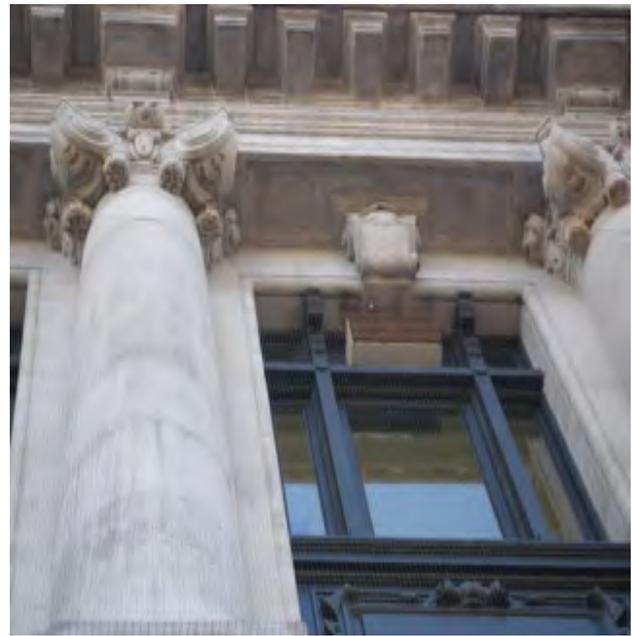


Photo Courtesy of Birdmasters, Inc.

TOP RIGHT: Special agent Julia Meredith discovered so many dead and injured birds on the ground outside the Chicago offices of the FBI that she lobbied to have special bird-friendly netting installed on the building's first floor windows. She estimates that the nets have reduced the number of birds crashing into the windows by 90 percent.

CENTER RIGHT: A close-up view of the New York Public Library barely shows the marble toned and clear netting over the building.

BOTTOM RIGHT: The netting placed over the windows at the New York Public Library is virtually invisible and helps prevent both bird strikes and building deterioration from pest species.



Photo Courtesy of Birdmasters, Inc.

## WIND GENERATORS

San Francisco has a policy to encourage the installation of on-site, renewable energy systems, such as small wind generators. Currently, there are two general types of wind generators available. One uses scoops or blades to spin on a vertical axis, shown at far left below. It is probable that birds would perceive this type as a solid barrier even when it's rotating.

The second design uses a propeller-like rotor to spin on a horizontal axis. This is a small-scale version of the most common generator used on large-scale wind farms throughout the world.

While it is unreasonable to believe that these small urban systems would cause the annihilation of birds such as the well-known disaster at Altamont, California (see discussion on adjacent page) a certain amount of caution is prudent in the absence of established scientific research. The Planning Department has exercised that caution by allowing a more widespread installation of vertical axis machines, and limiting locations of horizontal axis, open-bladed generators to areas that would seem to be less densely populated by birds, especially migrants and juveniles.

The only clear way at present to learn whether small urban wind generators will harm birds is to allow the installation of a few, and to monitor the interactions with animals, if any. For this reason, all approvals for wind generators have conditions that require monitoring and reporting of bird and bat strikes. These reporting protocols are in accord with recommendations made by the Mayor's Task Force on Urban Wind.

As of June 2011, none of the approved windmills have submitted monitoring information to the Planning Department.



LEFT: Horizontal axis and vertical access wind generators that do not present a solid appearance are discouraged, especially adjacent to water or open space larger than 2 acres.



ABOVE: Vertical axis wind generators may vary in appearance. Blades that present a solid appearance (such as the left image) are encouraged.



Golden Eagle photo by Eddie Bartley.

## Spotlight on the Altamont Windmills

Golden Eagles, named for the golden feathering at the nape of their necks, are majestic raptors that can be found throughout most of California and much of the northern hemisphere. California protects these magnificent raptors as both a species of special concern and a fully protected species, making it illegal to harm or kill them. Golden Eagles are protected under the Bald and Golden Eagle Protection Act. Golden Eagles are also protected under the Federal Migratory Bird Treaty Act, which forbids the killing (even unintentional killing) of any migratory bird.

Golden Eagles typically prefer open terrain, such as the rolling hills of eastern Alameda County. The open grasslands, scattered oaks, and bountiful prey make this area ideal habitat for Golden Eagles. Today, it supports the highest-known density of Golden Eagle nesting territories in the world.

### Conservation Issues

Every year, an estimated 75 to 110 Golden Eagles are killed by the wind turbines in the Altamont Pass Wind Resource Area (APWRA). Some lose their wings, others are decapitated, and still others are cut in half. The lethal turbines have been reduced from 6,000 to less than 5,000 which are still arrayed across 50,000 acres of rolling hills in northeastern Alameda and southeastern Contra Costa counties. The APWRA, built in the 1980s, was one of the first wind energy sites in the U.S. At the time, no one knew how deadly the turbines could be for birds. Few would now deny, however, that Altamont Pass is probably the worst site ever chosen for a wind energy project. According to a 2004 California Energy Commission (CEC) report, as many as 380 Burrowing Owls (also a state-designated species of special concern), 300 Red-tailed Hawks, and 333 American Kestrels are killed every year. The most recent study by Dr. Shawn Smallwood, a member of the Altamont Scientific Review Committee estimates that approximately 7,600-9,300 birds are killed here each year. (Smallwood 2010)



In 2004, Golden Gate Audubon joined four other Bay Area Audubon chapters (Marin Audubon, Santa Clara Valley Audubon, Mt. Diablo Audubon, and Ohlone Audubon) and Center for Biological Diversity and Californians for Renewable Energy (CARE) in challenging the renewal permits for this facility. The Audubon/CARE CEQA lawsuit settled, with terms requiring the wind companies to reduce avian mortality by 50% within three years and to complete a comprehensive conservation plan to govern operations in the Altamont.

Reducing the kill entirely may not be possible as long as the wind turbines continue to operate at Altamont. However, significant progress can be made. The CEC estimates that wind operators could reduce bird deaths by as much as 50 percent within three years—the goal stated in the settlement agreement—and by up to 85 percent within six years—all without reducing energy output significantly at APWRA. These reductions could be achieved by removing turbines that are the most deadly to birds and shutting down the turbines during four winter months when winds are the least productive for wind energy, combined with some additional measures. Anecdotal data indicate there may not be a substantial improvement for Golden Eagles and there may actually be much higher mortality for bats.

Golden Gate Audubon is working with Alameda County to ensure that the permits granted to the wind industry achieve reductions in bird mortality, in addition to other requirements that will help address the unacceptable bird kills at Altamont Pass over the long term. Pursuit of clean energy technology, when done correctly, can help reduce the risk of global warming and its impacts on wildlife.

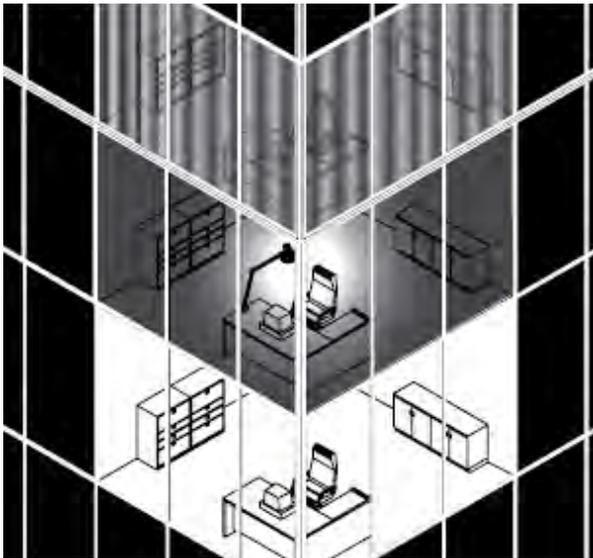
*Written by the Golden Gate Audubon Society.*

## LIGHTING TREATMENTS

While the ultimate cause of collisions are invisible surfaces, light pollution can increase risk. Night migrants depend on starlight for navigation, and brightly-lit buildings can draw them off course. Once within the aura of bright lights, they can become disoriented, and may collide with buildings, or may fly in circles around the light source, until they drop to the ground from exhaustion, having expended their limited energy reserves needed to complete their migration. Architects and building owners should collaborate to address the two key lighting issues: design and operation.

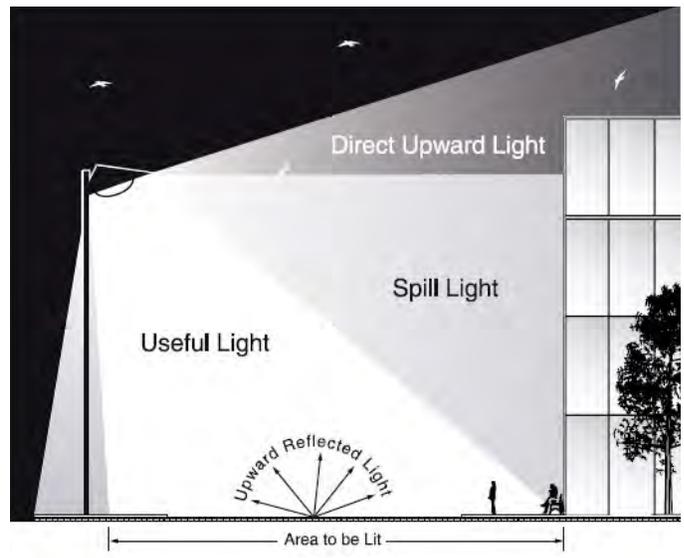
Eliminating unnecessary lighting is one of the easiest ways to reduce bird collisions, with the added advantage of saving energy and expense. As much as possible, lights should be controlled by motion

sensors. Building operations can be managed to eliminate or reduce night lighting from activities near windows. Minimize perimeter and vanity lighting and consider filters or special bulbs to reduce red wavelengths where lighting is necessary. Strobe lighting is preferable to steady burning lights. Exterior light fixtures should be designed to minimize light escaping upwards. Motion detectors are thought to provide better security than steady burning lights, because lights turning on provide a signal, and because steady lights create predictable shadows.



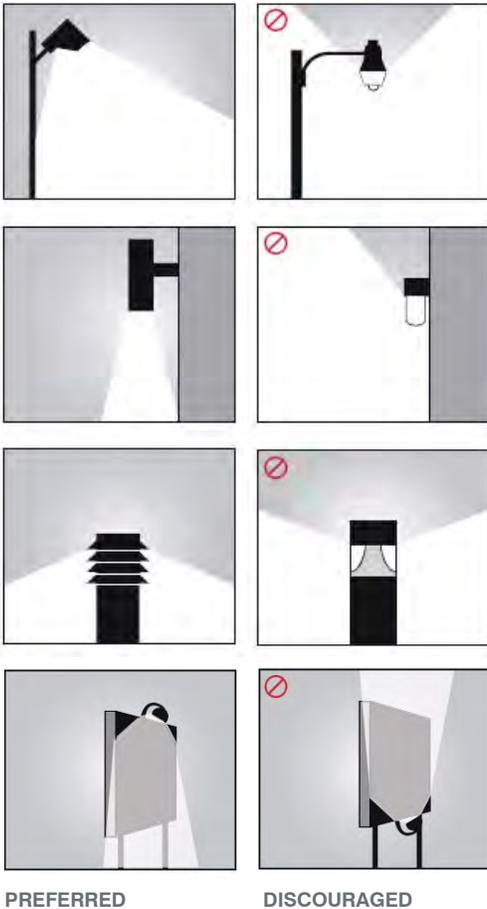
Minnesota Bird-Safe Building Guidelines

**REDUCE: UNNECESSARY INTERIOR LIGHT**



Minnesota Bird-Safe Building Guidelines

**REDUCE: UNNECESSARY EXTERIOR LIGHT**



City of Toronto

The Tribute of Lights / Copyright (c) 2010 John de Guzman: <http://johndeguzman.com>

### LIGHTING DESIGN

The built environment should be designed to minimize light pollution including: light trespass, over-illumination, glare, light clutter, and skyglow while using bird-friendly lighting colors when possible (*Poot et al. 2008*).

- **Avoid uplighting**
- **Avoid light spillage**
- **Use green and blue lights when possible**

### LIGHTING OPERATIONS

Unneeded interior and exterior lighting should be turned off from dusk to dawn during migrations: February 15 through May 31 and August 15 through November 30. Rooms where interior lighting is used at night should have window coverings that adequately block light transmission, and motion sensors or controls to extinguish lights in unoccupied spaces. Event searchlights are strongly discouraged during these times.

Several cities, including San Francisco, have launched citywide efforts to reduce unneeded lighting during migration. In addition to saving birds, these “Lights Out” programs save a considerable amount of energy and reduce pollution by reducing carbon dioxide emissions. The savings for a building can be significant. One participating municipal building in the Toronto Lights Out program reported annual energy reductions worth more than \$200,000 in 2006.

Lights Out requires that building owners, managers, and tenants work together to ensure that all unnecessary lighting is turned off during Lights Out dates and times (during spring and fall migration February 15th through May 31st and August 15th through November 30th). Best practices for lighting include turning off unnecessary lights after dusk and leaving the lights off until dawn. If inside lights are needed, window coverings such as blinds or drapes should be closed.

LEFT: The white streaks are the time-exposed paths of birds attracted to, dazed by, and circling within the columns of light. Many succumbed to exhaustion and perished without completing their migration. Lights Out policies do not allow the use of searchlights during the Spring and Autumn migration periods for this reason.

### III. Bird-Safe Requirements and Guidelines Across North America

When discussing human-caused threats to birds, the US Fish and Wildlife Service reports “that the incidental, accidental or unintentional take of migratory birds is not permitted by the Service and is a criminal violation of the Migratory Bird Treaty Act” but that the Service first attempts to work with industries and individuals who unintentionally cause bird death before pursuing criminal prosecution (*US Fish and Wildlife Service 2002*).

Several major cities are addressing the issue through local legislation.

- **Chicago:** In July of 2008, Cook County, Illinois, which includes Chicago, passed an ordinance requiring that all new buildings and major renovations incorporate design elements to reduce the likelihood of bird collisions. This ordinance established Chicago as the first major jurisdiction with a requirement for bird-safe elements. Other nearby local jurisdictions, such as Highland Park, are also following suit with new bird-safe architecture requirements.
- **Toronto:** This effort has evolved from voluntary ratings and incentive program to bird-friendly construction guidelines that became mandatory at the beginning of 2010. The bird-friendly guidelines were integrated into Toronto’s local Green Development Standard, required for nearly all new construction. In addition, the City of Toronto offers an acknowledgement program that offers incentives to developers and building owners and managers who implement the Bird-Friendly Development Guidelines. Once a development has been verified by City staff as “bird-friendly”, the City provides the owner with an original print by a local artist and the building may be marketed as “bird-friendly.” A bird-friendly designation could give these buildings a competitive advantage by identifying these features to an increasingly environmentally concerned and aware marketplace. Toronto also has had great success with

their Lights Out program which has been in effect since 2006. (See images on page 36.)

- **Minnesota:** As of 2009, the State of Minnesota requires that all state owned and leased buildings turn off their lights at night during migration. As of June, 2011, bird-safe building criteria are being developed for incorporation into the State of Minnesota Sustainable Building Guidelines.
- **Michigan:** Since 2006, the governor of Michigan has issued an annual proclamation, declaring “Safe Passage” dates during spring and fall migration, when buildings managers are asked to turn off lights at night.
- **Nationally:** In April 2011, Congressman Mike Quigley introduced a bill (*H.R. 1643*) into the U.S. Congress that, if passed, would mandate bird-friendly construction practices for federal buildings.



NY Bird-Safe Building Guidelines

## IV. San Francisco's Bird-Safe Requirements

It is clear from studies done throughout the U.S. and Canada that certain building and landscape configurations can be especially dangerous to birds. These sites present heightened risks for collisions and necessitate requirements, which are included in Section 139 of the Planning Code, Standards for Bird-Safe Buildings.



NY Bird-Safe Building Guidelines

The following bird-safe measures apply in San Francisco.

Structure and/or siting characteristics that present the greatest risk to birds are called "bird-hazards" and include:

- 1 Location-related hazards
- 2 Building feature-related hazards

# 1 Requirements for Location-Related Hazards

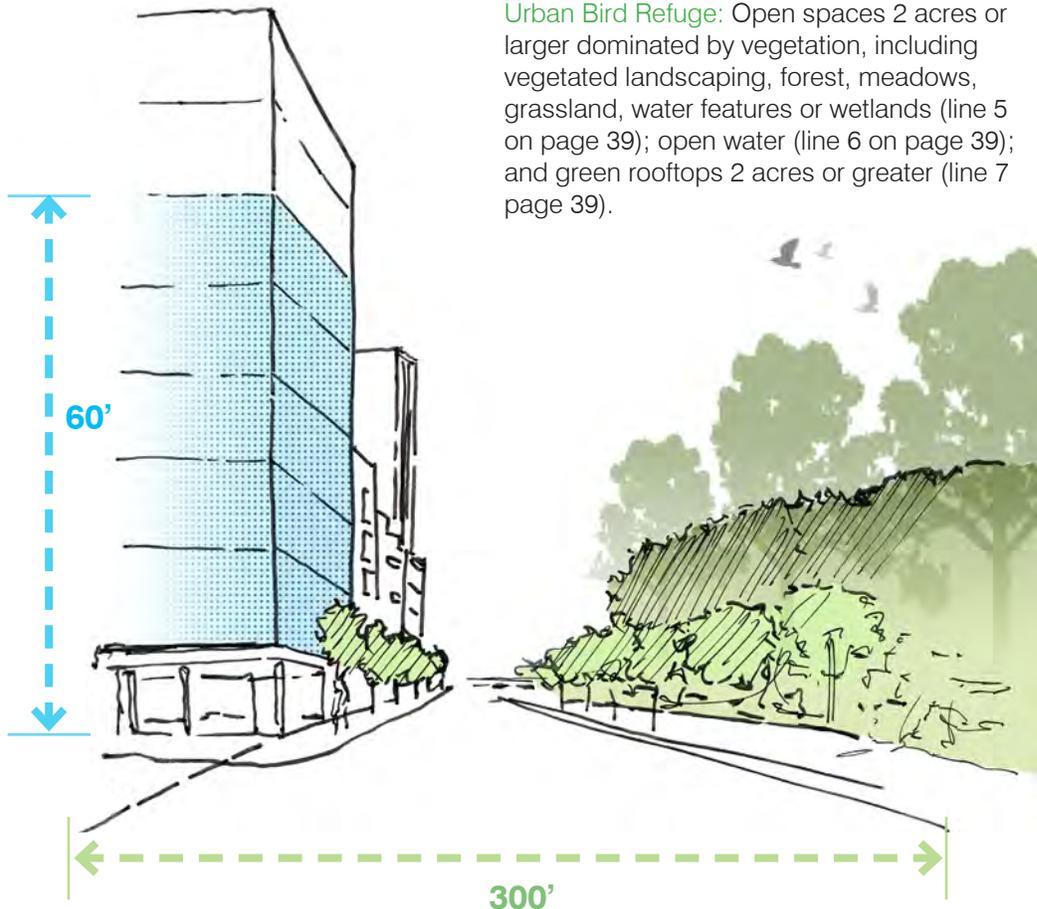
What is a “location-related” hazard?

**Location-Related Hazard:** Buildings located inside of, or within a clear flight path of less than 300 feet from an Urban Bird Refuge (defined below) require treatment when:

- New buildings are constructed;
- Additions are made to existing buildings (Note: only the new construction will require treatment); or
- Existing buildings replace 50% or more of the glazing within the “bird collision zone” on the façade(s) facing the Urban Bird Refuge.

## Bird Collision Zone

**Zone:** The portion of buildings most likely to sustain bird strikes. This area begins at grade and extends upwards for 60 feet. This zone also applies to glass façades directly adjacent to large landscaped roofs (two acres or larger) and extending upward 60 feet from the level of the subject roof.



**Urban Bird Refuge:** Open spaces 2 acres or larger dominated by vegetation, including vegetated landscaping, forest, meadows, grassland, water features or wetlands (line 5 on page 39); open water (line 6 on page 39); and green rooftops 2 acres or greater (line 7 page 39).

## What requirements apply to a “location-related” hazard?

**Treatment of Location-Related Hazards.** Buildings located inside of or within a clear flight path from an Urban Bird Refuge shall implement the following applicable treatments for façades facing an Urban Bird Refuge.

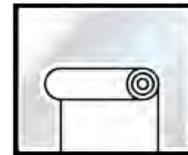
- **Façade Treatments:** Bird-Safe Glazing Treatment is required such that the Bird Collision Zone consists of no more than 10% untreated glazing. Building owners are encouraged to concentrate permitted transparent glazing on the ground floor and lobby entrances to enhance visual interest for pedestrians.
- **Lighting Design:** Minimal lighting shall be used. Lighting shall be shielded. No uplighting shall be used. No event searchlights should be permitted for the property.
- **Wind Generators:** Sites should avoid horizontal access windmills or vertical access wind generators that do not appear solid.\*



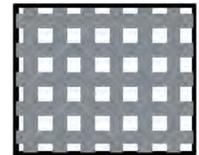
ABOVE: The California Academy of Sciences uses external screens 24 hours per day during spring and fall migration to reduce bird/building collisions.



