

April 2017 | **Draft** Response to Comments
State Clearinghouse No. 2015101075

SOUTHEAST AREA SPECIFIC PLAN

City of Long Beach

Prepared for:

City of Long Beach

Contact: Craig Chalfant, Planner
Development Services Department, Planning Bureau
333 W. Ocean Boulevard, 5th Floor
Long Beach, California 90802
562.570.6368
Craig.Chalfant@longbeach.gov

Prepared by:

PlaceWorks

Contact: Nicole Morse, Esq., Associate Principal
3 MacArthur Place, Suite 1100
Santa Ana, California 92707
714.966.9220
info@placeworks.com
www.placeworks.com



Table of Contents

Section	Page
1. INTRODUCTION.....	1-1
1.1 INTRODUCTION.....	1-1
1.2 FORMAT OF THE FEIR.....	1-1
1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES.....	1-2
2. GENERAL RESPONSES.....	2-1
2.1 TYPE AND PURPOSE OF THIS DEIR.....	2-1
2.2 TRANSPORTATION AND TRAFFIC.....	2-1
2.2.1 Traffic Mitigation Measures.....	2-3
2.3 BIRD-SAFE TREATMENTS.....	2-4
3. RESPONSE TO COMMENTS ON THE DEIR.....	3-1
4. RESPONSE TO COMMENTS ON RECIRCULATED TRAFFIC SECTION.....	4-1
5. REVISIONS TO THE DRAFT EIR.....	5-1
5.1 DEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS.....	5-1
6. REFERENCES.....	6-1

APPENDICES

Appendix A.	Comment Letters on DEIR
	A1. Agency and Organization
	A2. Residents
	A3. Late Letters
Appendix B.	Comment Letters on DEIR Recirculated Traffic Section
	B1. Agency and Organization
	B2. Residents
Appendix C.	Biological Resources
	C1. WRA Memo on Bird Safe Measures
	C2. WRA SEASP DEIR RTC Memo
Appendix D.	Traffic Data
	D1. Traffic Data Sheets on Intersection #10
	D2. New Intersections: Freeway Figures
	D3. Public Records Request Memo
Appendix E.	Infrastructure Report
Appendix F.	PC Study Session Meeting Minutes August 18, 2016
Appendix G.	Petitions

Table of Contents

LIST OF TABLES

Table		Page
Table A3-1	MXD+External Vehicle Trip In/Out Summary.....	3-8
Table A7-1	Level of Service Descriptions for Signalized Intersections.....	3-24
Table R60-1	Level of Service Descriptions for Signalized Intersections.....	3-139
Table R83-1	Existing With Project Intersection Impact Summary – HCM Intersections >80 sec delay.....	3-166
Table R83-2	Cumulative 2035 With Project Intersection Impact Summary – HCM Intersections >80 sec delay.....	3-167
Table A3-1	MXD+External Vehicle Trip In/Out Summary.....	3-8
Table A7-1	Level of Service Descriptions for Signalized Intersections.....	3-24
Table R60-1	Level of Service Descriptions for Signalized Intersections.....	3-139
Table R83-1	Existing With Project Intersection Impact Summary – HCM Intersections >80 sec delay.....	3-166
Table R83-2	Cumulative 2035 With Project Intersection Impact Summary – HCM Intersections >80 sec delay.....	3-167

1. Introduction

1.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §§ 21000 et seq.) and CEQA Guidelines (California Code of Regulations §§ 15000 et seq.). According to the CEQA Guidelines, Section 15132, the FEIR shall consist of:

- (a) The Draft Environmental Impact Report (DEIR) or a revision of the Draft;
- (b) Comments and recommendations received on the DEIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies comments on the DEIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

This document contains responses to comments received on the DEIR and recirculated traffic section of the DEIR for the Southeast Area Specific Plan (SEASP; Specific Plan) during two public review periods. The 60-day public review period on the DEIR began July 20, 2016, and closed September 19, 2016 and the 45-day public review period on the recirculated traffic section of the DEIR from February 17, 2017 to April 3, 2017. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated DEIR will comprise the FEIR, in accordance with CEQA Guidelines, Section 15132.

1.2 FORMAT OF THE FEIR

This document is organized as follows:

Section 1, Introduction. This section describes CEQA requirements and content of this FEIR.

Section 2, General Comments. This section includes responses to recurring comments.

Section 3, Response to Comments on DEIR. This section provides a list of agencies and interested persons commenting on the DEIR and individual responses to written comments. The corresponding comment letters are provided in Appendix A. This section also includes responses to written responses received at a Study Session held by the City of Long Beach Planning Commission on August 18, 2016 regarding the DEIR. To facilitate review of the responses, each comment letter has been reproduced and assigned a number (A1 through A15 for letters received from agencies and organizations, R1 through R97 for letters received from residents, L1 through L7 for late letters received). Individual comments have been

1. Introduction

numbered for each letter and the letter is followed by responses with references to the corresponding comment number. This section also incorporates comments and responses received at the August 18, 2016 Planning Commission Study Session (see Appendix F) that was held during the DEIR 60-day public review period.

Section 4, Response to Comments on Recirculated Traffic Section. This section provides a list of agencies and interested persons commenting on the recirculated traffic section of the DEIR and individual responses to written comments. The corresponding comment letters are provided in Appendix B. To facilitate review of the responses, each comment letter has been reproduced and assigned a number (A-16 through A-21 for letters received from agencies and organizations, and R-98 through R-179 for letters received from residents). Individual comments have been numbered for each letter and the letter is followed by responses with references to the corresponding comment number.

Section 5. Revisions to the Draft EIR. This section contains revisions to the DEIR text and figures as a result of the comments received by agencies and interested persons as described in Sections 3 and 4, and/or errors and omissions discovered subsequent to release of the DEIR for public review.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of DEIRs should be “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines Section 15204(c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204(d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204(e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.” In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this FEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on DEIRs.

2. General Responses

This section summarizes those environmental issues that were raised by multiple commenters. General responses provide background information to augment the individual responses found in Chapters 3 and 4 of this Draft Response to Comments.

2.1 TYPE AND PURPOSE OF THIS DEIR

Several of the commenters requested additional studies or information on environmental impacts that would be more appropriate at the project level or when a site specific development is being proposed. For example, a detailed construction level noise analysis would be appropriate to prepare at the time when construction equipment type and quantities and construction schedules are known.

As stated in DEIR Section 1.2.2, this DEIR fulfills the requirements of a Program EIR. Program EIRs are typically more conceptual and may contain a more general discussion of impacts, alternatives, and mitigation measures than a Project EIR. As provided in Section 15168 of the State CEQA Guidelines, a Program EIR may be prepared on a series of actions that may be characterized as one large project. Although the legally required contents of a Program EIR are the same as those of a Project EIR, Program EIRs are typically more conceptual and may contain a more general discussion of impacts, alternatives, and mitigation measures than a Project EIR.

Use of a Program EIR provides the City (as lead agency) with the opportunity to consider broad policy alternatives and program-wide mitigation measures and provides the City with greater ability to address project-specific and cumulative environmental impacts on a comprehensive basis. This allows the City to consider the impacts and mitigation measures for the SEASP area as a whole versus. This Program EIR considered the environmental impacts of buildout of the SEASP and the proposed land uses changes. Future site specific development projects will be required to implement the mitigation measures identified in the SEASP DEIR and conduct further environmental review as required by CEQA.

2.2 TRANSPORTATION AND TRAFFIC

Several of the commenters expressed concerns related to the Project's traffic related impacts. Due to the amount of existing and proposed congestion in the area, many of the residents stated that the Project is too dense or would allow for too much growth. These comments are acknowledged. It is the purpose of the DEIR to identify environmental impacts so that the decision-makers (Planning Commission and City Council) can make an informed decision on the Project.

Based on comments received during the DEIR public review period, new traffic information was added to the DEIR. This new information identified new significant traffic impacts and required recirculation pursuant to CEQA Guidelines Section 15088.5(c). As a result the DEIR Section 5.16, *Transportation and Traffic* and the

2. General Responses

traffic study appendices (J1, *Transportation Impact Analysis*; J2, *Transportation Demand Management [TDM] Plan*; and J3, *VMT Memorandum*) were recirculated for a 45-day public review period from February 17, 2016 to April 3, 2017. These documents are referred to in the responses to comments as the “recirculated traffic section.” Below is a summary of revisions made to the previously recirculated traffic section:

- Expanded study area to include seven additional intersections, as follows:
 - 22. Pacific Coast Highway & Seal Beach Boulevard
 - 23. 1st Street & Marina Drive
 - 24. SR-22 Off-Ramp to Studebaker Road & College Park Driver
 - 25. 7th Street & Santiago Avenue
 - 26. 7th Street & Park Avenue
 - 27. 2nd Street & Bay Shore Avenue
 - 28. 2nd Street & Livingston Drive
- Freeway assessment was completed on key State facilities on I-405, SR-22, and I-605.
- Queuing assessment of freeway ramps.
- Adding significance criteria for unsignalized intersections in the jurisdictions of Seal Beach and Caltrans.
- Updated traffic count data, analysis, impacts, mitigation measures, and findings pertaining to the analysis of additional intersections and freeway facilities identified above (Intersections #22–28).
- Revised trip generation and VMT analysis.
- Additional analysis related to construction impacts and emergency access.
- Creation and analysis of the TDM Plan identified as a requirement in PDF-2.
- New and revised Mitigation Measures TRAF-1 through TRAF-6.
- New Table 5.16-20 and Figure 5.16-5 to clarify the impacts, mitigation measures, and feasibility of each intersection impact.
- Identification of new impacts related to intersection impacts at 2nd Street/Bay Shore Avenue and 2nd Street/Bay Shore Avenue, construction impacts, and freeway facility impacts.

Appendices

- Updated Transportation Impact Analysis incorporating all of the revisions above (Appendix J1).
- New TDM Plan (Appendix J2).

3. Response to Comments

- Updated Vehicle Miles Travelled (VMT) Technical Memorandum to add VMT reductions associated with the TDM Plan (Appendix J3).

2.2.1 Traffic Mitigation Measures

As summarized in Table 5.16-20 of the DEIR, significant and unavoidable traffic impacts were identified at 17 intersections, in addition to freeway mainlines. Several of the commenters expressed concern that identification of a significant and unavoidable impact when intersection improvements are within the responsibility of another agency meant that the City was able to dismiss the mitigation measures. This is not correct.

Pursuant to CEQA Guidelines Section 15091(a)(2), the City must identify a significant unavoidable impact where a change to the project (such as a mitigation measure) is within the responsibility and jurisdiction of another public agency and not the agency making the finding. Furthermore, CEQA requires the City to consider all feasible mitigation measures when significant unavoidable impacts are identified (CEQA Guidelines Section 15091(f)).

Therefore, mitigation measures to State facilities or to facilities in the jurisdiction of Seal Beach were identified as significant and unavoidable because the City of Long Beach cannot guarantee that the improvement will be constructed. However, these improvements are still required mitigation of the Project provided that they are feasible in all other respects (e.g. right-of-way acquisition does not require take of a building). For example, see Mitigation Measures TRAF-4 and TRAF-6, which require intersection improvements to intersections within the jurisdiction of Seal Beach and Caltrans, respectively. DEIR Section 5.16.7 provides a detailed analysis of mitigation measures that were considered and rejected and Table 5.16-20 provides a summary of proposed mitigation measures, feasibility of mitigation, and level of significance for each identified intersection impact.

Pursuant to PDF-2 in Section 5.16 of the DEIR, the City hired Fehr & Peers to prepare a TDM Plan. This proposed TDM Plan was prepared to further reduce traffic impacts and was added to the DEIR and distributed for public review as part of the recirculated traffic section. The TDM Plan identifies the following targets for vehicle trip reductions as noted on page 6 of the plan (Page J2-6 of Appendix J2):

- Minimize Peak Hour Vehicle Trips
 - TDM programs reduce Net External Peak Hour Trips by an additional 10 percent:
 - AM Peak Hour Goal = 4,315 (4,795 trips * 90 percent). Stated another way: minimize the increase in external AM peak hour trips such that the overall increase with SEASP implementation is 47 percent instead of 57 percent.
 - PM Peak Hour Goal = 6,980 (7,758 * 90 percent). Stated another way: minimize the increase in external PM peak hour trips such that the overall increase with SEASP implementation is 36 percent instead of 46 percent.
 - Increase Bicycle, Pedestrian, and Transit Use
 - 4.9 percent bicycle and pedestrian mode share for trips within the SEASP Planning Area.

2. General Responses

- 10 percent increase in transit boarding and alighting at transit stops in the SEASP Planning Area.
- 10 percent increase in bicycling and walking in SEASP.

Additionally, Pages 17-20 of the plan (Pages J2-17 through J2-20 of Appendix J2) identify the monitoring program that will be implemented to ensure that the targets noted above are being met; in particular, the additional reduction of peak hour trip generation by 10 percent. This is further documented in the DEIR as PDF-1 through PDF-3, which requires the 10 percent TDM reduction and implementation of the monitoring program to ensure that the TDM requirements are being realized.

2.3 BIRD-SAFE TREATMENTS

Refer to Appendix C1 of this draft response to comments. A number of commenters expressed concern that biological resources impacts were not adequately address or that the bird-safe treatments identified in the SEASP not adequate. However, one of the main goals of the plan is to protect and enhance the wetlands and the sensitive plants and wildlife that are home to the wetlands. The City hired WRA Environmental Consultants to review relevant portions of the DEIR and SEASP to ensure that the project design features and mitigation measures incorporated into the Project were adequate to protect sensitive birds and wildlife. This analysis was incorporated as Appendix C1 of this document.

In summary, the biologist found that the bird-safe design measures in the SEASP and the draft Mitigation Measures were appropriate and adequate overall in terms of affording protection to the adjacent LCWC and related biological resources (including birds), as future redevelopment of the area moves forward. These measures were identified as being especially important because of the wetland/habitat restoration and enhancement goals exist for the LCWC, and natural/semi-natural undeveloped areas are scarce in Long Beach. The biologist found that the bird-safe requirements in the SEASP and DEIR recognize and are appropriately tailored to this context.

As described in Appendix C1, the bird-safe elements in the SEASP are adequate because they include restrictions for exterior facades and artificial night lighting, generally the two primary design elements that influence the likelihood of bird collisions with buildings (SEASP p. 166, Sheppard 2011 and references therein [hereafter Sheppard 2011]). Regarding facades, generally speaking, the most hazardous areas of buildings for birds are the lower stories, specifically ground level up to 60 feet in height or approximately the lower 4.5 (average-height) building stories (San Francisco Planning Department [SFPD] 2011 and references therein [hereafter SFPD 2011]). Most bird migration (both diurnal and nocturnal) occurs at altitudes of 500 feet or greater (approximately 38 average-height building stories), and thus the risk of collisions is usually greatest when the birds descend to rest/forage or during inclement weather (Sheppard 2011, SFPD 2011). As such, the birds most susceptible to potential collisions in the SEASP area are 1) locally resident species present throughout the year, and 2) migratory species that are using the SEASP as stopover and/or wintering habitat, and may transit to/from and between habitat patches such as the LCWC. The SEASP requires that building facades incorporate bird-safe treatments above the ground floor such that less than no more than 10 percent of the total area is untreated glazing (SEASP page 166). Most bird-safe guidance documents (e.g., SFPD 2011) recommend that such treatments occur up to a minimum of 60 feet in height, so the SEASP

3. Response to Comments

requirements not only fulfill this recommendation but actually go further (higher), i.e., to the maximum height of the proposed buildings.

Regarding lighting, among other requirements, the SEASP stipulates that all building lighting be designed to minimize spillage, and that interior lighting be minimized through the use of automated on/off systems (SEASP p. 166). The SEASP also encourages building owners to follow bird-safe best practices and a “Light’s Out for Birds” regimen (SEASP page 167). Such requirements conform to general bird-safe design guidelines (e.g., SFPD 2011, Sheppard 2011). Birds present locally are presumably at least somewhat adapted to the artificial light emanating from the current developments and surrounding areas, which are highly urban/suburban and have been developed for decades. As is known, existing developments within the relevant portions of the SEASP have not implemented bird-safe design elements and are not currently required to. It is recognized that additional development within these areas has the potential to increase the extent of lighting in the area on a localized scale, and the relevant requirements in the SEASP (related to lighting types, direction of illumination, etc.) are in accordance with general bird-safe recommendations.

In the DEIR, Mitigation Measures BIO-5 through BIO-7 sufficiently reinforce the bird-safe design elements in the SEASP for future development of the planning area. Moreover, the other DEIR Mitigation Measures, including reporting and agency consultation, construction management plans, noise reduction, and pre-construction nesting bird surveys (and the avoidance of active nests), augment the SEASP requirements such that impacts to birds and other wildlife are avoided and minimized to the extent feasible during future construction activities. These measures conform to standard CEQA practices regarding protecting biological resources in urban areas.

The biologist made two additional recommendations to further reduce the potential for bird collisions. The recommendations are described below and were incorporated into the SEASP and DEIR (see SEASP, v. Hearing Draft May 2017 and Section 5 of this document).

- The SEASP requires that bird-safe design treatments be installed above the ground floor of new buildings, such that no more than 10% of the total surface area is untreated glazing. To further reduce the likelihood of bird collisions, WRA suggests that bird-safe treatments be required or strongly encouraged for the portions of ground floors that face the LCWC (this would not be relevant to the portions that do not directly face the LCWC, and are presumably less likely to impact wildlife there). Examples of such treatments are provided in the draft SEASP (p. 166) and outlined in more detail by SFPD (2011; pp. 18–21). An alternative to façade treatments would be to simply recess ground floors “behind” the floors above, which would generate shadowing on the exterior of the ground floor under average lighting conditions, and overall reduce the reflectivity of areas with untreated glazing.
- The draft SEASP encourages building owners to participate in a “Light’s Out for Birds” program during the peak migratory periods (Feb. 15 –May 31 and Aug. 15 – Nov. 30). To further encourage participation, the program could be promoted through mandatory educational outreach efforts such as written materials (brochures) and/or workshops and presentations; the written component could be incorporated in materials prepared and disseminated under Mitigation Measure BIO-7.

2. General Responses

This page intentionally left blank.

3. Response to Comments on the DEIR

Section 15088 of the CEQA Guidelines requires the Lead Agency (City of Long Beach) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DEIR and prepare written responses.

This section provides all written responses received on the DEIR and the City of Long Beach’s responses to each comment.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the DEIR are excerpted in this document, the sections are shown indented. Changes to the DEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the DEIR during the 60-day public review period.

Number Reference	Appendix Page No.	Commenting Person/Agency	Date of Comment	Page No.
Agencies & Organizations				
A1	A1-1	Alamitos Bay Partnership, LLC	September 19, 2016	3-5
A2	A1-6	California Department of Fish and Wildlife	September 15, 2016	3-7
A3	A1-9	Caltrans District 7	September 16, 2016	3-8
A4	A1-12	El Dorado Audubon Society	September 12, 2016	3-11
A5	A1-27	Long Beach Unified School District	September 19, 2016	3-17
A6	A1-28	Los Angeles County Business Federation	September 16, 2016	3-18
A7	A1-30	Los Cerritos Wetlands Land Trust	September 19, 2016	3-19
A8	A1-82	Naples Improvement Association	August 18, 2016	3-46
A9	A1-83	Naval Weapons Station, Seal Beach	July 21, 2016	3-47
A10	A1-84	Regional Hispanic Chamber of Commerce	Undated	3-48
A11	A1-85	Sacred Places Institute for Indigenous Peoples	September 19, 2016	3-49
A12	A1-87	Sanitation Districts of Los Angeles County	September 19, 2016	3-50
A13	A1-89	State Clearinghouse	August 19, 2016	3-56
A14	A1-97	State Coastal Conservancy	September 16, 2016	3-57
A15	A1-99	United Coalition to Protect Panhe	September 19, 2016	3-58
Residents				
R1	A2-1	Kerrie Aley	August 26, 2016	3-60
R2	A2-41	Dave Allen	September 18, 2016	3-69
R3	A2-4	Christine Badgley	September 18, 2016	3-70
R4	A2-43	Jeanne Badgley	September 16, 2016	3-71
R5	A2-44	David Baker	September 17, 2016	3-72
R6	A2-48	Jan Barcus	August 8, 2016	3-73
R7	A2-49	Kristina Barger	September 19, 2016	3-74
R8	A2-50	Lynn & Ben Barillaro	September 19, 2016	3-75

3. Response to Comments on the DEIR

Number Reference	Appendix Page No.	Commenting Person/Agency	Date of Comment	Page No.
R9	A2-54	Alex Bellehumeur	September 15, 2016	3-77
R10	A2-55	Kent Bimson	September 12, 2016	3-78
R11	A2-58	Cathy Black	September 11, 2016	3-79
R12	A2-59	Patricia Bliss	September 19, 2016	3-80
R13	A2-61	Michael Bohn	September 19, 2016	3-81
R14	A2-66	Sarah Brinton	September 15, 2016	3-83
R15	A2-67	Kevin Brown	September 7, 2016	3-84
R16	A2-68	Nancy Buchanan	September 19, 2016	3-85
R17	A2-69	Mike Buhbe	September 19, 2016	3-86
R18	A2-70	Jennifer Cameron	September 12, 2016	3-87
R19	A2-71	Ann Cantrell	September 19, 2016	3-88
R20	A2-76	Patricia Chen	September 19, 2016	3-91
R21	A2-78	George Christensen	September 19, 2016	3-92
R22	A2-82	Tahesha Knapp- Christensen	September 19, 2016	3-94
R23	A2-84	Lynn Clarke	September 6, 2016	3-95
R24	A2-86	Aileen Colon	September 16, 2016	3-96
R25	A2-88	Melinda Cotton	September 16, 2016	3-97
R26	A2-93	Cindy Crawford	September 19, 2016	3-100
R27	A2-182	Leon Crawford	July 26, 2016	3-101
R28	A2-183	Thomas Curwen	August 26, 2016	3-102
R29	A2-185	Janice Dahl	September 18, 2016	3-103
R30	A2-186	Howard Davis	September 12, 2016	3-104
R31	A2-187	Dennis Digiovanni	August 28, 2016	3-105
R32	A2-188	Tami Donald	August 29, 2016	3-106
R33	A2-189	Charley Durnin	July 23, 2016	3-107
R34	A2-190	Jonathan Eldridge	August 1, 2016	3-108
R35	A2-192	Michael Ferrara	September 10, 2016	3-109
R36	A2-193	John Fries	September 19, 2016	3-1110
R37	A2-194	Andrew Garber	September 19, 2016	3-111
R38	A2-195	Laurence Goodhue	July 24, 2016	3-112
R39	A2-196	Pete Grant	September 16, 2016	3-113
R40	A2-197	Richard Hardt	September 6, 2016	3-114
R41	A2-198	Lynn Harkins	September 19, 2016	3-115
R42	A2-201	Bill & Margie Hearn	August 16, 2016	3-117
R43	A2-202	Mary Hochman	September 18, 2016	3-118
R44	A2-203	Jeff Hoffman	September 14, 2016	3-119
R45	A2-204	Carol Holden	July 22, 2016	3-120
R46	A2-205	Glenn Ihrke	September 15, 2016	3-121
R47	A2-206	Bryan Jones	September 19, 2016	3-122
R48	A2-227	Debi Jones	September 19, 2016	3-125
R49	A2-228	Gordana Kajer	September 18, 2016	3-126
R50	A2-230	James Kirkham	September 19, 2016	3-128
R51	A2-231	Robb Korinke	September 19, 2016	3-129
R52	A2-232	Jann Kronick-Gath	September 18, 2016	3-130
R53	A2-233	Bob Lane	September 17, 2016	3-131

3. Response to Comments on the DEIR

Number Reference	Appendix Page No.	Commenting Person/Agency	Date of Comment	Page No.
R54	A2-235	Iris Lovelace	September 19, 2016	3-132
R55	A2-236	Christine Martinovic	September 14, 2016	3-133
R56	A2-237	B. Thomas Mayes	September 19, 2016	3-134
R57	A2-238	Kelsea Mazzocco	September 19, 2016	3-135
R58	A2-239	Donna Medine	August 28, 2016	3-136
R59	A2-240	Jeff Miller	September 19, 2016	3-137
R60	A2-241	Jim Miller	September 19, 2016	3-139
R61	A2-242	La Vonne Miller	September 19, 2016	3-141
R62	A2-243	Susan Miller	September 9, 2016	3-142
R63	A2-244	David Moore	September 10, 2016	3-143
R64	A2-245	Wendy Munster	August 6, 2016	3-144
R65	A2-246	Robert C. Myrtle	September 8, 2016	3-145
R66	A2-248	Ronald W. Novonty	August 18, 2016	3-146
R67	A2-249	Patrick O'Sullivan	September 18, 2016	3-147
R68	A2-250	Diane Paull	July 22, 2016	3-148
R69	A2-251	Amy Pearson	September 18, 2016	3-149
R70	A2-253	Randy Peck	September 12, 2016	3-150
R71	A2-254	Linda Pemberton	September 19, 2016	3-151
R72	A2-263	Susan G. Phillips	September 9, 2016	3-153
R73	A2-271	Linda Piera-Avila	September 19, 2016	3-156
R74	A2- 272	Maureen Poe	September 16, 2016	3-+157
R75	A2-273	Hailey Rafter	September 16, 2016	3-158
R76	A2-274	Cheryl Rodi	August 29, 2016	3-159
R77	A2-275	Kia Ross	September 19, 2016	3-160
R78	A2-277	Jeffrey Sanchez	September 5, 2016	3-161
R79	A2-278	Kenneth H. Seiff	August 11, 2016	3-162
R80	A2-282	Dave Shukland	September 19, 2016	3-163
R81	A2-284	Todd Smith	September 13, 2016	3-164
R82	A2-285	Michael E. Solt	September 13, 2016	3-165
R83	A2-287	Douglas W. Sprague	August 9, 2016	3-166
R84	A2-289	Catherine Steisel	September 7, 2016	3-168
R85	A2-291	Dianne Sundstrom	September 19, 2016	3-169
R86	A2-294	Kristin Tarnofsky	September 19, 2016	3-172
R87	A2-295	Regina Taylor	September 19, 2016	3-173
R88	A2-296	Ray & Becky Thorn	August 10, 2016	3-174
R89	A2-297	Lawrence Triesch	September 18, 2016	3-175
R90	A2-298	Lona Tucker	August 22, 2016	3-176
R91	A2-301	Charles F. Ward	August 8, 2016	3-177
R92	A2-302	Cindy Wederich	August 10, 2016	3-178
R93	A2-304	Alaine Weiss	September 19, 2016	3-180
R94	A2-307	John Weiss	September 19, 2016	3-182
R95	A2-309	Terry Welsh	September 18, 2016	3-183
R96	A2-310	Sara Wescott	August 9, 2016	3-184
R97	A2-312	Karen Yberico	August 25, 2016	3-185

3. Response to Comments on the DEIR

Number Reference	Appendix Page No.	Commenting Person/Agency	Date of Comment	Page No.
Late Letters				
L1	A3-1	Dana Brounstein	September 20, 2016	3-186
L2	A3-2	Amber Chitty	September 20, 2016	3-187
L3	A3-3	Julie Dean	September 20, 2016	3-188
L4	A3-5	Laura L. Greco	September 23, 2016	3-189
L5	A3-7	Denny Lund	September 20, 2016	3-190
L6	A3-8	Jeff Severson	September 20, 2016	3-191
L7	A3-9	City of Seal Beach	October 13, 2016	3-192
Planning Commission Study Session				
PC1-PC56	F	Various Commenters	August 18, 2016	3-194

3. Response to Comments on the DEIR

A1. Response to Comments from Alamitos Bay Partnership, LLC, dated September 19, 2016 (Appendix A1, page A1-1).