Solution: Visual Noise



Solution: Use of plastic films, diachroic coatings and tints on facade



Solution: Screen / scrim / fritting

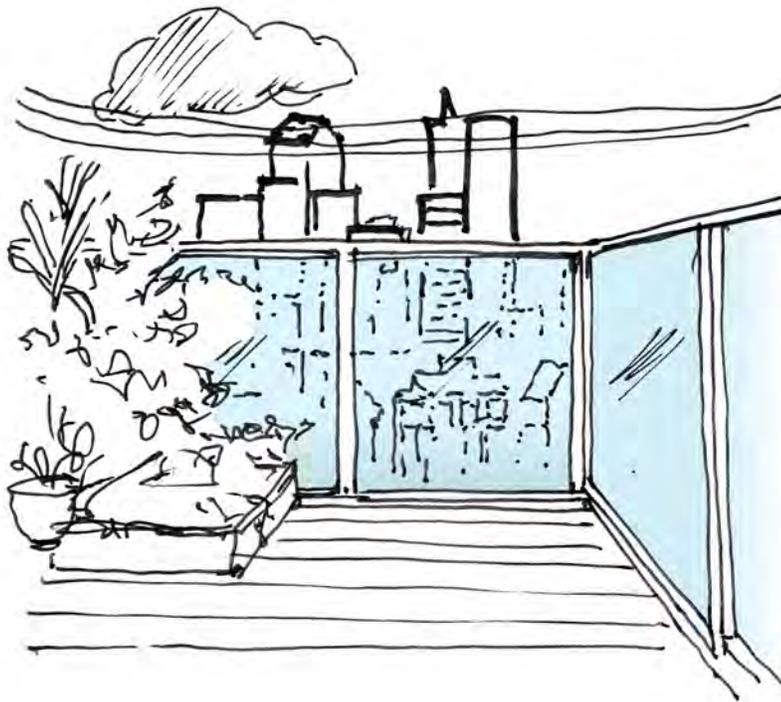
\* The Planning Commission adopted a policy that would prohibit nonsolid or horizontal-axis wind generators via Resolution No. 18383. However, Ordinance No. 199-11, as adopted by the Board of Supervisors, does not expressly prohibit specific types of wind generators. Instead, the Planning Code requires that proposals for wind generation undergo individual project review to evaluate their specific risk to birds.

# 2 Requirements for Feature-Related Hazards

What is a “feature-related” hazard?

**Building Feature-Related Hazard:** Certain potential bird traps are hazardous enough to necessitate treatment, regardless of building location. A building-specific hazard is a feature that creates hazards for birds in flight unrelated to the location of the building. Building feature-related hazards include free-standing clear glass walls, skywalks, greenhouses on rooftops, and balconies that have unbroken glazed segments 24 square feet and larger in size. (See citywide bird-safe checklist, lines 19-22 on page 39). These features require treatment when:

- New buildings are constructed;
- Additions are made to existing buildings (Note: only the new construction will require treatment).



LEFT: These windows are an example of a feature-related hazard.

## What requirements apply to a “featured-related” hazard?

**Treatment of Feature-Related Hazards** - Regardless of whether the site is located inside or adjacent to an Urban Bird Refuge, 100% of building feature-related hazards shall be treated.



LEFT: A transparent glass skywalk poses a “feature-related” hazard.

*Image courtesy of Lightsoutindy.org*

LEFT: This skywalk was intentionally treated with fritting by the Indiana Museum to avoid creating a “feature-related” hazard.



RIGHT: The fritting maintains transparency for pedestrians.



*Images courtesy of Lightsoutindy.org*

## The Details: Exceptions and Specifications

**Exceptions:** Certain exceptions apply to the aforementioned controls.

**1) Treatment of Historic Buildings.** Treatment of replacement glass façades for structures designated as City landmarks or within landmark districts pursuant to Article 10 of the Planning Code, or any building Category I-IV or Category V within a Conservation District pursuant to Article 11 of the Planning Code, shall conform to Secretary of Interior Standards for Rehabilitation of Historic Properties. Reversible treatment methods such as netting, glass films, grates, and screens are recommended. Netting or any other method demonstrated to protect historic buildings from pest species that meets the Specifications for Bird-Safe Glazing Treatment stated above may also be used to fulfill the requirement.

### 2) Exceptions for Treatment of Location-Related Hazards for Residential Buildings within R-Zoned Districts.

→ **Limited Glass Façade:** Residential buildings less than 45 feet in height within R-Districts that have an exposed façade comprised of less than 50% glass are exempt from new or replacement glazing treatments, but must comply with feature-related and wind generation requirements below.

→ **Substantial Glass Façade:** Residential buildings within R-Districts that are less than 45 feet in height but have a façade with a surface area of more than 50% glass, must provide glazing treatments for location-related hazards such that 95% of all large, unbroken glazed segments that are 24 square feet and larger in size are treated.

**3) Other Waivers or Modifications by the Zoning Administrator.** The Zoning Administrator may either waive requirements for Location-Related Hazards or Feature-Related Hazards or modify the requirements to allow equivalent Bird-Safe Glazing Treatments based upon the recommendation of a qualified biologist.



A New York volunteer examining a window casualty.

Photo courtesy NY Audubon

**Glazing Treatment Specifications:** Bird-safe glazing treatment may include fritting, netting, permanent stencils, frosted glass, exterior screens, physical grids placed on the exterior of glazing or UV patterns visible to birds. To qualify as Bird-Safe Glazing Treatment, vertical elements of the window patterns should be at least 1/4 inch wide at a maximum spacing of 4 inches, or have horizontal elements at least 1/8 inch wide at a maximum spacing of 2 inches (*Klem 2009*.)

## V. Recommended Actions and Bird-Safe Stewardship

### Public Education and Outreach Partnerships

The Planning Department will partner with the Golden Gate Audubon Society to conduct outreach on bird-safe building practices. Staff will work collaboratively to increase awareness of bird/building issues, and disseminate educational materials on design and treatment options. A public education effort will proactively increase awareness of the issues and strive to make bird safety practices a part of the construction lexicon within this highly urbanized area. Developers, architects, planners, property owners, businesses, city residents and youth groups are encouraged to contact the Department about educational programs. Curriculum will include education about the standards for bird-safe buildings and exploring citizen involvement of monitoring bird/building collisions as well as general advocacy for bird conservation.



Photo courtesy Jessica Weinberg. <http://www.jessicaweinberg.com/>

### Building Owner Bird-Safe Stewardship

Owners of new buildings and buildings proposing major renovations with a façade of greater than 50% glass are encouraged to evaluate their building against the Bird-Safe Building Checklist (pages 38-39) and provide future tenants with a copy of this document. Although requirements only apply to the most hazardous conditions, building owners and architects can become more aware of potential hazards and treatments. With the support of building owners who help educate future tenants, the people of San Francisco would become better educated about ways to enhance bird safety.

Building owners can help make their buildings safer by evaluating the risks of their buildings and retrofitting buildings with known hazards. Engaging in conservation measures outlined in this guide and granting access to collision monitoring groups help to address the issue and increase our understanding.

### Encouraged Treatments

The following treatments are encouraged to enhance bird safety, in addition to meeting requirements:

- **Expanding treatment outside of the Bird Collision Zone:** bird-safe treatments on building façades above the minimum height requirements.
- **Other window treatments:** latticework, grilles and other devices, both functional and decorative, outside the glass or integrated into the glass spacing requirements;
- **Placement of trees or tall shrubs:** should be located directly adjacent to glazing (with 3 feet) to slow birds down on approach, or placed far enough away to avoid reflecting canopies in the glazing.

## Building Tenant Education

Some of the most effective treatments for making buildings bird-safe are those that require the cooperation of building owners and tenants. For this reason, the City should continue to use and should expand a “carrot”-based system to widely encourage participation in bird-safe efforts. San Francisco’s existing Lights Out for Birds Program seeks to educate residents and provide recognition of voluntary bird-safe measures. Since 2008, the City has urged building owners and managers to turn off unnecessary interior and exterior lights. Twenty-two of the City’s forty-four tallest buildings have been asked to participate.

To raise bird-awareness of building occupants, building owners may supply tenants with copies of this booklet. Building occupants can help make buildings bird-safe through the following good practices:

- Interior plants should be moved so as not to be visible from the outside.
- Consider limiting nighttime building use by combining motion operated light sensor with daytime cleaning services. This combination will reduce light pollution and increase energy conservation.
- Where interior lighting is used at night, window coverings should be closed to block light transmission adequately.
- Consider seasonal migration needs. Unneeded interior and exterior lighting should be turned off from dusk to dawn from February 15 through May 31 AND August 15 through November 30.



Greater Scaup

Photo by Robert Lewis



Western Sandpiper

Photo by Robert Lewis

## Bird/Building Collision Monitoring

Project Safe Flight in Manhattan has collected and documented over 4,000 dead and injured birds since 1997. In 2009 the Chicago Bird Collision monitors recovered more than 6,000 dead or injured migratory birds from more than 100 different species. In Toronto, Fatal Light Awareness Program (FLAP) volunteers patrol Toronto's downtown core in the early morning hours rescuing live birds and collecting the dead ones since 1993. In the summer of 2010, the Oregon Zoo funded a six-week sunrise study of Portland's newest and tallest buildings where volunteers collected dead and injured birds. Audubon Minnesota has collected over 3000 birds of 110 species from monitoring efforts between 2007-2011.

Aside from regular collection of injured or dead migratory birds throughout the City by San Francisco Animal Care and Control staff and bird group volunteers, the only large bird/building monitoring program currently being conducted by the California Academy of Sciences, read more on page 14 (*Flannery 2011*). Additional regular monitoring of the hazard in San Francisco is needed to help in the evaluation of local conditions and refinement of appropriate controls. Collaborations between building owners and bird-research groups should be encouraged to help increase our understanding of San Francisco's unique conditions. With the publication of this document, the City calls for more local research to help achieve the goal of better characterizing the problem on a local level, as well as for testing of new bird-safe technologies that could be utilized along with those that are already available.



Photo by Eddie Barley

A 2008 San Francisco pilot study discovered a Green Heron in the Downtown area. Further monitoring may reveal other unexpected neotropical migrants passing through the City's dense core.

### CONTACT THE SAN FRANCISCO BIRD-STRIKE HOTLINE TO REPORT BIRD-STRIKES

Report injured birds found outside of buildings by emailing [safebirds@goldengateaudubon.org](mailto:safebirds@goldengateaudubon.org) or by calling **Golden Gate Audubon Society** at **(510) 843-6551** with the following information:

Date:

Time:

Address including cross streets:

Location details:

Species of bird, if known:

Male or female, if known:

Adult or juvenile bird, if known:

Condition of bird:

Did you see or hear the collision?

If so, please provide a description:

Weather:

Please email a photo of the bird and building, if possible. If the bird appears to be injured, call **San Francisco Animal Care and Control** at **(415) 554-9400** and record the date and time you called.

## Lights Out for Birds San Francisco

The Golden Gate Audubon Society, Pacific Gas and Electric Company and the San Francisco Department of the Environment administer “Lights Out for Birds – San Francisco.” This voluntary program helps building owners, managers and tenants save energy and money while protecting migratory birds. Lights Out for Birds asks participants to turn off building lights during the bird migration (February through May and August through November each year).

“Participants in the Lights Out for Birds program can save natural resources, money, and birds by turning off lighting after dusk each evening and leaving lights off until dawn,” said Mike Lynes, Conservation Director for Golden Gate Audubon. “Over 250 species of birds migrate through San Francisco in the spring and fall, and many that migrate at night can become confused by the City’s lights and collide with tall buildings and towers. The Lights Out for Birds program can reduce bird deaths while cutting energy costs and saving participants thousands of dollars each year.”

The North American Bird Conservation Initiative—a joint effort of federal agencies and nonprofit conservation organizations—released the “2009 State of the Birds” in which it reported that the majority of migratory birds in North America are suffering significant population declines due to human-induced causes, including habitat loss and collisions. In addition to window treatments to reduce daytime collisions, effective Lights Out programs can help stem these population declines.

Participants in the Lights Out for Birds program also gain significant financial benefits. Building operators and tenants have reported significant savings on energy bills as a result of participation—one business in Toronto reported a savings of \$200,000 in 2006. In 2010 Mayor Gavin Newsom announced energy efficient retrofit funding for 2,000 small to mid-sized businesses and 500 homes. By installing timers or motion detectors and turning off unnecessary lights, building owners and operators can significantly reduce their energy bill. Reduced energy consumption decreases overall greenhouse gas emissions, which is essential in the effort to combat climate change.

San Francisco was one of the first cities to implement a Lights Out program in 2008. Now over 21 cities in the US and Canada have a Lights Out program. Conservationists hope that the program extends to every major city in North America, to save birds, energy and money.



*Photos of 2008 Lights Out Toronto by Dick Hemingway via WWF-Canada.*



Toronto’s established Lights Out Program creates a dramatic change in the skyline appearance. As San Francisco’s program spreads we should be able to see seasonal changes as our skyline lights up in non-migratory months and dims down during migration.

Building owners, managers and tenants interested in an energy evaluation and current rebates should contact the San Francisco Department of the Environment or a PG&E representative. For more information on how to participate in the program and to learn about local bird populations and how to help, contact the Golden Gate Audubon Society at (510) 843-6551.

### PARTICIPANTS IN SAN FRANCISCO LIGHTS OUT FOR BIRDS

101 California Street  
Allsteel Inc.  
Barker Pacific Group, Inc.  
New Resource Bank  
Pacific Gas and Electric Company  
San Francisco Department of the Environment  
Tishman Speyer



ABOVE: Rescued thrush resting safely in the hand of a Chicago Bird Collision Monitor volunteer.

Photo: Willowbrook Wildlife Center  
<http://www.chicagoaudubon.org/imgcas/21-02/rescuedthrush.jpg>

## Beyond Requirements: Voluntary Treatments and Acknowledgment

San Francisco building owners who implement Bird-Safe treatments are strongly encouraged to seek recognition under the City's new Bird-Safe Building Certification and Acknowledgement Program. Buildings which avoid creating hazards or implement bird-safe treatments as identified in this document would be acknowledged by the City and could be marketed as such. Three levels of certification will be offered:

#### **Bird-Safe Building:**

The building meets the minimum conditions for bird-safety. This level focuses on ensuring "bird-hazards" and "bird traps" are not created or are remedied with bird-safe treatments.

#### **Select Bird-Safe Building:**

The building meets all of the minimum requirements; commits to "lights out" practices during migratory seasons; reduces untreated glazing beyond the requirements; and commits to educating future building occupants.

#### **Sterling Bird-Safe Building:**

This is the highest level of Bird-Safe Building certification possible. The building meets all of the conditions of the other certification levels, plus the building reduces the amount of glass on the façade, avoids or treats additional hazards—beyond the requirements, and features year-round best management practices for lighting.

The program will be administered by the Planning Department. Buildings that qualify will be awarded plaques and public recognition through the City's website and outreach materials. To find out if your building qualifies for Bird-Safe Certification, fill out the attached Bird-Safe Building Checklist on pages 38-39 of this document and contact the Planning Department at (415) 558-6377.

# VI. Bird-Safe Building Checklist

**Use of this checklist:** This checklist serves three purposes: 1) assessing risk factors and determining risks which must be addressed by the requirements; 2) increasing awareness of risk factors that are de minimis and don't require treatment; and 3) evaluating buildings for certification as a bird-safe building.

1

**REQUIREMENTS FOR THE MOST HAZARDOUS CONDITIONS:** The conditions that warrant special concern in San Francisco are designated by red-shaded boxes. These red boxes indicate prohibited building conditions or conditions which are only permitted if the glazing is installed with bird-safe glazing treatments. If the project combines a glass façade with a high-risk location ("location-related hazard", line 5-7), glazing treatments will be required for the façade(s) such that the amount of untreated glazing is reduced to less than 10% for the façade facing the landscaping, forest, meadow, grassland, wetland, or water. If a project creates a new bird-trap or "feature-related hazard" (lines 19-22) or remodels an existing feature-related hazard, bird-safe treatment will be required.

2

**INCREASING AWARENESS:** Owners of buildings with a façade of greater than 50% glass (lines 9 -10) are strongly encouraged to evaluate the building against the checklist and to help provide future tenants with copies of this guide. Use this checklist to evaluate design strategies for building new structures and retrofitting existing buildings throughout the City. This checklist summarizes conditions that could contribute to bird mortality and will help to identify the potential risks. Interested neighborhood groups and trade associations are encouraged to contact the Department for suggestions on how to proactively increase awareness of the issue and make bird safety practices a part of the construction lexicon.

3

**VOLUNTARY RATINGS:** Project sponsors interested in submitting a project for "Bird-Safe Certification" may use this form. The Department will partner with local artists to produce appropriate artwork and/or plaques to acknowledge those who actively seek to reduce bird collisions on their property. The ratings system will create tiers certification to recognize projects that meet minimum requirements as well as those projects that exceed the requirements.

## RISK ASSESSMENT LEGEND:

### Potential Risk Factors:

These shade indicate factors that may present hazards to birds. Note: actual risks vary greatly depending upon building and site-specific variables.

**GRAY:** This shade indicates potential increased risk.  
**NOTE:** *The net assessment of total risk varies with the combination of building factors. While every building in San Francisco will present some element of risk to birds, only combinations with "red" boxes present a risk level necessitating bird-safe treatments.*

**RED:** This shade indicates prohibited conditions or conditions which are prohibited unless bird-safe treatment is applied.

## CERTIFICATION LEGEND:

By checking all of the boxes for one (or more) of these colors on the Bird-Safe Building Checklist (page 39), a building owner is eligible to apply to the Planning Department for Bird-Safe Building Certification.

### Bird-Safe Building Certification and Acknowledgement:

Buildings which avoid creating hazards or which enhance bird safety with treatments identified as effective in this document would be acknowledged by the City and could be marketed as such. This document proposes three levels of certification by the City. Certification is determined by applying the checklist criteria.

**YELLOW:**  
**Bird-Safe Building**  
The building meets the minimum conditions for bird-safety. This level focuses on ensuring "bird-hazards" and "bird traps" are not created or are remedied with bird-safe treatments.

**GREEN:**  
**Select Bird-Safe Building**  
The building meets all of the minimum requirements; commits to "lights out" practices during migratory seasons; reduces untreated glazing beyond the requirements; and commits to educating future building occupants.

**BLUE:**  
**Sterling Bird-Safe Building**  
This is the highest level of Bird-Safe Building certification possible. The building meets all of the conditions of the other certification levels, plus the building reduces the amount of glass on the façade, avoids or treats additional hazards—beyond the requirements, and features year-round best management practices for lighting.

# BIRD-SAFE BUILDING CHECKLIST

Using the key on the prior page, complete this checklist as a guide to help evaluate potential bird-hazards or eligibility for Bird-Safe Building Certification.

		QUESTION	YES	NO
<b>MACRO-SETTING</b> (PAGE 12, 16)	1	Is the structure located within a major migratory route? (All of San Francisco is on the Pacific Flyway)		
	2	Is the location proximate to a migratory stopover destination? (Within 1/4 mile from Golden Gate Park, Lake Merced or the Presidio)		
	3	Is the structure location in a fog-prone area? (Within 1/2 mile from the ocean or bay)		
<b>MICRO-SETTING</b> <b>(LOCATION-RELATED HAZARD)</b> (PAGES 13, 16, 28-29)	4	Is the structure located such that large windows greater than 24 square feet will be opposite of, or will reflect interlocking tree canopies?		
	5	Is the structure inside of, or within a distance of 300 feet from an open space 2 acres or larger dominated by vegetation? (Requires treatment of glazing, see page 28)		
	6	Is the structure located on, or within 300 feet from water, water features, or wetlands? (Requires treatment of glazing, see page 28)		
	7	Does the structure feature an above ground or rooftop vegetated area two acres or greater in size? (Requires treatment of glazing, see page 29)		
<b>GLAZING QUANTITY</b> (PAGE 8)	8	Is the overall quantity of glazing as a percentage of façade: (Risk increases with amount of glazing)	Less than 10%?	
		More than 50%? (Residential Buildings in R-Districts must treat 95% of unbroken glazed segments 24 square feet or greater in size if within 300 feet of an Urban Bird Refuge.)		
	9	Will the glazing be replaced?	More than 50% glazing to be replaced on an existing bird hazard (including both feature-related hazards as described in lines 19-22 and location-related hazard as described in lines 4-7)? (Requires treatment see pages 29 and 31.)	
<b>GLAZING QUALITY</b> (PAGE 6, 7)	10	Is the quality of the glass best described as:	Transparent (If so, remove indoor bird-attractions visible from outside the windows.)	
	11		Reflective (If so, keep visible light reflectance low (between 10-20%) and consider what will reflect in the windows. Note: Some bird-safe glazing such as fritting and UV spectrum glass may have higher reflectivity that is visible to birds.)	
	12		Mirrored or visible light reflectance exceeding 30%. (Prohibited by Planning Code.)	
<b>GLAZING TREATMENTS</b> (PAGE 18-21)	13	Is the building's glass treated with bird-safe treatments such that the "collision zone" contains no more than 10% untreated glazing for identified "location-related hazards" (lines 4-7) and such that 100% of the glazing on "feature-related hazards" (lines 19-22) is treated?		
	14	Is the building's glass treated for required "bird hazards" (as described in line 13) <i>and</i> such that no more than 5% of the collision zone (lower 60') glazing is untreated but not for the entire building?		
	15	Is the building glazing treated (as described above in lines 14 and 15) <i>and</i> such that no more than 5% of the glazing on the exposed façade is left untreated?		
<b>BUILDING FAÇADE GENERAL</b> (PAGE 8, 13)	16	Is the building façade well-articulated (as opposed to flat in appearance)?		
	17	Is the building's fenestration broken with mullions or other treatments?		
	18	Does the building use unbroken glass at lower levels?		
<b>BUILDING FEATURE-RELATED HAZARDS AND BIRD TRAPS</b> (PAGE 8, 30-31)	19	Does the structure contain a "feature-related" hazard or potential "bird trap" such as:	Free standing clear-glass walls, greenhouse or other clear barriers on rooftops or balconies? (Prohibited unless the glazing is treated with bird-safe applications.)	
	20		Free standing clear-glass landscape feature or bus shelters? (Prohibited unless the glazing is treated with bird-safe applications.)	
	21		Glazed passageways or lobbies with clear sight lines through the building broken only by glazing?	
	22		Transparent building corners?	
<b>LIGHTING DESIGN</b> (PAGE 10, 25)	23	Does the structure, signage or landscaping feature uplighting? (Prohibited within 300 feet of an Urban Bird Refuge)		
	24	Does the structure minimize light spillage and maximize light shielding?		
	25	Does the structure use interior "lights-out" motion sensors?		
	26	Is night lighting minimized to levels needed for security?		
	27	Does the structure use decorative red-colored lighting?		
<b>LIGHTING OPERATIONS</b> (PAGE 12, 24-25)	28	Will the building participate in San Francisco Lights Out during the migration seasons? (February 15-May 31 and August 15- November 30th) To achieve "sterling" certification the building must participate in year-round best management practices for lighting.		
<b>OTHER BUILDING ELEMENTS</b> (PAGE 23)	29	Does the structure feature rooftop antennae or guy wires?		
	30	Does the structure feature horizontal access wind generators or non-solid blades?		
<b>CONSENT</b> (PAGE 34)	31	Does the building owner agree to distribute San Francisco's Bird-Safe Building Standards to future tenants?		

Authorized Signature

X \_\_\_\_\_

Date: \_\_\_\_\_



From City of Toronto Green Development Standard: "Bird-Friendly Development Guidelines."

Some of the birds killed by building collisions and collected during one migration season in Toronto's Financial District.

*“A vast and growing amount of evidence supports the interpretation that, except for habitat destruction, collisions with clear and reflective sheet glass and plastic cause the deaths of more birds than any other human-related avian mortality factor. From published estimates, an upper level of 1 billion annual kills in the U.S. alone is likely conservative; the worldwide toll is expected to be billions.*

*Birds in general act as if sheet glass and plastic in the form of windows and noise barriers are invisible to them. Casualties die from head trauma after leaving a perch from as little as one meter away in an attempt to reach habitat seen through, or reflected in, clear and tinted panes... Glass is an indiscriminate killer, taking the fittest individuals of species of special concern as well as the common and abundant.”*

- DANIEL KLEM, JR.

Leading researcher of bird/building collisions as presented at Fourth International Partners in Flight Conference, 2008.

Photo by Glenn Neill

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SAN FRANCISCO  
PLANNING  
DEPARTMENT

### FOR MORE INFORMATION: Call or visit the San Francisco Planning Department

**Central Reception**  
1650 Mission Street, Suite 400  
San Francisco CA 94103-2479

TEL: **415.558.6378**  
FAX: **415.558.6409**  
WEB: **<http://www.sfplanning.org>**

**Planning Information Center (PIC)**  
1660 Mission Street, First Floor  
San Francisco CA 94103-2479

TEL: **415.558.6377**

*Planning staff are available by phone and at the PIC counter.  
No appointment is necessary.*

**Nicole Morse**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Friday, November 20, 2015 4:09 PM  
**To:** Nicole Morse  
**Subject:** FW: Additional Comments on Southeast Long Beach Specific Plan/SEADIP Update

**From:** Michelle Black [<mailto:mnb@cbcearthlaw.com>]  
**Sent:** Friday, November 20, 2015 3:35 PM  
**To:** Craig Chalfant  
**Cc:** Elizabeth Hommel  
**Subject:** Additional Comments on Southeast Long Beach Specific Plan/SEADIP Update

Good afternoon, Mr. Chalfant -

The Los Cerritos Wetlands Land Trust has one additional comment on the Notice of Preparation issued for the proposed SEADIP Update:

In order to make sure that the Project properly determines which wetland areas in SEADIP should be restored and preserved for habitat use and which areas have been so severely degraded that viability for wetlands habitat restoration is not possible, an in-depth assessment of the habitat quality and environmental factors would be required. LCWLT recommends that the biological resources assessment also focus on habitat quality assessment. Currently, almost all of Los Cerritos Wetlands is in some level of "degradation." The level of degradation can be determined by considering a variety of ecological factors. In order to determine if the site is degraded beyond repair requires much more than a wetlands delineation study. The habitat quality assessment should identify areas dominated by native vegetation versus those dominated by non-native vegetation. Of those areas dominated by non-native vegetation it should be determined if those non-native plant species are considered as wetlands species or not. Unvegetated areas should be analyzed to determine the factors that keep vegetation from establishing itself. This will require investigation of current/past land uses, soil quality (composition, content and compaction), herbivory intensity, etc. Upland areas along the perimeter of the wetlands should be analyzed for their potential to be used as urban buffers as opposed to becoming developed or restored to wetlands.

Thank you for your attention to these additional comments. We look forward to reviewing the EIR.

- Michelle Black

Michelle N. Black



2200 Pacific Coast Highway, Suite 318  
Hermosa Beach, CA 90254

Phone: (310) 798-2400

Fax: (310) 798-2402

[www.cbearthlaw.com](http://www.cbearthlaw.com)

## Craig Chalfant

---

**From:** Anita Au <au@scag.ca.gov>  
**Sent:** Monday, November 23, 2015 1:46 PM  
**To:** Craig Chalfant  
**Cc:** Lijin Sun; Ping Chang  
**Subject:** SCAG Comments on the NOP of a Draft EIR for the Southeast Area Specific Plan [SCAG NO. IGR8652]  
**Attachments:** IGR8652 NOP Southeast Area Specific Plan.pdf

Dear Mr. Chalfant,

Please find attached SCAG Comments on the NOP of a Draft EIR for the Southeast Area Specific Plan [SCAG NO. IGR8652].

Please contact Lijin Sun at (213) 236-1882 or [sunl@scag.ca.gov](mailto:sunl@scag.ca.gov) if you have any questions or difficulties with the attached file. Thank you.

### Anita Au

Assistant Regional Planner  
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS  
818 West 7th Street, 12th Floor, Los Angeles, CA 90017  
T: (213) 236-1874 | F: (213) 236-1962  
E: [au@scag.ca.gov](mailto:au@scag.ca.gov)

Stay Connected 



November 20, 2015

Mr. Craig Chalfant, Senior Planner  
City of Long Beach Development Services  
333 West Ocean Boulevard  
Long Beach, California 90802  
Phone: (562) 570-6368  
E-mail: [craig.chalfant@longbeach.gov](mailto:craig.chalfant@longbeach.gov)

**RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Southeast Area Specific Plan [SCAG NO. IGR8652]**

**Main Office**  
818 West 7th Street  
12th Floor  
Los Angeles, California  
90017-3435  
t (213) 236-1800  
f (213) 236-1825  
[www.scag.ca.gov](http://www.scag.ca.gov)

Dear Mr. Chalfant,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Southeast Area Specific Plan ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

**Officers**  
President  
Cheryl Viegas-Walker, El Centro  
First Vice President  
Michele Martinez, Santa Ana  
Second Vice President  
Margaret Finlay, Duarte  
Immediate Past President  
Carl Morehouse, San Buenaventura

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.<sup>1</sup> Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

**Executive/Administration  
Committee Chair**  
Cheryl Viegas-Walker, El Centro

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Southeast Area Specific Plan in the Los Angeles County. The proposed project includes a proposal of a new Specific Plan covering 1,466 acres. Buildout of the Specific Plan would allow a total of 9,698 dwelling units, 2,665,052 square feet of commercial/employment uses, and 425 hotel rooms.

**Policy Committee Chairs**  
Community, Economic and  
Human Development  
Bill Jahn, Big Bear Lake  
Energy & Environment  
Deborah Robertson, Rialto  
Transportation  
Alan Wapner, San Bernardino  
Associated Governments

**When available, please send environmental documentation to SCAG's office in Los Angeles or by email to [sunl@scag.ca.gov](mailto:sunl@scag.ca.gov) providing, at a minimum, the full public comment period for review.** If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Lijin Sun, Esq., Senior Regional Planner, at (213) 236-1882 or [sunl@scag.ca.gov](mailto:sunl@scag.ca.gov). Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Ping Chang".

Ping Chang  
Program Manager II, Land Use and Environmental Planning

<sup>1</sup> SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

**COMMENTS ON THE NOTICE OF PREPARATION OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
THE SOUTHEAST AREA SPECIFIC PLAN [SCAG NO. IGR8652]**

**CONSISTENCY WITH RTP/SCS**

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS.

**2012 RTP/SCS GOALS**

The SCAG Regional Council adopted the 2012 RTP/SCS in April 2012. The 2012 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see <http://rtpscs.scag.ca.gov>). The goals included in the 2012 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2012 RTP/SCS are the following:

<b>SCAG 2012 RTP/SCS GOALS</b>	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and non-motorized transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format. Suggested format is as follows:

SCAG 2012 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

**RTP/SCS STRATEGIES**

To achieve the goals of the 2012 RTP/SCS, a wide range of strategies are included in SCS Chapter (starting on page 152) of the RTP/SCS focusing on four key areas: 1) Land Use Actions and Strategies; 2) Transportation Network Actions and Strategies; 3) Transportation Demand Management (TDM) Actions and Strategies and; 4) Transportation System Management (TSM) Actions and Strategies. If applicable to the proposed project, please refer to these strategies as guidance for considering the proposed project within the context of regional goals and policies. To access a listing of the strategies, please visit <http://rtpscsc.scaq.ca.gov/Documents/2012/final/f2012RTPSCS.pdf> (Tables 4.3 – 4.7, beginning on page 152).

**REGIONAL GROWTH FORECASTS**

At the time of this letter, the most recently adopted SCAG forecasts, at the jurisdictional level, consists of the 2020 and 2035 RTP/SCS population, household and employment forecasts. To view them, please visit <http://scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf>. The forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts		Adopted City of Long Beach Forecasts	
	Year 2020	Year 2035	Year 2020	Year 2035
Population	19,663,000	22,091,000	491,000	534,100
Households	6,458,000	7,325,000	175,600	188,900
Employment	8,414,000	9,441,000	176,000	184,800

**MITIGATION**

SCAG staff recommends that you review the SCAG 2012 RTP/SCS Final Program EIR Mitigation Measures for guidance, as appropriate. See Chapter 6 (beginning on page 143) at: <http://rtpscsc.scaq.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf>

As referenced in Chapter 6, a comprehensive list of example mitigation measures that may be considered as appropriate is included in Appendix G: *Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects*. Appendix G can be accessed at: [http://rtpscsc.scaq.ca.gov/Documents/peir/2012/final/2012fPEIR\\_AppendixG\\_ExampleMeasures.pdf](http://rtpscsc.scaq.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf)



South Coast  
Air Quality Management District  
21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

October 30, 2015

Craig Chalfant, Senior Planner  
Development Service Department  
City of Long Beach  
333 West Ocean Boulevard  
Los Angeles, CA 90802

**Notice of Preparation of a CEQA Document for the  
Southeast Area Specific Plan and Notice of Public Scoping Meeting Project**

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

**Air Quality Analysis**

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

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

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts

when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

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

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

### **Mitigation Measures**

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4>.

### **Data Sources**

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

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [Jwong1@aqmd.gov](mailto:Jwong1@aqmd.gov) or call me at (909) 396-3176.

Sincerely,

*Jillian Wong*

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

LAC151029-01  
Control Number



**COMMENT CARD**  
Southeast Area Specific Plan (SEADIP)  
Scoping Meeting

November 4, 2015 at 6:00 PM

Based on the environmental checklist included in the California Environmental Quality Act (CEQA) Guidelines, the Initial Study for the proposed project determined that the following topics would be analyzed further in the Draft EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards/Hazardous Materials
- Hydrology and Water Quality
- Land Use/Planning
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation/Traffic
- Utilities/Service Systems

Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

*I fully support the conclusions of the initial study with respect to the topics being covered in the Environmental Impact Report.*

Name: *Joseph R. Brown III, Alamitos Bay Partnership, LLC*  
Address: *P.O. Box 962, Solvang, CA 93464*

Please return this comment card to *Craig Chalfant, Senior Planner, City of Long Beach*, at the end of the Scoping Meeting or mail to: *Craig Chalfant, Senior Planner, Long Beach Development Services, 333 West Ocean Blvd., 5th Floor, Long Beach, CA 90802. Comments must be submitted by November 20<sup>th</sup>, 2015.*



**COMMENT CARD**  
**Southeast Area Specific Plan (SEADIP)**  
**Scoping Meeting**

November 4, 2015 at 6:00 PM

Based on the environmental checklist included in the California Environmental Quality Act (CEQA) Guidelines, the Initial Study for the proposed project determined that the following topics would be analyzed further in the Draft EIR:

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- Biological Resources
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- Hazards/Hazardous Materials
- Hydrology and Water Quality
- Land Use/Planning
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation/Traffic
- Utilities/Service Systems

Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print): The Southeast Area Specific Plan Draft EIR should include an analysis of a **project alternative** that designates the triangular property between

---

Loynes Drive and the Los Cerritos Channel, known as 6400 Loynes Drive (the "Property"), as "Mixed Use Marina," rather than "Coastal Habitat, Wetlands & Recreation." The existing land use shown for the Property in the Initial Study is "Vacant Undifferentiated." The Draft EIR will analyze the impacts of the Specific Plan designating the Property as "Coastal Habitat, Wetlands & Recreation," but this analysis will not reflect the Specific Plan's actual impacts. Significant and substantial evidence has been presented to the City showing that the Property is not biologically or physically suitable for coastal habitat or wetlands. Los Angeles County Department of Public Health, the South Coast Air Quality Management District, the Regional Water Quality Control Board and the California Coastal Commission have all gone on record affirming that establishing a wetland, or wetland areas, on the Property is not plausible, scientifically feasible, or consistent with the applicable codes and policies. (Please see attached letter to Angela Reynolds.)

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An EIR must describe a reasonable range of alternatives sufficient to permit informed decision-making and public participation. As the currently proposed land use designation for the Property is not potentially feasible, it is critical that the Draft EIR contain analysis of an alternative that does address the feasible uses of the Property. The areas adjacent to the Property which also border the Los Cerritos Channel and the mobile home park are to be designated Mixed Use Marina, and this is the appropriate and likely designation for the Property, as well. As such, the Draft EIR should include a project alternative that analyzes the environmental impacts of designating the Property as Mixed Use Marina.

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**Name:** Lisa A. Weinberg - Gaines & Stacey LLP

---

**Address:** 16633 Ventura Blvd., Suite 1220, Encino, CA 91436

---

Please return this comment card to *Craig Chalfant, Senior Planner, City of Long Beach*, at the end of the Scoping Meeting or mail to: *Craig Chalfant, Senior Planner, Long Beach Development Services, 333 West Ocean Blvd., 5th Floor, Long Beach, CA 90802*. **Comments must be submitted by November 20<sup>th</sup>, 2015.**

FRED GAINES  
SHERMAN L. STACEY  
LISA A. WEINBERG\*  
REBECCA A. THOMPSON\*  
NANCI SESSIONS-STACEY  
KIMBERLY A. RIBLE  
ALICIA B. BARTLEY

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LAW OFFICES OF  
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16633 VENTURA BOULEVARD, SUITE 1220  
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FACSIMILE (818) 933-0222  
INTERNET: WWW.GAINESLAW.COM

September 16, 2015

**ORIGINAL VIA U.S. MAIL**

**VIA EMAIL [angela.reynolds@longbeach.gov](mailto:angela.reynolds@longbeach.gov)**

Ms. Angela Reynolds, AICP  
Deputy Director  
City of Long Beach Development Services  
333 W. Ocean Boulevard, Third Floor  
Long Beach, CA 90802

Re: 6400 East Loynes Drive, Long Beach  
APN: 7237-017-006  
Planned Development District PD-1, SEADIP Subarea 23  
Facility ID: 171091 (AQMD)  
Facility File No.: 19-AK-5003  
City Dump and Salvage 1 & 3

Dear Ms. Reynolds:

This law firm represents the owner of the above-referenced property (the "Property"), 2H Construction. I understand that you are overseeing the City of Long Beach's (the "City") update of the Southeast Area Development and Improvement Plan ("SEADIP"), in which the Property is included as "Subarea 23." Both Sean Hitchcock of 2H Construction, and his consultants, Donald Schmitz and Nicole Farnoush of Schmitz & Associates, Inc., have contacted your consultant, Wendy Grant of PLACEWORKS, over the course of the past nine months to point out that the City's proposed SEADIP maps show Subarea 23 designated as wetlands, despite that technical studies, reports, the site history and documentation all show that the Property does not currently contain a brackish pond or any standing water and was never a wetland. Furthermore, the Los Angeles County Department of Public Health, the South Coast Air Quality Management District ("AQMD"), the Regional Water Quality Control Board ("RWQCB") and the California Coastal Commission ("CCC") have all gone on record affirming that establishing a wetland, or wetland areas, on Subarea 23 is not plausible, scientifically feasible, or consistent with the applicable codes and policies. CalRecycle, the preparer

of Closed Disposal Site Inspection reports, also concurs that wetlands are not feasible for the Property.

Nevertheless, neither PLACEWORKS nor the City have responded to this information, nor have the proposed SEADIP maps been changed to reflect it. 2H Construction is entitled to have its Property designated appropriately in the updated SEADIP, and any wetlands designation in the face of the significant and unanimously adopted substantial evidence that it is not and cannot become a wetland would be arbitrary and capricious.

On March 8, 2012, the CCC approved Permit Amendment No. A-5-LOB-10-015-A1 for on-site restoration of the Property due to site disturbance in 2009. At that time, CCC's Staff Ecologist, Dr. Jonna Engel, visited the Property, reviewed the available evidence, and considering that the Property was an abandoned landfill, determined that there were no wetlands on the Property. CCC and its staff agreed and determined that there was no evidence of wetlands on the Property, and that creating a brackish pond or wetland involves substantial environmental risk:

"The site is a disturbed, degraded site characterized by imported fill soils, and a predominance of non-natives. The site, currently, does not have depressions that would support wetlands or alkaline meadows." (Dr. Jonna Engel at November 2010 CCC Hearing.)

"The restoration of the project site as a brackish pond, as called for by the SEADIP plan, is not appropriate at this time and does not appear to be a viable alternative. . . it would likely involve substantial environmental risk to create a pond on top of the old dump. . . . The creation of a brackish pond or wetlands on the site could also increase methane releases and pollution of the adjacent waters . . . The AQMD and the LA County Health Department (regulator of old dumps) strongly advise against allowing any standing water on top of the old dump . . . ." (November 2010 CCC Staff Report.)

"The certified LCP designates the project site (Subarea 23) as a site for a brackish pond in the future. The site does not currently contain a brackish pond or any standing water. . . . The restoration of the project site as a brackish pond, as called for by the SEADIP plan, is not appropriate at this time and does not appear to be a viable alternative. . . .it would involve substantial environmental risk to create a pond on top of the old dump. . . ." (March 2012 CCC Staff Report.)

". . . a wetland, or wetland areas on this site is not recommended by LA County Department of Public Health, the AQMD and the Regional Water Quality Control Board." (Jack Ainsworth, CCC Senior Deputy Director, at November 2010 CCC Hearing.)