- A1-1 The commenter is a property owner within the Project area and is supportive of the Specific Plan and increased development intensity to achieve “an economically prosperous, pedestrian-welcoming district with a mix of uses desired by the community,” wetland restoration, and other amenities. Comment noted; no response necessary.
- A1-2 This comment relates to the Specific Plan and not the adequacy of the DEIR. However, the comment is acknowledged and will be provided to the decision-makers—Planning Commission and City Council—for their consideration of the Project. It should be noted that DEIR Sections 5.7, *Greenhouse Gas Emissions*, and 5.16, *Transportation and Traffic*, address AB 32, SB 375, and AB 1358 in Sections 5.
- A1-3 The commenter notes the goals of the Specific Plan to slow traffic speeds and make Pacific Coast Highway safer for all users and achieve a vision of a “main street” in this area. The commenter also states that they support relinquishment of Pacific Coast Highway and provide specific recommendations related to design of the roadway including further reducing lane widths on Pacific Coast Highway to 10.5 feet in width. The comment and suggestions are noted. The specific plan proposes 10.5 to 12 foot lanes along Pacific Coast Highway and the commenter’s suggestion of creating a main street is supported by the Specific Plan.
- A1-4 The commenter acknowledges the need for added building height to provide greater opportunities to create public open spaces, new streets to alleviate traffic, and funding for the wetlands mitigation grant. The commenter requests the Specific Plan to provide additional recommendations for building massing to create visual variety and opportunities for visual connection to the wetlands. This comment relates to the Specific Plan and not the adequacy of the DEIR. However, the comment is acknowledged and will be provided to the decision-makers—Planning Commission and City Council—for their consideration of the Project.
- A1-5 The commenter states that the Specific Plan’s approach to wetland sustainability is fragmented and recommends a program(s) to ensure private development transparency and a commitment toward protecting the wetlands. The commenter recommends The Envision program or SITES to provide third-party review and certification programs specific to landscape and infrastructure performance to facilitate environmental responsibility. This comment relates to the Specific Plan and not the adequacy of the DEIR. However, the comment is acknowledged and will be provided to the decision-makers—Planning Commission and City Council—for their consideration of the Project.

3. Response to Comments on the DEIR

- A1-6 The commenter supports the creation of a wetland mitigation bank, but suggests that development fees should be based on modeled or actual environmental performance of the developments versus development size. The commenter states that this will incentivize development projects that enhance environmental health. This comment is acknowledged and will be provided to the decision-makers—Planning Commission and City Council—for their consideration of the Project.
- A1-7 The commenter discusses the need for the Specific Plan to address the impacts and implication of emerging technologies, including fully automated vehicles. It asks that the Specific Plan guide development to be aligned with future mobility options. This comment is acknowledged and will be provided to the decision-makers—Planning Commission and City Council—for their consideration of the Project.
- A1-8 The commenter states that the Specific Plan would be consistent with other State, coastal, regional, and city goals related to land use. Applicable regulations for each environmental topic area are provided in the “Environmental Setting” section throughout Chapter 5, *Environmental Analysis*, of the DEIR. Additionally, the Specific Plan’s consistency with land use policies and programs adopted for the purpose of mitigating environmental impacts are provided in Section 5.10.3 of the DEIR (see Tables 5.10-1, *Consistency with the Adopted Long Beach General Plan*; 5.10-2, *Consistency with the Long Beach LCP*; 5.10-3, *Consistency with SCAG’s 2016–2040 RTP/SCS Goals*).
- A1-9 The commenter is correct in pointing out that components of the proposed Specific Plan would uniquely avoid or minimize specific environmental impacts compared to the “no project” alternatives identified in Chapter 7 of the DEIR.
- A1-10 The commenter requests the City to study the impacts of extending Marina Drive north of 2nd Street, Colorado Avenue to Pacific Coast Highway, and Shopkeeper to Pacific Coast Highway to enhance traffic flow. As shown on Figure 6-16 of the Specific Plan, the extension of Marina Drive to the north and the extension of Shopkeeper to the south have both been included as part of the Project. However, the extension of Colorado Avenue was not considered as part of the SEASP because it would increase traffic along a two-lane street with residential frontage.
- A1-11 The commenter describes CEQA changes that are being proposed as the implementation of SB 743 progresses through the State. The DEIR describes the changes required by SB 743 on page 5.16-2 of the DEIR and analyzes the Specific Plan’s consistency with SB 743 on page 5.16-58 of the DEIR. As shown in Table 5.16-17 of the DEIR, the overall VMT would increase by approximately 305,044 compared to existing conditions, and the VMT per service population would decrease by approximately 5.84 or 13 percent.
- A1-12 Comment noted; no response necessary.

3. Response to Comments on the DEIR

A2. Response to Comments California Department of Fish and Wildlife, dated September 14, 2016 (Appendix A1, page A1-6).

A2-1 The commenter had a question regarding where to find a portion of the proposed Specific Plan as referenced in the DEIR and the information was provided to the commenter by a link to the Specific Plan via email. No additional response is necessary.

3. Response to Comments on the DEIR

A3. Response to Comments from Caltrans, dated September 16, 2016 (Appendix A1, page A1-10).

- A3-1 The commenter is describes the project description. No response necessary.
- A3-2 The commenter acknowledges the difficulty in alleviating traffic congestion with limited room to expand vehicular capacity. The commenter applauds the Specific Plan’s effort to incorporate multi-modal elements to promote alternative modes of transportation and better manage existing parking. The commenter requests the City to consider that increased parking leads to increase automobile use and cost of housing. Please note that the Specific Plan encourages reduced parking requirements through incorporation of Transportation Demand Management (TDM) strategies (see PDF-1 through PDF-3 on page 5.16-62 of the DEIR and Appendix J2).

Additionally, the commenter requests the City to coordinate with Caltrans in implementing the proposed bicycle facility plan and alternative modes of transportation. These comments are acknowledged; no additional response is necessary.

- A3-3 The comment discusses Caltrans guidance and discusses the process of developing significance thresholds for freeway mainline and ramp facilities. This comment is noted.
- A3-4 The comment discusses the trip generation of the Project and notes that vehicles will use Caltrans facilities in the area. Table A3-1 shows the trip generation used in the Transportation Impact Analysis to determine Project impacts:

Table A3-1 MXD+External Vehicle Trip In/Out Summary

	Daily	AM Total	PM Total
Existing Conditions	65,731	3,047	5,299
Specific Plan Buildout	96,299	4,795	7,758
Net Change	30,568	1,748	2,459

The comment also notes that it would be helpful for the traffic study to disclose the cumulative plus project trips and assignment of those trips on the state facilities. Figure 5-1 of the traffic study shows the Cumulative No Project forecasts (which include cumulative growth without the project) and Figure 6-1 shows the Cumulative Plus Project forecasts. Comparing these forecasts to the existing traffic volumes shown on Figure 3-5 will identify the growth assumed between these scenarios.

- A3-5 An analysis of State facilities including a freeway ramp queuing analysis was prepared as part of the recirculated traffic section (see DEIR Section 5.16 and Appendix J1).
- A3-6 The commenter states that they are in agreement with the findings in Table 6-2 of the TIA but disagrees with the conclusion that traffic impacts are significant and unavoidable. In accordance with CEQA Guidelines §15091(a)(2), a significant

3. Response to Comments on the DEIR

unavoidable impact is required when the project changes (i.e. mitigation measures) are not within the responsibility of the lead agency. Mitigation Measure TRAF-3 proposes traffic improvements to Caltrans facilities that would reduce impacts to less than significant, including impacts to Studebaker & SR-22 West- and Eastbound Ramps and PCH & Studebaker Road. Even though these measures would reduce impacts to less than significant, a statement of overriding considerations is still required since the improvements are within the control of Caltrans and not the lead agency. However, it is acknowledged that there are significant unavoidable impacts to several other Caltrans intersections that cannot be feasibly mitigated due to lack of right-of-way and/or encroachment onto wetlands within the coastal zone. The City welcomes continued collaboration between itself and Caltrans related to improvements to State facilities. . Refer to General Response Section 2.2 of this document

A3-7 The commenter states that any improvements within Caltrans right-of-way will require discretionary review and approval by Caltrans and an encroachment permit. Comment noted; no further response necessary.

A3-8 The commenter states storm water run-off is an issue for Los Angeles County and that storm water run-off is not permitted onto State highway facilities without a storm water management plan. Comment noted. Regulatory requirements related to stormwater runoff, drainage, and water quality applicable to development in the Specific Plan area are identified in Section 5.9, *Hydrology and Water Quality*, of the DEIR.

A3-9 The commenter states that oversized-transport vehicles on State highways require a transportation permit from Caltrans. In response to the commenter's request that large size truck trips be limited to off-peak commute periods Mitigation Measure AQ-2 has been revised as follows:

AQ-2 Applicants for new development projects within the Southeast Area Specific Plan shall require the construction contractor to prepare a dust control plan and implement the following measures during ground-disturbing activities—in addition to the existing requirements for fugitive dust control under South Coast Air Quality Management District (SCAQMD) Rule 403—to further reduce PM10 and PM2.5 emissions. The City of Long Beach shall verify that these measures have been implemented during normal construction site inspections.

- Following all grading activities, the construction contractor shall reestablish ground cover on the construction site through seeding and watering.
- During all construction activities, the construction contractor shall sweep streets with SCAQMD Rule 1186-compliant, PM10-efficient

3. Response to Comments on the DEIR

vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling.

- During all construction activities, the construction contractor shall maintain a minimum 24-inch freeboard on trucks hauling dirt, sand, soil, or other loose materials and shall tarp materials with a fabric cover or other cover that achieves the same amount of protection.
- During all construction activities, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of three times per day.
- During all construction activities, the construction contractor shall limit onsite vehicle speeds on unpaved roads to no more than 15 miles per hour.
- Heavy construction vehicles trips shall be limited to off-peak hours.

A3-10 The City appreciates the invitation from Caltrans to cooperate related to traffic mitigation in the Specific Plan and considers Caltrans a valuable partner in addressing traffic issues in Long Beach.

3. Response to Comments on the DEIR

A4. Response to Comments from El Dorado Audubon Society, dated September 12, 2016 (Appendix A1, page A1-13).

A4-1 The commenter states that previous letters sent were not addressed in the SEASP DEIR and are included as Attachment (1). This comment is noted; responses to Attachment (1) are provided in Responses A4-8 through A4-25.

A4-2 The commenter states their concerns related to bird strikes. The Southeast Area Specific Plan (SEASP) acknowledges that lighting and building facades can pose a hazard to birds (SEASP p. 165). However, these hazards largely depend on the type, location, and orientation of lighting and facades. The SEASP requires bird-safe measures for both lighting and facades, which have been shown to reduce bird strikes (SEASP p. 166, Sheppard 2011 and references therein [hereafter Sheppard 2011]). Generally speaking, the most hazardous areas of buildings for birds are the lower stories, specifically ground level up to 60 feet in height or approximately the lower 4.5 (average-height) building stories (San Francisco Planning Department [SFPD] 2011 and references therein [hereafter SFPD 2011]).

Most bird migration (both diurnal and nocturnal) occurs at altitudes of 500 feet or greater (approximately 38 average-height building stories), and thus the risk of strikes is usually greatest when the birds descend to rest/forage or during inclement weather (Sheppard 2011, SFPD 2011). As such, the birds most susceptible to potential building strikes in the Project area are 1) locally resident species present throughout the year, and 2) migratory species that are using the Project area as stopover and/or wintering habitat, and may transit to/from and between habitat patches such as the Los Cerritos Wetlands Complex (LCWC). The bird-safe requirements in the SEASP recognize and are tailored to this context, requiring that building facades incorporate bird-safe treatments above the ground floor such that less than no more than 10 percent of the total area is untreated glazing (SEASP page 166). Most bird-safe guidance documents (e.g., SFPD 2011) recommend that such treatments occur up to a minimum of 60 feet in height, so the SEASP requirements actually go further (higher), i.e., to the maximum height of the proposed buildings. Regarding lighting, among other requirements, the SEASP stipulates that exterior lighting be shielded and downcast, and that interior lighting be minimized through the use of automated on/off systems. The SEASP also encourages building owners to follow bird-safe best practices and a lights out for birds regimen (SEASP page 167). See also Appendix C of this document.

A4-3 As shown in Figure 5.4-5 in Section 5.4, *Biological Resources*, of the DEIR, the small amount of wetland could be affected by a potential extension of Shopkeeper Road is ruderal, meaning that it is highly disturbed and contains nonnative plants. Furthermore, the area currently features above-ground fuel tanks, above-ground pipelines, and pump-jacks used for oil extraction. An extension of Shopkeeper Road would be expected to have minimal impact, if any, on the viability of the surrounding wetlands as habitat.

3. Response to Comments on the DEIR

Adherence with Mitigation Measures BIO-1 and BIO-2 would ensure that adverse impacts to wetland habitats would be avoided to the extent feasible. Where wetland avoidance is not possible, project applicant would be required to 1) obtain permits from the California Department of Fish and Wildlife and United States Fish and Wildlife Service (see Mitigation Measure BIO-1), and 2) ensure “no net loss of wetlands either by creation of applicant-sponsored wetlands or purchase of mitigation bank credits in consultation with applicable Federal- and State- agencies” (see Mitigation Measure BIO-2).

A4-4 Air quality impacts are analyzed in Section 5.1, *Air Quality*, of the DEIR. While implementation of the proposed Specific Plan would result in significant and air quality unavoidable impacts, the City’s experts disagree with the causality behind the assertion that “more density = more traffic = air quality impacts.” In many cases low-density, sprawling development patterns where land uses are located far from each other generate greater traffic and air quality impacts because they require more and longer vehicle trips (vehicle miles traveled). The walkable, mixed use nature of the proposed Specific Plan is a key component of the Project and is designed to reduce vehicle miles traveled by encouraging a development pattern that promotes shorter and fewer vehicle trips compared to conventional suburban development.

The City acknowledges the commenter’s attached article regarding birds and air pollution. However, the air quality impacts discussed in the submitted article largely pertain to regional, basin-wide air pollution and not impacts related to any specific building typology or development type. Also refer to Response to Comment A18-2.

A4-5 The City acknowledges the commenter’s Attachment (2) “Urban Street Trees, 22 Benefits.” SEASP Section 7.2.13, Landscaping requires that new plantings around the wetlands consist of native, non-invasive plants. Additionally, based on correspondence received from Los Cerritos Wetlands Land Trust a plant palette was added to SEASP (see Appendix D, Plant Palette of the SEASP, Hearing Draft May 2017).

A4-6 The City acknowledges the commenter’s opinion regarding which types of development are desirable in specific areas of Long Beach. However, the City’s long range planning documents, including the City’s General Plan and the original SEADIP plan, both allow a range of building types and land uses in the referenced areas of Long Beach. Furthermore, buildout of the proposed Specific Plan would not reflect the density or development pattern of downtown Long Beach.

A4-7 The proposed Specific Plan includes numerous provisions aimed at preserving these ideals of the original SEADIP plan. In particular, “public access to open space” and “view preservation” are considered top objectives of the Project and are listed as two of the Project’s 10 priorities (see Chapter 3 of proposed Specific Plan). New pedestrian and bike linkages are proposed throughout the Project area and in many cases link the public

3. Response to Comments on the DEIR

to views of the Los Cerritos Wetlands and other water bodies. The plan includes detailed provisions regarding wetland buffers (see Section 5.10), compliance with Coastal Act requirements for public access (see Section 5.11), and design standards encouraging public access and views (see Section 7.1.2). As shown in Figure 7-2 and described in Sections 7.1.2 and 7.1.3, the development pattern and block structure proposed for the Project area would create landscaped view and access corridors not currently offered in the Project area. These provisions demonstrate that the density allowed under the proposed Project is not incompatible with public access, public views, and landscaping. These amenities are integral to the land use pattern proposed for the Project area.

A4-8 The proposed Project is the product of robust, intensive community participation. The City acknowledges that the El Dorado Audubon Society found the Project to be inconsistent with public input and does not fully address issues related to environmental impacts and traffic. However, the City feels that the proposed Specific Plan embodies the values, aspirations and desired outcomes heard throughout the outreach process. The proposed Project was specifically crafted to protect and enhance wildlife habitat in the Los Cerritos Wetlands, facilitate cleanup and consolidation of hazardous oil extraction infrastructure, and to generally minimize or avoid environmental impacts. Provisions aimed at balancing development with the environment are found throughout the proposed Specific Plan.

Furthermore, air quality and biological impacts are analyzed in Sections 5.3 and 5.4 of the DEIR, respectively. Traffic impacts are analyzed in Section 5.16. As it is a long-range land plan, the Specific Plan itself would not generate traffic. Instead, it would strategically and responsibly guide how future development would occur to minimize locally-generated traffic and mitigate congestion impacts. For example, the mix of uses in the vicinity of 2nd and PCH is designed to capture more internal trip to the area, minimizing the number of vehicular trips that require use of dedicated roadways.

A4-9 The commenter details several concerns related to migratory birds along the Pacific Flyway, bird-strikes, and artificial night lighting. The context of the Pacific flyway is discussed in DEIR. It should be made clear that this flyway includes much of western North America, including the entirety of the state of California. As such, the Specific Plan area is a relatively tiny piece of the flyway, which occurs on substantially broader spatial-scales and includes a variety of biomes and habitats. The portions of the Project within which increased commercial development is allowed are already almost entirely developed. As such, the overall area(s) within the Project that may be utilized by birds migrating and wintering along the flyway will remain essentially unchanged. Given the extent of urban development in the greater Long Beach area, it is recognized that the LCWC provides locally important habitat for birds using the flyway, and thus measures to minimize potential impacts to birds from future re-development are included in the SEASP. Please see the Response to Comment A4-2 for the remainder of the response. See also Appendix C of this document.

3. Response to Comments on the DEIR

- A4-10 Refer to Response to Comment A4-4.
- A4-11 Refer to Response to Comment A4-3. Chapter 1, *Executive Summary*, of the DEIR includes a comprehensive list of the mitigation measures identified for the proposed Project, including measures related to dust-generated air pollutants (Mitigation Measure AQ-2) and construction-related runoff (Mitigation Measure HYD-4).
- A4-12 Commented noted.
- A4-13 The commenter provides background information on the El Dorado Audubon Society and its role in protecting wetlands and sensitive species. This comment is noted.
- A4-14 Refer to Response to Comment A4-3. Section 5.9, *Hydrology and Water Quality*, of the DEIR addresses impacts relating water quality and stormwater runoff. New development would be required to comply with the City's LID Ordinance providing stricter water quality standards compared to the existing development. Redevelopment allowed by the Specific Plan would enhance storm water quality.
- A4-15 The risk of bird strike is acknowledged and analysis was provided on Page 5.4-41 of the DEIR.
- A4-16 It is recognized that birds presumably transit to/from and between existing habitat patches within the Project area to Alamitos Bay and the Ocean. Regarding the height at which birds fly over buildings, those flying "between...and just barely over the tops of 3.5 story buildings" likely do so simply because they recognize the boundaries of the structures and are deliberately avoiding them (while minimizing the energy expenditure required to do so). The importance of birds being able to perceive the outline of solid structures (buildings) is recognized, and indeed the primary rationale for including bird-safe design requirements in the SEASP (see SEASP Section 7.2.14, Bird Safe Treatments, and Appendix C of this document).
- A4-17 The proposed Project directly addresses compliance with Coastal Act requirements for public access. For more information, see Section 5.11 of the proposed Specific Plan.
- A4-18 See response to Comment A4-7.
- A4-19 Comment noted.
- A4-20 The City respectfully disagrees with the commenter's characterization of the proposed Project as a "mega development" or "tall" and "dense." While the proposed Project would allow additional development capacity in the Project area compared to existing conditions, the land use regulations, development standards, and design guidelines contained with the proposed Specific Plan would ensure that new development in the Project area is context-sensitive and designed to reflect infrastructure capacity and existing community character. Furthermore, additional development capacity available

3. Response to Comments on the DEIR

under existing conditions would generate similar impacts in the areas mentioned by the commenter (see Chapter 7, *Alternatives*, of the DEIR). For example, continued implementation of the adopted SEADIP plan (the “No Project/Adopted PD-1 Alternative”) and the “No Project/No Development Alternative” would, like the proposed Project, result in significant traffic impacts at many intersections.

Air quality impacts of proposed Project are analyzed in Sections 5.3, *Air Quality*, and 5.7, *Greenhouse Gas Emissions*, of the DEIR.