In November 2010, the RWQCB commented on the proposed use of the Property, formerly a landfill, as a brackish pond. It said:

"Municipal solid wastes contain various pollutants, such as metals, nutrients, volatile and semi-volatile organic compounds. When submerged to water, such pollutants may be leached out of the wastes and cause pollution to surface and ground waters. Any land use of a closed landfill that submerge municipal wastes under water would not be consistent with the policies and practices of the Regional Board, which is the state regulatory agency responsible for protecting water quality in Los Angeles and Ventura Counties, including the Property." (November 9, 2010 letter from Samuel Unger, P.E., Executive Officer of California Regional Water Quality Control Board, Los Angeles Region.)

When asked whether the creation of a brackish pond at the Property would be feasible with the inclusion of a conceptual final cover system for the closed landfill that includes, among other things, a linear-low density polyethylene (LLDPE) flexible membrane and a geosynthetic clay liner (GCL), over which seasonal pools formed by captured stormwater would be constructed, the RWQCB still said no:

- "1. Because the closed landfill is still generating landfill gas, the installation of an impermeable final cover could potentially contribute to lateral landfill gas migration that may cause pollution of groundwater;
- "2. With the installation of an impermeable final cover, landfill gas may be forced to flow into the residential areas at the vicinity of the site and create a health and safety hazard . . . ."

As the Los Angeles County Department of Public Health, the AQMD, the RWQCB and the CCC all agree, and Closed Disposal Site Inspection reports by CalRecycle from the last two decades demonstrate, there were never any brackish ponds or wetlands on the Property, and allowing any standing water on top of the old dump on the Property is dangerous because of the potential for infiltration and increased methane emissions. Therefore, it is incumbent upon the City to ensure that the update to SEADIP does not designate Subarea 23 as existing or potential wetlands.

It would be arbitrary and capricious for the City to designate Subarea 23 as wetlands in the face of this substantial evidence that a wetlands designation and use of the Property is neither historically accurate or physically feasible. In fact, the evidence shows that the use of Subarea 23 as wetlands would create a health and safety hazard.

Ms. Angela Reynolds, AICP  
September 16, 2015  
Page 4

Please contact me at your earliest convenience to discuss the City's plans to properly designate the Property in its update to SEADIP. And please do not hesitate to contact me at any time with any questions or comments you may have.

Sincerely,

GAINES & STACEY LLP

By   
LISA A. WEINBERG

cc: Nicole Farnoush (via email: [nfarnoush@schmitzandassociates.net](mailto:nfarnoush@schmitzandassociates.net))  
Don Schmitz (via email: [dons@schmitzandassociates.net](mailto:dons@schmitzandassociates.net))  
Karen Farber (via email: [kfarber@schmitzandassociates.net](mailto:kfarber@schmitzandassociates.net))



**COMMENT CARD**  
Southeast Area Specific Plan (SEADIP)  
Scoping Meeting

November 4, 2015 at 6:00 PM

City of Long Beach  
**RECEIVED**  
NOV 20 2015

Planning Bureau

Based on the environmental checklist included in the California Environmental Quality Act (CEQA) Guidelines, the Initial Study for the proposed project determined that the following topics would be analyzed further in the Draft EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards/Hazardous Materials
- Hydrology and Water Quality
- Land Use/Planning
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation/Traffic
- Utilities/Service Systems

Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

In reference to Section 3.11, Mineral Resources, section A, page 53; "No Impact. The Project area does not contain any mineral resources of statewide or regional importance."

To clarify, the Department of Conservation defines "non-fuel mineral resources" as hard rock minerals at the surface or shallow depths, and this is what the Southeast Area Specific Plan's "Initial Study" is referring to in section 3.11. We recommend replacing the phrase "mineral resources" with "*non-fuel mineral resources*".

As an oil and gas company with mineral rights, operations and a vested interest in the area and its resources, it is important to understand and highlight that there is a highly valuable mineral resource/substance below the surface within the EIR/SEADIP defined project area.

Furthermore, we would like to respectfully request the existing oil and gas operations be integrated into all future SEADIP development plans. Our intent is to continue our operations and to provide economic benefit to our region for an extensive amount of time. If information about the oil and gas operations and/or the unique relationship between production and wetland preservation is needed throughout the planning process, we are happy to offer our knowledge and expertise.

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Name: Signal Hill Petroleum, Inc.  
Contact: Stefanie Gillett, Communications Specialist – (562) 326-5235 – Sgillett@shpi.net

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Address: 2633 Cherry Ave, Signal Hill, CA 90755

Please return this comment card to *Craig Chalfant, Senior Planner, City of Long Beach*, at the end of the Scoping Meeting or mail to: Craig Chalfant, Senior Planner, Long Beach Development Services, 333 West Ocean Blvd., 5th Floor, Long Beach, CA 90802. **Comments must be submitted by November 20<sup>th</sup>, 2015.**

## Nicole Morse

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Tuesday, November 17, 2015 4:44 PM  
**To:** Nicole Morse  
**Cc:** Wendy Grant  
**Subject:** FW: SEADIP

---

**From:** Rick Akers  
**Sent:** Tuesday, November 17, 2015 4:30 PM  
**To:** Craig Chalfant  
**Subject:** SEADIP

Dear Mr. Chalfant:

I live in the "hole" – University Park Estates these days. We moved into the neighborhood in 1977 just as SEADIP went into effect. We were well aware of the fight that occurred to reduce development density and end up with the golf course as one part of the compromises that were obtained then for SEADIP. SEADIP has served Long Beach well in the past 30 years. There is no need for any change.

The only people that want a change are developer/speculators that have overpaid for land within the SEADIP area with the expectation that some way they could get around the SEADIP restrictions. The idea being floated by the SEADIP review committee that we should add 60% or more to the population in the area and lots more retail/commercial development when traffic is already a large problem is just mind-bogglingly off base. Not to mention the impacts on the nearby wetlands that are certain to occur from more traffic, taller buildings (how else do you achieve the density), light pollution and all the other "benefits" we can count on if anything like the ideas now being floated were ever allowed to come to fruition. How could such a reversal of SEADIP ever get traction? This is just terrible. It is not possible to mitigate the impacts of such population increase or commercial traffic increase. It will just make the neighborhood worse for everybody already living in the area. The original SEADIP was adopted to prevent this kind of unreasonable development in this area.

There is no reason for any change.

Thanks.  
Frederick Akers  
470 Margo Avenue  
Long Beach, CA 90803

Frederick E. Akers  
President  
ESNA Enterprises, Inc.  
dba ESNA Logistics  
dba LA SARGE Warehouse and Distribution  
[www.esna-lasarge.com](http://www.esna-lasarge.com)  
500 S. Acacia Avenue  
Fullerton, CA 92831  
ph. 714 278 1003  
cell 562 824 9295  
fx. 714 278 1007



**Nicole Morse**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Tuesday, November 17, 2015 4:06 PM  
**To:** Nicole Morse  
**Cc:** Angela Reynolds; Christopher Koontz; Wendy Grant  
**Subject:** FW: SEADIP

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**From:**  
**Sent:** Tuesday, November 17, 2015 4:04 PM  
**To:** Craig Chalfant  
**Cc:**  
**Subject:** SEADIP

**Dear Craig,**

**I am very confused about "seadip" several years ago when it was up for discussion somehow the city created a CAC to create a new "seadip" committee to come up with new ideas on how to improve the "seadip" plan.**

**It appeared to me that in the old plan there was no way to mitigate the traffic which our current streets cannot facilitate.**

**On Nov. 4, 2015 I attended the meeting to re start "seadip" and again traffic was not addressed. Not only was it not addressed but you(the facilitators) were asking for the community input and had the nerve to tell us**

**that you would not share our comments that evening with us. You made it seam like you wanted our input one more time in an effort to manipulate our responses to best suit the developers.**

**I wish to record my objection to the city of Long Beach way of trying to trick it's citizens to change the long established "seadip" plan which currently benefits our neighborhood and it's adjoining wetlands. If the city is really concerned about doing something it should look into finding a way to mitigate traffic and then look into ways of proposing some changes to benefit it's citizens and maintain our last bit of wetlands.**

**sincerely,**

**Reyna Akers**

**470 Margo Ave.**

**90803**

**\*\*\*\*\***

Southeast Area Specific Plan The proposed Specific Plan area would encompass 1,466 acres. Land use designations would include: Single Family Residential, Mobile Homes, Multi-Family Residential, Commercial-Neighborhood, Mixed Use Community Core, Mixed Use Marina, Industrial, Public, Coastal Habitat/Wetlands/Recreation, Open Space/Recreation, Right-of-Way (ROW)/Caltrans, Dedicated ROW (not built), and Channel/Marina/Waterway. Buildout of the Specific Plan would allow a total of 9,698 dwelling units, 2,665,052 square feet of commercial/employment uses, and 425 hotel rooms. This would result in a net increase of 5,619 dwelling units, 438,292 square feet of commercial/employment uses, and 50 hotel rooms. Conventional Zoning Area The remaining nine acres of land within the current PD-1 is proposed to be extracted from the Specific Plan area and converted to conventional zoning. This area would not be included in the proposed Southeast Area Specific Plan. A conventional zoning designation (single family residential) was chosen to be

consistent with the existing residential development in the Belmont Heights neighborhood. No new development is intended in this area. Given that the existing intensity of development is not expected to change, buildout projections for the nine-acre conventional zoning area assume no change in number of dwelling units or population. POTENTIAL ENVIRONMENTAL EFFECTS: Potentially significant adverse environmental impacts associated with the proposed project include Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation and Traffic, and Utilities and Service Systems. These topics will be addressed in the EIR. In addition, the EIR will describe and evaluate project alternatives that may reduce or avoid any identified significant adverse impacts of the project. Unless new information identifying it as a potential impact is presented during the scoping process, the following topics will not be discussed further in the EIR: Agricultural Resources and Mineral Resources. PUBLIC REVIEW PERIOD: Pursuant to CEQA Guidelines Section 15082, responsible and trustee agencies and other interested parties, including members of the public, must submit any comments in response to this notice no later than 30 days after receipt. The Notice of Preparation (NOP) and accompanying Initial Study are available for a 30-day public review period beginning October 22, 2015, and ending November 20, 2015. Copies of the Initial Study and supporting documents are available for review at the following locations: • City of Long Beach Development Services, 333 West Ocean Boulevard, Long Beach, CA 90802 • Main Library, 101 Pacific Avenue, Long Beach, CA 90802 • Bay Shore Neighborhood Library, 195 Bay Shore Avenue, Long Beach, CA 90803 The Initial Study can also be viewed on the City of Long Beach website at the following address: [http://www.lbds.info/planning/environmental\\_planning/environmental\\_reports.asp](http://www.lbds.info/planning/environmental_planning/environmental_reports.asp). Additionally, a copy of the NOP was published in the Long Beach Press Telegram. RESPONSES AND COMMENTS: The City will accept written comments only during the aforementioned public review period. Please indicate a contact person for your agency or organization and send your written comments to Craig Chalfant, Senior Planner, Development Services Department, of the City of Long Beach at the above address, by facsimile to 562.570.6068, or by e-mail at [craig.chalfant@longbeach.gov](mailto:craig.chalfant@longbeach.gov). SCOPING MEETING: As a part of the NOP process, the City will conduct a public Scoping Meeting in order to present the proposed project and environmental process and to receive public comments and suggestions regarding the proposed project. The Scoping Meeting will be held on November 4, 2015, at 6:00 pm at Best Western Golden Sails, 6285 Pacific Coast Hwy, Long Beach, CA 90803.



**COMMENT CARD**  
Southeast Area Specific Plan (SEADIP)  
Scoping Meeting

November 4, 2015 at 6:00 PM

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- Aesthetics
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- Hydrology and Water Quality
- Land Use/Planning
- Noise
- Population/Housing
- Public Services
- Recreation
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- Utilities/Service Systems

Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

5443 units is not the baseline number for residential units in the existing SEADIP (Current Plan PD-1). Action 11a and 11b are on wetlands and "zoned" for residential land use in the existing plan. So 5443 is a false assumption for total # of residential units that could be built. Nothing can be built on wetlands as they are protected under the Coastal Act.

Please reuse this number when evaluating the "no build" alternative. This will give a clearer comparison against the proposed plan.

Name:

Address:

Please return this comment card to Craig Chalfant, Senior Planner, City of Long Beach, at the end of the Scoping Meeting or fold in half, staple, and mail to the City of Long Beach using the address provided (see reverse). **Comments must be submitted by November 20, 2015.**



**COMMENT CARD**  
 Southeast Area Specific Plan (SEADIP)  
 Scoping Meeting

November 4, 2015 at 6:00 PM

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- Land Use/Planning
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation/Traffic
- Utilities/Service Systems

Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

*• It is not clear on the "Land Use Plan" as to the future of Studebaker Rd. Is there a plan to reroute it at Loyces Dr.?*

*• I see a code for "Residential (Converted to Conventional Zoning", but I don't see any place on the "Land Use Plan" for such action?*

*• How will access to the "Habitat, Wetlands & Recreation" be located & maintained?*

*• What "Recreation" be considered for this area?*

Name: *Ron Beeler*

Address: *3422 N. Studebaker Rd, Long Beach, CA 90808*  
*Ron@RonBeeler.com*

Please return this comment card to Craig Chalfant, Senior Planner, City of Long Beach, at the end of the Scoping Meeting or fold in half, staple, and mail to the City of Long Beach using the address provided (see reverse). **Comments must be submitted by November 20, 2015.**



**COMMENT CARD**  
 Southeast Area Specific Plan (SEADIP)  
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November 4, 2015 at 6:00 PM

Based on the environmental checklist included in the California Environmental Quality Act (CEQA) Guidelines, the Initial Study for the proposed project determined that the following topics would be analyzed further in the Draft EIR:

- |                        |                               |                             |
|------------------------|-------------------------------|-----------------------------|
| • Aesthetics           | • Greenhouse Gas Emissions    | • Population/Housing        |
| • Air Quality          | • Hazards/Hazardous Materials | • Public Services           |
| • Biological Resources | • Hydrology and Water Quality | • Recreation                |
| • Cultural Resources   | • Land Use/Planning           | • Transportation/Traffic    |
| • Geology/Soils        | • Noise                       | • Utilities/Service Systems |

Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

Overall, it is a good plan and I support the conclusions of the initial study. The draft EIR should include amendments to the Local Coastal Program.

I also suggest that the analysis of the alternatives include the following:

- 1) An impact analysis of the buildout potential under the current zoning without extending Studebaker or Shopkeeper Roads
- 2) A separate impact analysis as above, but this time including both Studebaker + Shopkeeper Roads, and one including only Shopkeeper Road.

Name: Charles Benson

Address: 142 S. Barrington Ave #330 Los Angeles, CA 90064

Please return this comment card to Craig Chalfant, Senior Planner, City of Long Beach, at the end of the Scoping Meeting or mail to: Craig Chalfant, Senior Planner, Long Beach Development Services, 333 West Ocean Blvd., 5th Floor, Long Beach, CA 90802. **Comments must be submitted by November 20<sup>th</sup>, 2015.**

7215 E. Killdee Street  
Long Beach, CA 90808  
Phone and Fax: 562-425-6302

November 19, 2015

Mr. Craig Chalfant, Senior Planner  
Development Services Department  
City of Long Beach  
333 West Ocean Boulevard  
Long Beach, CA 90802

**Sent by email to:** [craig.chalfant@longbeach.gov](mailto:craig.chalfant@longbeach.gov)

Re: Notice of Preparation and Scoping for the Southeast Area Specific Plan

Dear Mr. Chalfant:

As CEQA requires, the EIR for the Southeast Area Specific Plan should be prepared with detailed analysis of a range of alternatives because harm to the environment must be avoided so long as alternatives or mitigation measures are feasible. CEQA also requires that this must be done even if an alternative may cost developers more from their profit margin than another alternative.

Preliminary guidelines that have been presented in your land use map seem rather general (**All** of Marina Pacifica mall and **all** of the Seaport Marina and **all** of the Marketplace changed to mixed use, for example) compared with what I think is required to make the area truly attractive to people and animals. Will the EIR be more specific about what the guidelines for builders in the area will be?

The following specifics are what I would like to see. They have to do with several issues: height, setbacks, and land use, to name a few.

1. No change in height limit or land use for the Best Western Golden Sails site (SEADIP 15). The hotel is high enough. Proximity to water bodies should be the ultimate determiner for height, keeping buildings next to water as low as possible. This site is very close to water so mixed-use marina is not a good designation for it.
2. If the Marina Pacifica mall (SEADIP 16) is rebuilt, one more story in the middle of its north region (the part that contains the Ralph's and the Best Buy and Tantalum) in return for lowering the Best Buy sign. I

would also like to see new buildings turned around to face the water (to the west) the way the project was originally built. There is a different *zeitgeist* now, one that would relish the water views, even from four stories up. However, more than four stories would not attract anyone because the upper stories would be too far from the water, and the people who currently live in Marina Pacifica do not want their eastern sun cut off. If some buildings in the Marina Pacifica mall are to be built closer to PCH than they are now, there should be some parking east and some west of those buildings. The buildings closest to PCH should be no more than the height allowed in the current SEADIP (three stories) because people driving by do not want to look at a wall of tall buildings.

3. No change to the small marina on the Channel (SEADIP 10b). Again, the proximity to water should dictate what can be built, and this area is very close to the water.
4. No further increases in density for the Marina Shores shopping center (Subarea 29) because parking there is already severely restricted. Where would anyone put the additional cars if this area were changed to mixed use?
5. The Seaport Marina Hotel site (SEADIP subarea 17) should be allowed to change to mixed use, but it should be allowed no more than four stories in height in the center of the site. Even allowing four stories would make the streets below very dark. There should be at least one water view corridor northeast to southwest in the center of the project.

In general: I applaud the land use changes that allow Los Cerritos Wetlands to remain open space/wetlands, and the fact that Placeworks recommends no changes to industrial and current residential areas.

Sincerely,

Patricia T. Bliss



**COMMENT CARD**  
Southeast Area Specific Plan (SEADIP)  
Scoping Meeting

November 4, 2015 at 6:00 PM

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- Land Use/Planning
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation/Traffic
- Utilities/Service Systems

Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

I believe Studebaker Road should be extended to PCH as it would greatly reduce traffic at Second/PCH intersection. It can be done without interfering with the potential wetland area (now oilfield).

If and when the existing Seal Beach Oil Field is converted to a wetland area it would be nice to have walking trails throughout. Public access to walking trails should also be placed in the northeast most portion of the eventual wetlands at the corner of Studebaker and Lognes.

We hope that oilfield operations will continue as long as necessary as oil company rights (mineral rights) should be preserved. This "Los Carritos Wetland" area continues to exist because of the oilfield.

Name: PAUL BUJKA

Address: 6268 E Vista St., Long Beach, CA 90803

Please return this comment card to Craig Chalfant, Senior Planner, City of Long Beach, at the end of the Scoping Meeting or fold in half, staple, and mail to the City of Long Beach using the address provided (see reverse). **Comments must be submitted by November 20, 2015.**

## Nicole Morse

---

**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Friday, November 20, 2015 4:04 PM  
**To:** Angela Reynolds; Christopher Koontz  
**Cc:** Nicole Morse; Wendy Grant  
**Subject:** FW: Scoping comments for SEADIP

**From:**  
**Sent:** Friday, November 20, 2015 1:30 PM  
**To:** Craig Chalfant; Angela Reynolds  
**Subject:** Scoping comments for SEADIP

SCOPING COMMENTS FOR SOUTHEAST AREA SPECIFIC PLAN (SEADIP)  
November 20, 2015

### AESTHETICS

Study should include not only public views of the marina, but of the San Gabriel Mountains and the wetlands. In my opinion, any building over 35 feet will block these views.

Retain the Historic building at 2nd and PCH, now known as the Seaport Marina Hotel.

Study should be done as which lighting will provide the least glare and least environmental hazards for birds. Travis Longcore, PhD at USC [longcore@urbanwildlands.org](mailto:longcore@urbanwildlands.org), is someone who can give you guidance on this.

### AIR QUALITY

I suggest that reduced density and traffic will improve air quality.

### BIOLOGICAL RESOURCES

It appears that there are plans to build on the perimeters of the wetlands along the east side of PCH. Wetlands need buffers from traffic, noise, lights and people. All public trails must be on the perimeter of the wetlands, with public access only by kayak in Steamshovel Slough or with trained naturalists. The best place for an interpretative center would be on the land north of the wetlands on Loynes Drive.

A thorough access of current biological resources in the wetlands by a certified biologist should be done for this Draft EIR. It known that the endangered Belding's Savannah Sparrow nest in the pickleweed in the wetlands. Endangered Least Terns used to nest on the area south of the Marketplace before it was filled for the extension of Studebaker and the Pumpkin Patch. However, the terns do still forage in the slough. There may be Burrowing Owls and Harriers left, along with pygmy blue butterflies. Although not endangered, we know that coyotes, rabbits, skunks, raccoons, field mice, snakes, hawks, finches, song sparrows, and many other critters using the wetlands. El Dorado Audubon has records for birds in all parts of the wetlands.

In your list of references, I see nothing on biology, wetlands, light, or noise. I would suggest that planning consult with outside experts on these subjects.

### HAZARDS AND HAZARDOUS MATERIALS

As much of the land around the wetlands have been used as a trash dump over the years, soil samples must be taken to access toxins and methane in the area.

### HYDROLOGY AND WATER QUALITY

Study should be made of the fracking/well enhancement which has been practiced by the oil operators on these properties. Water, steam and chemicals have been injected into the wells in order to force out remaining oil and sludge.

Although it has been several years since there have been rains, in El Nino years, much of the wetland area is under water. The Los Cerritos Wetlands Land Trust has a number of photos of the wetlands in 'wet' years. This, along with the 100 years flood and raising sea levels due to climate change, should be taken into consideration when planning any construction.

#### LAND USE AND PLANNING

It is difficult to comment on what should be studied without knowing the proposed development plan. Just the proposed increase in population and density numbers will no doubt change current height restrictions, traffic, water use, police and fire protection, schools, recreation and quality of life.

Although the current SEADIP allows 5,499 units, only 4,079 have been built. With an allowed 9,698 units and an increase in population from the current 6,486 to allowed 15,420, it obvious the wetlands will be surrounded by people, cars, light and noise. The public has continually stated the importance of the wetlands. This amount of population and land use increase will destroy the wetlands and all the life in them.

#### MINERAL RESOURCES

I question the NO IMPACT for this category. Why aren't oil and gas considered mineral resources? I would argue these mineral extractions determine how this land is used and developed and must be studied, especially in connection with the restoration of the wetlands.

#### NOISE

It has been shown that noise has a negative effect on breeding birds and should be studied for the EIR. Again, Dr. Travis Longcore is an expert on this issue.

#### POPULATION AND HOUSING

See my comments on Land Use and Planning.

#### PUBLIC SERVICES

Increasing the density by over half will certainly have a negative impact on our already stretched fire, police, schools, parks and other public facilities.

#### RECREATION

In addition to parks, access for the public to the marina, bay and ocean for recreation should be included.

#### TRANSPORTATION/TRAFFIC

This, of course, is the most difficult problem to solve when increasing density. The intersections at PCH and 2nd and Studebaker and Westminster are already at F level some times of the day. I am happy to hear that the plan to extend Studebaker Road through the wetlands is eliminated from the SEADIP plan, however, I question how the extension of Shopkeeper Road can be managed without affecting the Market Place Wetlands.

#### UTILITIES AND SERVICE SYSTEMS

I agree all issues a) through f) need to be studied to explain how the city can supply water, waste treatment, storm water drainage, landfill and trash facilities for two and a half times more people in the area. I question why g) "Comply with federal, state and local statues and regulations related to solid waste" is not a significant impact? Will the city be able to provide the needed trash trucks and workers needed for this many more people?

#### MANDATORY FINDINGS OF SIGNIFICANCE

In my opinion, it is impossible for this planned density and population increase not to have the impacts on wildlife and the environment listed here. I hope the planning department will come to the same conclusion and reduce the density to what is allowed by the current SEADIP. That will be difficult enough to mitigate.

Sincerely,  
Ann Cantrell  
3106 Claremore  
Long Beach, CA 90808  
562/495-7288



# Questions re SEADIP "Initial Study" for NOP Comment Purposes

Melinda Cotton  
11/17/15

To: Craig Chalfant

Dear Craig,

I am working on Comments to be submitted by Nov. 20th regarding the SEADIP Notice of Preparation.

Would you please tell me where the following statement concerning the "Buildout of the Specific Plan..." in the Initial Study came from?

How were these figures arrived at? How was it determined that there should be a 'net increase of 5,619 dwelling units, 438,292 square feet of commercial/employment uses and 50 hotel rooms"?

**"Buildout of the Specific Plan would allow a total of 9,698 dwelling units, 2,665,052 square feet of commercial/employment uses, and 425 hotel rooms. This would result in a net increase of 5,619 dwelling units, 438,292 square feet of commercial/employment uses, and 50 hotel rooms".**

On page 17 of the Initial Study in Table 4 it is stated that the SEADIP area population on "Buildout" would be "15,420" a net increase of "8,934" persons.

There is no information as to how the projections in this table were arrived at. Please provide this information.

\*\*\*\*\*

Regarding the "Caltrans Alamos Bay Bridge Improvement Project" ... Page 21... how wide will this bridge be? How many lanes will it include. This information will significantly affect the Transportation aspect of the EIR.

\*\*\*\*\*

Appreciate receiving this information promptly.

Thank you.

Melinda Cotton

Melinda Cotton  
PO Box 3310  
Long Beach, CA 90803  
November 20, 2015

Comments on the SEADIP Update (NOP) of a Draft EIR pursuant to the CEQA Guidelines Section 15082

Lack of clearly and openly presented information in either the SEADIP Initial Study (dated Oct. 2015) or the Nov. 4, 2015 SEADIP NOP meeting has seriously hindered community efforts to respond.

At the NOP Scoping Meeting on Nov. 4th, the more than 100 interested individuals in attendance were **not allowed to ask questions of the presenters**. There was **no Public Comment** period when attendees could ask questions that could be heard by everyone and answered by City Staff and the Consultants. This was extremely disturbing to those attending. We had understood the purpose of this meeting was to obtain information, yet that was not allowed in an open format.

Rather in the minimal amount of meeting time remaining, attendees were told they could only ask questions at one of the 'stations' ... thus what the attendees thought was the purpose of the meeting was totally hindered ... many of the attendees left, others spoke among themselves trying to comprehend the situation, very few went to the 'stations'.

To try to gain more information, I e-mailed Senior Planner Craig Chalfant with specific questions (e-mail attached).

What I received back was a four-page document labeled "SEADIP Questions" with no date, no names or attribution of who wrote this document, and the "answers" were not to the questions I submitted but a variety of topics of unknown origin. The "answers" were written in complex language I can only call "planner-ese" with references to documents not attached. The "answers" were confusing and not helpful. (see attachment)

Given the lack of pertinent information provided, despite the nearly two years already devoted to this study (no Draft Plan, no Draft Transportation Study, no details of land use, building descriptions, building heights, etc.), I will attempt to comment.

The Initial Study has stated that: "Buildout of the Specific Plan would allow a total of 9,698 dwelling units, 2,665,052 square feet of commercial/employment uses, and 425 hotel rooms. This would result in a net increase of 5,619 dwelling units, 438,292 square feet of commercial/employment uses, and 50 hotel rooms". And on page 17 of the Initial Study in Table 4 it is stated that the SEADIP area population on "Buildout" would be "15,420" a net increase of "8,934" persons.

These "Buildout" projections and intensification of development in this area mean huge potentially significant Environmental Impacts in everyway on the SEADIP area. The "Initial Study" has already checked off 22 of the 24 possible items listed in the environmental checklist included in the California Environmental Quality Act (CEQA). These are all "potentially significant".

The Initial Study does not provide any information as to the architecture of the structures that will house and contain these 8,934 additional individuals. Where will they be located? How tall will they be? How wide will they be? There are no details as to how traffic will be handled in an area that is already at Level F of traffic flow. This intensification of use in Table 4 will seriously impact traffic in the area.

We have been verbally told in previous SEADIP meetings that there are plans for additional streets crossing PCH. No details have been provided. But additional cross streets will mean more traffic signals, more turn signals, more pedestrian crossings ... all of which will impede and slow down vehicle traffic and make the traffic flow significantly worse.

Heavy traffic brought to this area by additional residents, commercial development, etc. will greatly hinder emergency access and discourage visitors to the area. This is a Coastal location adjacent to bays, marinas, beaches, wetlands all tourist attractions - which cry out for low scale hotels, bikeways, pedestrian paths, view opportunities and open space. But we find in the earlier SEADIP Update presentations by City and consulting staff is a focus on "financial feasibility" for developers, property value increases for landowners, etc., with little regard for the public or environment.

The Grant Funding provided by the State of California was targeted at updating land uses in the SEADIP area to preserve wetlands, open space, recreational and visitor uses. The Draft EIR should answer and provide for these needs.

The original SEADIP wisely limited building heights to 35 feet. Current landowners and developers purchased their properties knowing of these limitations. For the sake of the City of Long Beach, for Coastal visitors, for the preservation of one of the last viable wetlands in our area - we need to adhere to these height limits and disregard the proposed "Buildout of the Specific Plan" noted above.

We look forward to receiving the Land Use Plan, Traffic Study, etc. in order to be able to properly comment. Also, please schedule a Planning Commission Study Session when these are available so the public may have a Public Comment opportunity.

Sincerely,  
Melinda Cotton  
32 year Belmont Shore Resident

## SEADIP Questions

**1. The document prepared for the Planning Commission in May uses the statistics of 1,600 – 2,900 housing units. The November EIR documentation states 5,619 housing units. Why has this changed?**

The number of future units has not changed. The May 2015 Planning Commission presentation notes “1,600 – 2,900 new housing units in the Study Area *by 2035*.” The CEQA NOP notes: 4,079 existing units (Table 1), 5,499 allowed units under the current (PD-1) zoning (Table 2), and 9,698 units allowed under the proposed plan (Table 4).

The slide shown to the Planning Commission referenced units that could potentially be developed in the area by 2035. It is not anticipated that every parcel would be developed by 2035 nor is it anticipated that every development will build the maximum allowed number of units. The CEQA document however does disclose the total increase in units (5,619) that is theoretically possible if every parcel was fully redeveloped and maxed-out their density, for example by 2050.

**2. Why aren't all the costs for community benefits included in the Financial Analysis?**

The purpose of the financial analysis was to gain a basic understanding of what building types the market might deliver within the SEADIP area. It was not meant to be a final cost analysis, nexus study or exhaustive pro-forma for individual developments. For these reasons and because the final set of community benefits are still being developed, community benefit costs were not included in the financial feasibility analysis.

Community Benefits will become a requirement under the Specific Plan. Some benefits may be installed directly by a developer (such as plazas, fountains and open-space on the project site), while others will involve the payment of fees toward City installation of the improvement (bike lanes, medians, wetlands restoration). These expenses may have some impact on developer cost and may impact their individual development pro-forma analysis. The City however is not attempting to answer how an individual developer will or will not make a profit (or how much) but rather, in general, what development types are profitable enough to trigger potential investment and redevelopment of sites within the SEADIP area over time.

**3. What would it look like if they looked at ground-floor-retail with housing flats above them, for the 1-3 story scenario, as they did in the other scenarios?**

The development scenarios studied were intended to meet the objectives outlines in the vision statement created through the community outreach process. Only the most likely development scenarios consistent with the vision were studied in the financial analysis. New ground-up mixed use at 1-3 stories was not studied based on surveys of Southern California developments, market data and developer interviews. While 3-story mixed-use buildings are constructed in some markets, they

are difficult for developers because the lobby, entrance and amenity areas decrease the leasable retail area, a large portion of the residential space is non-leasable (lobby, corridor, amenity, rental office) in relation to the total amount of leasable residential space. The fixed costs and site-preparation on a 3-story product is also greater as a proportion of total cost than in a 5-story product.

**4. I see the conclusion here, but where are the costs calculated into the feasibility formula?**

The goal of the financial analysis was not to provide a full pro-forma profit analysis for developers. The goal was to determine what product types were feasible at all. A development typology that is not feasible simply from a cost standpoint by definition cannot pay additional community benefit costs. A product type that is feasible however may be able to pay for community benefits. Those amenities will become requirements under the Specific Plan and only developments that are able to deliver those benefits will move forward.

**5. What follows is a number of examples of Community Benefits. Again where are the costs and implementation plan? How can these be written into the Plan?**

Community Benefits will become a requirement under the Specific Plan. Some benefits may be installed directly by a developer (such as plazas, fountains and open-space on the project site), while others will involve the payment of fees toward City installation of the improvement (bike lanes, medians, wetlands restoration). These details and the draft plan will be shared with the community at the next workshop (March/April 2016). The specific plan will contain development standards (height, FAR, etc), amenity requirements (open space, pedestrian and public amenities) and fee provisions (transportation and wetland improvements).

**6. Again, more great concepts for Public Benefits. Again the question, how much of this is paid for by developers/owners. Where are the costs?**

See responses 2 and 5. Cost figures are under development and will be used for any fee program. Other requirements (for example that every X square feet of retail space require Y square feet of public plaza) will become development requirements in the Specific Plan.

**7. How much financial support do we need from developers for these benefits?**

The complete transformation of PCH as well as installation of public gathering places and other amenities could exceed \$10 million in cost. While these figures will be studied and articulated as the plan continues development, it is clear that the City alone cannot bear these costs.

**8. How much money are we lacking in Scenario 1 and 2?**

In Scenario 1 and 2 the residual land value of the parcels would decrease. There would be no financial incentive to redevelop the parcels. This is not simply an issue of money lacking, it is an issue of no investment and no change would result from this zoning.

**9. Does the community still want all these public benefits if they have to live with 7 story density?**

We do not have the answer to this question. This is the point of the public-outreach process, to understand community needs and desires. The City is committed to continuing its dialogue with residents of all types and ages, business and property owners, area recreation users, visitors and anyone else who may wish to participate in the process.

**10. If the value of land goes up as a result of changing the development standards, and then someone sells the property for a higher value, how is it then feasible to pay for public benefits?**

Based on market factors, residual land values (as well as improvement/exchange values based on the current rents and improvements) may rise or fall. All the requirements for development, including public benefits, will be contained within the Specific Plan. Typically developer purchases occur at a price where the developer believes they can cover all of their costs and achieve an industry-standard profit level. If this price (the development value or residual land value) is less than the value of the income stream from the current improvements the property will not be purchased for development. The sale or resale of a parcel does not impact the requirement to or ability to deliver a community benefit.

**11. Scenario 2 is set-up as a townhome, single-story retail example. What happens to the financial feasibility picture if a ground-floor-retail, stacked-flats model is used for the 1-3 story Scenario? Why isn't this being considered?**

See response #3

**12. There are a lot of variances between one scenario and another? Why? Why are there more streets in Scenario 1 and fewest in Scenario 4? Why is there such a large square footage for Plazas in Scenario 2, compared to the others?**

Each scenario is based on area developments and industry practice for that product type. The scenario 1 involves large amounts of surface parking and separate large pads for retail (box) development. This necessitates large amounts of street to access parking areas and different retail pads. Scenario 4 involves the least amount of surface parking and locates buildings in close relationship to parking and each other, resulting in less new street construction. The amount of plaza is greater in Scenario 2 because Plaza space serves as a transition and separation between the townhome and residential uses.

**13. These variances would make a difference in retail and housing square footages available to generate revenue? Are these correct? The rationale is not obvious.**

Industry figures are used for the assumptions in all the scenarios. For example a developer could not simply reduce the amount of plaza space in Scenario 2 to increase revenue-generating retail space. A retail development that has insufficient amenity space (in this case Plaza) will not attract sufficient merchants and shoppers and will not be as successful a revenue generator as a center developed with the correct balance of amenity and leasable square footage.

**14. Parking costs by square foot are given in the table that follows but no Sq Ft [SIC] number is provided for the parking spaces per scenario above, so we cannot add the parking costs into the equation.**

The amount of parking is listed in Figure 3. Standard ratios for the size of parking spaces and the amount of square footage required to develop parking were used. Industry calculators and figures were used for the parking calculations. The relationship between number of parking spaces and square footage required is not linear.

**15. Which Public Benefit amenities are not included in the financial analysis? There are many. What are the costs for them? How much will developers/owners contribute?**

To the degree that public benefits are in addition to industry practice (for example more open space, better fountains, art in the plaza) they are not accounted for in the financial analysis. Please see responses 2 and 5-8.



**COMMENT CARD**  
 Southeast Area Specific Plan (SEADIP)  
 Scoping Meeting  
 November 4, 2015 at 6:00 PM

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- Cultural Resources
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- Hydrology and Water Quality
- Land Use/Planning
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation/Traffic
- Utilities/Service Systems

Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

Although we are all for the LCW and support the Synergy initiative, we are excited to see East Long Beach as an enhanced quality of life with exceptional housing, retail, entertainment and leisure. Please include in the Project Description in the EIR to indicate that part of the project will include amendments to the Local Coastal Program.

Please include:

\* Impact analysis of the buildout potential under the current zoning designations, without extending Studebaker Road or Shopkeeper Road.

\* Impact analysis of the buildout potential under the current zoning designations, including both Studebaker Road and Shopkeeper Road, and analysis including only Shopkeeper Road.

Name: Lisette Coulter

Address: 2200 W. Valley Boulevard, Alhambra, CA 91803

Please return this comment card to *Craig Chalfant, Senior Planner, City of Long Beach*, at the end of the Scoping Meeting or mail to: *Craig Chalfant, Senior Planner, Long Beach Development Services, 333 West Ocean Blvd., 5th Floor, Long Beach, CA 90802. Comments must be submitted by November 20<sup>th</sup>, 2015.*



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Planning Bureau

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SEADIP = NO, NO, NO

Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

1. WATER = AVERAGE OF 100 GAL. PER DAY = 676,600 GAL. FOR THE 6,766 NEW PEOPLE IN LONG BEACH.
2. 6,766 PEOPLE, EACH WITH 1 CAR, AVERAGE 12,000 MILES PER YEAR @ 30 MPG = 2,706,400 GAL. OF GASOLINE NEEDED AND ~ 81,192,000 MILES OF AUTO POLLUTION. WHERE WILL THE CARS BE PARKED? HAVE YOU DRIVEN PCH, 2ND STREET, STUDEBAKER @ RUSH HOUR?
3. EDUCATION = HOW CAN WE HANDLE THIS POPULATION INFUX, SCHOOLS ARE OVERCROWDED NOW.
4. WETLANDS = OBVIOUSLY, THIS WILL ENDANGER AND EVENTUALLY DESTROY WETLANDS & MIGRATORY BIRDS
5. DO WE REALLY NEED ANOTHER SHOPPING AREA?
6. WATER AGAIN = I'M NOT ALLOWED TO WATER MY YARD NOW, WHAT WILL HAPPEN IF THIS STUPID PROJECT GOES THROUGH?

Name: LEON CRAWFORD

Address: 56 SEA CREST CT, LONG BEACH 90803

Please return this comment card to *Craig Chalfant, Senior Planner, City of Long Beach*, at the end of the Scoping Meeting or mail to: *Craig Chalfant, Senior Planner, Long Beach Development Services, 333 West Ocean Blvd., 5th Floor, Long Beach, CA 90802*. Comments must be submitted by November 20<sup>th</sup>, 2015.

## Nicole Morse

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Tuesday, November 17, 2015 3:48 PM  
**To:** Nicole Morse  
**Subject:** FW: SEADIP comments

**From:** W H Davis  
**Sent:** Tuesday, November 17, 2015 3:41 PM  
**To:** Angela Reynolds  
**Cc:** Craig Chalfant  
**Subject:** SEADIP

For the comments you requested for SEADIP.

Dear Angela,

On November 4, 2015, we had a nice visit together regarding SEADIP including the problem of the traffic saturation on 2nd and PCH.

We agreed that Mr. Lin's holdings have a status that, when developed, will make our traffic congestion worse. Hopefully we can strike a deal with that property that damages mobility the least.

Thus, with that damage to mobility as a given -- should we voluntarily allow other properties to additionally impede mobility?

That's my 2 cents.

Howard Davis  
Naples resident



City of Long Beach  
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NOV 17 2015

**COMMENT CARD**  
Southeast Area Specific Plan (SEADIP)  
Scoping Meeting

November 4, 2015 at 6:00 PM

Planning Bureau

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Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

Nov. 10, 15

Dear Mr. Chalfant:

I am responding to the Specific Plan Draft EIR:

Thank you for the effort you have given to this project, but I must disagree with the ~~rest~~ results:

I attended so-called community meeting where we had new pictures, etc. descr. being what the EIR should look like - I attended all but the last meeting. The "people" overwhelmingly asked for preservation of the wetlands - and a lid on the number of stories allowed for the buildings. We believed we were being listened to - obviously, the ~~was~~ <sup>was</sup> mistaken. That was just a "feel-good" waste of our time & money. Stories allowed - and mitigation for the terrible ~~road~~ traffic was on included - what was that done? Are they more interested in the huge profits of developers - or the real will of the people? The EIR should include preservation of the wetlands - and no higher than ~~3~~ three stories for the buildings. That is what the people want.