- A4-21 The commenter is correct in stating that implementation of the proposed Project would result in significant and unavoidable air quality and traffic impacts, and that no feasible mitigation is available to some intersections already operating at deficient LOS. However, the DEIR identifies all feasible mitigation measures, including measures aimed at reducing air quality impacts on sensitive receptors (e.g., Mitigation Measure AQ-7). An analysis of CO hotspots, areas where vehicle congestion of the potential to create pockets of CO emissions, is analyzed on Pages 5.3-20 and 5.3-29 of the DEIR. Impacts from CO hotspots were determined to be less than significant.
- A4-22 See response to Comment A4-4. The commenter is correct in stating that the walkable, mixed use nature of the proposed Project will not completely eliminate the demand for motorists’ use of Project area as either a destination or a route for traveling through southeast Long Beach. However, the City’s experts have determined that the proposed Project’s land use pattern and provisions aimed at encouraging nonmotorized transportation would represent a substantial improvement over the type of suburban-scaled development pattern allowed in the Project area under existing conditions, which is almost entirely dependent on automobile travel, even between adjacent shopping centers.
- A4-23 Comment noted. Air quality impacts of proposed Project are analyzed in Section 5.3, *Air Quality*, and impacts related to demand for potable water supplies is analyzed in Section 5.17, *Utilities and Service Systems*, of the DEIR. The South Coast Air Quality Management District (SCAQMD) conducts in-depth analysis of toxic air contaminants and their resulting health risks for the South Coast Air Basin (SCAB), which includes the Project area, and documents their findings in a report titled Multiple Air Toxics Exposure Study (MATES). Overall, the most recent iteration of this study reported that the ambient, excess cancer risk in the SCAB fell by more than 50 percent between their 2008 (MATES-III) and 2015 (MATES-IV) studies (see analysis starting on Page 5.3-16 of the DEIR).
- A4-24 As described in Section 5.9, *Hydrology and Water Quality*, of the DEIR, redevelopment of land uses in the Project area would require installation of robust flood control measures, low-impact development (LID) best management practices (BMPs), and treatment control BMPs that would retain, filter, and/or treat stormwater runoff. Redeveloped

3. Response to Comments on the DEIR

land uses would replace land uses that don't currently provide such robust water quality design features. Therefore, as described in Section 5.9 of the DEIR, implementation of the proposed Project, including adherence to regulatory requirements and mitigation measures (see Mitigation Measures HYD-1 through HYD-4), would result in beneficial impacts related to water quality. For additional information see Sections 5.4 and 5.9 of the DEIR.

A4-25 The City acknowledges the comments provided by the El Dorado Audubon Society and will forward these comments to decision makers.

3. Response to Comments on the DEIR

A5. Response to Comments from Long Beach Unified School District, dated September 19, 2016 (Appendix A1, page A1-27).

A5-1 The Long Beach Unified School District requests that all future project applications and CEQA documents within the Specific Plan area be forwarded to the District for review. The City acknowledges the District's comments and is committed to keeping the District informed of future projects in the Project area that would affect school facilities and enrollment.

3. Response to Comments on the DEIR

A6. Response to Comments from Los Angeles County Business Federation, dated September 16, 2016 (Appendix A1, page A1-28).

A6-1 The commenters provide support for the Specific Plan stating that the benefits outweigh its significant environmental impacts and mixed-use designations will reduce dependence on the automobile. The City acknowledges the comments and will forward these comments to decision-makers—Planning Commission and City Council—for their consideration of the Project.

3. Response to Comments on the DEIR

A7. Response to Comments from Los Cerritos Wetlands Land Trust, dated September 19, 2016 (Appendix A1, page A1-30).

A7-1 The commenter provides a background of the agency that it is representing and its interest in protecting and restoring southeast Long beach's Los Cerritos Wetlands. The commenter expresses their agreement with removing the "white holes" in the local coastal program. No further response is necessary.

A7-2 The commenter is concerned with the potential for SEASP to double the population in the area. Note that the Project area has a population of 6,486 and buildout of the all land uses within the Specific Plan would result in a population of 15,134 representing a net increase of 8,648 residents.

A7-3 The existing and buildout assumptions provided by the commenter are correct. The City acknowledges that LCWLT cannot support a Shopkeeper Road extension that would cut through wetlands. The SEASP would not allow Shopkeeper to impact delineated wetlands.

While the Project would allow five- and in some cases seven-story buildings in the Mixed-Use Community Core land use, the Specific Plan incorporates a number of standards to reduce impacts to the wetlands, wildlife, sensitive birds. For example, the maximum building height at the intersection of PCH and Studebaker Road is 3 stories with the top floor stepback minimum of 10 feet at the top floor. A maximum building height of 3 stories is allowed for building adjacent wetlands. See also SEASP Sections 5.8, Wetlands; 5.9, Wetland Conservation and Monitoring Fund; 5.10, Wetland Buffers.

A7-4 The City acknowledges the requirement of CEQA to fully disclose the environmental impacts of the Project. All environmental impacts have been discussed in Chapter 5, *Environmental Analysis*, of the DEIR. Please note that this is a Program EIR intended to analyze buildout of the Specific Plan on a comprehensive basis (see Section 1.2.2 of the DEIR). Future development proposals would be evaluated on an individual basis to determine the extent of future environmental review. Refer to General Response Section 2.1 of this document.

A7-5 Refer to Response to Comments A7-40 through A7-101.

A7-6 The discussion of impacts to Los Cerritos Wetlands starting on Page 5.4-37 of the DEIR was intended to include all potential development that could occur in the Coastal, Habitat, Wetlands & and Recreation land use designation, the Lyons Pumpkin Patch, and the Orange County parcel, including access roads to allowed uses and the Shopkeeper Road extension.

The Shopkeeper Road Extension would occur largely on existing parking lots; however, all future site development, including this extension, would be subject to compliance

3. Response to Comments on the DEIR

with federal laws and regulations governing wetlands, including the Clean Water Act. Any impacts to the Marketplace Marsh wetlands, even though they are degraded and disturbed, would be mitigated in accordance to these regulations pursuant to Mitigation Measures BIO-1 through BIO-3. In addition, Section 5.8 of the SEASP requires new projects within the Coastal Habitat, Wetlands & Recreation land use designation to submit an approved preliminary jurisdictional delineation or a biologist-signed declaration that no wetlands will be impacted by the development. Focused surveys for special status species would be required, as necessary, at the time a site specific development is proposed.

To provide further clarification to the commenter, the following analysis of Page 5.4-38 in the DEIR; added text is shown underlined and deleted text is shown in ~~strikeout~~:

No site specific development project is being proposed in the Coastal Habitat, Wetlands & Recreation area as part of the Specific Plan. However, the Coastal Habitat, Wetlands & Recreation land use designation lies entirely within the coastal zone and provides for coastal restoration, access, and visitor-serving recreation—ancillary office space, boat storage, trails, ~~and an interpretive center,~~ access and the Shopkeeper Road extension. These uses are intended to be complementary to the surrounding habitat and consistent with the Coastal Act. While these uses are intended to be developed in disturbed areas or ruderal uplands consisting of bare land or nonnative vegetation, development of these uses could impact sensitive habitat or result in the loss of native vegetation supporting sensitive species. For example, implementation of the Specific Plan could allow development of dry-stack boat storage on the Alamitos Bay Partnership property—about six acres in the LCWC at the southeast corner of Pacific Coast Highway and the Los Cerritos Channel—which includes about one acre of jurisdictional wetlands and sensitive plant species. Development on this property could result in a significant impact.

A7-7 The ultimate alignment and timing of the Shopkeeper Road extension is not known at this time. The DEIR assumes that the Shopkeeper Road extension would occur; impacts to development on the wetlands has been identified and mitigation measures have been incorporated to reduce impacts to less than significant. With implementation of mitigation measures, no net loss of wetlands would occur. Refer to Response to Comment A7-6.

A7-8 The Project area is a built environment with roads and developed parcels adjacent to wetlands. This limits the opportunity for natural buffers. As a result, the Specific Plan proposes that for projects that cannot provide 100' buffers, Project Design Feature PDF-BIO-2 (see Page 5.4-46 of the DEIR and Section 5.9 of the SEASP [3/24/2016]) requires each development or redevelopment to contribute to a fund to provide long-term management to the wetlands. In addition, mitigation pursuant to Coastal

3. Response to Comments on the DEIR

Commission and regulatory agency permits is required for all impacts to waters of the state and U.S.

Project Design Feature PDF-BIO-3 (see Page 5.4-46 of the DEIR and Section 5.10 of the SEASP) specifies design and maintenance requirements for wetland buffers that will minimize urban edge effects, specifically shielding the existing wetland from lighting, noise and human intrusion resulting from subsequent project. Passive recreational uses are to be allowed within the area only if it can be demonstrated that these uses will not adversely impact the wetland ecosystem or the buffer's function. These uses could include to bird watching, walking, jogging, and bike riding, and may include the construction of paths and interpretive signs and displays. All paths are to be constructed to minimize impact to plants and animals. In addition, mitigation measure BIO-6 requires educational signage to be located at all pedestrian access points to inform users of their responsibilities associated with the open space interface and how to minimize impacts.

Mitigation Measure BIO-4 addresses noise generated during construction. Mitigation Measure BIO-5 addresses shielding of nighttime lighting. Project Design Features PDF-BIO-4 and PDF-BIO-5 address protection against invasive plants and the use of California Native species or non-hybridizing species at the wetlands edge at Shopkeeper Road (see Section 5.4.7 of the DEIR).

A7-9

Refer to General Response Section 2.3. Section 7.2.14 of the SEASP, Bird-Safe Treatments, provides two pages of required bird-safe building treatments that are required for all new buildings, and major renovations of existing buildings, within the SEASP area. These apply to building façade treatments, landscaping and lighting design. In addition, height limitations and stepbacks are required for buildings adjacent to the wetlands. Section 7.1.7 of the SEASP provides standards for building placement and orientation which require building separation to create open space and view corridors. This corridor would allow birds to travel between Alamitos Bay and the Los Cerritos Wetlands without having to fly over a solid mass of 5 story buildings.

Both the DEIR and SEASP acknowledge that lighting and building facades can pose a hazard to birds (SEASP Page 165; DEIR Page 5.4-41). However, these hazards largely depend on the type, location, and orientation of lighting and facades. The SEASP requires bird-safe measures for both lighting and facades, which have been shown to reduce bird strikes (SEASP p. 166, Sheppard 2011 and references therein [hereafter Sheppard 2011]). Generally speaking, the most hazardous areas of buildings for birds are the lower stories, specifically ground level up to 60 feet in height or approximately the lower 4.5 (average-height) building stories (San Francisco Planning Department [SFPD] 2011 and references therein [hereafter SFPD 2011]).

3. Response to Comments on the DEIR

Most bird migration (both diurnal and nocturnal) occurs at altitudes of 500 feet or greater (approximately 38 average-height building stories), and thus the risk of strikes is usually greatest when the birds descend to rest/forage or during inclement weather (Sheppard 2011, SFPD 2011). As such, the birds most susceptible to potential building strikes in the Project area are 1) locally resident species present throughout the year, and 2) migratory species that are using the Project area as stopover and/or wintering habitat, and may transit to/from and between habitat patches such as the Los Cerritos Wetlands Complex (LCWC). The bird-safe requirements in the SEASP recognize and are tailored to this context, requiring that building facades incorporate bird-safe treatments above the ground floor such that less than no more than 10 percent of the total area is untreated glazing (SEASP page 166). Most bird-safe guidance documents (e.g., SFPD 2011) recommend that such treatments occur up to a minimum of 60 feet in height, so the SEASP requirements actually go further (higher), i.e., to the maximum height of the proposed buildings. Regarding lighting, among other requirements, the SEASP stipulates that exterior lighting be shielded and downcast, and that interior lighting be minimized through the use of automated on/off systems. The SEASP also encourages building owners to follow bird-safe best practices and a lights out for birds regimen (SEASP page 167). See also Appendix C of this document.

A7-10 The comment is noted. Regarding artificial light sources and circadian rhythms, the zoning changes proposed apply almost entirely to areas that are currently developed, with existing commercial buildings and related artificial lighting sources for parking lots and streets. Birds present locally are presumably at least somewhat adapted to the artificial light emanating from the current developments and surrounding areas, which are highly urban/suburban and have been developed for decades. As is known, existing developments within the relevant portions of the Project area have not implemented bird-safe design elements and are not currently required to. It is recognized that additional development within these areas has the potential to increase the extent of lighting in the area on a localized scale, and the relevant requirements in the SEASP (related to lighting types, direction of illumination, etc.) are included for that reason. Regarding verb usages in the SEASP, prominent bird-safe design measures indeed use “shall” and are binding. Examples include mandating that building exteriors have a large proportion of “treated” glass/glazing, and that building light be shield and directed downward (SEASP p. 166). Some bird-safe elements do occur as recommendations (“should”/“could”), primarily to encourage additional bird-safe practices while maintaining a balance between human use of the area and minimizing potential impacts to biological resources. See also Appendix C of this document.

A7-11 As requested by the commenter, the SEASP Section 7.2.13, Bird-Safe Treatments, was modified to limit the use of blue light to one that necessary for safety and security purposes. Warm-white lights or filtered LEDs designed to minimize blue emissions shall be used.

3. Response to Comments on the DEIR

- A7-12 This comment relates to the SEASP and not the adequacy of the DEIR. The City acknowledges the comments and will forward these comments to decision-makers—Planning Commission and City Council—for their consideration of the Project.
- A7-13 Cumulative lighting impacts are discussed on Page 5.1-25 of the DEIR. A significant cumulative impact to light and glare would occur if development within the Specific Plan could, combined with other development in the immediate area result in a substantial increase in nighttime illumination or glare in southeast Long Beach. However, as concluded in Section 5.1, *Aesthetics*, of the DEIR, light and glare impacts of the proposed Specific Plan would be less than significant upon compliance with existing regulations and the provisions of the proposed Specific Plan. In addition, due to the existence of light and glare from existing residential and nonresidential uses in the Project area and surrounding properties, the proposed Specific Plan is not anticipated to add significant new sources of nighttime light and glare in the Project vicinity. Furthermore, Project area is located in a highly urbanized setting that already experiences a high level of nighttime illumination. A significant amount of new development or light sources in the surrounding area is expected to occur. Finally, as with development that would be accommodated by the proposed Specific Plan, cumulative development projects in Long Beach would be required to adhere to the lighting standards outlined in the California Code of Regulations, Title 24, Part 6 and the City's Municipal Code Sections 21.44.259, 21.44.855, and 21.44.600. Therefore, the proposed Specific Plan's contribution to cumulative light and glare impacts is less than considerable and is therefore less than cumulatively significant.
- A7-14 SEASP does not propose dry-stack boat storage on the Alamitos Bay Partners property. However, boat storage facilities, including dry stack storage, is an allowed uses in the Coastal Habitat/Wetlands/Recreation land uses and would support visitor serving coastal resources in the Coastal Zone. With implementation of Mitigation Measures BIO-1 through BIO-7 impacts to wetlands would be less than significant.
- A7-15 The Wetland Conservation and Monitoring Fund is a project design feature of the Specific Plan (DEIR PDF-BIO-2; SEASP Section 5.9). While the fund is intended to provide long-term management and enhancement of the wetlands it was not relied on as a Mitigation Measure to prevent impacts to wetlands. Implementation of Mitigation Measures BIO-1 through BIO-7 would reduce impacts to wetlands to less than significant, with or without the Wetland Conservation and Monitoring Fund.
- A7-16 Refer to Response to Comments A7-59 through A7-90.
- A7-17 The biological impact of the Shopkeeper Road extension was analyzed in Section 5.4, *Biological Resources*, as described in Response to Comment A7-6. Other roadway impacts that were determined to be significant and unavoidable because improvements would

3. Response to Comments on the DEIR

encroach into wetlands within the coastal zone are described in Section 5.16.8 of the DEIR.

Response to Tom Brohard’s review is provided in Responses to Comments A7-102 through A7-149.

A7-18 The commenter notes that no weekend peak hour assessment was completed for the Project and, using ITE rates, the Saturday midday peak would be greater than the weekday peak rates used in the traffic study. The comment goes on to recommend that a peak weekend assessment should be assessed to document impacts associated with the Project. The comment also notes that no weekend baseline was utilized in the assessment.

The commenter is correct that no weekend peak hour assessment was completed. This is a typical approach for traffic engineering assessment as professionals typically do not design roadways to handle traffic that fluctuates based on the season and in the worst case month of July would only occur four or five hours over the course of a year (e.g. the peak hour of a Saturday during the peak month). Instead, roadways are typically designed to handle typical traffic (e.g. weekday peak hour, which occurs approximately 150 days per year).

Fehr & Peers did pull available PeMS data from Caltrans at the monitoring station on Pacific Coast Highway at the Orange County/Los Angeles County border. The data, shown below, was pulled from July to show the worst case scenario for travel during off-peak hours and on weekends. Table A7-1 shows that the number of vehicles using the roadway during peak weekday periods is far greater than the number of vehicles using the roadway on a weekend during the busiest month. It should be noted that the only available data set for the month of July was from 2009; however, travel trends in the month should be generally consistent with that identified below. As such, the impact assessment is using the peak data in the study area (e.g. peak hours) and provides appropriate information for identifying impacts.

Table A7-1 Level of Service Descriptions for Signalized Intersections

Time Period	Total Vehicles	Percentage	No. of Samples	No. of Estimates
Weekday AM Peak Hour (6–10 am)	93217	14.12	1488	0
Weekday PM Peak Hour (3–7 pm)	151012	22.88	1488	0
Off-peak (10am–3pm)	143184	21.69	1488	0
Off-peak (7pm–6am)	100798	15.27	1488	0
Saturday	91332	13.84	1488	0

3. Response to Comments on the DEIR

Table A7-1 Level of Service Descriptions for Signalized Intersections

Time Period	Total Vehicles	Percentage	No. of Samples	No. of Estimates
Sunday	80496	12.2	1488	0

Source: Fehr & Peers 2016

A7-19 The commenter states that the mitigation measures are not concrete and enforceable because the public realm improvement identified as part of the Project phasing on Page 3-18 is dependent the availability of funding. The purpose of this section is to explain the basis for the phasing and buildout used to analyze environmental impacts. The public realm improvements identified in the Specific Plan benefits of the Project and not mitigation measures.

A7-20 The commenter claims that the DEIR would improve impacts at one intersection. This is incorrect. The DEIR and traffic analysis identified mitigation measures for every intersection that was identified as a significant impact. Although not all of the mitigation measures were considered feasible, Mitigation Measures TRAF-3 and TRAF-4 would require improvements to eight intersections.

Some of these improvements are within the jurisdiction of another agency. Since the City does not have control of those improvements or when they would be implemented it is still considered a significant avoidable impact pursuant to CEQA Guidelines 15091(a)(2). This does not mean that the improvement will not be constructed or that the City is unwilling to work with the controlling agency. Additionally, the City is working with both Caltrans and the City of Seal Beach to ensure that impacts and mitigation for their facilities are fully considered. Refer to General Response Section 2.2.1.

A7-21 The commenter is correct that all feasible mitigation measures must be incorporated to reduce significant unavoidable impacts. Mitigation measures for all impact intersections were identified and evaluated in Section 5.16.8 of the DEIR (see Section 12 of the TIA; Appendix J1 of the DEIR). The commenter does not provide any additional mitigation that could or should be considered; nor does the commenter provide evidence to suggest that measures determined to be infeasible are actually feasible.

A7-22 The comment discusses the formation of a Transportation Management Association to mitigate impacts that are significant and unavoidable. The comment goes on to note that if adequately implemented, a TIA can achieve up to a 24 percent reduction in employee trips and that additional reductions in employee trips could be achieved.

The traffic study and DEIR did not assume additional trip reductions associated with a TMA to provide a conservative assessment of impacts associated with the Project.

3. Response to Comments on the DEIR

Subsequent to the release of the DEIR, a TDM Plan was prepared and analyzed. The TDM Plan (Appendix J2 of the DEIR) along with Section 5.16, *Transportation and Traffic*, of the DEIR was recirculated for public review. Refer also to Response to Comment A18-8 and A18-10.

- A7-23 The comment discusses that, due to increased traffic in the study area, that emergency access will be impeded and those impacts should be evaluated, disclosed, and mitigated. Please note that the California Vehicle Code section 21806 discusses requirements related to yielding to emergency vehicles. Given that the law requires vehicle traffic to yield right of way and drive to the right side of the roadway, although there will be additional congestion in the area, emergency responders should not be significantly impacted in the area.

As provided on Page 5.16-55 of the DEIR, the Project provides for the needs of pedestrian, bicyclists, vehicles, and transit uses. The proposed mobility plan would provide greater connectivity as well as convenient, efficient, and safe access to uses within the proposed Project. The Project is situated in a congested area that experiences vehicle delay at intersections with and without the proposed Project during peak hours. During peak periods emergency vehicles have the ability to use the entire roadway right-of-way, as is done under existing conditions. The Long Beach Fire Department (LBFD) indicated that it is currently meeting its response time goals and expects to do so in the future (see Section 5.14, *Public Services*). Additionally, the Specific Plan's additional connectivity in the area will provide additional route choices for emergency responders, which would assist in improving response times in the area

- A7-24 The commenter claims that the adding additional traffic cannot result in a reduction in delay at a study area intersection, specifically Channel Drive and PCH. However, this comment is not correct. Delay at signalized intersections and all-way stop controlled intersections is reported as the average delay experienced by all users of that intersection. As such, if traffic is added to movements with below-average delay, the average delay will decrease at the intersections as there are more vehicles experiencing lower delays. Therefore, the comment is incorrect that delay cannot decrease when vehicles are added to an intersection.

- A7-25 The comment discusses that the Project's impact to the 2nd Street/Naples Plaza intersection, was not evaluated for the Existing Plus Project and Year 2035 Plus Project scenarios. However, Tables 4-5 and 6-1 of the Traffic Study both document operations under these conditions with the proposed Project. This information is also presented in Tables 5.16-6 and 5.16-10 of the DEIR.

The comment also states that impacts further west, including 2nd Street at Bayshore, should be evaluated and the amount of traffic headed further west was not disclosed in the traffic study. Based on the distribution, there are approximately 129 AM and 81 PM

3. Response to Comments on the DEIR

westbound peak hour trips on 2nd Street. An updated traffic analysis was conducted to include this intersection (#27) as part of the recirculated traffic section. Refer to General Response Section 2.2.

A7-26 The Office of Environmental Health Hazards Assessment (OEHHA) adopted new guidance for the preparation of health risk assessments issued in March 2015. Emissions from construction equipment primarily consists of diesel particulate matter (DPM). OEHHA has developed a cancer risk factor and non-cancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. Although SCAQMD has adopted the new OEHHA guidance for the AB 2588 Air Toxics “Hot Spots” Program and for permitting purposes (SCAQMD Air Toxics Release June 18, 2015), SCAQMD does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term Project and instead uses the construction LST analysis as an indicator of potential health risk.¹ Localized construction-related air quality impacts are described under Impact 5.3-4 of the DEIR. Because the proposed Project is a program level assessment of impacts associated with the Specific Plan, not enough specificity is known about the individual construction activities that would allow a localized significance threshold assessment of the Project’s construction emissions. This approach is consistent with SCAQMD’s LST guidance, which states that LSTs are applicable to Projects at the project-specific level. Because of the magnitude of emissions generated by the program-level project (as shown in Table 5.3-8) and the likelihood that future construction activities associated with individual project-level developments would occur proximate to sensitive receptors, localized construction impacts were considered a significant unavoidable impact of the Project.

A7-27 See Response to Comment A7-26. No air district within California, including the SCAQMD requires or has guidance that warrants a health risk assessment for air toxics for congested intersections. As identified in the localized intersection impact analysis under Impact 5.3-5 of the DEIR, with the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, air pollutant concentrations in the SoCAB and in the state have steadily declined. The 2016 *Air Quality Management Plan* (AQMP) highlights the fact that despite population growth, air quality has improved significantly over the years, primarily due to the impacts of air quality control programs at the local, state and federal levels. As identified on page 5.3-16 and 5.3-17, based on the 2016 SCAQMD *Multiple Air Toxics Exposure Study* (MATES IV), cancer risk in the SoCAB has declined 57 percent since the MATES III study in 2008. Furthermore, DPM associated with goods movement is the largest contributor to health risk in the SoCAB. Given that proposed mix of land uses associated with the Specific Plan, the increase in vehicle trips associated with the Project would be primarily from passenger vehicle cars, which are primary gasoline powered. The proposed Project

¹ Based on correspondence at the annual SCAQMD CEQA Update Workshop on August 31, 2016.

3. Response to Comments on the DEIR

would not encourage warehouse style industrial development that is associated with goods movement and truck trips. Consequently, the proposed Project would not have the potential to substantially increase heavy duty (diesel-powered) truck traffic that has the potential to affect DPM concentrations at congested intersections.

A7-28 The Transportation Impact Analysis VMT Memorandum, included as Appendix J3 to the DEIR, evaluated VMT reductions from the transportation demand management measures incorporated into the Specific Plan such as pedestrian and bicycle network which has the potential to convert mode share away from the vehicle trips. The Project would offer pedestrian sidewalks on both sides of most streets, providing connections within the site and off-site. The SEASP would also offer traffic calming measures on the streets and intersections in the Project site. Using the California Air Pollution Control Officer's Association (CAPCOA) Quantifying GHG Mitigation Measures methodology, these project design features result in a 2.5 percent VMT reduction due to increased active transportation. The Project would also offer an increase in bicycle lanes throughout the Project site. CAPCOA specifies that for each increase in bicycle lane mile, an additional 1 percent of mode share can be accomplished. With all the pedestrian and bicycle facilities in the SEASP, the total active transportation VMT reduction of 7.4 percent was identified. Given that the CAPCOA methodology estimates that suburban centers, like the proposed Project, typically reflect an average VMT reduction of up to 17 percent, a 7.4 percent reduction in VMT associated with the measures identified above is not unexpected and is within the reasonable range.

The commenter also makes reference to the Transportation Management Agency (TMA) and Transportation Demand Management (TDM) Plan incorporated into the Specific Plan, which is identified as PDF-1 and PDF-2 in the air quality and GHG emissions section of the EIR. The Transportation Impact Analysis does not take into account additional VMT reductions from these mandatory Project components; therefore, no additional emissions reductions are estimated from these measures in Section 5.3, *Air Quality*, or 5.7, *GHG Emissions*, of the EIR. Air quality and GHG emissions impacts were identified as a significant unavoidable impact of the proposed Project. These project design features would help reduce emissions associated with the Project site but not to less than significant levels. Subsequent to the release of the DEIR, a TDM Plan was prepared and analyzed. The TDM Plan (Appendix J2) along with Section 5.16, *Transportation and Traffic*, of the DEIR was recirculated for public review. Refer also to Response to Comment A18-8 and A18-10.

A7-29 The commenter claims that the alternatives analysis is inadequate and that there are undisclosed biological resources impacts. This comment is incorrect. All biological resources impacts were disclosed (see Response to Comment A7-6). In addition, to the two "no project" alternatives, which are required by CEQA, the Reduced Intensity Alternative was analyzed to reduce impacts related to air quality, greenhouse gas emissions, noise, and traffic. The Reduced Building Height Alternative was analyzed

3. Response to Comments on the DEIR

based on comments received during the public outreach process and for its potential to reduce biological impacts. Additionally, a several other alternatives were considered for their ability to reduce significant environmental impacts but were rejected from further analysis. These alternatives and the reasons for rejection are provided in Section 7.2 of the DEIR.

- A7-30 The DEIR did not omit any significant impacts to biological resources. However, two reduced height alternatives were considered and analyzed, the No Project/Adopted PD-1 (SEADIP) Alternative and the Reduced Building Height Alternative (discussed above). The No Project/Adopted PD-1 (SEADIP) Alternative would limit building height to 30 feet for residential and 35 feet for non-residential. No additional reduced building height alternative needs to be evaluated.

The evaluation of wider buffers is also not necessary because it would not further reduce biological resources impacts, which were determined to be less than significant with mitigation measures incorporated.

There is no proposed extension of Studebaker Road; refer to Response to Comment A7-6 for a discussion of the Shopkeeper Road extension.

Note that SEASP also requires a 10 foot step-back at the 3rd story and above at the corner of Shopkeeper and 2nd Street.

- A7-31 There are no significant undisclosed impacts to biological resources. As stated, the alternatives considered were crafted to reduce significant environmental impacts.

- A7-32 The commenter claims that the alternatives analysis is “reverse engineered” to favor the SEASP and provides an example of the No Project/Adopted PD-1 (SEADIP) Alternative’s aesthetics impacts. The City disagrees with the comments. An increase in building height does not necessarily result in a significant impact. Aesthetic impacts are evaluated with respect to views, visual character, scenic resources, and lighting. As extensively detailed in Section 5.1, *Aesthetics*, implementation of the Specific Plan would not result in a significant aesthetic impact.

As provided in Section 7.4.1 of the DEIR, impacts associated with aesthetics include the degradation of scenic vistas, decreased visual quality, and increased light and glare. Similar to the proposed Project, the No Project/Adopted PD-1 (SEADIP) Alternative would not impact a scenic vista. This alternative would also restrict the building height to 30 feet for residential uses and 35 feet for non-residential uses for the vast majority of new development. Although this alternative would reduce the allowable building height compared to the Project—the proposed Specific Plan would allow 5 and 7 stories in portions of the mixed-use land use designations—it would not enhance view corridors. The proposed Specific Plan would enhance views by creating a block structure in the Mixed Use Community Core land use area, introducing new sightlines that would extend

3. Response to Comments on the DEIR

between PCH and the scenic vistas beyond, including views of Alamitos Bay to the west and the Los Cerritos Wetlands to the east.

The No Project/Adopted PD-1 (SEADIP) Alternative would result in decreased visual quality compared to the proposed Project. The character of the Project area would continue to be defined by the adopted PD-1. Unlike the proposed Project, this alternative does not include development standards and design guidelines for existing commercial areas along the PCH corridor: see PD-1 Subareas 16, 17, and 18 (currently developed as Marina Pacifica Mall, Seaport Marina Hotel, and the Marketplace). Additionally, PD-1 does not concentrate new development within existing developed areas and along the PCH corridor. For example, areas of the proposed Project designed for limited uses and preservation under the Coastal, Habitat, Wetlands & Recreation land use would be allowed more intense development under PD-1. Specifically, Subarea 11b allows residential uses at 8.4 dwelling units per acre (du/ac), and Subareas 25 and 26 would allow business park uses (office commercial and light industrial). This alternative would not include the proposed development standards and design guidelines that emphasize land use compatibility, enhanced building form and architectural design, and view preservation.

The No Project/Adopted PD-1 (SEADIP) Alternative would have slightly greater impacts related to light and glare since it would allow a greater intensity of land uses on undeveloped areas. As stated above, residential and business park uses would be allowed in Subareas 11b, 25, and 26. Additionally, development under this alternative would not be subject to the proposed Specific Plan design guidelines that reduce impacts related to light and glare (see DEIR page 5.1-20). However, it should be noted that all new development under this alternative or the proposed Project would be subject of the City's Municipal Code, which would ensure that light and glare would be minimized. Overall, aesthetic impacts associated with the No Project/Adopted PD-1 (SEADIP) Alternative would be greater than the proposed Project.

A7-33 The commenter is claims that the No Project/Adopted PD-1 (SEADIP) Alternative's analysis of biological resources is disingenuous. The commenter provides no support for their claim and ignores the main reasoning for the alternative's conclusion. As stated in Section 7.4.4 of the DEIR, the No Project/Adopted PD-1 (SEADIP) Alternative would result in increased impacts to biological resources. Although the adopted PD-1 makes some provision for the maintenance and restoration of wetlands and buffers, it would allow increased development in undeveloped areas in and adjacent to the Los Cerritos Wetland Complex (LCWC). For example, as stated above, residential and business park uses would be allowed in Subareas 11b, 25, and 26, in the LCWC. This could increase direct impacts to jurisdictional wetlands and increase conflicts between the urban and wetland interface.

3. Response to Comments on the DEIR

A7-34 Extensive community outreach was conducted to establish the Project objectives for SEASP to ensure the orderly long-term development that balances planning, the environment, and economic feasibility. The adopted PD-1 does not have the tools in place to accomplish this, as evidenced by the piecemeal development that has occurred over the past several decades without an overarching plan or benefit to the community.

As stated in Section 7.4.18 of the DEIR, implementation of the No Project/Adopted PD-1 (SEADIP) Alternative would allow development to occur in accordance with the adopted PD-1. Therefore, the vast majority of the Project objectives would not be achieved under this alternative. Although the PD-1 provides some level of guidance for future development, it does not give equal weight to development that considers planning, environmental, and economic feasibility (Objective 1). The PD-1 does not include a flexible land use plan that provides a greater mix of uses (Objective 2). Although the PD-1 provides some level of wetland protect through development of wetland buffers and preservation requirements, it allows more development within the wetland areas and does not enhance views or creates a sense of place for the community (Objective 3). Furthermore, continuation of the adopted plan would not allow for the expansion of multimodal transportation options (Objective 4); there would be no option to increase public connectivity to open space, including the marina, other waterways, the wetlands, and parks (Objective 5); and there would be no plan for enhanced gateway and landmark locations (Objective 6).

Importantly, the No Project/Adopted PD-1 (SEADIP) Alternative would not provide any of the Project benefits that would occur with adoption of the Southeast Area Specific Plan, including enhancement of wetlands through implementation of the Wetland Conservation and Monitoring Fund (providing funds for the preservation, restoration, and maintenance of wetlands), water quality enhancement, creation of place, and revitalization in the area.

A7-35 Comment noted. The analysis in the alternative simply discloses whether the reduction in impacts would eliminate significant unavoidable adverse impacts. This disclosure is a requirement of CEQA. The City disagrees with the commenter that the DEIR places a judgement on whether the reductions “matter;” rather the DEIR provides a factual determination to be used by the decision-makers in weighing their options.

A7-36 As stated in Section 7.6.4 of the DEIR, the Reduced Intensity Alternative would result in similar impacts to biological resources, since the development area would be the same and development would be directed away from the wetland areas and toward urbanized areas of the plan. Therefore, this alternative does not further avoid wetland impact. Further the Wetland Conservation and Monitoring Fund required in Section 5.9 of SEASP would require each development or redevelopment to contribute its fair share to the fund based on the size of development. The fund is to be used for the purpose of

3. Response to Comments on the DEIR

providing long-term management of wetlands. Therefore, it is reasonable to assume that less development equals less money placed in the fund to manage wetlands.

A7-37 Page 7-32 of the DEIR provides a number of examples of how the Reduced Intensity Alternative would not fully meet the Project objectives. This one factor that may be considered in choosing to accept or reject an alternative. The City acknowledges that it must make findings pursuant to CEQA Guidelines Section 15091, when approving the Project.

A7-38 The commenter is incorrect in stating that a comparison of the alternatives to the Project objectives is not a valid standard. It is this analysis and disclosure that assists the decision-makers and the public in understanding and comparing the alternatives. The DEIR does not claim that the alternatives need to meet all Project objectives to be valid. However, the Specific Plan provides a development incentive for proposed hotel and residential uses—allowing up to seven stories when certain conditions are met in the Mixed Use Community Core designation. It is reasonable to assume that additional hotel and/or residential uses would be developed if a developer were allowed to receive additional entitlements.

A7-39 Comment noted.

A7-40 The commenter supports the overall planning effort; no response is necessary.

A7-41 The commenter states that the objective of the memo is to highlight the elements of the SEASP that are not adequately analyzed in the DEIR. The commenter provides background on this viewpoint and makes claims the DEIR is inadequate. No further response is necessary; responses to specific comments on the DEIR are addressed in Responses to Comments A7-42 through A7-101.

A7-42 The commenter is incorrect that the reduced building height alternative was rejected because it would provide less incentive to hotel or residential development. The analysis on Page 7-31 of the DEIR is intended to provide a summary of the alternative's ability to reduce environmental impact and achieve Project objectives.

The DEIR considered a reasonable range of alternatives. The selection of alternatives is based on their ability to reduce significant environmental impacts. The proposed Project's compliance with SEASP Section 7.2.14, Bird-Safe Treatments would ensure that impacts due to bird strike are less than significant. Three of the four alternatives consider a height limitation compared to the proposed Project; therefore an additional alternative to further reduce building height is not necessary and would not provide new meaningful information.

A7-43 Comment noted.

A7-44 Comment noted.

3. Response to Comments on the DEIR

- A7-45 Refer to Response to Comments A7-6 and A7-7. The SEASP was revised to ensure that the Shopkeeper extension would not impact delineated wetlands (see Hearing Draft May 2017). All future site development would be subject to compliance with federal laws and regulations governing wetlands, including the Clean Water Act. Clean Water Act regulations require an analysis of alternatives. In addition the mitigation measures required in the EIR, Section 5.8 of the SEASP requires new projects within the Coastal Habitat Wetlands and Recreation designation to submit an approved preliminary jurisdictional delineation or a biologist-signed declaration that no wetlands will be impacted by the development.
- Mitigation Measures BIO-1 through BIO-3 would mitigate impacts to wetlands. Mitigation Measure BIO-1 requires submittal of a biological report, including focused surveys. This report would be prepared once the development footprint of the site specific development is known (i.e. concurrent with submittal of development plans). Also it is important that an analysis is done when the actual development would occur in order include an accurate description of existing environmental conditions and potential impacts. The project applicant would be required to demonstrate complete avoidance or required permits from CDFW and USFWS.
- A7-46 The wetlands buffer is required pursuant to Section 5.10 of SEASP. The commenter states that the Shopkeeper Road extension should be considered a significant hydrology impact, but provides no reasoning or support for making this determination.
- A7-47 The DEIR analyzes the potential impacts of the uses allowed in the Coastal Habitat, Wetlands, and Recreation designation which provides for coastal restoration, access, visitor-serving recreation (includes boat storage), public access, interpretive centers, parking, and on-going oil operations. The analysis on Page 5.4-38 of the DEIR is intended to provide an example of an allowed use within this designation and its potential impacts. The proposed Specific Plan does not propose any site-specific development project; which would be required to go through a separate entitlement process.
- A7-48 Refer to Response to Comment A7-47. No boat storage facility is being proposed at this time.
- A7-49 The commenter provides suggestions on the Specific Plan. These comments will be forwarded to the decision-makers—Planning Commission and City Council—for their consideration. No site specific development is being proposed at this time. Land uses allowed with the Coastal Habitat, Wetlands, and Recreation designation have been properly analyzed throughout the DEIR. Refer to Response to Comment A7-14.
- A7-50 While the studies cited by the commenter are recognized, the context of the studies does not apply to areas of proposed change in the SEASP. Please see the Response to Comment A7-10 regarding overall lighting in the rezoning area. Additionally, the

3. Response to Comments on the DEIR

undeveloped areas adjacent to the areas of proposed change are not densely vegetated in the same manner as the focal areas in the study by Gelb and Delacretaz (2009). The undeveloped portions of the Specific Plan consist primarily of open areas with scattered palm trees and shrubbery amid short herbaceous and wetland vegetation, versus the urban parks with tall, mature trees in the aforementioned study.

Most bird migration (both diurnal and nocturnal) occurs at altitudes of 500 feet or greater (approximately 38 average-height building stories), and thus the risk of strikes is usually greatest when the birds descend to rest/forage or during inclement weather (Sheppard 2011, SFPD 2011). As such, the birds most susceptible to potential building strikes in the Project area are 1) locally resident species present throughout the year, and 2) migratory species that are using the Project area as stopover and/or wintering habitat, and may transit to/from and between habitat patches such as the Los Cerritos Wetlands Complex (LCWC). The bird-safe requirements in the SEASP recognize and are tailored to this context, requiring that building facades incorporate bird-safe treatments above the ground floor such that less than no more than 10 percent of the total area is untreated glazing (SEASP page 166). Most bird-safe guidance documents (e.g., SFPD 2011) recommend that such treatments occur up to a minimum of 60 feet in height, so the SEASP requirements actually go further (higher), i.e., to the maximum height of the proposed buildings. Regarding lighting, among other requirements, the SEASP stipulates that exterior lighting be shielded and downcast, and that interior lighting be minimized through the use of automated on/off systems. The SEASP also encourages building owners to follow bird-safe best practices and a lights out for birds regimen (SEASP page 167). See also Appendix C of this document.

It is recognized that birds may transit to/from and between patches of nearby habitat such as the LCWC, and the relevant bird-safe design requirements in the SEASP are included for this reason. It is assumed the birds using the LCWC may come and go from essentially any direction, and the bird-safe requirements and guidelines apply to all areas of proposed commercial zoning changes within the Project area (which are relatively discrete and largely contiguous). Therefore, specific animal movement studies for each building or individual development are not warranted.

- A7-51 The commenter is referring to the cumulative impact analysis, but is commenting on the Projects urban edge effects on the wetlands. These impacts were fully analyzed in Section 5.4.3 of the DEIR. There are no other cumulative development outside of the Specific Plan area that would combine to create urban edge effects in southeast Long Beach near the wetlands.
- A7-52 Project Design Feature PDF-BIO-3 (Section 5.10 of the SEASP) specifies design and maintenance requirements for wetland buffers that will minimize urban edge effects, specifically shielding the existing wetland from lighting, noise and human intrusion

3. Response to Comments on the DEIR

resulting from subsequent projects. Buffers are intended to consider all proposed development, including sidewalks and street improvements.

A7-53 The analysis and mitigation measures presented in the DEIR are intended to include all development, including sidewalks, and streets.

A7-54 It would not be feasible to restrict construction within SEASP to one project at a time. However, several construction-related mitigation measures have been included in the DEIR to ensure that impacts are reduced to the extent feasible. Cumulative construction impacts that may have an effect on biological resources were also analyzed in DEIR Sections 5.3.8 and 5.12.4.

A7-55 Refer to Mitigation Measures BIO- and BIO-2 which require additional studies concurrent with site development plans for development on or adjacent to undeveloped land and all land within the Coastal Habitat, Wetlands & Recreation designation. Also refer to Section 5.8 of SEASP. The commenters recommendation is already a requirement of the plan.

A7-56 Project Design Feature PDF-BIO-3 (Section 5.10 of the SEASP) specifies design and maintenance requirements for wetland buffers that will minimize urban edge effects, specifically shielding the existing wetland from lighting, noise and human intrusion resulting from subsequent project. Passive recreational uses are to be allowed within the area only if it can be shown that these uses will not adversely impact the wetland ecosystem or the buffer's function. These uses could include to bird watching, walking, jogging, and bike riding, and may include the construction of paths and interpretive signs and displays. All paths are to be constructed to minimize impact to plants and animals.

Construction-related impacts to the natural communities were analyzed under Impact 5.4-2 of the DEIR. Mitigation Measure BIO-4 addresses noise generated during construction and Mitigation Measure BIO-5 addresses shielding of nighttime lighting. With implementation of Mitigation Measure Bio-3, it would not be feasible or necessary to install a noise monitoring station during construction.

A7-57 The recommendation requested by the commenter is already required in accordance with the BMPs required as part of the NPDES permit and the City's LID Ordinance.

A7-58 The City acknowledges the commenters suggestion to create a "Southeast Area Wetlands Technical Advisory Committee" to develop a comprehensive mitigation policy for the SEASP wetlands and designating Wetland Conservation and Monitoring Fund standards. This comment will be provided to the decision-makers—Planning Commission and City Council—for their consideration of the Project.

3. Response to Comments on the DEIR

- A7-59 DEIR Section 5.4.1, *Environmental Setting*, Page 5.4-1 is hereby revised; added text is shown underlined and deleted text is shown in ~~strikeout~~:

Marine Mammal Protection Act

Marine Mammal Protection Act (MMPA) was enacted on October 21, 1972 to prohibit the take of marine mammals in U.S. waters. The MMPA protects all marine mammals. A person may not harass, fee, hunt, capture, collect, or kill any marine mammal or part of a marine mammal. A permit may be issued for incidental take under limited exceptions.

- A7-60 Several property owners in the SEASP area prepared their own jurisdictional delineations. These delineations were reviewed in the field and confirmed and form the basis for the overall delineation. Individual projects will be required to confirm the existing delineations or have a biologist certify that no delineation is necessary because no waters are present. The methodology for preparing the report is detailed on Page 5.4-13 of the DEIR. No changes the DEIR were made.

- A7-61 Page 5.4-9 is referring to state agencies, therefore the title was not changed. DEIR Section 5.4, *Biological Resources*, Page 5.4-10 is hereby revised; added text is shown underlined and deleted text is shown in ~~strikeout~~:

5.4.1.2 CURRENT PLANNING

Current planning efforts have resulted in focused consideration on the future of the remaining wetlands within the Project area. While the decisions regarding the future of the wetlands are still in flux, it is anticipated that the majority of the wetlands and potential wetlands will be protected in perpetuity from development. LCWA does not intend to allow development that is inconsistent with wetland preservation on its property. Synergy Oil is in the process of creating a wetland mitigation bank and does not intend to develop on its property. The City of Long Beach, which owns Marketplace Marsh, is also contemplating the establishment of a wetland mitigation bank on this parcel and, if so, would not allow development inconsistent with the banking operation or existing oil extraction operations on its property. These three properties comprise the majority of the undeveloped wetlands in the Project area. Bryant properties, are anticipated to be sold to LCWA and included in the Los Cerritos Wetland Complex. The remaining wetlands identified in this report may undergo some form of development.

LCWA has prepared a Conceptual Restoration Plan to restore the wetlands by creating ideal hydrology and soil conditions. Wetland habitat presently exists on portions of the site, but is desired to occupy all appropriate areas, and be complemented by transitional and upland habitat along the perimeter. The plan requires a connection to reliable and relatively unrestricted seawater sources. The restoration plan is in progress and is operating independently of the SEASP process.

3. Response to Comments on the DEIR

- A7-62 The change was not made the table differentiates between developed and undeveloped land in the Project area.
- A7-63 Sims' Pond is characterized properly on Page 5.4-17 of the DEIR. No change was made.
- A7-64 The DEIR describes the eel grass and native wetlands habitat on Page 5.4-18 of the DEIR. No change was made.
- A7-65 It is unclear what the commenter is requesting.
- A7-66 DEIR Section 5.4, *Biological Resources*, Page 5.4-19 is hereby revised; added text is shown underlined and deleted text is shown in ~~strikeout~~:

Marketplace Marsh

The Marketplace Marsh, about 35 acres, is currently owned by the City of Long Beach. A jurisdictional delineation report prepared by AECOM in 2012 documented 21.8 acres of Coastal Commission CDFW-jurisdictional and 19.9 acres of Corps jurisdictional wetlands.

Over 90 percent of the Waters of the U.S. identified in Marketplace Marsh were southern brackish marsh (12.69 acres) and southern coastal saltmarsh (6.0 acres). Other vegetation consisted of alkali meadow, mulefat scrub and southern willow scrub. All wetland communities in the marsh were degraded and disturbed. Habitat types are mapped on Figure 10, *Marketplace Marsh Vegetation*, of the biological resources assessment included as Appendix D of the DEIR. A list of plant and wildlife species observed in Marketplace March are provided in Tables 4.2-1 and 4.2-2, respectively, of the biological resources assessment (Appendix D of the DEIR).

- A7-67 DEIR Section 5.4, *Biological Resources*, Page 5.4-20 is hereby revised; added text is shown underlined and deleted text is shown in ~~strikeout~~:

The wetlands support dominant stands of cordgrass and two species of pickleweed that provide microenvironments for algae, juvenile fish, and crustaceans and nesting of certain birds, such as Belding's savannah sparrow, a ~~state~~federally listed endangered species. At the invertebrate and microscopic levels, the wealth and diversity of species, despite the twice daily foraging by shore birds, is characteristic of a long-standing, healthy mudflat-estuarine ecosystem.

- A7-68 DEIR Section 5.4, *Biological Resources*, Page 5.4-25 is hereby revised; added text is shown underlined and deleted text is shown in ~~strikeout~~:

LCWA Wetlands

LCWA Wetlands, ~~encompassing three areas adjacent to the San Gabriel River and~~ totaling about 67 acres, comprise several habitat types: mulefat scrub, ruderal wetlands,

3. Response to Comments on the DEIR

salt flat, southern coastal brackish marsh, southern coastal salt marsh, and alkali meadow.