Name: Ann Demison

Address: 6931 F 11th St L B 90515

Please return this comment card to Craig Chalfant, Senior Planner, City of Long Beach, at the end of the Scoping Meeting or fold in half, staple, and mail to the City of Long Beach using the address provided (see reverse). **Comments must be submitted by November 20, 2015.**



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Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

REMOVAL OF (ANY) AREA FROM  
SEADIP - MAY NOT BE DONE  
WITHOUT RECONVING  
COUNCIL OF TRUST

Name: LAWRENCE B. GOODHUE  
Address: USPO BOX 141464 LONG BEACH 90802

Please return this comment card to Craig Chalfant, Senior Planner, City of Long Beach, at the end of the Scoping Meeting or fold in half, staple, and mail to the City of Long Beach using the address provided (see reverse). **Comments must be submitted by November 20, 2015.**

## Nicole Morse

---

**Subject:** FW: SEADIP CEQA PROCESS COMMENTS FROM JAN HALL

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

From: Frank Zolin

To: christopher.koontz

Cc: julie.maleki

Sent: Tue, Nov 17, 2015 3:22 pm

Subject: SEADIP CEQA PROCESS COMMENTS FROM JAN HALL

Having attended the meeting regarding the CEQA process, I have these comments regarding the scope of the environmental review of the proposed SEADIP plan.

1. Traffic congestion and the subsequent ramifications to the existing residents will be significant based on the additional proposed density, i.e., an almost 50% increase. The document should include reviewing both L.A. Caltrans district office as well as Orange Co's plans for additional lanes on the I-405 ending at 7th St.(Rte. 22) through Long Beach and the impact in the SEADIP area.
2. Growth at both CSULB and the VA facility must be included as volumes of traffic generated by both will impact the intersection at 7th ST., Pacific Coast Hwy and Bellflower. (the Iron Triangle)
- 3 The proposed development of housing in Seal Beach should also be part of the review as it will impact PCH as it goes through the SEADIP area heading north.
- 4 The intersection of 2nd and PCH is already regarded as "F" by Caltrans. The need to study potential options or mitigations needs to include the extension of Studebaker as was proposed in the original plan. It could potentially provide relief to both "the Iron Triangle" and the intersection at 2nd and PCH and divert traffic coming from the 405 heading south to Seal Beach, Sunset Beach and Huntington Beach.
5. The idea of converting PCH to two lanes in the SEADIP area will create more congestion in that area and certainly increase pollution from vehicles. With bicycle paths recommended on both sides of roadway, the issue of riders health should be taken into consideration in the report as well as the air quality in the surrounding area since the prevailing winds are from the north/west. The proposed height of between 5 and 6 stories along PCH should be studied as those same prevailing winds may be intercepted by those buildings and change the natural flow to the east.
6. The impact on emergency services and their ability to evacuate areas in the case of a natural disaster earthquake or flooding, will be clearly impacted by greater congestion at critical intersections and cause problems for Naples and Belmont Shore. A review of this issue should be included.
7. An economic review regarding of the cost of any needed improvements or mitigation needs to be identified as to who will bear the costs (taxpayers or property owners/developers). The original plan required the developer to bear the cost as the need for the improvements were because of their developments.

I feel that I must add that if as stated at the meeting the specific plan is still to be written, I wonder how you can complete the EIR without a specific plan.

Thanks for the opportunity to offer my suggestions.

Jan Hall

November 10, 2015.

Craig Chalfant, Senior Planner  
Development Services Department  
City of Long Beach  
333 West Ocean Boulevard, Fifth Floor  
Long Beach, CA 90802

City of Long Beach  
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NOV 17 2015

Planning Bureau

Dear Mr. Chalfant,

I was an attendee at the "Southeast Area Specific Plan (Seadisp)" scoping meeting, and comments were suggested. Beside the comments, the reasons also enclosed.

In the 1977 approval, the wetlands acreage was considered to be an open space for the people of Long Beach to walk through and study the flora and fauna of this unique expanse. This was a similar use to the recreational parks.

The Seadisp plan proposes 9,698 dwelling units up from 5,619 dwelling units. This increases the population of 15,420 people. This is equivalent to five full high schools. That is a huge increase in the population for this area.

In the Seadisp plan there was "no restriction on height limits" on dwelling units or buildings included in the scoping plan.

The residents, who already live in this area surrounding the unique wetlands, enjoy their views of Mount Wilson, Mount Baldy, Saddleback Mountain, San Pedro Hill, Signal Hill, Catalina Island, and the Pacific Ocean. On a clear day, the mountains bearing Lake Arrowhead and Big Bear are visible.

Why would any of these residents desire to see these views blocked or destroyed by this Seadip plan? We have all seen the past mistake of Long Beach of allowing mansions built next to one-story dwellings blocking out beautiful views as well as the sun in many neighborhoods. Let us or Seadip not make that mistake here.

Traffic congestion, during the going to work and coming from work, between the hours 4:30 A.M. to 9:15 A.M. and 3:15 P.M. to 7:30 P.M. Monday through Friday is a present problem already close to grid-lock. All this takes place on the streets bordering the wetland area.

On the Pacific Coast Highway, Studebaker Road, and Lynn Drive, the lanes are filled at the stop signals during these specific hours. These streets lead to three freeway on-ramps, the university (S.U.L.B.) and to additional east-west streets of Willow, Spring, and Carson.

We know or visualize that an influx of population of 15,420 new people would definitely make this traffic congestion worse. Why is it necessary to add a future problem, Seadip, to an already present problem? Traffic congestion would really be made worst if these 15,420 new residents have two cars. That is what most families have for those of us who work for a living.

This overall Seadip plan is not a plan that the residents of this area desire. The wetlands is unique in its own characteristics. It should be an open space in perpetuity. In an ancient Roman law suggests, "Live and let live!" This should be considered before any Seadip plans be implemented.

Sincerely,  
John Kinrichs



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- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation/Traffic
- Utilities/Service Systems

Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

1. POPULATION/HOUSING: 15,420 NEW PEOPLE - WAY TO MANY FOR THIS  
UNIQUE WETLANDS AREA. SHOULD BE CUT DOWN TO ZERO!  
NO RESTRICTION ON HEIGHT LIMITS ON DWELLING UNITS AND BUILDINGS  
IN SEADIP PLAN. ABSURD! RESIDENTS WISH TO KEEP ALL VIEWS (SCENIC)!  
SEADIP PLAN PROPOSAS 9,698 DWELLING UNITS UP FROM 5,619 = +4,079 ADDITIONAL  
UNITS. NO DWELLING UNITS SHOULD BE BUILT IN WETLANDS AREA! ZERO!  
2. TRANSPORTATION/TRAFFIC: TRAFFIC CONGESTION ON PACIFIC COAST HIGHWAY,  
STUDEBAKER ROAD, AND LOYNS, DURING GOING TO WORK HOURS AND COMING FROM WORKHOURS,  
ARE IN NEAR GRID-LOCK AT PRESENT TIME. STOP SIGNAL WAITING CAN BE UP  
TO FIVE SIGNAL CHANGES BEFORE GETTING TO PASS. NOW SEADIP RECOMMENDS  
15,420 NEW RESIDENTS WITH TWO CARS IN EACH FAMILY IF THEY BOTH WORK,  
THAT WOULD ADD 30,840 CARS TO A PROBLEM THAT HAS YET TO BE SOLVED  
IN PRESENT TIME, AND THIS WOULD ADD TO THE PRESENT PROBLEM  
TO MAKE A GREATER, HORRIBLE FUTURE PROBLEM,  
THIS IS NOT THE TIME FOR THIS SEADIP PLAN!

Name: JOHN HENRICHS

Address: 306 ARGONNE AVE., LONG BEACH, CA 90814.

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I would like to see a reconsideration of the decision to not extend Studebaker south of 2<sup>nd</sup> St.

Please consider extending Studebaker, using a causeway-type of roadway. Look at I-10 between Baton Rouge and New Orleans. It runs for miles over bayous. The way that road is constructed allows ~~and~~ wildlife and marine life as well as fishermen and others to pass undisturbed by traffic.

Yes, it would be more expensive than 1) doing nothing (as now contemplated), or 2) creating a ground level roadway, ~~but~~ but the benefits to traffic flow will be tremendous.

Name: Lucy Johnson

Address: 2402 Pitalussa Ave, LB 90815

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Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

I support the conclusions stated in the initial study, and it appears to be a good plan overall. The draft EIR should include amendments to the local coastal program.

I think the analysis of alternatives should also include:

- a) impact analysis of the buildout potential under current zoning w/o extending Studebaker or Shopkeeper Roads
- b) Separate impact analysis like above in a) but including both Studebaker and Shopkeeper Roads, and one additional one including only Shopkeeper Road.

Name: DARRIN KENNEDY

Address: 4056 Stansbury Ave., Sherman Oaks, CA 91423

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It is a good plan; the consultants have given all of various parties an opportunity to express their views & initially I worried about wetlands, however the development mentioned & the densities seem reasonable & sustainable & permit the residents to enjoy proximity to the wetlands.

I think that Studebaker & shopkeeper should be extended to relieve congestion & permit drivers to enjoy the wild life & nature.

Also, I feel that maximum densities should be allowed & that it is good to plan for increased population in our coastal areas.

Name: Kentfield E Kennedy

Address: 370 Fondyee Rd, Los Angeles, CA 90049

Please return this comment card to Craig Chalfant, Senior Planner, City of Long Beach, at the end of the Scoping Meeting or mail to: Craig Chalfant, Senior Planner, Long Beach Development Services, 333 West Ocean Blvd., 5th Floor, Long Beach, CA 90802. **Comments must be submitted by November 20<sup>th</sup>, 2015.**

*Return mail to*



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*REQUIRE*

1. PLEASE KEEP ALL BUILDINGS BE LOW-RISE  
THIS IS ALL THAT FITS IN THE AREA

2. COME UP WITH SOMETHING REALLY CREATIVE  
FOR TRAFFIC INTERSECTIONS PARTICULARLY  
PCH + 2ND etc. Maybe thru TRAFFIC WOULD  
NOT STOP IN EITHER DIRECTION AND USE  
A TUNNEL / OVERPASS TO KEEP THE FLOW  
GOING - IT IS AN ENTRY TO THE CITY.

Name: ELLEN MATHIS 562 433 6509

Address: 63 St Joseph Av LB 90803

Please return this comment card to *Craig Chalfant, Senior Planner, City of Long Beach*, at the end of the Scoping Meeting or mail to: *Craig Chalfant, Senior Planner, Long Beach Development Services, 333 West Ocean Blvd., 5th Floor, Long Beach, CA 90802. Comments must be submitted by November 20<sup>th</sup>, 2015.*

## Nicole Morse

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Friday, November 20, 2015 4:01 PM  
**To:** Angela Reynolds; Christopher Koontz  
**Cc:** Nicole Morse; Wendy Grant  
**Subject:** FW: SEADIP NOP comments

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

From: Jeff Miller  
Sent: Friday, November 20, 2015 1:16 PM  
To: Craig Chalfant  
Subject: SEADIP NOP comments

Mr. Craig Chalfant  
Senior Planner  
City of Long Beach

Pursuant to the Notice of Preparation (NOP) from the City of Long Beach regarding the City's Southeast Area Specific Plan Draft EIR and the request for comments, I submit the following:

The NOP does not meet the requirements of CEQA section 15082 (a) (1), which states: "The notice of preparation shall provide the responsible and trustee agencies and the Office of Planning and Research with sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response."

The key words in 15082.a.1 are "sufficient information". Specifically, the information and plans provided to the public at the November 4 Scoping Meeting did not contain sufficient details of the proposed zoning changes, such as increased allowed heights of structures and the rationale for allowing construction of additional residences. Nor was sufficient data presented to explain or correctly predict the effects of increased traffic, congestion, noise, light, air and water pollution, loss of views, open space, and other aesthetic considerations.

In meetings previous to the Scoping Meeting, many comments from citizens were received by the City. Together these comments identified some common themes, issues, concerns, and opinions about the updating of the zoning of the SEADIP area. These data were not presented at the Scoping Meeting. There is no explanation given by the City to justify the plans now proposed which are in direct conflict with these prior opinions expressed by the citizens of Long Beach.

One of these prominent and significant expressions of public opinion is that there should not be an increase in allowed building height. However, the City is proposing a change to double the allowed height, which was not revealed in the Initial Study or at the Scoping Meeting. The only mention of this change is the one sentence in the Initial Study, "Implementation of the Specific Plan would allow for the redevelopment of existing uses within the Project area, resulting in new development that differs from existing land uses in height, scale, mass, and character".

Additionally, the intent and spirit of CEQA section 15083, Early Public Consultation, were not met. The November 4 Scoping Meeting did not allow for effective "public consultation". In fact, specific requests for such a dialogue from several citizens present were explicitly denied. Meaningful, pointed questions were ignored.

Because of these many shortcomings in this process as conducted by the City, work on a draft EIR should not proceed until another Scoping Meeting is held, with sufficiently detailed information presented and an honest, open forum is available for the members of the public to comment and be heard. Those comments must then be considered by the city in good faith.

Jeff Miller  
PO Box 3310  
Long Beach, CA 90803

## Nicole Morse

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Friday, November 20, 2015 3:59 PM  
**To:** Angela Reynolds; Christopher Koontz  
**Cc:** Nicole Morse; Wendy Grant  
**Subject:** FW: Comments on SEADIP "Initial Study" for NOP/due Nov. 20, 2015  
**Attachments:** LA Conservancy comments, PCH & 2nd NOP (4-17-2014).pdf; LB Negative Declaration blobdload.pdf; Benefits of Urban Street trees.pdf; LandPlan\_022015\_LQ.jpg

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**From:** SUSAN MILLER  
**Sent:** Friday, November 20, 2015 11:52 AM  
**To:** Craig Chalfant  
**Subject:** Comments on SEADIP "Initial Study" for NOP/due Nov. 20, 2015

To: Craig Chalfant  
RE: Comments on SEADIP initial NOP/due Nov. 20, 2015

I have attended many of the Seadip meetings. A good, environmentally sound strategic plan must be implemented for the protection of this area. The City of Long Beach already has a population near the half million mark. Current City of Long Beach infrastructures, public works/services and utilities are in demise with stretched funds available now and in the near future.

I will concentrate my 3 comments on the area identified in the above Land Plan map as MU-CC or Mixed Use Community Core:

1. Area 17 in the MU-CC contains the Sea Port Marina hotel. As the above letter from the LA Conservancy states this is a architecturally and culturally significant building. The Southeast area is identified as an area with unique character and is to be preserved.

2. In the City's Draft Land Use Plan dated April 2015 / in the Southeast plan/ page 152 & 153, under point 5: "Intensification of the existing mix without adequate consideration for parking, traffic and residential quality of life shall not be permitted." The SEADIP plan violates this Draft Land Use Plan by over developing/increasing density and vehicle use.

3. Per above document named LB Negative Declaration alternative modes of transporation are encouraged: *"more emphasis on pedestrian, bicycling, and public transit options and transformative infrastructure projects to spur community revitalization."* Planting mature trees along the sidewalks lining PCH will provide natural shade to encourage more walking, bicycling, Segway types and the trees are a much needed element for the wildlife and human habitats. See above PDF on Benefits of Urban Streets.

Thank you for taking my comments under consideration.

Regards,

Susan Miller  
4217 East Ocean Blvd.  
Long Beach, CA

Belmont Shore area in the

April 17, 2014

**Submitted electronically**

Craig Chalfant  
Development Services Department  
333 West Ocean Boulevard, 5<sup>th</sup> Floor  
Long Beach, CA 90802  
Email: [craig.chalfant@longbeach.gov](mailto:craig.chalfant@longbeach.gov)

523 West Sixth Street, Suite 826  
Los Angeles, CA 90014

213 623 2489 OFFICE  
213 623 3909 FAX  
[laconservancy.org](http://laconservancy.org)

**Re: PCH & Second Project NOP (SeaPort Marina Hotel, 6400 E. Pacific Coast Hwy)**

Dear Mr. Chalfant:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for the PCH & Second Project. We believe the SeaPort Marina Hotel is architecturally and culturally significant. We strongly urge the City of Long Beach, as the lead agency under the California Environmental Quality Act (CEQA) process, to consider the hotel a historical resource and to mandate consideration of potentially feasible alternatives to demolition and mitigation measures that reduce impacts on historic resources in the draft EIR.

The Conservancy and its Modern Committee, as well as Long Beach Heritage, have long recognized the significance of the SeaPort Marina Hotel as a rare local example of a Googie style garden motel and as an important local example of the work of prominent African American architect Roy Anthony Sealey. In 2010 and 2011, the Conservancy submitted comments on the Draft Environmental Impact Report (EIR) and Recirculated Draft EIR for the Second + PCH Project previously proposed for the site. Then and now, as part of these comments, the Conservancy has provided compelling information on the historical significance of the SeaPort Marina Hotel and the need to evaluate and recognize the structure as a historical resource under CEQA.

**I. The SeaPort Marina Hotel (Edgewater Inn) Qualifies As A Historical Resource for Purposes of CEQA**

A property's potential eligibility for an historic register, rather than actual listing, is sufficient evidence for the city to consider that resource historic under CEQA (CEQA Guideline §15064.5 (a)(3)). As the authoritative guide to the state's significant architectural and cultural resources, the California Register serves to identify, evaluate, register, and protect California's historical resources. To be determined eligible for the California Register, an historical resource must be significant at the local, state, or national level under one or more of the following criteria:

1. It is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;  
or



2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, state or the nation.

In addition to meeting one or more of the four above criteria, California Register-eligible properties must retain sufficient integrity to convey historic significance; it need not retain all aspects of integrity, but only a sufficient degree of those aspects of integrity that relate to why it is significant.

Contrary to previous evaluation findings for the SeaPort Marina Hotel from the Second + PCH Project draft EIR, the Conservancy believes the subject property does maintain sufficient integrity to convey its historical significance. Despite some alterations and additions through the years, the SeaPort Marina Hotel retains sufficient elements of integrity with which to convey its historical significance and it remains identifiable as a garden motel characterized by distinctive Googie style design features.

Designed by Roy Anthony Sealey (1917- ), a prominent African American architect, the Conservancy believes that the SeaPort Marina Hotel is eligible for listing in the California Register as the work of a noted architect (criterion 3) and as a rare surviving example of a 1960s Googie-style garden hotel (criteria 1 and 3).

While studying architecture at the University of Southern California in 1939, Sealey worked for renowned architect Paul Revere Williams. He left Williams' practice in 1945 to open his own office nearby on Wilshire Boulevard. As an indication of his prominence, Sealey was profiled in an article in the August 1950 edition of *Ebony* magazine, "Architect for the Wealthy," including an interview and photographs of several buildings he had designed.<sup>1</sup>

Although Sealey had worked as a successful designer for nearly two decades, he did not obtain his California architect's license until 1957. By the 1960s, he was "one of a small group of notable African American architects practicing in Southern California."<sup>1</sup> Among Sealey's notable projects include the Brierwood Terrace Valley Convalescent Hospital in Encino (1958); the Cockatoo Hotel in Inglewood (1961); the East Los Angeles Department of Social Services (1967); and the expansion of the County USC Medical Center (1968-75). The SeaPort Marina Hotel is not only the best example of Sealey's work in Long Beach, but is also a rare surviving intact example of a mid-century garden motel.

Completed in 1963, the SeaPort Marina Hotel (originally known as the Edgewater Inn) included two-hundred guest rooms and suites, three restaurants, a 24-hour coffee shop, two cocktail lounges, convention and meeting rooms seating 1,000 people, a gift shop, liquor shop, a yacht catering service and a children's playground. The hotel was an important addition to the Long Beach hospitality business in the early 1960s. Located across from the recently completed Alamitos Bay Marina, the hotel catered to tourists driving along Pacific Coast Highway, boaters docked at the marina, conventioners, and other groups holding events there.

The SeaPort Marina Hotel exhibits several distinctive elements characteristic of the mid-century Googie-style architecture, including the double zigzag layout of the guest room wings, the "Y" shaped piers of the main building, and the folded plate roofline of the circular lobby and convention facilities. Other extant character-defining features include the lozenge shaped roofline on the motel block, decorative concrete block screen, decorative lozenge shaped iron balcony railings, original aluminum mullions and glazing, and mature plantings and palm trees (as further depicted in Attachment A). The hotel's striking roofs and piers are similar to those found in Sealey's design for the Pittman Dog and Cat Hospital (1964), located at 2901 Exposition Boulevard in Los Angeles, which was recently restored to its original condition.

<sup>1</sup> PCR Services Corporation, "Second + PCH Development, Recirculated Draft Environmental Impact Report," City of Long Beach, March 2011, Section IV.D-29.