- A7-69 Figure 5.4-4 of the DEIR will be revised to show the wetland habitat areas.
- A7-70 Page 33 of SEASP identifies the area referred to by the commenter as a retaining basin owned by the Orange County Flood Control District, also described as the Los Alamitos Retarding Basin. A pump station in the basin pumps stormwater into the San Gabriel River. When the pump station cannot keep up with the inflow excess water is stored in this basin until it can be discharged. The City acknowledges that a new pump station will be constructed southwesterly of the existing pump station at the Los Alamitos Retarding Basin. The Project will nearly double the capacity of the existing pump station. The Project, which is independent of SEASP, consists of a new containment structure, intake structure, control room, new pumps and natural gas engines, new control panels, back-up fuel support systems and other equipment. No change to the text is necessary.
- A7-71 The Alamitos Bay delineation and its adjacency to the mouth of Steamshovel Slough is shown on Figure 15 of the biological resources assessment (Appendix D of the DEIR). See also Response to Comment A7-69.
- A7-72 The commenter is incorrect; the reference is not a typo. The biology section refers to Table 4.2-7 which lists plants surveyed on the Project site—Australian Saltbrush, Ripgut Brome, Red Brome, Hottentot Fig, Alkali Weed, Seashore Saltgrass, Alkali Heath, Sea-Lavender, Dwarf Glasswort, American Glasswort, Seablite. The proposed Project does not propose any development on this parcel.
- A7-73 The biological analysis was completed prior to the publication of the journal article mentioned by the commenter. No change is necessary.
- A7-74 Comment noted. Alamitos Bay is outside of the Project area. No change is necessary.
- A7-75 Regulations concerning mineral resources and oil operations on the Project site are provided in Section 5.11, *Mineral Resources*, of the DEIR. Additionally, impacts related to future wetlands restoration is outside of the scope of this Program EIR. No change is necessary.
- A7-76 This statement was based on the biologists' observations. No change is necessary.
- A7-77 Comment noted.
- A7-78 The discussion of existing wildlife movement corridors in Section 5.4.1.5 of the DEIR is based on the biological resources assessment prepared for the Project (Appendix D of the DEIR).

3. Response to Comments on the DEIR

- A7-79 The commenter provides no justification for these revisions. No changes are necessary.
- A7-80 DEIR Section 5.4, *Biological Resources*, Page 5.4-34 is hereby revised; added text is shown underlined and deleted text is shown in ~~strikeout~~:

Regional Wildlife Movement

The Pacific Flyway is a major north-south flyway for migratory birds in America, extending from Alaska to Argentina and Chile. Migratory birds travel on an annual migration some or all of this distance both in spring and in fall. The Los Cerritos Wetlands are part of this migration, providing food and resting places; some species seek breeding grounds onsite.

Other wildlife movement within the region is limited to the San Gabriel River and other drainage corridors, such as Los Cerritos Channel. The majority of the Project area and its surroundings are developed with residential, commercial, and industrial development. This developed area surrounds the open space and wetland areas of the Project. Additionally, the Project boundaries are surrounded by urbanized development and, with the exception of the trail along the San Gabriel River, these land uses do not provide access to larger open space areas for larger mammals.

- A7-81 The Shopkeeper Road extension is part of the Project, however, no site specific development is being proposed at this time. The intent of the Specific Plan is provide allowed land uses, circulation, etc., to guide future development.
- A7-82 Refer to Response to Comment A7-6.
- A7-83 The reference for this statement was provided by the American Bird Conservancy, Bird-Friendly Building Design, (https://abcbirds.org/wp-content/uploads/2015/04/Bird-friendly_Building_Guide_WEB.pdf).
- A7-84 Comment noted.
- A7-85 The commenter does not explain which storm drains are missing from Figure 5.9-2 or how this map is inadequate. No change is necessary.
- A7-86 A formal wildlife movement study was not prepared for the SEASP area based on the fact that it is a highly urbanized area. Animals associated with urban settings are expected to occur, in addition to migratory bird species associated with the Pacific Flyway.
- A7-87 Responses to the comments on the tables in Appendix D are listed below:
- Table 4.2-3 is specifically relating to the Synergy Property.

3. Response to Comments on the DEIR

- Table 4.2-5 is based on a report by Tidal Influence (2012) and the species list is taken verbatim from that report.
- Table 4.2-7 this table is quoting the Endemic Environmental Services Report verbatim.
- Table 4.2-8 – The information in this table is taken from published biological reports by several consulting firms.
- Table 4.4-6 This heading will be changed to Animal Species Observed.

A7-88 As requested by the commenter the following typographical errors have been revised; added text is shown underlined and deleted text is shown in ~~strikeout~~:

- Page 5.4-10: The Project area is a stand-alone section of the City's LCP, which was certified by the Coastal Commission in 1980.
- Page 5.4-27: Open Water habitats include the San Gabriel River, Los~~El~~ Cerritos Channel/Steamshovel Slough, Bahia Marina, and the Haynes Cooling Channel.
- Page 5.4-32: Riparian areas in the Project area include the San Gabriel River, Los~~El~~ Cerritos Channel/Steamshovel Slough, Bahia Marina, and the Haynes Cooling Channel. Habitats along San Gabriel River, El Cerritos Channel, and the Haynes Cooling Channel are channelized within the Project area.
- Page 5.4-40: Additionally, landscaping within 500 feet of natural areas like the edge of Shopkeeper Road shall consist of California Native species or varieties that will not invade habitat or hybridize with existing native vegetation to create a more seamless transition between the natural wetlands and development (per CalGreen and Cal-IPC standards) (SEASP Section 7.1.5).

A7-89 The typographical error on Page 5.4-43 has been revised; added text is shown underlined and deleted text is shown in ~~strikeout~~:

Riparian habitats found within the Project area include the San Gabriel River and, to lesser extent, the Los~~El~~ Cerrito Channel and Haynes Cooling Channel.

A7-90 The typographical error on Page 5.4-45 has been revised; added text is shown underlined and deleted text is shown in ~~strikeout~~:

The cumulative study area for biological resources is the southeast Long Beach area consisting of the~~an~~ urbanized uses.

A7-91 Refer to Response to Comment A7-42.

3. Response to Comments on the DEIR

- A7-92 Refer to Response to Comment A7-6.
- A7-93 Refer to Response to Comments A7-47 and A7-49.
- A7-94 Refer to Response to Comment A7-50.
- A7-95 Refer to Response to Comments A7-53 and A7-55.
- A7-96 Refer to Response to Comment A7-54.
- A7-97 This is already a requirement of the SEASP and DEIR. Refer to Response to Comment A7-55.
- A7-98 Refer to Response to Comment A7-56.
- A7-99 Refer to Response to Comment A7-57.
- A7-100 Refer to Response to Comment A7-58.
- A7-101 The City acknowledges receipt of the attachments and references submitted by the commenter and will forward these items to the decision makers.
- A7-102 Comment is noted regarding Mr. Tom Brohard's credentials; no further response is necessary.
- A7-103 This comment claims that only one of the 15 significant transportation impacts would be mitigated and that additional impacts would be identified if a weekend assessment is completed. As noted in Response to Comment A7-18 above, the available Caltrans PeMS data indicates that weekend peak traffic in this area is less than weekday peak traffic as such, less impacts would likely occur during the weekend compared to the weekday.

Refer to Response to Comment A7-20. It should be noted that mitigation is identified for all of the impacted locations. The significance findings in the study reflect specific conditions that occur in the area, for example potential to impact wetland areas or facilities that the City does not control (such as impacts to Caltrans or City of Seal Beach intersections). As such, there are potentially feasible mitigation measures but those will need approval from external agencies.

The comment also identifies that an alternative to the proposed Project that does not create any significant traffic impacts must be considered. It should be noted that, under the Cumulative No Project Condition, ten study intersections are projected to operate unacceptably. As such, any project that adds traffic to these intersections will likely cause an impact. As such, the only project alternative that would not have any traffic impacts would be the No Project/No Development Alternative.

3. Response to Comments on the DEIR

- A7-104 According to Table 3-2 and text on Page 3-13, buildout of the Specific Plan would result in a net increase of 5,439 dwelling units, 573,576 square feet of commercial uses, and 50 hotel rooms, contrary to the numbers described by the commenter. The comment states that development increases must be tempered and reduced to eliminate the number of significant traffic impacts that are forecast to occur. Note that a Reduced Intensity Alternative was analyzed in Section 7.6 of the DEIR. As discussed in Response to Comment A7-103, there numerous impacted locations under the No Project scenario which reflect that many of the identified impacts would occur if the area had no new development.
- A7-105 The comment summarizes the increase in trip generation associated with the Project. As noted, the Project will increase traffic in the study area. The traffic study (Appendix J1 of the DEIR), beginning on Page J1-36, discusses the trip generation estimates for the proposed Project and, as noted in the study and Section 5.16, *Transportation and Traffic*, of the DEIR, several significant Project impacts have been identified due to traffic from the proposed Project.
- A7-106 Refer to Response to Comment A7-18 regarding weekend trips. As described, weekday baseline and trip generation are higher than weekend conditions and provide the worst case analysis for determining the Project's traffic impacts.
- A7-107 Refer to Response to Comments A7-18 and A7-106.
- A7-108 The comment discusses the implementation of mitigation measures for the Project. The comment notes that Section 9.3.2 of the specific plan does identify phasing for improvements to the transportation system. The comment goes on to identify that the phasing information is not specific enough to provide value in determining when construction of various mitigation measures would be required and suggests that an interim assessment should have been completed.
- CEQA requires that the Project's impact to the existing environment be identified and that the Project's cumulative impacts be identified. As such, the scenarios evaluated are consistent with CEQA requirements. The timing triggers for each of the mitigation measures are provided in the language of the mitigation measure itself. For example, Mitigation Measure TRAF-1 is required prior to issuance of building permits and TRAF-2 is required during processing of applications for development projects. Since, many of the impacted locations are operating at a deficient level under Existing Conditions; improvements are triggered prior to any development. Also, the Specific Plan does identify the formation of a fee program to assist with collecting fair share contributions for the identified improvements which should be one of the early implementation measures.
- A7-109 The comment discusses the significant impacts identified in the traffic study and notes that significant impacts at most of the study intersections cannot be mitigated.

3. Response to Comments on the DEIR

Additionally, the comment discusses the potential for additional impacts on weekends. Please see response to Comment A7-18 above related to potential Project impacts on weekends. Additionally, please see Response to Comments A7-20 and A7-103 regarding impacts where mitigation has been identified but the impacts have been classified as significant and unavoidable as there are circumstances outside of the City's control that may limit their ability to implement the mitigation measure (such as the need for approval from an external agency or the potential to impact wetland habitat in the area).

- A7-110 The comment is noted that many impacts have been identified as significant and unavoidable as the facility is outside of the control of the City. It also identifies that, if Caltrans relinquishes any facility to the City, then the mitigation would be feasible as it would be controlled by the City. Comment noted. Note that the finding is a CEQA requirement under CEQA Guidelines Section 15091(a)(2) and does not necessarily indicate that the mitigation measure will not be implemented.
- A7-111 The commenter states that all feasible mitigation measures should be considered as part of the environmental document. The recommended improvements and geometries at each of the significantly impacted intersections were analyzed and provided in Section 5.16.7 of the DEIR (see also Table 5.16-20). The analysis and justification for each finding was provided in Section 5.16.8 of the DEIR, and Section 12 of the traffic study (Appendix J1 of the DEIR).
- A7-112 The comment notes that the Project should be responsible for implementing feasible mitigation measures and that a reduced intensity alternative should be considered. Please see Response to Comment A7-104.
- A7-113 The TDM Plan (Appendix J2) along with Section 5.16, *Transportation and Traffic*, of the DEIR was recirculated for public review. Refer also to Response to Comment A18-8 and A18-10.
- A7-114 This comment discusses research completed by ITE that TDM can have a significant reduction on trip generation; especially related to commute-based trips. The comment is correct that TDM can be effective if implemented correctly; however, the ITE manual for trip reduction related to TDM programs relies on limited data points. Current state of the practice related to quantifying reductions associated with TDM programs is the CAPCOA document. Refer also to Response to Comment A18-8 and A18-10.
- A7-115 Refer to Response to Comment A7-23.
- A7-116 Refer to Response to Comment A7-24.
- A7-117 Please see Response to Comment A7-24 related to how delay can decrease when the Project adds traffic to movements with less than average delay. Responses to the

3. Response to Comments on the DEIR

comment regarding technical errors are also provided in Response to Comments A7-118 through A7-124.

- A7-118 Refer to Response to Comment A7-24 related to how delay can go down when traffic is added to movements with below average delay. Additionally, review of the technical analysis did indicate an error in the volume entry at the Channel Drive and Pacific Coast Highway intersection under both the Existing Plus Project and Cumulative Plus Project condition. The updated technical calculations are provided in Appendix B, but the corrected calculations at this location indicate that the Project is expected to operate at LOS A or LOS B during peak hours during the Existing Plus Project and Cumulative Plus Project conditions.
- A7-119 Refer to Response to Comments A7-24 and A7-118.
- A7-120 Refer to Response to Comments A7-24 and A7-118.
- A7-121 Refer to Response to Comment A7-118 related to the revised assessment at this location.
- A7-122 Refer to Response to Comment A7-118 related to the revised assessment at this location.
- A7-123 Refer to Response to Comment A7-24. This comment is referring to a location where the Project adds traffic to movements with below average delay.
- A7-124 Refer to Response to Comment A7-24. This comment is referring to a location where the Project adds traffic to movements with below average delay.
- A7-125 This comment has been addressed in Responses to Comments A7-102 through A7-124.
- A7-126 See response to Comment A7-102.
- A7-127 See response to Comment A7-103.
- A7-128 See response to Comment A7-104.
- A7-129 See response to Comment A7-105.
- A7-130 See response to Comment A7-106.
- A7-131 See response to Comment A7-107.
- A7-132 See response to Comment A7-108.
- A7-133 See response to Comment A7-109.
- A7-134 See response to Comment A7-110.

3. Response to Comments on the DEIR

- A7-135 See response to Comment A7-111.
- A7-136 See response to Comment A7-112.
- A7-137 See response to Comment A7-113.
- A7-138 See response to Comment A7-114.
- A7-139 See response to Comment A7-115.
- A7-140 See response to Comment A7-116.
- A7-141 See response to Comment A7-117.
- A7-142 See response to Comment A7-118.
- A7-143 See response to Comment A7-119.
- A7-144 See response to Comment A7-120.
- A7-145 See response to Comment A7-121.
- A7-146 See response to Comment A7-122.
- A7-147 See response to Comment A7-123.
- A7-148 See response to Comment A7-124.
- A7-149 See response to Comment A7-125.

3. Response to Comments on the DEIR

A8. Response to Comments from Naples Improvement Association, dated August 18, 2016 (Appendix A1, page A1-82).

A8-1 The commenter expresses concern over the added traffic resulting from the Project and its impact to the Naples community and the intersection of 2nd Street at Pacific Coast Highway (PCH). Please also note that the Specific Plan plans for the Shopkeeper extension and the DEIR includes Mitigation Measure TRAF-2 requiring analysis and improvements to signal timing of 2nd Street through Naples. The City acknowledges the comments and will forward these comments to decision-makers—Planning Commission and City Council—for their consideration of the Project.

3. Response to Comments on the DEIR

A9. Response to Comments from Naval Weapons Station, Seal Beach, dated July 21, 2016 (Appendix A1, page A1-83).

A9-1 The commenter is correct regarding the mislabeling identified on Figure 3-2 of the DEIR. This figure will be revised for the Final EIR.

3. Response to Comments on the DEIR

A10. Response to Comments from Regional Hispanic Chamber of Commerce (undated) (Appendix A1, page A1-84).

A10-1 The commenter provides support of the Specific Plan and DEIR. The City acknowledges the comments and will forward these comments to decision-makers—Planning Commission and City Council—for their consideration of the Project.

3. Response to Comments on the DEIR

A11. Response to Comments from Sacred Places Institute for Indigenous Peoples, dated September 19, 2016 (Appendix A1, page A1-85).

A11-1 On behalf of the City, McKenna et al. sent requests for consultation to 18 tribal representatives on December 3, 2015 as part of that firm's preparation of a cultural resources overview and Sacred File Land Search. Tribal contact information was supplied by the Native American Heritage Commission (NAHC). McKenna et al. received four official responses; two from Juaneno representatives and two from Gabrielino representatives. The referenced response from the United Coalition to Protect Panhe noted that the Project area is considered part of the Juaneno traditional territory and expressed a desire to be kept informed of the results of subsequent cultural investigations. The representative requested no further consultation related to the proposed Project and only asked to be consulted on a project-by-project basis. As described in Chapter 3, *Project Description*, of the DEIR, the Specific Plan is a programmatic, long-range land use plan for the Project area—not a development project—adoption of the proposed Specific Plan does not include approval of any specific development, redevelopment, or infrastructure project.

Additionally, the City conducted Native American consultations pursuant to SB 18 and AB 52. The City received a list of tribal contacts made up of tribal contacts under both of the consultation processes from NAHC and written requests from tribal councils in 2015, consisting of 10 tribal representatives. Letters requesting consultation were mailed out to these representatives on December 8, 2015. The City received two responses, both of which requested tribal monitoring during ground disturbing activities.

In summary, several responses from tribal representatives indicated the sensitivity of the Project area for tribal cultural resources, requested the presence of Native American monitors, and requested notification of future development projects proposed within the Project area. However, none of the responses requested formal consultation with the City of Long Beach. Section 5.5, *Cultural Resources*, of the EIR acknowledged the sensitivity for tribal cultural resources in the Project area and found that grading and development activities could uncover tribal cultural resources resulting in a potentially significant impact. Mitigation Measures CUL-3 through CUL-5 were proposed to reduce these impacts to less than significant. As requested by the Tribes, Mitigation Measure CUL-4 requires a Native American monitor during ground disturbing activities.

3. Response to Comments on the DEIR

A12. Response to Comments from Sanitation Districts of Los Angeles County, dated September 19, 2016 (Appendix A1, page A1-87).

A12-1 Page 5.17-1 of the DEIR is revised; added text is shown underlined and deleted text is shown in ~~strikeout~~:

Regulatory Background

Local

County Sanitation Districts of Los Angeles County

Capital improvements to the Los Angeles County Sanitation District's (LACSD) water reclamation plants are funded from connection fees charged to new developments, redevelopments, and expansions of existing land uses. LACSD is 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 quantified of wastewater discharged from connected facilities. The connection fee is a capital facilities fee used to provide additional conveyance, treatment, and disposal facilities (capital facilities) required by new users connecting to the LACSD's sewerage system or by existing users who significantly increase the quantity or strength of their wastewater discharge. The fee is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed Project. The Connection Fee Program ensures that all users pay their fair share for any necessary expansion of the system. Estimated wastewater generation factors used in determining connection fees in LACSD's 22 member districts are set forth in the Connection Fee Ordinance for each respective district available on LACSD's website. Most of the City of Long Beach, including the Project area, is in District 3 of the Sanitation District; (LACSD 2016a)

A12-2 The City acknowledges that LACSD reviews individual development projects within the Project area to determine whether there is sufficient trunk sewer capacity to serve the Project as part of its Will Serve process.

A12-3 Page 5.17-6 of the DEIR is revised; added text is shown underlined and deleted text is shown in ~~strikeout~~:

Wastewater Treatment

Wastewater from the City of Long Beach is treated at LACSD's Joint Water Pollution Control Plant (JWPCP) in the City of Carson and Long Beach Water Reclamation Plant (LBWRP) in the City of Long Beach.² The JWPCP has capacity of 400 mgd and, in 2014, treated average daily flows of about 263 mgd; it currently processes an average flow of 256.8 mgd. The LBWRP has capacity of 25 mgd and, in 2014, treated average

² The Project area is in LACSD District 3, which is within the sewer shed of the JWPCP (LACSD 2016a; LARWQCB 2011).

3. Response to Comments on the DEIR

daily flows of about 15.6 mgd (LACSD 2015b); it currently processes an average flow of 13.9 mgd. Treated effluent from the JWPCP is discharged through an ocean outfall pipe. Nearly 6 mgd of treated wastewater from the LBWRP is used for irrigation, groundwater recharge, and re-pressurization of oil-bearing rocks; the remainder is discharged to Coyote Creek (LACSD 2016b).

Page 5.17-11 of the DEIR is revised; added text is shown underlined and deleted text is shown in ~~strikeout~~:

Both wastewater treatment plants serving the Project are have adequate capacity to treat the increase in sewer generation associated with the proposed Project. JWPCP currently has a remaining capacity of 143437 mgd and LBWRP has a remaining capacity of 11.194 mgd. The proposed Project has the potential to increase sewer flows by 1.16 mgd. Therefore both JWPCP and LBWRP have adequate remaining treatment capacity to serve the Project at buildout.

A12-4 Figure 5.17-2 in the DEIR has been revised.

A12-5 The analysis of sewer impacts and preparation of the Infrastructure Technical Report (Appendix H of the DEIR) were prepared by Fuscoe Engineering in coordination with LACSD. Following receipt of this comment letter, Fuscoe again coordinated with LACSD to provide and receive further clarification related to the pumping plants and to correct inconsistencies in the report. Revisions to the Infrastructure Technical Report are provided in Appendix E of this document. Revisions to Section 5.17.1, *Wastewater Treatment and Collection*, of the DEIR to reflect the changes in the report have been incorporated; added text is shown underlined and deleted text is shown in ~~strikeout~~:

Page 5.17-2:

Existing Conditions

Sewers

The sewer system serving the Project area is extensive and includes a variety of pipe sizes ranging from 2- to 27-inches including numerous force mains. There is approximately 103,345 linear feet (LF) of pipe of 8-inches diameter or less; 14,400 LF of pipe ranging from 10- to 12-inches diameter, and 15,925 LF of sewer pipe 15-inches diameter or greater. The sewer system is operated and maintained by the City of Long Beach Water Department (LBWD) and the Los Angeles County Sanitation District (LACSD). Typically, the LBWD owns and operates sewer lines 15-inches or smaller while LACSD owns and operates the lines 15-inches or greater within the Project area. The primary sewer systems include LACSD's sewer system draining northerly along Pacific Coast Highway (15- to 18-inches ceramic) and the sewer system (18- to 21-inches ceramic) along Colorado Street draining westerly. There are also two LACSD pumping plants within the study area to assist with the conveyance of sewerage flows along the

3. Response to Comments on the DEIR

Pacific Coast Highway corridor. Sewer lines serving several portions of the Project area are described below and shown on Figure 5.17-1, *Existing Sewer System*.

Page 5.17-5, 1st two bullets:

- The hotel and surrounding area on the east side of PCH north of Los Cerritos Channel, The Mixed Use Marina, is served primarily by 8-inch City lines. These lines ultimately discharge to an 18-inch City line and then into the 15-inch LACSD trunk line along PCH. This area includes Marina #1 Pumping Plant.
- Marina Pacifica, the Marketplace, and Marina Shores areas are served by a combination of City and LACSD sewer facilities. City lines throughout the area range from 8- to 12-inches and ultimately tie into the 15-inch LACSD trunk line along the southern portion of PCH. This area includes Marina #2 Pumping Plant.

Page 5.17-5, “Sewer Flow Capacity,” last two paragraphs:

LACSD has identified a few segments along the PCH corridor where maximum peak flows have almost reached ~~exceeded~~ their specific design criteria. Such findings do not warrant immediate replacement or upsizing but rather allows LACSD to effectively monitor these lines more closely. They also assist LACSD in identifying which sewer lines may require additional study as growth occurs.

LACSD also has mechanisms in place that account for proposed sewer demand changes related to General Plans, Specific Plans, and individual projects. This information is use to issue will-serve letters for individual projects, establish connection fees and also helps LACSD determine when the lines will need to by upsized in the future.

Page 5.17-7, Impact 5.17-1:

Impact Analysis: Specific Plan buildout is forecast to increase wastewater generation from the Project area by 1.16 mgd, as shown below in Figure 5.17-2, *Proposed Sewer Demands*. The increase in flows are generally focused within the proposed Mixed Use Community Core and Mixed Use Marina land use areas, thereby potentially impacting numerous city sewer lines and LACSD trunk lines within these areas.

Long Beach Water Department Sewer System

It is anticipated that several of the 8-inch sewer lines serving the Mixed Use Community Core and the Mixed Use Marina will require upsizing to 10- or 12-inch lines dependent upon the size, density and location of the individual projects. The requirement to evaluate existing lines and determine if upsizing is required is covered in the LBWD Sewer Design Guidelines.

3. Response to Comments on the DEIR

All sanitary sewers must be designed in accordance with certain design standards, Long Beach Water Department (LBWD) Rules and Regulations, and to accepted engineering principles. In all newly development areas and/or in all existing areas where new sanitary sewers are required, the design must include the provisions that the sewer systems' size and capacity can adequately accommodate the ultimate anticipated conditions.

Flow monitoring and sewer capacity studies ~~are~~ ~~is~~ required under certain scenarios. These include when a proposed development intensifies the land use from the existing development on the site or a proposed development requires a general plan amendment to a more intense use. Typically, the modeling of an "existing condition" scenario will be compared to an "existing condition with proposed development" scenario to determine any significant increases in sewer flows. The capacity study is to ensure the sewer system can accommodate a proposed development, and if it cannot, to identify improvements required for the development. The developer is required to cover the costs associated with flow monitoring, sewer capacity study, and sewer modeling.

Proponents of projects developed pursuant to the Specific Plan may need to make improvements to the sewer system at their own cost and request reimbursement agreement to recover a portion of the costs from other developments that tie into the system and benefit from the improvements. These agreements typically run about 20 years and are not guaranteed to be paid in full.

Los Angeles County Sanitation District's Sewer System

In addition to impacts to the LBWD sewer system, impacts ~~could~~ ~~may~~ occur to the LACSD trunk lines and pumping plants, which provide regional sewer service and collect flows from the tributary LBWD sewer lines. Maximum peak flow data and maximum design capacities ~~were~~ ~~was~~ obtained from LACSD to evaluate long term impacts. LACSD trunk lines serving the site are designed to accommodate on average over 3.26 mgd, and the maximum flow rates from 2007-2012 averaged approximately 1.15 mgd, indicating there is sufficient regional capacity to accept the 1.16 mgd projected increase. ~~The addition of the 1.11 mgd to the existing trunk lines would not increase the flows beyond the total design capacity of these larger trunk lines, and implementation of the Project would not impact the regional system.~~

However, numerous trunk lines serve the PCH corridor and Colorado Street and individual LACSD trunk lines could potentially be impacted dependent upon the individual project locations. Implementation of the Specific Plan may require upsizing to an individual trunk line. To prevent sewer lines from reaching their maximum capacity, LACSD has regional mechanisms and databases in place to track growth projections, changes in land use, and flow monitors to determine if certain trunk lines may be impacted in the future. In addition, all site specific flow monitoring required by LBWD is provided to LACSD so they can track the capacity of the lines connecting with

3. Response to Comments on the DEIR

LACSD trunk lines within a certain region. Through this process, long term capacity is monitored closely to determine when trunk lines are nearing their design capacity. If LACSD identifies that, over time, specific trunk lines are nearing their design capacity, the line will be added to their comprehensive Capital Improvement Project list for future upgrade.

Based on correspondence with LACSD, the addition of 1.16 MGD would impact the ability of three existing pumping plants (two within the Project area in PCH) and one upstream and outside of the Project area in Colorado Blvd) to accommodate the increase in sewer flows. The current capacity of the three pumping plants is not sufficient to accommodate the full build out of the proposed plan and the increase of 1.16 MGD. Since the proposed land plan changes are anticipated to occur over many years, it provides sufficient time for planning and design to evaluate the ability to expand the capacities of the existing pumping stations and/or add new pumping stations as the proposed land uses are converted into actual projects. As projects are built in accordance with the proposed land use changes, LACSD will evaluate the pump stations and identify means to either upgrade the existing pumping stations or add new pumping stations through the connection fees specific to the service region. In addition, an individual developer may also be required to build a new pumping station in accordance with LACSD design standards to offset impacts on the existing conveyance and pumping station systems; partial reimbursement may be available based on future connection fees in the region.

Project applicants are required to pay their fair share fees for any necessary expansion of the sewer system pursuant to LACSD's Connection Fee Program. If upgrades are required, conformance with the General Construction Permit for Linear Projects would be followed which serves to reduce the impacts of construction through the use of sediment and erosion based best management practices (BMPs).

Page 5.17-12, Impact 5.17-2:

Both wastewater treatment plants serving the Project are have adequate capacity to treat the increase in sewer generation associated with the proposed Project. JWPCP currently has a remaining capacity of 137 mgd and LBWRP has a remaining capacity of 9.4 mgd. The proposed Project has the potential to increase sewer flows by 1.16 mgd. Therefore both JWPCP and LBWRP have adequate remaining treatment capacity to serve the Project at buildout.

Implementation of the Southeast Area Project would not require upsizing of the LACSD treatment plant facilities as the trunk lines serving the site are designed to accommodate on average over 3.26 mgd. The maximum flow rates from 2007-2012 averaged approximately 1.15 mgd. The addition of the 1.16 mgd to the existing trunk

3. Response to Comments on the DEIR

lines would not increase the flows beyond the total design capacity of these larger trunk lines nor would it exceed the design capacity of the wastewater treatment plants.

~~There are a variety of LACSD trunk lines serving the Project area including main lines and relief lines along PCH and Colorado Blvd. In total, there is sufficient capacity to accommodate the entire SEASP sewer increase projection. However, individual trunk lines may be impacted dependent upon the orientation and sewer loadings of the specific projects within SEASP. LACSD tracks and monitors the capacity of their trunk lines through flow tests and projected sewer flows. In the event a particular trunk line is identified as nearing design capacity over time, LACSD would include the particular line to its capital improvement project list. LACSD can also request that the SEASP projects modify their sewer alignment to tie into a different LBWD line that does not impact the specific LACSD trunk line. Through these requirements, LACSD can commit to providing sufficient sewer capacity for the proposed Project and impacts related to sewer treatment capacity would be less than significant~~

- A12-6 The DEIR assumes year 2035 as the anticipated buildout of the Specific Plan. However, the City acknowledges that development projects as they are proposed would be required to be reviewed by LACSD to ensure adequate truck sewer capacity. Please also refer to Response to Comment A12-5.

3. Response to Comments on the DEIR

A13. Response to Comments from State Clearinghouse, dated August 19, 2016 and September 19, 2016 (Appendix A1, page A1-89).

A13-1 This portion of the letter from the State Clearinghouse establishes the 60-day public review period on the DEIR. No further response is necessary.

A13-2 The State Clearinghouse submitted comments by the Department of Transportation. These comments were addressed in Responses to Letter A3.

3. Response to Comments on the DEIR

A14. Response to Comments from State Coastal Conservancy, dated September 16, 2016 (Appendix A1, page A1-97).

A14-1 The commenter provides a background on the agency and their interest in the Los Cerritos Wetlands complex. No further response is necessary.

A14-2 A full analysis of impacts to biological resources resulting from the Project, including the Shopkeeper extension is addressed in Section 5.4-4, *Biological Resources*, of the DEIR. The proposed Specific Plan is a long-term planning document to guide future development. No site specific development is proposed at this time and the exact footprint or alignment of the Shopkeeper extension is unknown. However, as shown in Figure 5.4-5 in Section 5.4, *Biological Resources*, of the DEIR, the small amount of wetland could be affected by Shopkeeper Road extension is ruderal, meaning that it is highly disturbed and contains nonnative plants. Furthermore, the area currently features above-ground fuel tanks, above-ground pipelines, and pump-jacks used for oil extraction. An extension of Shopkeeper Road would be expected to have minimal impact, if any, on the viability of the surrounding wetlands as habitat. Adherence with Mitigation Measures BIO-1 and BIO-2 would ensure that adverse impacts to wetland habitats would be avoided to the extent feasible. Where wetland avoidance is not possible, project applicant would be required to 1) obtain permits from the California Department of Fish and Wildlife and United States Fish and Wildlife Service (see Mitigation Measure BIO-1), and 2) ensure “no net loss of wetlands either by creation of applicant-sponsored wetlands or purchase of mitigation bank credits in consultation with applicable Federal- and State- agencies” (see Mitigation Measure BIO-2). As a result, impacts would be less than significant with incorporation of these mitigation measures.

Wetland buffers are required as described in Section 5.10 of the SEASP.

A14-3 Refer to Response to Comment A14-2. Also note that proposed sidewalks would occur within the existing roadway right-of-way.

3. Response to Comments on the DEIR

A15. Response to Comments from United Coalition to Protect Panhe, dated September 19, 2016 (Appendix A1, page A1-99).

A15-1 The City conducted Native American consultations pursuant to SB 18 and AB 52. The City received a list of tribal contacts made up of tribal contacts under both of the consultation processes from NAHC and written requests from tribal councils in 2015, consisting of 10 tribal representatives. Letters requesting consultation were mailed out to these representatives on December 8, 2015. The City received two responses, both of which requested tribal monitoring during ground disturbing activities.

Responses from tribal representatives indicated the sensitivity of the Project area for tribal cultural resources, requested the presence of Native American monitors, and requested notification of future development projects proposed within the Project area. However, none of the responses requested formal consultation with the City of Long Beach. Section 5.5, *Cultural Resources*, of the DEIR acknowledged the sensitivity for tribal cultural resources in the Project area and found that grading and development activities could uncover tribal cultural resources resulting in a potentially significant impact. Mitigation Measures CUL-3 through CUL-5 were proposed to reduce these impacts to less than significant. As requested by the Tribes, Mitigation Measure CUL-4 requires a Native American monitor during ground disturbing activities.

The City made several attempts to meet with the commenter to further address her concerns. City staff submitted a request to consult on October 24, 2016, November 15, 2016, and November 21, 2016. No response was received.

A15-2 The Cultural Resources Overview (Appendix E of the DEIR) reviewed and analyzed past cultural resources reports on and near the 1,472-acre Project area to understand the potential for impacts to paleontological, archaeological, tribal cultural, and historical resources. This work was one part of the analysis, which was supplemented by a field reconnaissance survey (see Page 5.5-18).

A15-3 Mitigation Measure CUL-5 requires the archaeologist to identify procedures to mitigate impacts on significant resources. Additionally, Native American monitors are required pursuant to Mitigation Measure CUL-4. Please note that the vast majority of development allowed within the Specific Plan would occur within existing development areas. However, as discussed in the DEIR, unknown resources may be discovered during grading to an increased depth or for the limited uses allowed within the Coastal, Habitat, Wetlands & Recreation designation. Per your request Mitigation Measure CUL-4 has been revised to include language to recommend avoidance or preservation as follows:

CUL-4 At least 30 days prior to ground disturbance by each project development or redevelopment in conformance with the Specific Plan, the City of Long Beach would notify the three Native American tribal representatives who requested Native American monitoring of ground-disturbing activities. For

3. Response to Comments on the DEIR

each project, the project applicant would retain one certified Native American monitor who would accompany the professional archaeological monitor during on-call monitoring. The Native American monitor would have the same authority to halt activities that could adversely impact archaeological or tribal cultural resources that the professional archaeological monitor would. The Native American monitor would recommend measures to avoid, preserve and/or recover Native American archaeological and/or tribal cultural resources, as practicable, and would convey such resources to the pertinent tribe or most likely descendant, as applicable.

- A15-4 The comment is acknowledged and will be provided to the decision-makers—Planning Commission and City Council—for their consideration of the Project.

3. Response to Comments on the DEIR

R1. Response to Comments from Kerrie Aley, dated August 26, 2016 (Appendix A2, page A2-1).

R1-1 The commenter states that the reduced intensity alternative traffic analysis is missing from section 5.16 and the Transportation Impact Analysis (TIA) Appendix J1. The California Environmental Quality Act (CEQA) requires alternatives to be evaluated on a qualitative basis and does not require the alternative to be evaluated at the same level of detail as the proposed Project. As such, a detailed assessment of the reduced intensity alternative was completed as part of the TIA and the alternative was addressed in the Alternatives section of the EIR (see Section 7 of the EIR).

R1-2 The commenter states that the Long Beach Southeast Area Development and Improvement Plan (SEADIP) Multimodal Existing Conditions, Constraints, and Opportunities Assessment, Fehr & Peers, March 2014 was referenced in the traffic analysis but was not provided in the DEIR.

This document was provided to the commenter as part of a public records request. Please note that this information was ultimately incorporated into the Opportunities and Constraints workbook (Section 4.0 Mobility) prepared as part of the specific plan process and presented to the Community Advisory Committee. A copy of the workbook was incorporated as Appendix B to the Specific plan can found on the City's website: www.lbds.info/seadip_update/documents_and_reference_materials.asp.

R1-3 The commenter requests a breakdown of Project trip generation ITE by land use type and ksf. The commenter also requests a copy of the source "Fehr & Peers 2016a" and trip generation for the reduced intensity alternative.

The traffic analysis used ITE trip generation as one input of several inputs in the MXD Model to determine trip generation. This methodology and inputs are explained in Appendix J1 of the DEIR and D3 of this document.

The trip generation by ITE land use type and square feet was sent to the commenter as part of a public records request (see Appendix D3 of this document).

The information was developed by Fehr & Peers and the cited references are provided at the end of each topical section and the references section of the EIR. For example, the document referring to Fehr & Peers, 2016a is listed on Page 5.16-90 and 13-7 of the DEIR. Here, the citation is referencing the Transportation Impact Analysis that was included in its entirety in Appendix J of the DEIR (now Appendix J1).

The buildout trip generation estimates for the reduced intensity alternative and the ITE rates that were applied in the technical assessment were sent to the commenter as part of a public records request (see Appendix D3 of this document).

3. Response to Comments on the DEIR

- R1-4 The commenter requests documents containing the data on how Project trip generation estimates were calculated (existing, reduced and proposed Project) in a table by land use, (ITE) and sq ft. This is a standard calculation provided in a typical EIR traffic analysis. Please refer to Responses to Comments R1-2 and R1-3.

The commenter also states that it is her understanding that the trip generation numbers by land use are then used by Fehrs & Peers in their MXD model to factor for mixed use internalization trip reductions. This is correct. The MXD model was utilized to factor mixed-use internalization trip reductions. It should be noted that the Proposed Project also applied a supplemental reduction to account for the added bicycle infrastructure associated with the Project using the California Air Pollution Control Officers Association (CAPCOA) methodology. Please also refer to Page J1-37 through J1-41 of Appendix J1 of the DEIR regarding MXD methodology.

- R1-5 The commenter requests a document showing the methodology and calculations used to determine trip generation. Please refer to Response to Comment R1-4 and Page J1-37 through J1-41 of Appendix J1 of the DEIR regarding MXD methodology. The traffic analysis used ITE trip generation as one of several inputs in the MXD Model to determine trip generation. This methodology and inputs are explained on Pages J1-37 through J1-41 of the TIA (Appendix J1 of the DEIR). As shown on Table 5.16-5 of the DEIR, the proposed Project would generate a total of 96,299 daily, 4,795 AM Peak hour and 7,758 PM Peak hour trips and the existing land uses generate 65,731 daily, 3,047 AM Peak hour, and 5,299 PM Peak hour trips; resulting in a net increase of 30,568 daily, 1,748 AM Peak hour, and 2,459 PM Peak hour trips.

- R1-6 The commenter claims there is a typographical error in the page reference to the MDX methodology and insufficient explanation of how trip generation was obtained. Since references made to Pages 26 through 31 of Appendix J were updated with the recirculation of the traffic section references have been updated in this document. This methodology and inputs are explained on Pages J1-37 through J1-41 of the TIA (Appendix J1 of the DEIR).

As explained in the TIA, in order to determine the amount of trips that would be internal to the Project site, an MXD trip generation estimate was prepared. The MXD analysis first begins with gross trip rates identified in the Institute of Transportation Engineers' (ITE) Trip Generation (9th Edition, 2012). It then incorporates the MXD methodology for "matching" trips to estimate the amount of internalization within the Project site. Several inputs go into the MXD Model (see Tables 4-1 and 4-3) to result in the trip generation shown in Tables 4-2 and 4-4 of the TIA.

- R1-7 The commenter requests for an explanation for the use of 0.505 percent per year growth rate used in the SEASP cumulative traffic growth impact analysis. Growth rates used in this assessment were derived from the Metro Congestion Management Program

3. Response to Comments on the DEIR

Exhibit D-1 for the City of Long Beach. Specifically, the growth difference between Year 2035 (1.177) and Year 2015 (1.076) was divided by 20 years to identify a linear growth per year of 0.00505 (0.505 percent) which was utilized in the assessment.

- R1-8 Refer to Responses to Comments R1-3. The commenter refers to a hearing that was held during the 60-day public review period of the DEIR. This hearing was not delayed as requested by the commenter.
- R1-9 The commenter claims that there is a discrepancy in the table of contents and referenced page numbers. The table of contents was cross checked; however, no errors were identified. The commenter does not explicitly describe which pages or sections of the DEIR are referenced lately in the table of contents.
- R1-10 Refer to Response to Comment R1-1. The analysis was provided by Fehr & Peers and was based on their calculation of percentage trip reduction that would be required to reduce significantly impacted intersection to less than significant.
- R1-11 The commenter quotes a section from the DEIR alternatives analysis but does not provide a comment on the DEIR itself. No response is necessary.
- R1-12 Please note that the traffic section was revised and recirculated for public review. The DEIR is consistent with the requirements of CEQA.
- R1-13 The commenter claims that the DEIR Section 7.6.16, implies that the existing congestion does not matter. However, the DEIR is meant to disclose the environmental impacts. The alternatives section compares impacts of the alternatives to the Project so that the decision-makers (Planning Commission and City Council) can make a fully informed decision on the merits of the Project.
- R1-14 The commenter makes comments that do not related to the adequacy of the EIR, including reference to two public records requests, a request for signal timing, and to cancel the hearing. These comments are noted.
- The commenter states that DEIR is incomplete. However, has provided in these responses to comments, the DEIR fully analyzes the impacts of the Project and meets the requirements of CEQA.
- R1-15 Refer to Response to Comment R1-1.
- R1-16 Refer to Response to Comments R1-3 to R1-5.
- R1-17 Refer to Response to Comment R1-7.
- R1-18 The commenter states that a separate records request was made to obtain information on the signal timing at 2nd Street and PCH. This comment is noted.

3. Response to Comments on the DEIR

- R1-19 The commenter states that the City is delaying providing information and has included comments on the proposed local serving commercial land uses. These comments are noted.
- R1-20 The commenter cites Public Resources Code Section 21168.6.5. This information was sent to the commenter as part of a public records request (see Appendix D3 of this document).
- Refer to Response to Comments R1-3 and R1-6 regarding trip generation and assumptions used in the MXD model.
- R1-21 Refer to Response to Comments R1-3 and R1-6 regarding trip generation and assumptions used in the MXD model. This methodology and inputs are explained on Pages J1-37 through J1-41 of the TIA (Appendix J1 of the DEIR).
- Refer to Appendix J3 of the DEIR regarding VMT estimates and reductions.
- R1-22 Refer to Response to Comment R1-1.
- R1-23 The commenter refers to the Strategic Economic analysis, which was not a part of the DEIR. No response is necessary.
- R1-24 The commenter requests an extension of the public review period due to the timing that she received the materials in response to her public records request. The public review period of 60-days was not extended. However, it should be noted that the traffic section of the DEIR was recirculated for a 45-day public review period.
- R1-25 The commenter expresses comments on the Project itself, related to commercial uses, and not on the adequacy of the DEIR. No further response is required. Refer also to Appendix J2 of the DEIR with respect to traffic reductions associated with the TDM Plan.
- R1-26 The commenter claims that the DEIR fails to appropriately address commercial uses and requests to see the trip generation estimates. Buildout of the proposed Specific Plan, including the allowed commercial uses, were properly analyzed throughout the DEIR. Comments related to trip generation were provided in Response to Comment R1-3.
- R1-27 The City acknowledges the residents efforts involved in providing input on the SEASP and associated DEIR.
- R1-28 The commenter claims that there was a lack of significant public participation in preparation of the SEASP. The SEASP process including significant Project outreach which was documented in a binder and included as Appendix A of the SEASP.

3. Response to Comments on the DEIR

R1-29 The commenter states that the proposed SEASP conflicts with the City of Long Beach General Plan and Local Coastal Plan (LCP). The commenter goes on to cite sentences within the LCP that she deems the plan to be inconsistent with: 1) a statement in the executive summary that the program 2) a discourages increased auto circulation (Page I-4) and a statement that traffic constraints must be addressed during planning.

As required by CEQA, the DEIR includes an analysis of the Project's consistency with policies and programs adopted for the purpose of mitigating or avoiding environmental impacts (see Impact 5.10-2 of the DEIR). Analysis of the Project's consistency with relevant General Plan policies are provided in Table 5.10-1 and LCP policies are provided in Table 5.10-2. Traffic constraints were a main consideration in the design of the Project as detailed in the SEASP Chapter 6 Mobility Plan. Additionally, the SEASP includes several measures to reduce the traffic congestion associated with the Project as detailed starting on Page 3-14 of the DEIR and in the VMT Plan (Appendix J2 of the DEIR). As documented in the DEIR, the proposed Project is consistent with the City's General Plan and LCP.

R1-30 The commenter states that the SEASP replaces local serving with regional attracting commercial businesses, resulting in increased vehicle miles travelled. However, SEASP would allow both local and regional commercial uses. As stated SEASP Section 4.3.4, the commercial-neighborhood designation is intended to serve small scale local retail needs, while the Mixed-Use Community retail uses would include both regional destinations and local retailers. SEASP has the potential to attract smaller upscale retail shops while maintain the area's strength as a regional hub for well kept conveniences and big box stores (SEASP Page 30).

R1-31 Following adoption of the SEASP, the City would be required to process the LCP Amendment to provide consistency with the revised land uses.

R1-32 Pages 7 of 31 and 8 of 31 of the comments cites information on other planned developments within the City. The purpose of providing this information is unclear since this information does not relate to SEASP. No further response is needed.

R1-33 The commenter has several comments on the financial feasibility analysis. This analysis does not relate to the information provided in the DEIR. No response is required.

R1-34 The commenter claims that they have requested information that was used to prepare the DEIR that has not been provided. The commenter submitted a public records request in August 2016. Responses to the public records request and additional information requested was provided to the commenter. Responses to the public records request are also responded to in Responses to Comments R1-1 through R-7.

R1-35 The commenter claims that the SEADIP plan was not made available to the public. However, the City's zoning, including SEADIP (PD-1), is and has been available on the

3. Response to Comments on the DEIR

City's website. SEADIP can be accessed at:

<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=2459>.

- R1-36 The commenter states that the DEIR should be rewritten to describe the impacts of the current condition. However, CEQA does not require an analysis of impacts of the existing conditions or development that happened prior to baseline conditions. No revisions to the DEIR are needed.
- R1-37 The commenter disagrees with points made by City staff at the Planning Commission Study Session held on August 18, 2016 related to the Project's financial feasibility and density. These comments do not relate to the adequacy of the DEIR and no response is needed.
- R1-38 The commenter disagrees with points made by City staff at the Planning Commission Study Session held on August 18, 2016 related to the signal timing at 2nd and PCH. These comments do not relate to the adequacy of the DEIR and no response is needed.
- R1-39 The commenter states that the DEIR should provide evidence that improvements to signal timing have the ability to improve level of service. Refer to Response to Comments R168-1 through R168-5.
- R1-40 The commenter states that the City has the ability and is currently working with Caltrans on changing signal timing to state facilities. Comment noted.
- The commenter also states that signal timing is not an appropriate mitigation measure because the effort is already on-going and it is a "minor" improvement compared to "major" impacts.
- Coordination of signal timing with Caltrans was incorporated as a project design feature to improve level of service along State facilities. Several mitigation measures and project design features, in addition to signal timing, were considered and incorporated into the Project to reduce impacts related to traffic. CEQA requires the City to consider all feasible mitigation measures when there are significant unavoidable impacts. Significant unavoidable impacts would occur at 19 intersections, which would be reduced through Mitigation Measures TRAF-1 through TRAF-6. Additionally, implementation of the Project requires a TDM Plan (see Appendix J2 of the DEIR), which would further reduce peak hour trips.
- Finally, the commenter lists five documents and data that she received from Caltrans. This comment is noted.
- R1-41 The commenter continues to argue that signal timing should not be included as a project design feature that mitigates Project impacts because the City is already coordinating with Caltrans on signal timing improvements. However, the City is required to continue

3. Response to Comments on the DEIR

this effort as part of the Project. As such, there is no justification for removing this project design feature.

The commenter attaches correspondence between the City and Caltrans to provide evidence that the two agencies coordinate. Comment noted.

- R1-42 The commenter alleges that the City has failed to comply with past mitigation monitoring programs. The commenter states that the DEIR should provide a list of all previous mitigation measures and the timing and implementation procedures for new development.

First, the commenter provides no evidence that the City has failed at past attempts to implement their own mitigation monitoring program. Second, it is not the purview of this Project nor a requirement of CEQA to document the implementation of mitigation measures for past projects. The purpose of mitigation monitoring programs are to document compliance with implementation of mitigation measures. A draft mitigation monitoring and reporting program (MMRP) was prepared and circulated along with the DEIR (see Appendix M of the DEIR). The timing for each mitigation measure is documented in the mitigation measure itself and in the MMRP. This document must be updated and adopted along with certification of the Final EIR.