The City of Long Beach's 2009 Historic Context Statement states, "Examples of the Googie style are rare in Long Beach; however, there are a few scattered within areas of postwar development, particularly the Los Altos area."<sup>2</sup> The Historic Context Statement further states:

Because pure Googie style is uncommon in Long Beach, it is more likely that a building will feature elements of the style rather than showcase a complete package. A Googie style building will most likely be significant as an individual resource. Eligible resources should retain most of their character-defining features, although some impact or loss to character-defining features may be acceptable for local designation due to the rarity of the type and the degree of integrity compared to other extant examples. Original materials, roof configuration, and concept of glass walls are critical in conveying the essence of the style, as are period signage and features such as lighting that are suggestive of the Space Age.<sup>3</sup>

The "fair argument" test "establishes a low threshold for initial preparation of an EIR, which reflects a preference for resolving doubts in favor of environmental review."<sup>4</sup> Evidence supporting a fair argument of a significant environmental impact will trigger an EIR even if the record contains contrary evidence.<sup>5</sup> Although the city has already selected the EIR as the form of environmental review for the project, based on the Initial Study and evaluation of potentially significant impacts, the evaluation of the SeaPort Marina Hotel is forthcoming as part of the draft EIR.

Because compelling evidence supports the fair argument that the SeaPort Marina Hotel qualifies as a potential historic resource under CEQA, the draft EIR must evaluate it as such and consider preservation alternatives and appropriate mitigation measures to substantially lessen or avoid such impacts.

## **II. The EIR should analyze potentially feasible alternatives and mitigation measures that lessen or avoid significant adverse impacts on historical resources**

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history."<sup>6</sup> The EIR is considered "the heart" of CEQA because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts.<sup>7</sup> Accordingly, the EIR should include preservation alternatives and mitigation measures that attempt to meet project goals and reduce significant adverse impacts to historic resources.

As currently proposed, the project would raze the existing SeaPort Marina Hotel for a commercial development consisting of retail and restaurant uses totaling approximately 245,000 square feet of floor area contained in several one- and two-story buildings. The project also calls for landscaped courtyards and open space areas. Yet the design and layout of the existing SeaPort Marina Hotel contains similar elements to those being proposed for the design of the PCH & Second Project: two-story structures, surface parking, landscaped courtyards and open space areas, and square footage devoted to restaurant use.

Thank you for the opportunity to comment on the NOP for the PCH & Second Project. Please do not hesitate to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions or concerns.

<sup>2</sup> Historic Context Statement, City of Long Beach. Page 233. July 10, 2009.

<sup>3</sup> Historic Context Statement, City of Long Beach. Page 233. July 10, 2009.

<sup>4</sup> *Santa Teresa Citizen Action Group v. City of San Jose* (2003) 114 Cal.App.4<sup>th</sup> at 703.

<sup>5</sup> *League for the Protection of Oakland's Historic Resources v. City of Oakland* (1997) 52 Cal.App.4<sup>th</sup> 896, 904-05; *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 310.

<sup>6</sup> Public Resource Code, Sec. 21001 (b), (c).

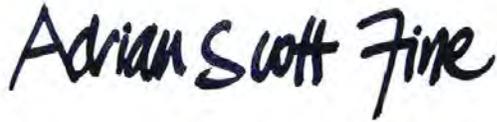
<sup>7</sup> *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see PRC Secs. 21002, 21002.1.



**About the Los Angeles Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,500 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Sincerely,



Adrian Scott Fine  
Director of Advocacy

cc: Docomomo Southern California  
Long Beach Heritage



# Urban Street Trees

**22 Benefits**

**Specific Applications**



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

# Urban Street Trees

## 22 Benefits

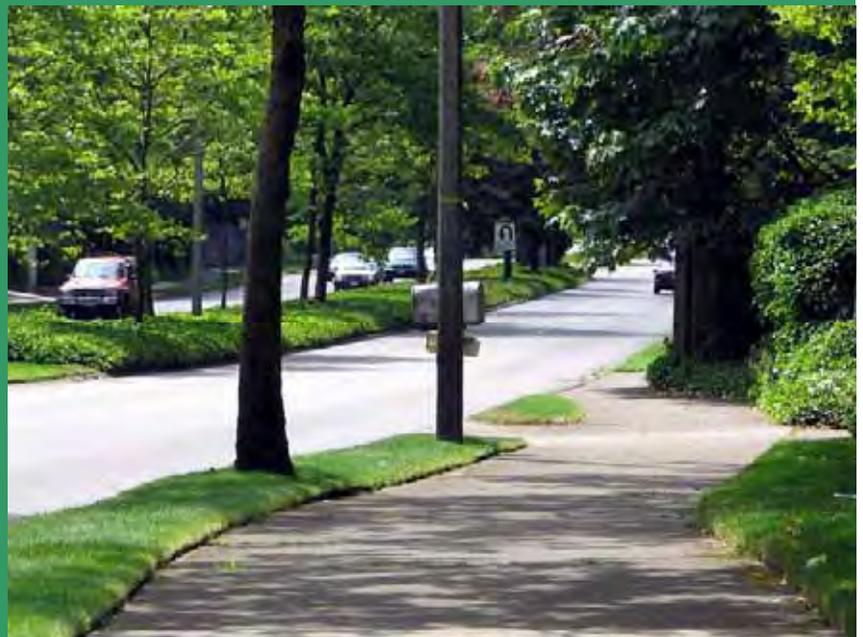
By Dan Burden, Senior Urban Designer  
Glattig Jackson and Walkable Communities, Inc;  
August, 2006

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.

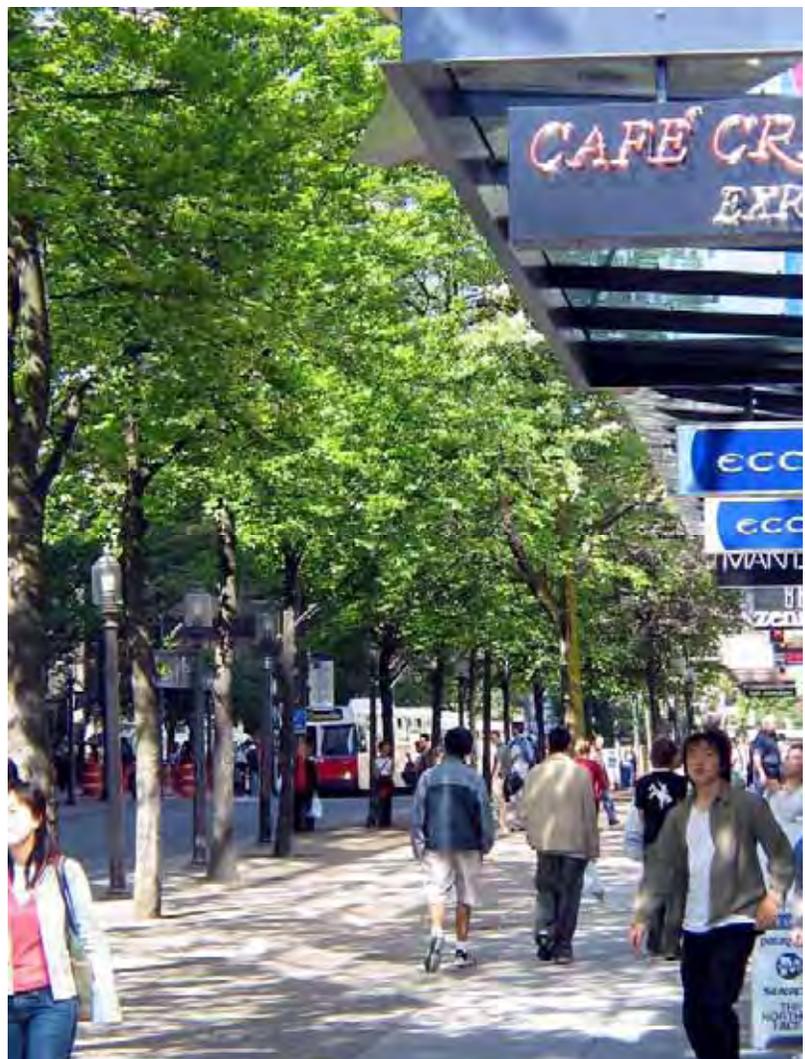


12. **Convert streets, parking and walls into more aesthetically pleasing environments.** There are few streetmaking elements that do as much to soften wide, grey visual wastelands created by wide streets, parking lots and massive, but sometimes necessary blank walls than trees.

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, Glattig Jackson).



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.

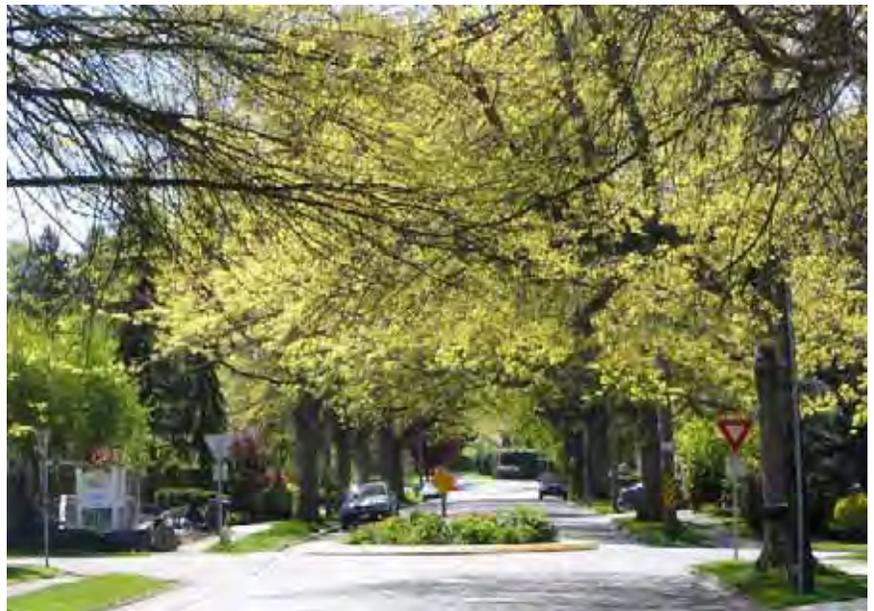


19. **Provides a lawn for a splash and spray zone, storage of snow, driveway elevation transition and more.** Tree lawns are an essential part of the operational side of a street.

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.

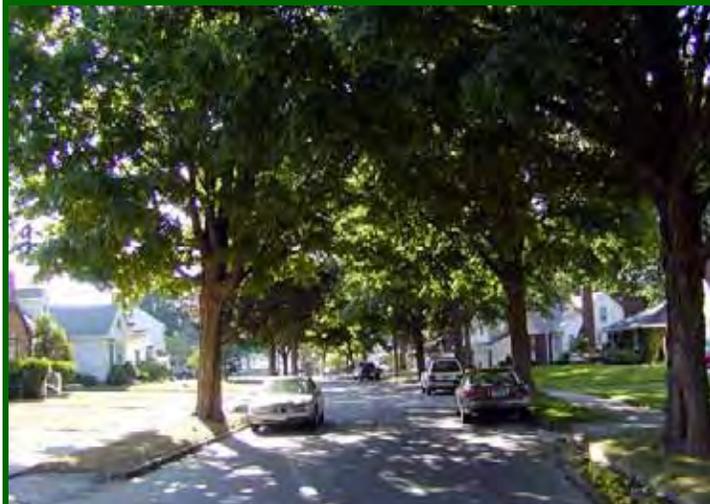


## Tree and Lamp Placement

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 mid-way between trees, allowing for some variation between other essential furniture such as seating and fire hydrants.



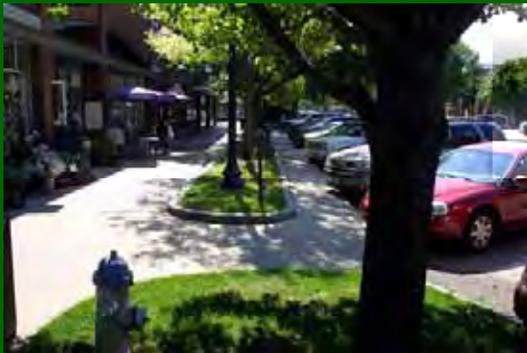


## Traffic Calming results from correct tree placement

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

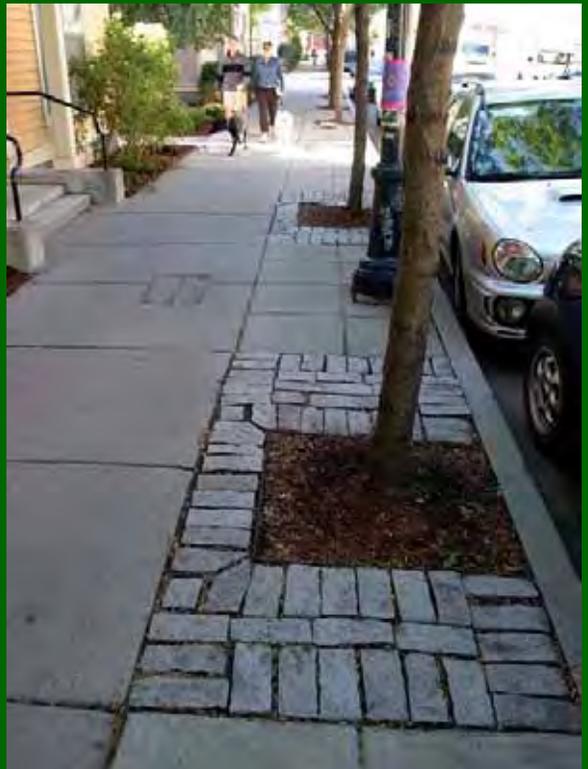
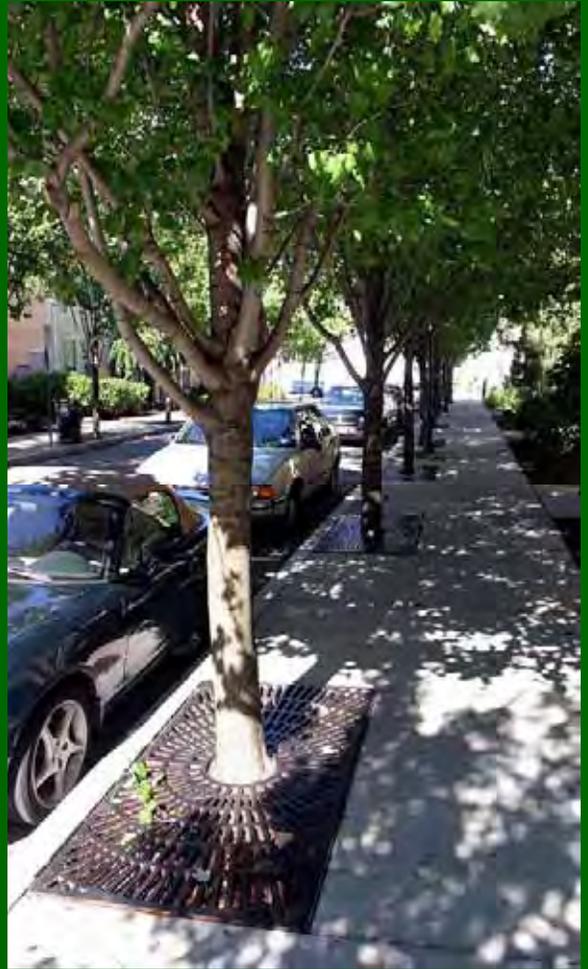
There is a distinct visual advantage in using alley loaded properties. Driveways break up the natural rhythm and opportunity of attractively and evenly spaced street trees. Driveways also eliminate the possibility of using a longer tree planter strip. Long and narrow strips are sometimes essential to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





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



# CITY OF LONG BEACH

LONG BEACH DEVELOPMENT SERVICES

333 West Ocean Blvd., 5<sup>th</sup> Floor, Long Beach, CA 90802 Phone: 570-6194 Fax: 570-6068

## NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION

TO: Office of the County Clerk  
Environmental Filings  
12400 E. Imperial Highway, Room 2001  
Norwalk, CA 90650

FROM: Department of Development Services  
Planning Bureau, 5<sup>th</sup> Floor  
333 W. Ocean Boulevard  
Long Beach, CA 90802

In conformance with Section 15072 of the State CEQA Guidelines, please post this Notice for a period of 30 days. Enclosed is the required fee of \$75.00 for processing.

Notice is hereby given that the Long Beach Planning Commission, Lead Agency for the purposes of CEQA, proposes to adopt a Negative Declaration (ND 01-11) for the project described below:

### **Project Location**

Citywide

### **Project Title**

City of Long Beach Mobility Element

### **Project Description**

The Mobility Element focuses on the circulation component of the City of Long Beach General Plan and will replace the adopted 1991 Transportation Element. Compared to the current Transportation Element, the proposed update places more emphasis on pedestrian, bicycling and public transit options, and transformative infrastructure projects to spur community revitalization. The Mobility Element update is being prepared in compliance with the 2008 Complete Streets Act (Assembly Bill 1358), which mandates that circulation elements to include concepts for a balanced, multimodal transportation network that meets the needs of all users of streets and highways including motorists, pedestrians, bicyclists, children, person with disabilities, seniors, movers of commercial goods and user of public transportation.

The new Mobility Element is expected to result in increased options for mobility; less congestion and greenhouse gas emissions; more walkable communities, and fewer travel barriers for active transportation and those who cannot drive such as children and people with disabilities. In addition, part of this balanced mobility network will be a reduction in vehicle miles traveled (VMT) as a result of additional pedestrian, transit, and other non-motorized vehicle trips. The project is considered consistent with the Regional Transportation Plan and Sustainable Communities Strategy.

**Review Period during which the Lead Agency will receive comments on the proposed Negative Declaration**

Starting Date: May 2, 2013

Ending Date: May 31, 2013 at 4:30 p.m.

**Copies of the Negative Declaration and all referenced documents are available for public review by contacting the Planning Bureau staff member shown below or on the internet at:**

[http://www.lbds.info/planning/environmental\\_planning/environmental\\_reports.asp](http://www.lbds.info/planning/environmental_planning/environmental_reports.asp)

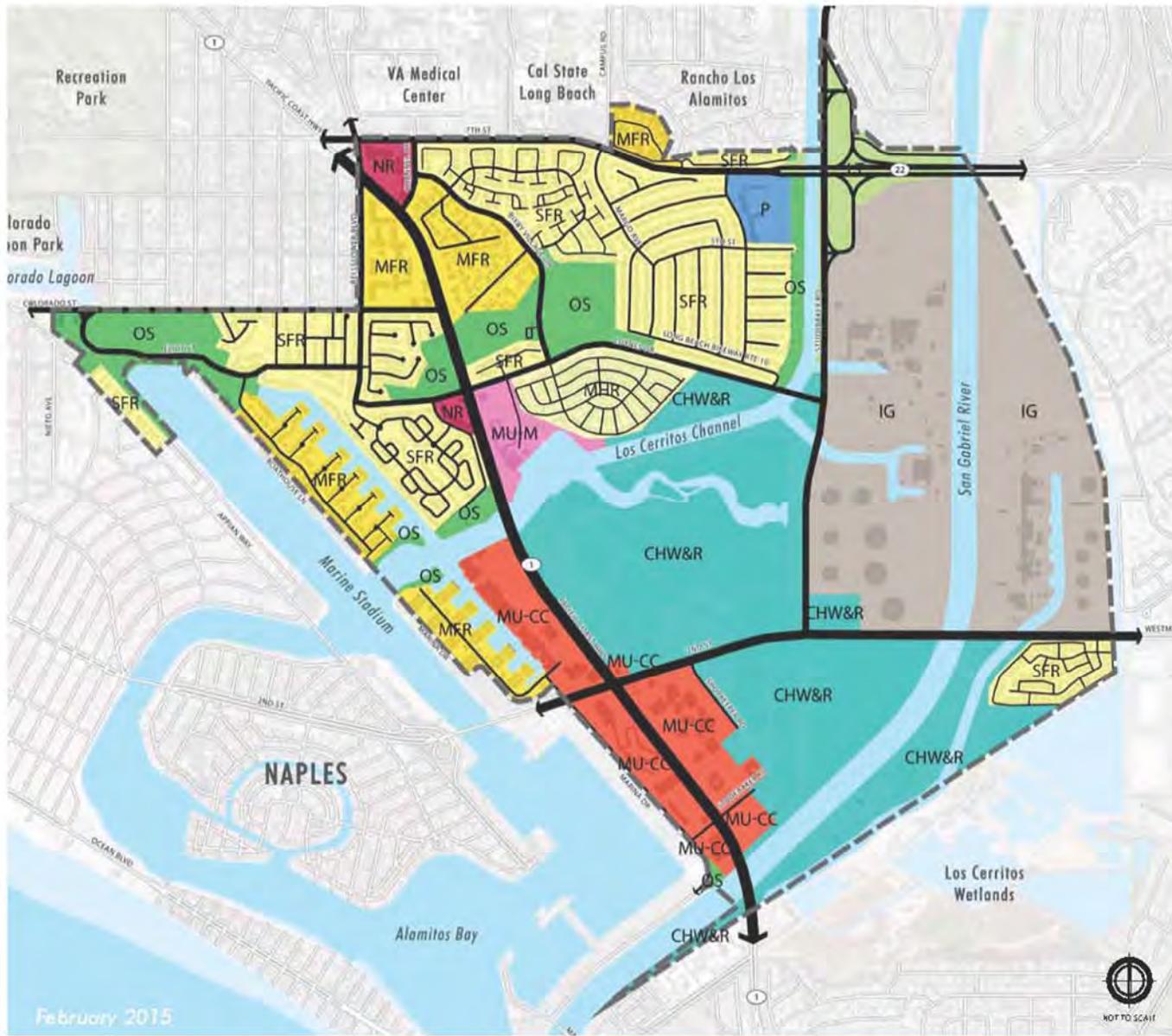
**The project does not include any sites on any list as enumerated under Section 65962.5 of the California Government Code.**