- R1-43 The commenter states that the DEIR does not consider impacts due to SB 743. With respect to VMT, The DEIR describes the changes required by SB 743 on page 5.16-2 of the DEIR and analyzes the Specific Plan's consistency with SB 743 on page 5.16-58 of the DEIR. As discussed in the DEIR, the City has not established VMT criteria. Since OPR has not yet amended the CEQA Guidelines to implement the change required by SB 743, automobile delay is still considered a significant impact, and the City of Long Beach will continue to use the established LOS criteria. As shown in Table 5.16-17 of the DEIR, the overall VMT would increase by approximately 305,044 compared to existing conditions, and the VMT per service population would decrease by approximately 5.84 or 13 percent. As shown in Table 5.16-18, with the incorporating of active transportation measure the net increase in VMT would be reduced by 56,267 vehicle miles.

The commenter asks whether future projects would be exempt from mitigation measures once SB 743 traffic metrics have been adopted. The City does not have a plan to exempt future projects under SEASP from the mitigation measures incorporated by the EIR. Please note that even though SB 743, once fully implemented, would not allow an traffic impact to be identified based on a level of service standard, this does not hinder the City's ability to require a level of service standards as part of other City requirements (e.g. the City's General Plan or traffic study guidelines).

3. Response to Comments on the DEIR

Finally, the commenter states that the mitigation measures need to be attached to each parcel. Unless otherwise stated in the DEIR, the mitigation measures apply to all projects under the SEASP.

R1-44 As stated under Response to Comment R1-45, the City has not established thresholds pursuant to SB 743. The City would be required to adopt thresholds on a citywide basis within two years of adoption of the new CEQA Guidelines.

R1-45 The commenter is incorrect that the SEASP would remove all local service commercial from the area. See Response to Comment R1-30. The methodology used to capture VMT is provided in Appendix J3 of the DEIR.

R1-46 The City acknowledges the commenter's request to update Citywide traffic thresholds and traffic analysis guidelines.

R1-47 The commenter cites Mitigation Measures TRAF-1. Note that this mitigation measure was revised and numbered TRAF-2 in the updated and recirculated traffic section.

The commenter reiterates previous comments related to SB 743 and signal timing. Refer to Responses to Comments R1-39 through R1-43.

R1-48 Refer to Response to Comment R1-43. The City has not yet established thresholds related to SB 743.

R1-49 The commenter questions traffic counts that were taken on one day in the summer. The summary of why July was chosen to collect count data is correct. At the outset of the Project, both input received from residents in the community and input from City staff indicated that traffic volumes are higher in the SEASP area during summer months. As such, counts were collected in this area during that time period.

Note the original traffic counts were made in July of 2015 and traffic counts at the seven new intersections were made in September 2016, November 2016, and January 2017. The comment correctly identifies that the traffic counts were made at different times of year and no seasonal adjustments were made to the traffic counts. Fehr & Peers reviewed the new counts to ensure that the upstream and downstream intersections adjacent to the new counts were generally consistent and appropriate prior to using them in the traffic study. Given the above information, counts were taken and verified as appropriate.

R1-50 The commenter states that impacts to additional intersections must be evaluated. The City of Long Beach updated the traffic analysis and recirculated it for public review in a revised traffic section from February 17th through April 3rd, 2017. The revised traffic analysis analyzed impacts to 28 intersections and identified impacts to 18 intersections.

R1-51 Refer to Response to Comment R1-3.

3. Response to Comments on the DEIR

- R1-52 Fehr & Peers selected the most appropriate trip generation rate based on the existing and proposed land uses. As described in the ITE, Trip Generation Manual, 8th Edition, Land Use 820, Shopping Center includes neighborhood centers, community centers, regional centers, and super regional centers. Uses in this category typically include drive-in banks, retail stores, restaurants or small office.
- R1-53 Future volumes for Cumulative Year (2035) Without and With Project conditions were developed using a 0.505 percent per year growth rate, consistent with the Los Angeles County CMP Guidelines and Southern California Association of Governments' 2016 Regional Transportation Plan/Sustainable Communities Strategy. The growth rate accounts for pending and approved projects in the City of Long Beach as well as regional growth anticipated by Year 2035. This background growth rate provides a conservative analysis since the area surrounding the Project area is largely built out.
- R1-54 The commenter quotes a portion of the traffic analysis. No response is needed.
- R1-55 The commenter points out that that the City recently required right-of-way at 2nd and PCH. In order to determine whether a right-of-way taking is feasible a number of factors must be considered. Generally, if the improvement would intrude upon a building or pedestrian improvement the taking would not be feasible. Additionally, where the improvement would be barred by another agency, the mitigation would be seen as infeasible. To provide further clarification to the commenter the recirculated traffic section included Figure 5.16-5 to show the existing conditions and right-ow-way constraints at each impacted intersection.
- R1-56 Refer to Table 5.16-20 of the DEIR for a summary of the mitigation measures considered and the reasoning for identifying significant unavoidable impacts.
- R1-57 The DEIR does not refuse to consider mitigation measures under the jurisdiction and control of Caltrans. Refer to General Response Section 2.2.1.
- R1-58 The commenter is incorrect. The DEIR analyzed impacts, including traffic impacts, of buildout of the proposed Project, which included improvements described on Page 3-14 of the DEIR.
- R1-59 The analysis of mitigation measures and the level of significance after mitigation is analyzed in Section 5.16.8 of the DEIR.
- R1-60 Refer to Response to Comment R1-1.

3. Response to Comments on the DEIR

R2. Response to Comments from Dave Allen, dated September 18, 2016 (Appendix A2, page A2-41).

R2-1 The comment is introductory in nature and does not address the adequacy of the EIR. No response is needed.

R2-2 Regarding traffic impacts resulting from Specific Plan buildout, mitigation measures are specified for each of the significant circulation system impacts identified in DEIR Section 5.16, *Transportation and Traffic*. However, several of the mitigation measures are infeasible for a variety of reasons, including space constraints and required approvals from other agencies including the California Coastal Commission (wetlands impacts), Caltrans, and the City of Seal Beach. The City acknowledges that traffic impacts would be significant and unavoidable.

R2-3 The City acknowledges the commenter's preference that building heights in the proposed Specific Plan not exceed three stories.

R2-4 The comment asserts that the Project design contains insufficient parking. The Project design includes shared parking and would promote "park once" site use (see DEIR Section 5.16, *Transportation and Traffic*). The commenter's concern regarding return on investment and from developments is a socioeconomic effect of development outside the purview of CEQA. The comment does not address the adequacy of the EIR and no further response is needed.

R2-5 If the comment about proposed development "on top" of an earthquake fault refers to surface rupture of a fault, the Alquist-Priolo Earthquake Fault Zone surrounding the Newport-Inglewood Fault passes east of the proposed Mixed Use Community Core area, where most of the net increases in land use intensity would be permitted. Please refer to Page 5.6-1 of the DEIR, no new habitable development would be allowed on top of an earthquake fault. The comment does not address the adequacy of the EIR, and no further response is required.

3. Response to Comments on the DEIR

R3. Response to Comments from Christine Badgley, dated September 18, 2016 (Appendix A2, page A2-42).

- R3-1 The commenter expresses concerns regarding the outreach process for the SEASP. This is not a comment on the adequacy of the DEIR; no response is needed.
- R3-2 The commenter's concern about traffic impacts is acknowledged. Regarding the commenter's statement that "the environmental report indicates that mitigation is not possible," Refer to General Response Section 2.2.1, regarding improvements identified as significant and unavoidable.
- R3-3 The commenter's concern about extra noise, congestion, and pollution is acknowledged.
- R3-4 Regarding the commenter's concern about affordable housing, an analysis of the projected housing and consistency with the City's Housing Element and Regional Housing Needs Assessment (RHNA) is provided in Section 5.13, *Population and Housing*, in the DEIR (see pages 5.13-1 through 5.13-6). As stated, the City has demonstrated its ability to meet its affordable housing RHNA allocation through identification of 31 sites in central and western Long Beach. There are currently no sites identified in the Project area or surrounding vicinity.
- R3-5 The commenter's concern that more retail development is unneeded in Long Beach pertains to the Project design, not the adequacy of the EIR; no response is needed.
- R3-6 The commenter expresses her opinion on the Project itself and not the adequacy of the EIR; no response is required.

3. Response to Comments on the DEIR

R4. Response to Comments from Jeanne Badgley, dated September 16, 2016 (Appendix A2, page A2-43).

R4-1 While the comment expresses concern that the impacts of Specific Plan buildout have not been studied sufficiently, the comment does not assert any specific inadequacies of the DEIR. The DEIR met the requirements of CEQA, including disclosing impacts related to future construction.

3. Response to Comments on the DEIR

R5. Response to Comments from David Baker, dated September 17, 2016 (Appendix A2, page A2-44).

- R5-1 The comment is a response to a statement by Long Beach City Councilmember Suzie Price (see Comment R5-5) and does not address the adequacy of the EIR; no response is needed.
- R5-2 The comment asserts that City of Long Beach officials are pressuring City planners regarding the Project design. The comment does not address the adequacy of the EIR and no response is required.
- R5-3 During the Specific Plan outreach program, the community identified a desire to slow traffic on PCH and to make the Project area a destination instead of a location to drive through as quickly as possible (see section 4.1.2, Corridors, of SEASP). Therefore PCH street cross sections are envisioned include buffered bike lands, reduced travel lanes, and a landscaped median (see Section 6.6.2., Pacific Coast Highway, of SEASP).
- R5-4 The comment asserts past interference of a City Councilmember with a City staff function. The comment does not address the adequacy of the EIR and no response is needed.
- R5-5 The comment is Long Beach City Councilmember Suzie Price's response to Mr. Baker's comments. No further response is needed.
- R5-6 The comment relates to the Project itself and Councilmember Price's position on the proposed Project. The comment addresses traffic impacts, but does not assert a specific inadequacy in the EIR. Traffic impacts are analyzed in Section 5.16, *Transportation and Traffic*, of the DEIR.
- R5-7 Comment R5-7 duplicates comment R5-6.

3. Response to Comments on the DEIR

R6. Response to Comments Jan Barcus, dated August 8, 2016 (Appendix A2, page A2-48).

R6-1 The comment addresses traffic concerns. Note that traffic impacts are addressed in DEIR Section 5.16, *Transportation and Traffic*. Refer to General Response Section 2.2. The comment does not assert an inadequacy of the DEIR and no further response is required.

3. Response to Comments on the DEIR

R7. Response to Comments from Kristina Barger, dated September 19, 2016 (Appendix A2, page A2-49).

R7-1 The comment expresses support for the Project. The comment does not address the adequacy of the EIR and no response is required.

3. Response to Comments on the DEIR

R8. Response to Comments from Lynn & Ben Barillaro, dated September 19, 2016 (Appendix A2, page A2-50).

- R8-1 The comment is introductory in nature. While the comment mentions several resources that would be impacted by Project buildout, the comment does not address the adequacy of the EIR and no response is needed.
- R8-2 The comment related to the opposition to any increase in residential units due to existing heavy traffic on several arterial roadways in the traffic study area is acknowledged. Note that existing and proposed traffic conditions are described in DEIR Section 5.16, *Transportation and Traffic*.
- R8-3 The comment opposes changes to Loynes Drive to accommodate additional traffic. The Project includes a proposed striped (Class II) bike lane on Loynes Drive from Long Beach Bikeway Route 10 (on the west side of Los Cerritos Channel) to Studebaker Road. Addition of several lanes to the intersection of Loynes Drive with Pacific Coast Highway is recommended in the traffic impact analysis. However, the mitigation is infeasible due to limited right-of-way in addition to required approvals by the California Coastal Commission. Traffic impacts at the intersection of Loynes Drive with Pacific Coast Highway are identified as significant and unavoidable.
- R8-4 The comment describes existing hazards on Loynes Drive and does not address the adequacy of the EIR. No response is needed.
- R8-5 The comment asserts that fire department and police department response times would be lengthened after the addition of Project traffic. Police department and fire department response times are addressed in DEIR Section 5.14, *Public Services*; it is expected that the Long Beach Fire Department and Long Beach Police Department would be able to maintain adequate response times after the addition of Project-generated traffic.
- R8-6 The comment addresses hazards that proposed five- to seven-story buildings near the Los Cerritos Wetlands could pose to birds. The Specific Plan includes design requirements relating to lighting, landscaping, and façade treatments to minimize the potential for bird strikes on buildings (see Impact 5.4-2 in DEIR Section 5.4, *Biological Resources*). See also General Response Section 2.3.
- R8-7 The comment addresses traffic and pedestrian hazards relative to transit users accessing bus stops. Although buildout of the Project would increase traffic in the area; the Specific Plan would increase pedestrian safety by creating multi-modal corridor. The Specific Plan details additional sidewalks along several roadway segments (see DEIR Chapter 3, *Project Description*). Roadway and sidewalk improvements would conform to City of Long Beach and Long Beach Fire Department roadway design standards (see DEIR Section 5.16, *Transportation and Traffic*).

3. Response to Comments on the DEIR

- R8-8 The comment relates to the Coastal Commission recommending that “future dense and high-rise development be focused in downtown Long Beach” and not in down-coast areas of the City. The comment is acknowledged. Note that the Project includes a proposed Local Coastal Program amendment which would require City and California Coastal Commission approvals before the Specific Plan could be implemented.
- The comment further asserts that Specific Plan buildout would reduce property values near the intersection of Loynes and Pacific Coast Highway. Socioeconomic effects of a Project are outside the purview of CEQA, and no response is required.
- R8-9 The comment duplicates Comment R8-8 and is referring to PD-6 the downtown shoreline planned development in downtown Long Beach; the balance of the comment pertains to the Golden Shore RV Park in downtown Long Beach several miles west of the Project site. No response is required.
- R8-10 The comment identifies two attachments, the Golden Shore Master Plan and Final EIRs to the comment letter; no response is needed.
- R8-11 The comment pertains to the Golden Shore [RV Park] Master Plan; see response B8-9.
- R8-12 The comment expresses concerns about Project impacts on traffic, air quality, light, wetlands, and noise. No specific inadequacy of the EIR is claimed. The identified impacts are analyzed in Chapter 5, *Environmental Analysis*, of the DEIR.

3. Response to Comments on the DEIR

R9. Response to Comments from Alex Bellehumeur, dated September 15, 2016 (Appendix A2, page A2-54).

- R9-1 The comment is a favorable assessment of the DEIR. No response is needed.
- R9-2 The comment requests that Project-specific traffic impact studies be carried out for each development project undertaken pursuant to the Specific Plan. Such traffic studies are required by Mitigation Measure TRAF-2. Each traffic study would analyze turning movements in all directions at all intersections affected by the respective project.
- R9-3 The comment recommends that Caltrans relinquish the segment of Pacific Coast Highway within the City to City control. Please note that the City is in on-going discussions with Caltrans regarding this matter.

3. Response to Comments on the DEIR

R10. Response to Comments from Kent Bimson, dated September 12, 2016 (Appendix A2, page A2-55).

- R10-1 The commenter is in favor in renovation and opposed to height and density variances. The comment describes existing traffic condition the intersection of Pacific Coast Highway and 2nd Street. The comment is acknowledged; no response is required.
- R10-2 The comment states that increased congestion at the intersection of Pacific Coast Highway and 2nd Street will likely induce many drivers to use residential streets. Note that the traffic analysis takes into account the redistribution of vehicle trips when intersections are congested (see Appendix J1 of the DEIR). The comment is acknowledged, and no further response is needed.
- R10-3 The comment states that height limitations should not be allowed. The comment is acknowledged, and no further response is needed.
- R10-4 The comment addresses tax revenues from future developments pursuant to the Specific Plan compared to City expenditures relating to the same developments. City finances are outside the purview of CEQA, and no response is required.
- R10-5 The comment opposes increased height and density on the site of the Seaport Marina Hotel [at the southwest corner of Pacific Coast Highway and 2nd Street]. The comment is acknowledged, and no further response is needed.
- R10-6 The comment asserts that the environmental impacts of increased density in the Project site would outweigh any benefits. Refer also to General Response Section 2.2.
- R10-7 The comment relates to quality of life and opposition to residential and hotel that exceed the adopted height limitations. No response is needed.

3. Response to Comments on the DEIR

R11. Response to Comments from Cathy Black, dated September 11, 2016 (Appendix A2, page A2-58).

- R11-1 The comment addresses traffic concerns, especially at the intersection of Pacific Coast Highway and 2nd Street, and asserts that the proposed mitigation for traffic impacts is inadequate. Traffic impacts and an analysis of mitigation are identified in DEIR Section 5.16, *Transportation and Traffic*. Refer also to General Response Section 2.2. The commenter also opposes the Specific Plan's proposed height limitations.
- R11-2 The comment asserts that five-story buildings onsite would be out of character for the site. Impacts to the visual character of the site were addressed in DEIR Section 5.1, *Aesthetics*; and impacts were determined to be less than significant. The comment does not assert an inadequacy of the analysis in Section 5.1, no response is needed.
- R11-3 The comment is a summary of the two preceding comments and is acknowledged; no further response is required.

3. Response to Comments on the DEIR

R12. Response to Comments from Patricia Bliss, dated September 19, 2016 (Appendix A2, page A2-59).

- R12-1 The comment is a favorable assessment of some provisions of the Specific Plan; no response is required.
- R12-2 The comment expresses opposition to the proposed increase in residential units and resultant increase in vehicle trips. Project traffic impacts are addressed in DEIR Section 5.16, *Transportation and Traffic*, which identify significant unavoidable impacts.
- R12-3 The comment expresses opposition to the proposed increase in commercial land uses and concomitant increase in vehicle trips. See response R12-2.
- R12-4 The Specific Plan would not allow the construction of roadways through the wetlands as asserted by the commenter.
- R12-5 The comment expresses disagreement with the analysis of views in DEIR Section 5.1, *Aesthetics*. However, the comment does not assert any inadequacy of the analysis; no response is needed.
- R12-6 The comment expresses opposition to the Project and does not pertain to the adequacy of the EIR. No response is needed.
- R12-7 The commenter disagrees with the alternatives analysis and recommends rejecting the proposed Project. No response is needed.

3. Response to Comments on the DEIR

R13. Response to Comments from Michael Bohn, dated September 19, 2016 (Appendix A2, page A2-61).

R13-1 The commenter expresses strong support for the SEASP and provides introductory comments and background on the firm's architecture, landscape, and urban design practice. The commenter also states that the plan guides future development in the area, to create a community that is as economically prosperous as it is sustainable. The commenter also states that increased development intensity on select and suitable sites will be a necessary and contributing factor in the restoration of the wetlands and numerous public amenities such as waterfront promenades, an event's park and plazas. The plan sets forth an appropriately scaled development for the surrounding context. Using the development standards in SEASP, the commenter developed a design concept for two sites (one in the Mixed-Use Community Core, and one in the Mixed-Use Marina) with the most density suggested in the Plan - and have received favorable comments from the community. These comments are statements about the plan itself and not the DEIR; no further response is needed.

R13-2 The commenter asks a series of questions related to PCH how the design would meet the goal for walkability and pedestrian comfort. Figures 6-7 and 6-8 of SEASP include conceptual designs for PCH that would continue to accommodate the existing vehicle travel lanes and include a protected bike lane and 22-foot sidewalk. Creating a grid pattern for internal access to development would provide greater access and establish a sense of place. Figures 6-20 through 6-23 of the SEASP show different options how to create a "Main Street" like atmosphere.

With respect to VMT, The DEIR describes the changes required by SB 743 on page 5.16-2 of the DEIR and analyzes the Specific Plan's consistency with SB 743 on page 5.16-58 of the DEIR. As discussed in the DEIR, the City has not established VMT criteria. Since OPR has not yet amended the CEQA Guidelines to implement the change required by SB 743, automobile delay is still considered a significant impact, and the City of Long Beach will continue to use the established LOS criteria. As shown in Table 5.16-17 of the DEIR, the overall VMT would increase by approximately 305,044 compared to existing conditions, and the VMT per service population would decrease by approximately 5.84 or 13 percent. As shown in Table 5.16-18, with the incorporating of active transportation measure the net increase in VMT would be reduced by 56,267 vehicle miles.

R13-3 The commenter is in strong support of the relinquishment of PCH by Caltrans to the City of Long Beach. The commenter states that this will allow traffic signal synchronization, greater efficiency, and the ability to reduce lane widths. These comments are noted.

3. Response to Comments on the DEIR

- R13-4 The comment recommends revising street section diagrams to include landscaping and other features; such revisions would not affect the adequacy of the EIR.
- R13-5 The comment notes that there have been objections raised over the proposed densities due to the increased congestion and air quality that occurs with increased land use. The comment goes on to note that the solution is not less density and increased roadway capacity with higher speeds; but it is through the provision of a suite of well-designed multimodal suite of transportation solution that can encourage ridership. The comment goes on to note the minimum required densities needed to support transit ridership, and that the SEASP area current does not currently meet those densities but would with implementation of the proposed Project. This comment is noted.
- R13-6 The comment regarding building materials and architectural style is acknowledged.

3. Response to Comments on the DEIR

R14. Response to Comments from Sarah Brinton, dated September 15, 2016 (Appendix A2, page A2-66).

R14-1 The comment details several reasons for opposing the Project and support for the No Project/No Development Alternative. The comments are acknowledged. The comments do not address the adequacy of the EIR; no further response is needed.

3. Response to Comments on the DEIR

R15. Response to Comments from Kevin Brown, dated September 7, 2016 (Appendix A2, page A2-67).

R15-1 The comment expresses support for the Project and an understanding that the increase in height relates to the funding of improvements; no response is required.

R15-2 The comment states concerns related to traffic impacts, including PCH at and 2nd street and PCH and 7th Street. Traffic impacts are analyzed in DEIR Section 5.16, *Transportation and Traffic*, and were determined to be significant and unavoidable. Please also refer to General Response Section 2.2, *Transportation and Traffic*.

R15-3 The commenter states that any increase in residential density should be supported by measures that avoid traffic congestion. Comment noted. Please also refer to General Response 2.2.

R15-4 The commenter suggests that the Specific Plan should consider converting major intersections (e.g. PCH at 2nd Street and PCH at 7th Street) to roundabouts or traffic circles. Please note that the Specific Plan on Page 211 acknowledges capital improvement projects listed in the General Plan Mobility Element, one of which being Studebaker Road and 7th Street Freeway roundabouts. Please note that roundabouts work well when traffic flows are consistent along all approaches and when there are lower percentages of left-turns at the intersections. When high left turn volumes or approaches with dominant flows occur, roundabouts typically will perform at a lower service level than traffic signals. Additionally, large roundabouts tend to have a larger footprint than signals and may potentially impact wetlands in the study area.

Using the Transportation Research Board's NCHRP 672 guidance related to the planning and design of roundabouts, roundabouts are not feasible at the locations noted above due to right-of-way constraints, potential impacts to wetland areas, and/or because of the traffic projections in the study area. However, any major improvements to Caltrans facilities in the study area will also be required to undertake Caltrans' TOPD-13-02 process in which Caltrans will review the appropriateness of signals and roundabouts on intersections being improved on their system.

3. Response to Comments on the DEIR

R16. Response to Comments from Nancy Buchanan, dated September 19, 2016 (Appendix A2, page A2-68).

R16-1 The comment provides support for the Project and recommends making 7th street the main street to the regional freeways. This comment is acknowledged; no response is needed.

3. Response to Comments on the DEIR

R17. Response to Comments from Mike Buhbe, dated September 19, 2016 (Appendix A2, page A2-69).

R17-1 The commenter is opposed to the Project's density and height because of the increased traffic in Seal Beach. The commenter is also opposed to building heights over two stories. These comments are acknowledged. Note that Project traffic impacts are analyzed in DEIR Section 5.16, *Transportation and Traffic*, and visual impacts are analyzed in DEIR Section 5.1, *Aesthetic*. The comment does not assert an inadequacy in the EIR and no further response is needed.

3. Response to Comments on the DEIR

R18. Response to Comments from Jennifer Cameron, dated September 12, 2016 (Appendix A2, page A2-70).

R18-1 The commenter opposes the Project because of the existing traffic congestion. Note that traffic impacts were analyzed in DEIR, Section 5.16, *Transportation and Traffic*. The comments are acknowledged; no response is needed. Refer to General Response Section 2.2.

3. Response to Comments on the DEIR

R19. Response to Comments from Ann Cantrell, dated September 19, 2016 (Appendix A2, page A2- (Appendix A2, page A2-71).