**The ND 01-11 Initial Study has determined that no significant impacts would occur to any resource areas as a result of this project.**

For additional information, contact:

Craig Chalfant, Planner  
Department of Development Services  
Planning Bureau, 5<sup>th</sup> Floor  
333 W. Ocean Boulevard  
Long Beach, CA 90802

(562) 570-6368  
[craig.chalfant@longbeach.gov](mailto:craig.chalfant@longbeach.gov)



February 2015

### LAND USE DESIGNATIONS

- Residential - Mobile Home, Single Family, Multifamily (361.5 ac)**
  - All residential uses will be retained and the City's residential zoning standards that most closely match housing type will apply
- Commercial - Neighborhood Retail (9 ac)**
  - Uses: Lower-scale, neighborhood retail uses, such as restaurants, grocery, personal services, etc.
  - City's commercial zoning standards that most closely match existing uses will apply
- Mixed-Use Marina (15 ac)**
  - Uses: Mix of uses, including residential, neighborhood retail, hotel, visitor serving recreation, marina
  - Maximum height: Up to 5 stories
  - Serves as transition from Community Core to lower density residential areas and will be required to create strong interface and connection with channel and marina
- Mixed-Use Community Core (79 ac)**
  - Uses: Mix of uses, including residential, regional retail, hotel, office
  - Maximum height: Up to 5 stories (Buildings up to 7 stories may be considered in limited application only if a project can demonstrate it provides an exceptional level of additional community benefits)
  - Serves as the SEADIP activity center and focuses on the pedestrian environment, gathering spaces, new linkages, and interface with marina and wetlands
- Industrial (299.5 ac)**
  - Uses: City's General Industrial Zoning uses with modifications (Utilities and oil related uses will be permitted; no heavy industrial, commercial, distribution or storage uses)
- Public (11 ac)**
  - Elementary School, County of Orange Retention Basin
- Open Space and Recreation (78.5 ac)**
  - Public and private parks & open spaces
  - Can include biological reserves
- Coastal Habitat, Wetlands, and Recreation (313.5 ac)**
  - Uses: Wetlands restoration, coastal visitor-serving recreation
  - Will allow for ongoing oil operations to encourage consolidation of wells
- Right-of-Way (R.O.W.) (173 ac)**
- Caltrans Right-of-Way - Landscape Area**
  - Specialized Landscape Treatment will be required for Caltrans R.O.W. at the 22 Interchange to define entry into the City

# PROPOSED LAND PLAN





**COMMENT CARD**  
Southeast Area Specific Plan (SEADIP)  
Scoping Meeting

November 4, 2015 at 6:00 PM

City of Long Beach  
**RECEIVED**

NOV 17 2015

Planning Bureau

Based on the environmental checklist included in the California Environmental Quality Act (CEQA) Guidelines, the Initial Study for the proposed project determined that the following topics would be analyzed further in the Draft EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards/Hazardous Materials
- Hydrology and Water Quality
- Land Use/Planning
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation/Traffic
- Utilities/Service Systems

Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

Prefer low density - suburban type  
single family homes

Prefer no commercial building in  
excess of 3 stories. Lot should  
include landscaped open space on  
all street / parking front

Lighted cross walks along major  
roads spaced between x-streets.

Engineered wetlands & channels to  
support marine life

Name: ANDY SIENKIEWICH  
Address: 260 XIMENO AVE, LONG BEACH, CA 90803

Please return this comment card to *Craig Chalfant, Senior Planner, City of Long Beach*, at the end of the Scoping Meeting or mail to: *Craig Chalfant, Senior Planner, Long Beach Development Services, 333 West Ocean Blvd., 5th Floor, Long Beach, CA 90802. Comments must be submitted by November 20<sup>th</sup>, 2015.*



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Southeast Area Specific Plan (SEADIP)  
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Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

- Economic Vitality vs. Community goals to maintain Beach Community
  - Industrial - "Consolidation of Wells" - Definition of oil related use and risk to human health
  - Coastal Habitat - Wetland Restoration - What are the specifics? - input from Audubon Society Oct 2015 Newsletter - the Conceptual Restoration Plan (Aug 12, 2015) includes parcels not yet in public ownership
  - synergy of sources about 200 acres
  - has the Term sheet Agreement between Los Coronados Wetlands Authority been finalized
  - interface with California Coastal Commission
  - Mobility concerns - continued commuter traffic congestion
- Name: Anne Conneen Thompson annie on park  
Address: 56 Park Ave. L.B 90803 Email: avenue@icloud.com  
Telephone: (562) 439-7980

Please return this comment card to Craig Chalfant, Senior Planner, City of Long Beach, at the end of the Scoping Meeting or fold in half, staple, and mail to the City of Long Beach using the address provided (see reverse). **Comments must be submitted by November 20, 2015.**



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- Population/Housing
- Public Services
- Recreation
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- Utilities/Service Systems

Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

My concerns is that there will be enough housing to fulfill demand for everyone that wants to live in Southeast Long Beach. Ultimately to provide the housing, there needs to be density, and density means higher height limits, where tall buildings should be limited to downtown Long Beach.

Of course, every development brings more traffic, and I think we need to see a real thoughtful traffic engineering study of extending Shopkeeper or Studebaker. What other mitigations and areas should be considered, and what impacts will more housing have. I think we also need to see what we can do to slow traffic down on PCH by widening our sidewalks and adding another stop light so that a U-turn can be put in by Marina Pacifica.

Recreation should include public access to the wetlands in a way they can be enjoyed but also protected.

Name: John Lucy

Address: 310 Washington Blvd., Unit 804, Marina del Rey, CA 90292

Please return this comment card to Craig Chalfant, Senior Planner, City of Long Beach, at the end of the Scoping Meeting or mail to: Craig Chalfant, Senior Planner, Long Beach Development Services, 333 West Ocean Blvd., 5th Floor, Long Beach, CA 90802. **Comments must be submitted by November 20<sup>th</sup>, 2015.**

## Nicole Morse

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Friday, November 20, 2015 8:08 AM  
**To:** Angela Reynolds; Christopher Koontz  
**Cc:** Nicole Morse; Wendy Grant  
**Subject:** FW: "Initial Study" for NOP Comment Purposes  
**Attachments:** SEADIP Questions.doc

**From:**  
**Sent:** Friday, November 20, 2015 5:51 AM  
**To:** Craig Chalfant  
**Cc:**  
**Subject:** "Initial Study" for NOP Comment Purposes

Hi Craig--hope all is well and please accept the following:

While I have many thoughts about this process --I will once again try to express just some of my concerns about the current NOP-- . My past experience is that most of the time on prior occasions they have never truly been responded to: soo I broke down when I got this from Melinda ( I totally agree with her) and I am responding with my concerns as a "past member of the SEADIP committee" who will reiterate that other than business owners, not one member of the community wanted developments that exceeded current height limits. When will you survey just the people who live in this area?

Pat Towner  
University Park Estates

1. The area from 2nd/Westminster, PCH & Studebaker is a Flyway zone for migrating birds: tall buildings not only cast sun shadows interfering with loss of direct sunshine for homes adjacent to the property,, they also impose hazards to flying birds, has this been addressed?
- 2 Impacts on Loynes which will surely become a major thoroughfare given the "7" stories that are the new height limits: wow, I think they believe another layer of tar will help--but a tall building and increased traffic is ludicrous for land that has been retarred (at least 6 to 8 inches) three times since I purchased my home..
3. All major new projects will contribute to increased air pollution in this area: Including the winds from the Port, potential airline landing and take-off over this corner of the City, increased activity on the freeway (idling to get a lane or onto a pay lane going south), the enormity of the congestion on 7th from off the freeways to PCH EVERY DAY. What will be done to assure that the "gateway" to our city does not look like a parking lot?
4. The impact on Studebaker which has ramps leading both on & off the freeway (405/605/22) that are just car lots with slow traffic trying to gain entry to the freeway. In addition, with the Electric Plant moving it's machinery to the back of the premises, and the remainder of properties fronting Studebaker that are now up for sale (light industrial of course) are not even considered, but they are going to widen a bridge and reduce traffic capacity on PCH----to benefit who--or is it whom?
5. The city is required to show that significant environmental effects have been addressed or mitigated and a finding reported at a sufficient level of detail.

6. Require a traffic review at all land uses which will generate an increase in vehicle trips or any other increased environmental impacts that were not evaluated.

7. Removing commercial parking to encourage a walking community is BS...they are using antiquated notions of needs to formulate a premise that serves only a limited number of persons who live and work in this community (older, physically or other challenged people who can neither ride a bike or perhaps even afford one) and don't have children of course when they go shopping for groceries or just want to eat out or go to the movies.

8. What traffic patterns has the City considered and monitored so far and what about the future and if so, what are they?

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

From: Melinda Cotton

Sent: Thu, Nov 19, 2015 3:25 pm

Subject: FW: Questions re SEADIP "Initial Study" for NOP Comment Purposes

(Remember SEADIP NOP comments due tomorrow - Nov. 20th)

I just received this document from Craig Chalfant in answer to some questions I asked (below) ... He said this document was "recently created" ... so many questions out there.

Melinda

---

From: [Craig.Chalfant@longbeach.gov](mailto:Craig.Chalfant@longbeach.gov)

To:

Subject: RE: Questions re SEADIP "Initial Study" for NOP Comment Purposes

Date: Thu, 19 Nov 2015 22:48:12 +0000

[Please see attached.](#)

---

**From:** Melinda Cotton

**Sent:** Tuesday, November 17, 2015 1:53 PM

**To:** Craig Chalfant

**Subject:** Questions re SEADIP "Initial Study" for NOP Comment Purposes

Dear Craig,

I am working on Comments to be submitted by Nov. 20th regarding the SEADIP Notice of Preparation.

Would you please tell me where the following statement concerning the "Buildout of the Specific Plan..." in the Initial Study came from?

How were these figures arrived at? How was it determined that there should be a 'net increase of 5,619 dwelling units, 438,292 square feet of commercial/employment uses and 50 hotel rooms"?

**"Buildout of the Specific Plan would allow a total of 9,698 dwelling units, 2,665,052 square feet of commercial/employment uses, and 425 hotel rooms. This would result in a net increase of 5,619 dwelling units, 438,292 square feet of commercial/employment uses, and 50 hotel rooms".**

On page 17 of the Initial Study in Table 4 it is stated that the SEADIP area population on "**Buildout**" would be "**15,420**" a net increase of "**8,934**" persons.

There is no information as to how the projections in this table were arrived at. Please provide this information.

\*\*\*\*\*

Regarding the "Caltrans Alamitos Bay Bridge Improvement Project" ... Page 21...

how wide will this bridge be? How many lanes will it include. This information will significantly affect the Transportation aspect of the EIR.

\*\*\*\*\*

Appreciate receiving this information promptly.

Thank you.

Melinda Cotton

## SEADIP Questions

**1. The document prepared for the Planning Commission in May uses the statistics of 1,600 – 2,900 housing units. The November EIR documentation states 5,619 housing units. Why has this changed?**

The number of future units has not changed. The May 2015 Planning Commission presentation notes “1,600 – 2,900 new housing units in the Study Area *by 2035*.” The CEQA NOP notes: 4,079 existing units (Table 1), 5,499 allowed units under the current (PD-1) zoning (Table 2), and 9,698 units allowed under the proposed plan (Table 4).

The slide shown to the Planning Commission referenced units that could potentially be developed in the area by 2035. It is not anticipated that every parcel would be developed by 2035 nor is it anticipated that every development will build the maximum allowed number of units. The CEQA document however does disclose the total increase in units (5,619) that is theoretically possible if every parcel was fully redeveloped and maxed-out their density, for example by 2050.

**2. Why aren't all the costs for community benefits included in the Financial Analysis?**

The purpose of the financial analysis was to gain a basic understanding of what building types the market might deliver within the SEADIP area. It was not meant to be a final cost analysis, nexus study or exhaustive pro-forma for individual developments. For these reasons and because the final set of community benefits are still being developed, community benefit costs were not included in the financial feasibility analysis.

Community Benefits will become a requirement under the Specific Plan. Some benefits may be installed directly by a developer (such as plazas, fountains and open-space on the project site), while others will involve the payment of fees toward City installation of the improvement (bike lanes, medians, wetlands restoration). These expenses may have some impact on developer cost and may impact their individual development pro-forma analysis. The City however is not attempting to answer how an individual developer will or will not make a profit (or how much) but rather, in general, what development types are profitable enough to trigger potential investment and redevelopment of sites within the SEADIP area over time.

**3. What would it look like if they looked at ground-floor-retail with housing flats above them, for the 1-3 story scenario, as they did in the other scenarios?**

The development scenarios studied were intended to meet the objectives outlines in the vision statement created through the community outreach process. Only the most likely development scenarios consistent with the vision were studied in the financial analysis. New ground-up mixed use at 1-3 stories was not studied based on surveys of Southern California developments, market data and developer interviews. While 3-story mixed-use buildings are constructed in some markets, they

are difficult for developers because the lobby, entrance and amenity areas decrease the leasable retail area, a large portion of the residential space is non-leasable (lobby, corridor, amenity, rental office) in relation to the total amount of leasable residential space. The fixed costs and site-preparation on a 3-story product is also greater as a proportion of total cost than in a 5-story product.

**4. I see the conclusion here, but where are the costs calculated into the feasibility formula?**

The goal of the financial analysis was not to provide a full pro-forma profit analysis for developers. The goal was to determine what product types were feasible at all. A development typology that is not feasible simply from a cost standpoint by definition cannot pay additional community benefit costs. A product type that is feasible however may be able to pay for community benefits. Those amenities will become requirements under the Specific Plan and only developments that are able to deliver those benefits will move forward.

**5. What follows is a number of examples of Community Benefits. Again where are the costs and implementation plan? How can these be written into the Plan?**

Community Benefits will become a requirement under the Specific Plan. Some benefits may be installed directly by a developer (such as plazas, fountains and open-space on the project site), while others will involve the payment of fees toward City installation of the improvement (bike lanes, medians, wetlands restoration). These details and the draft plan will be shared with the community at the next workshop (March/April 2016). The specific plan will contain development standards (height, FAR, etc), amenity requirements (open space, pedestrian and public amenities) and fee provisions (transportation and wetland improvements).

**6. Again, more great concepts for Public Benefits. Again the question, how much of this is paid for by developers/owners. Where are the costs?**

See responses 2 and 5. Cost figures are under development and will be used for any fee program. Other requirements (for example that every X square feet of retail space require Y square feet of public plaza) will become development requirements in the Specific Plan.

**7. How much financial support do we need from developers for these benefits?**

The complete transformation of PCH as well as installation of public gathering places and other amenities could exceed \$10 million in cost. While these figures will be studied and articulated as the plan continues development, it is clear that the City alone cannot bear these costs.

**8. How much money are we lacking in Scenario 1 and 2?**

In Scenario 1 and 2 the residual land value of the parcels would decrease. There would be no financial incentive to redevelop the parcels. This is not simply an issue of money lacking, it is an issue of no investment and no change would result from this zoning.

**9. Does the community still want all these public benefits if they have to live with 7 story density?**

We do not have the answer to this question. This is the point of the public-outreach process, to understand community needs and desires. The City is committed to continuing its dialogue with residents of all types and ages, business and property owners, area recreation users, visitors and anyone else who may wish to participate in the process.

**10. If the value of land goes up as a result of changing the development standards, and then someone sells the property for a higher value, how is it then feasible to pay for public benefits?**

Based on market factors, residual land values (as well as improvement/exchange values based on the current rents and improvements) may rise or fall. All the requirements for development, including public benefits, will be contained within the Specific Plan. Typically developer purchases occur at a price where the developer believes they can cover all of their costs and achieve an industry-standard profit level. If this price (the development value or residual land value) is less than the value of the income stream from the current improvements the property will not be purchased for development. The sale or resale of a parcel does not impact the requirement to or ability to deliver a community benefit.

**11. Scenario 2 is set-up as a townhome, single-story retail example. What happens to the financial feasibility picture if a ground-floor-retail, stacked-flats model is used for the 1-3 story Scenario? Why isn't this being considered?**

See response #3

**12. There are a lot of variances between one scenario and another? Why? Why are there more streets in Scenario 1 and fewest in Scenario 4? Why is there such a large square footage for Plazas in Scenario 2, compared to the others?**

Each scenario is based on area developments and industry practice for that product type. The scenario 1 involves large amounts of surface parking and separate large pads for retail (box) development. This necessitates large amounts of street to access parking areas and different retail pads. Scenario 4 involves the least amount of surface parking and locates buildings in close relationship to parking and each other, resulting in less new street construction. The amount of plaza is greater in Scenario 2 because Plaza space serves as a transition and separation between the townhome and residential uses.

**13. These variances would make a difference in retail and housing square footages available to generate revenue? Are these correct? The rationale is not obvious.**

Industry figures are used for the assumptions in all the scenarios. For example a developer could not simply reduce the amount of plaza space in Scenario 2 to increase revenue-generating retail space. A retail development that has insufficient amenity space (in this case Plaza) will not attract sufficient merchants and shoppers and will not be as successful a revenue generator as a center developed with the correct balance of amenity and leasable square footage.

**14. Parking costs by square foot are given in the table that follows but no Sq Ft [SIC] number is provided for the parking spaces per scenario above, so we cannot add the parking costs into the equation.**

The amount of parking is listed in Figure 3. Standard ratios for the size of parking spaces and the amount of square footage required to develop parking were used. Industry calculators and figures were used for the parking calculations. The relationship between number of parking spaces and square footage required is not linear.

**15. Which Public Benefit amenities are not included in the financial analysis? There are many. What are the costs for them? How much will developers/owners contribute?**

To the degree that public benefits are in addition to industry practice (for example more open space, better fountains, art in the plaza) they are not accounted for in the financial analysis. Please see responses 2 and 5-8.



**COMMENT CARD**  
Southeast Area Specific Plan (SEADIP)  
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November 4, 2015 at 6:00 PM

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- Utilities/Service Systems

Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

① Concerns for keeping open space and quality of life for the residents and wild life.

② more housing and high density development means more traffic and air pollution.

③ We are so fortunate to have the wetlands in Long Beach and it is a precious jewel to be protected.

④ Thank you for listening to our comments and concerns.

Name: Connie Warner

Address: 6233 E. Marina View Dr, Long Beach 90803

Please return this comment card to Craig Chalfant, Senior Planner, City of Long Beach, at the end of the Scoping Meeting or fold in half, staple, and mail to the City of Long Beach using the address provided (see reverse). **Comments must be submitted by November 20, 2015.**



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Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

SEADIP and the wetland restoration project have combined/similar goals. In reference to the wetland area ~~to~~ bordered by the south end of the PCH bridge, east along the Cerritos channel and south along PCH about 300 meters creating about an 11 acre 'pie shaped' sliver of land adjacent to the Synergy Property; is this piece of property owned by somebody willing to participate?

A previous meeting chaired by E. LAMB had Jon McKeown<sup>(SP?)</sup> guest speak. He indicated at the time the 11 acre parcel was owned by

Name: a person uninterested in participating.

Address: IF true (?) have they been re-engaged?

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R. L. WARNER  
6233 MARINA VIEW DR  
LONG BEACH, CA 90805



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- |                        |                               |                             |
|------------------------|-------------------------------|-----------------------------|
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| • Air Quality          | • Hazards/Hazardous Materials | • Public Services           |
| • Biological Resources | • Hydrology and Water Quality | • Recreation                |
| • Cultural Resources   | • Land Use/Planning           | • Transportation/Traffic    |
| • Geology/Soils        | • Noise                       | • Utilities/Service Systems |

Please identify any concerns you may have regarding the Southeast Area Specific Plan Draft EIR, including any additional environmental topic areas, potential mitigation measures, or project alternatives (please print):

1. Who is involved from Caltrans (re Bridge) <sup>PCIT</sup> <sup>alternatives</sup> & the plans they have for this bridge? Do you <sup>Chalfant</sup> know Caltrans may completely change PCIT around this bridge?

BIKE ACCESS TO wetlands & I can't walk miles / swim

Good boating (swimming) in wetlands & Bicycle Park!

\* Marinas (Long Beach & Corinthian Bahia) <sup>should be</sup> involved in EIR  
 I can help getting a representative to help you.

Name: Har Wood  
 Address: 397 HAINES AVE #B 90814 [ALPINDIR@aol.com]

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