- R19-1 The comment asserts that the Specific Plan would not meet the chief concerns of the public who participated in the Specific Plan outreach program. Comment noted..
- R19-2 The commenter states that the significant unavoidable impacts of the Project render the Project unacceptable; no response is needed.
- R19-3 The commenter cites portions of the environmental analysis provided in DEIR Section 5.4.3, Environmental Impacts, and states that the lighting mitigation measures are inadequate. The project design features referenced in the comment are Specific Plan design guidelines set forth in SEASP Section 7.2.14. These are requirements of the Project; they are not mitigation measures, although they have a mitigating effect. Lighting was determined to be a potential significant to wildlife in the DEIR (see DEIR Page 5.4-40). As a result, Mitigation Measure BIO-5 was incorporated into the Project, which limits light spillover on sensitive habitat and the Coastal Habitat, Wetlands & Recreation land use designation. This mitigation measure would reduce potential light impacts to biological resources to less than significant. Refer also to General Response Section 2.3.
- R19-4 The commenter expresses concern related to human intrusion into wetlands. The referenced 100-foot-wide buffers are required in SEASP Section 5.4, Coastal Habitat, Wetlands, and Recreation, and described in detail in DEIR Section 5.4, *Biological Resources*, Page 5.4-43 to 5.4-44. Buffers in most cases must be 100 feet wide; however, the City may determine that a buffer may be narrower than 100 feet if scientific documentation demonstrates that a proposed development may use a reduced, enhanced buffer to accomplish the avoidance and minimization measures related to edge effects; or the City may determine that a buffer must be wider than 100 feet to provide adequate protection of the wetland values. In addition, the Mitigation Measures BIO-6 and BIO-7 were incorporated into the Project to reduce potential impacts related to human intrusion.
- R19-5 The comment concerns impacts of development and trails to the wetlands including the “Pumpkin Patch” and the Alamitos Bay Partnership property. DEIR Page 5.4-37 states: “trails, if allowed, would be developed on upland or unvegetated areas, thus minimizing direct impacts to native vegetation.” SEASP Section 5.6, Coastal Act Compliance, Page 74, states “The proposed location of bike and pedestrian trails within SEASP provides the public access to the *perimeter* of the Los Cerritos Wetlands.” (emphasis added). Furthermore, impacts of land use that would be permitted in the wetlands on the “Pumpkin Patch” and the Alamitos Bay Partnership property would be less than significant after mitigation measures are incorporated.

3. Response to Comments on the DEIR

R19-6 The City acknowledges that there have been significant historic losses of wetlands statewide. Wetlands identified in the City of Long Beach General Plan consist of the Los Cerritos Wetlands; and the Dominguez Gap and other areas along the Los Angeles River (City of Long Beach 2002). CEQA Guidelines Section 15355(b) states: “The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other *closely related* past, present, and reasonably foreseeable probable future projects.” (emphasis added). Much of the wetlands mapped in the region on 1896 topographic maps (*Downey* and *Redondo* sheets) had been destroyed by the mid-1950’s by urbanization and development of port facilities (Los Alamitos Quadrangle 1950; Long Beach Quadrangle 1951; and Torrance Quadrangle 1953; all topographic maps accessed via the US Geological Survey *National Geologic Maps Database*). Those past projects are unrelated to the proposed Project chronologically and in purpose.

Furthermore, implementation of the Specific Plan would enhance the wetlands through creation of a Wetland Conservation and Monitoring Fund (SEASP Section 5.9) and Wetland Buffers (SEASP Section 5.10). As described on Page 5.4-38 of the DEIR any development or trails within the wetland are intended to be developed on the upland or disturbed areas of the Coastal Habitat, Wetlands & Recreation land use designation. For development that could impact small areas of delineated wetland Mitigation Measure BIO-2 was incorporated to ensure no net loss of wetlands. Since the Project would enhance wetlands with the incorporation of project design features and mitigation measures, it would not contribute to a cumulative wetland impact.

R19-7 The Specific Plan includes design requirements relating to lighting, landscaping, and façade treatments to minimize the potential for bird strikes on buildings (see Impact 5.4-2 in DEIR Section 5.4, *Biological Resources*). Special design requirements have been established relating to lighting, landscaping, and façade treatments. For example, building façade treatments specify glazing materials, and building site design prohibits features that create bird traps. In addition to the building, lighting, and landscaping requirements, height limitations are required within 100 feet of a wetland. Refer also to General Response Section 2.3, *Bird Safe Treatments*. The commenter does not present evidence that the Specific Plan provisions to minimize bird strikes would result in inadequate protection to birds. No DEIR revision is needed.

R19-8 Refer to Response to Comment R19-7 relating to bird-safe treatments. The comment also asserts that mitigation in the DEIR for nesting birds is inadequate; claiming that it takes years for replacement trees to grow large enough to be used for nesting. The vast majority of the native habitat onsite would be preserved; and the overwhelming majority of development projects pursuant to the Specific Plan would be redevelopments. Therefore, nearly all tree removals would be of ornamental landscape trees on developed sites, and not from native habitat. Replacement trees for mature trees removed by development projects would compensate for the loss of mature trees – for

3. Response to Comments on the DEIR

example, use of 36-inch box trees. There is no evidence to suggest that birds would not use newly planted trees to nest. Mitigation Measure BIO-8 would provide adequate protection for nesting birds to reduce such impacts to less than significant, and no DEIR revision is needed.

- R19-9 The comment claims that the mitigation measures for biological resources are inadequate and recommends the No Project/No Development Alternative. The comment does not specify which mitigation measures are inadequate, or how; or present evidence of such inadequacy. No DEIR revision is required.
- R19-10 The comment expresses disagreement with the analysis of impacts to biological resources of the No Project/No Development Alternative. The comment is correct in that the California Coastal Commission already requires 100-foot-wide wetland buffers with specified exceptions. However, the proposed Wetland Conservation and Monitoring Fund is a provision of the proposed Specific Plan; asserting that the City could or would implement such a Fund in the absence of Specific Plan implementation is erroneous. No DEIR revision is required.
- R19-11 The comment is a summary of some of the previous comments in Letter R19; see responses to Comments R19-1 through R19-10.

3. Response to Comments on the DEIR

R20. Response to Comments from Patricia Chen, dated September 19, 2016 (Appendix A2, page A2-76).

R20-1 The comment expresses opposition to a proposed Alamitos Energy Center electric generating station gas-fired burner and asserts that the EIR should have analyzed impacts of the burner project as well as impacts of use of energy storage as an alternative to that project. AES Southland Energy, LLC (AES) proposes to construct a 300-megawatt battery energy storage system that is a separate project completing independent environmental review. This proposal was not analyzed in the EIR; however, the SEASP DEIR analyzed the environment impacts of land uses that would be allowed within the proposed Industrial land use designation at a programmatic level.

3. Response to Comments on the DEIR

R21. Response to Comments from George Christensen, dated September 19, 2016 (Appendix A2, page A2-78).

R21-1 The comment asserts that consultation with Native American tribes respecting the proposed Project was inadequate. Consultation involved 18 mailed inquiries and four responses (see the Cultural Resources Overview, DEIR Appendix E), and met the requirements of CEQA.

R21-2 The comment alleges that the City deprived Native American tribal representatives of their right to consultation through misrepresentation of at least one tribal representative's request for consultation. This comment is not incorrect. On behalf of the City, McKenna et al. sent requests for consultation to 18 tribal representatives on December 8, 2015 as part of that firm's preparation of a cultural resources overview and Sacred File Land Search. Tribal contact information was supplied by the Native American Heritage Commission (NAHC). McKenna et al. received four official responses; two from Juaneno representatives and two from Gabrielino representatives. The referenced response from the United Coalition to Protect Panhe noted that the Project area is considered part of the Juaneno traditional territory and expressed a desire to be kept informed of the results of subsequent cultural investigations. The representative requested no further consultation related to the proposed Project and only asked to be consulted on a project-by-project basis.

Information on Native American Consultations was provided starting on Page 5.5-14 of the DEIR and potential impacts were analyzed under Impact 5.5-2, starting on Page 5.5-21 of the DEIR.

R21-3 The comment alleges that the DEIR did not acknowledge the cultural importance of the site and surroundings to Native American tribes. However, as stated on Page 5.5-21 of the DEIR the Puvunga village site was identified and the sensitivity of the area for tribal cultural resources was acknowledged. As stated, implementation of the Specific Plan may uncover tribal cultural resources, which is considered a potentially significant impact. Mitigation Measures CUL-3 through CUL-5 were proposed to reduce these impacts to less than significant. As requested by the Tribes, Mitigation Measure CUL-4 requires a Native American monitor during ground disturbing activities. The National Register Site of Puvugna is located north of the Project area at the campus of California State University, Fullerton. Areas adjacent to this area within the Specific Plan consist of existing residential development; no land use changes are proposed in this area.

R21-4 In addition to the Native American consultations performed by McKenna described in Response to Comments R21-2, the City conducted Native American consultations pursuant to SB 18 and AB 52. The City received a list of tribal contacts made up of tribal contacts under both of the consultation processes from NAHC and written requests from tribal councils in 2015, consisting of 10 tribal representatives. Letters

3. Response to Comments on the DEIR

requesting consultation were mailed out to these representatives on December 8, 2015. The City received two responses, both of which requested tribal monitoring during ground disturbing activities.

- R21-5 The City performed the required Native American consultations under SB 18 and AB 52; PlaceWorks and McKenna were not the gatekeepers of that process.
- R21-6 Refer to Response to Comments R21-2 through R21-4.
- R21-7 As stated in the responses above, none of the Tribes contacted requested a formal consultation.
- R21-8 Refer to Response to Comment R21-4 regarding SB 18. The City conducted a separate Native American consultation process from McKenna's consultation. Rebecca Robles' reviewed the cultural resources the investigation and submitted a comment on the DEIR; responses are included herein (see Responses to Comments A15-1 through A15-4). Note that the DEIR is a programmatic EIR that analyzes the impacts of land uses allowed within the proposed Specific Plan. No site specific development is being proposed at this time. The City acknowledges that they will keep the Native American Tribes who have requested informed of future development in the area.
- R21-9 A summary of responses received from Native American Tribes were included in the DEIR starting on Page 5.5-14 and Appendix E of the DEIR. The commenter states that the mitigation measures for tribal cultural resources are inadequate to mitigate impacts but does not explain how. No changes to the DEIR are necessary.
- R21-10 The commenter is incorrect; the DEIR does not draw a conclusion that the Project benefits outweigh its unavoidable significant environmental effects; however, this will be required of the decision-makers (Planning Commission and City Council) when determining whether to approve the Project.
- R21-11 Refer to Response to Comments R21-9 regarding identification of Native American responses.
- R21-12 The NAHC was contacted as part of the Sacred Lands File Search and required Native American consultations. The NAHC did not identify the Los Cerritos Wetlands as a traditional tribal cultural landscape. However, due to the sensitivity of the area, any proposed recreational development in the Coastal Habitat, Wetlands & Recreation designation is required to prepare a Phase 1 Cultural Resources Investigation to identify site specific resources, impacts and mitigation (see Mitigation Measure CUL-5).
- R21-13 The Los Cerritos Restoration Project is not a part of the required approvals for the Specific Plan.
- R21-14 Refer to General Response Section 2.3.

3. Response to Comments on the DEIR

R22. Response to Comments from Tahesha Knapp-Christenshen, dated September 19, 2016 (Appendix A2, page A2-82).

- R22-1 In addition to the Native American consultations performed by McKenna, the City conducted Native American consultations pursuant to SB 18 and AB 52. The City received a list of tribal contacts made up of tribal contacts under both of the consultation processes from NAHC and written requests from tribal councils in 2015, consisting of 10 tribal representatives. Letters requesting consultation were mailed out to these representatives on December 8, 2015. The City received two responses, both of which requested tribal monitoring during ground disturbing activities.
- R22-2 The NAHC was contacted as part of the Sacred Lands File Search and required Native American consultations. The NAHC did not identify the Los Cerritos Wetlands as a cultural landscape designation. However, due to the sensitivity of the area, any proposed recreational development in the Coastal Habitat, Wetlands & Recreation designation is required to prepare a Phase 1 Cultural Resources Investigation to identify site specific resources, impacts, and required measures to reduce impacts (see Mitigation Measure CUL-5).
- R22-3 An accurate summary of the correspondence with Rebecca Robles is provided in the DEIR. Rebecca Robles' reviewed the cultural resources the investigation and submitted a comment on the DEIR; responses are included herein (see Responses to Comments A15-1 through A15-4). Her comments are acknowledged.
- R22-4 Tribal consultation was properly conducted and described in Section 5.5, *Cultural Resources*, of the DEIR (see Pages 5.5-5, -6 -14, -15, -21, and -29).

3. Response to Comments on the DEIR

R23. Response to Comments from Lynn Clarke, dated September 6, 2016 (Appendix A2, page A2-84).

R23-1 The commenter has concerns related to the Project's impacts on congestion, pollution, and property values. Traffic impacts are addressed in DEIR Section 5.16, *Transportation and Traffic*; air pollution impacts in DEIR Section 5.3, *Air Quality*; and water pollution impacts in DEIR Section 5.9, *Hydrology and Water Quality*. No specific inadequacy of the EIR is claimed and no EIR revision is needed.

3. Response to Comments on the DEIR

R24. Response to Comments from Aileen Colon, dated September 16, 2016 (Appendix A2, page A2-86).

- R24-1 The comment expresses opposition to the Project, specifically the proposed permitted land use intensification on part of the site. The comment does not address the adequacy of the EIR and no response is needed.
- R24-2 The comment describes current congestion on some Project site roadways. The DEIR includes three mitigation measures for traffic impacts and concludes that traffic impacts would be significant and unavoidable (see DEIR Section 5.16, *Transportation and Traffic*); the EIR met the requirements of CEQA. Refer to General Response Section 2.2, *Transportation and Traffic*.
- R24-3 Refer to General Response Section 2.2, *Transportation and Traffic*. Additionally, the comment expresses opposition to the proposed height limits in the Project design. The comment does not address the adequacy of the EIR and no response is needed.

3. Response to Comments on the DEIR

R25. Response to Comments from Melinda Cotton, dated September 16, 2016 (Appendix A2, page A2-88).

R25-1 The commenter provides introductory comments regarding opposition to the proposed Project. This comment bullet points the reason for opposition. The basis for these comments are provided in subsequent comments and responded to in Response to Comments R25-2 through R25-21.

R25-2 Section 5.1, *Aesthetics*, of the DEIR adequately addresses the Projects impact on views for the surrounding area. The commenter does not provide evidence that any new significant impacts would occur. Views from four viewsheds along Pacific Coast Highway are analyzed in DEIR Section 5.1, *Aesthetics*: B, Los Cerritos Channel; C, middle of Marina Pacifica frontage; L, middle of Marketplace and Marina Shores frontages; and K, southeast City boundary. It's not clear what scenic vistas would be blocked by construction of five- to seven-story buildings in the proposed Mixed Use Community Core land use designation. Views from developed frontages of Pacific Coast Highway in the proposed MU-CC Designation of the Los Cerritos Wetlands to the east and Alamitos Bay to the west are already blocked by existing buildings, trees, and signage.

R25-3 The comment regarding air quality impacts is noted. The DEIR fully analyzed air quality impacts in DEIR Section 5.3 and biological resources impacts in Section 5.4. The comment does not specify an inadequacy of the EIR and no further response is required.

R25-4 The commenter states that impacts to sensitive species and natural comments would be significant. This is correct as detailed under Impacts 5.4-1 and 5.4-2 of the DEIR. With the incorporation of mitigation measures identified in the DEIR, impacts would be reduced to less than significant. Jurisdictional waters, wetlands, and wildlife movement (including impacts to nesting migratory birds) are determined to be less than significant after mitigation in Section 5.4, *Biological Resources*. The comment does not provide substantial evidence that the analysis of the specified impacts is inadequate; no further response is needed

R25-5 The commenter states that impacts to wetlands would be significant. This is correct as detailed under Impact 5.4-3 of the DEIR. With the incorporation of mitigation measures identified in the DEIR, impacts would be reduced to less than significant.

The commenter also states that the Project would significantly affect wildlife movement. As discussed under Impact 5.4-4 of the DEIR implementation of the Specific Plan may result in the removal of trees and active nests during the breeding season. With the incorporation of mitigation measures identified in the DEIR, impacts would be reduced to less than significant.

3. Response to Comments on the DEIR

- R25-6 The commenter's reference to Impact 5.5-1 is acknowledged.
- R25-7 For the reasons stated in Section 5.6 of the DEIR impacts would be less than significant.
- R25-8 The commenter's reference to Impact 5.7-1 is acknowledged.
- R25-9 The commenter's reference to Impact 5.12-1 is acknowledged.
- R25-10 The commenters concern related to traffic is acknowledged.
- R25-11 The comment asserts that the conclusions of less than significant impacts in DEIR Section 5.14, Public Services, are inaccurate. However, the comment does not specify an inaccuracy in Section 5.14, or present evidence supporting such claim of inaccuracy. The analysis in Section 5.14 is supported by descriptions of recent and pending improvements to public services facilities serving the project site and by written questionnaire responses from public service officials.
- R25-12 The commenters concerns related to the traffic findings in the DEIR are acknowledged. Please also refer to Table 5.16-20 which provided analysis of additional intersections and was recirculated as part of Section 5.16 of the DEIR for public review. Refer also to General Response Section 2.2.1.
- The comment claims that mitigation measures for transportation and traffic impacts set forth in the DEIR are inadequate because, 1, there is no funding available to implement them; and, 2, nearly all of the mitigation measures are later noted as infeasible. Mitigation Measures TRAF-2 and TRAF-3 specify that implementation of those measures would be funded by fair-share payments by developers. Mitigation Measure TRAF-1 requires project-specific traffic studies prepared by project applicants/developers; the applicants/developers fund preparation of such studies. No DEIR revision is required.
- R25-13 Not all mitigation measures were deemed infeasible. Please refer to General Response Section 2.2.1, Sections 5.16.7 and 5.16.8 of the DEIR, and Appendix J2 (TDM Plan).
- R25-14 The pedestrian and bicycle improvements proposed as part of the Project area are summarized on Page 3-17 of the DEIR and shown on Figures 3-5 and 3-6. Additional details on the proposed improvements are provided in SEASP Section 6.2 and funding mechanisms are provided in Section 9.3.1.
- R25-15 The comment questions the analysis of intersection phase timing, noting that several tables in Section 5.16 note that the analysis used software that analyzes exclusive pedestrian phasing. Exclusive pedestrian phasing, where all vehicles are stopped in one phase of the signal cycle, and pedestrians may cross in all directions, including

3. Response to Comments on the DEIR

diagonally. The Specific Plan does not propose implementation of exclusive pedestrian phasing, and no inadequacy of the DEIR is identified..

R25-16 The commenter expresses concerns related to the study area in relation to comparable projects. An expanded study area was analyzed and a revised traffic impact analysis and DEIR traffic section was recirculated for public review. This analysis included the intersections referenced by the commented–Livingston and 2nd Street (#28), Bay Shore at 2nd Street (#27), and intersections west of PCH and 7th (#25 and #26).

R25-17 The comment asserts that the traffic impact study for another project is more thorough than the study for the proposed project. The comment does not assert an inadequacy in the EIR or support such assertion, and no response is required..

R25-18 The commenter expresses concerns related to traffic delay on PCH caused by pedestrian crossings and increased block density. Please note that the analysis in the traffic study at the study intersection was completed using Synchro level of service software and the Highway Capacity Manual methodology. This method utilizes traffic signal timing to evaluate operations. As such, the analysis accounts for pedestrian calls at the intersection and it is included in the impact assessment.

The specific plan proposes increased block density in the study area which would increase the options for travel and ability for pedestrians to cross the roadway in the study area. Although access to these areas would be evaluated concurrent with proposed development, depending on how much traffic they generate, traffic signals will likely be warranted at these locations where pedestrians would cross. The traffic signals would be interconnected with adjacent signals and timed so that traffic progression would occur smoothly and at a reasonable rate of speed.

R25-19 Refer to Response to Comment R25-16.

R25-20 The City of Long Beach considers three of the approved and pending development projects - removal and consolidation of existing industrial operations at the Synergy Oil Field; construction of an AES Battery grid energy storage facility along Studebaker Road north of the existing AES facility; and light industrial development on Studebaker Road (stalled since 2014) – to be part of buildout of the Specific Plan. Traffic generated by the two offsite related projects – Belmont Pool replacement and development of 28 homes in Seal Beach – is accounted for by the 0.505 percent annual growth rate used to estimate regional growth as well as pending and approved projects in the City of Long Beach; 0.505 percent annually for 20 years totals 10.6 percent.

R25-21 The commenter states that reduced parking requirements in SEASP are a huge mistake. This comment is noted.

3. Response to Comments on the DEIR

R26. Response to Comments from Cindy Crawford, dated September 19, 2016 (Appendix A2, page A2-93).

- R26-1 The commenter requests the No Project/No Development Alternative would like an alternative that does not have unavoidable significant impacts.
- R26-2 Comment noted.
- R26-3 The commenter expresses concern related to the mixed use component of the plan and lists unacceptable impacts relating to traffic, public safety, air quality, water quality, water supply, and wetlands. The commenter states that there is no community benefit. These comments are noted. The comments do not address the adequacy of the DEIR and not future response is needed.
- R26-4 The commenter recommends placing oil drilling operations east of Studebaker and not on the pumpkin patch site. This comment is noted.
- R26-5 The commenter states that no recreation uses should be allowed in the Coastal Habitat, Wetlands, and Recreation zone. This comment is noted.
- R26-6 The commenter recommends lower buildings, large open spaces between buildings, 100-foot wetland buffers, nature themed landscaping, winding sidewalks and bike paths, and bird safe buildings. This comment is noted.

3. Response to Comments on the DEIR

R27. Response to Comments from Leon Crawford, dated July 26, 2016 (Appendix A2, page A2-182).

R27-1 The commenter expresses opposition to the Project; these comments are acknowledged. Please note that DEIR Section 5.14.3, *School Services*, provides an analysis of the Project's impacts to schools.

3. Response to Comments on the DEIR

R28. Response to Comments from Thomas Curwen, dated August 26, 2016 (Appendix A2, page A2-183).

R28-1 The commenter expresses opposition to the proposed Project on grounds of traffic, congestion, density, quality of life. These comments are acknowledged. The comment does not address the adequacy of the EIR and no further response is required.

3. Response to Comments on the DEIR

R29. Response to Comments from Janice Dahl, dated September 18, 2016 (Appendix A2, page A2-185).

R29-1 The commenter expresses opposition to the proposed Project, and concerns about building height, population growth, traffic, pollution, and water supply are acknowledged. The comment does not address the adequacy of the EIR and no further response is required.

3. Response to Comments on the DEIR

R30. Response to Comments from Howard Davis, dated September 13, 2016 (Appendix A2, page A2-186).

R30-1 The commenter requests a thorough review of traffic impacts for the redevelopment of Seaport Marina Hotel and that traffic impact mitigation measures set forth in the DEIR for the proposed Specific Plan be implemented before finalizing of any plans. Please note that no site specific development is being proposed as part of the Specific Plan at this time. A separate project application has been submitted for the Seaport Marina Hotel property, which is undergoing separate environmental review.

3. Response to Comments on the DEIR

R31. Response to Comments from Dennis Digiovanni, dated August 28, 2016 (Appendix A2, page A2-187).

R31-1 The comment expresses concerns about traffic at the intersection of 2nd Street at PCH and Studebaker at PCH, and expresses opposition to high-density development next to that intersection due to traffic impacts. These comments are acknowledged. The comment does not address the adequacy of the EIR and no further response is needed. Refer to General Response Section 2.2.

3. Response to Comments on the DEIR

R32. Response to Comments from Tami Donald, dated August 29, 2016 (Appendix A2, page A2-188).

R32-1 The comment advocates protecting the Los Cerritos Wetlands by making the entire area a public park. The Specific Plan would designate nearly the entire Los Cerritos Wetlands Complex (LCWC) as Coastal Habitat, Wetlands & Recreation. As stated in DEIR Section 5.4, *Biological Resources*, “The intent of the Specific Plan is to preserve, restore, and enhance sensitive biological habitat.” Project design features for protection of biological resources in the LCWC are summarized on Page 3-14 in Chapter 3, *Project Description*, and discussed further in Section 5.4. The comment does not address the adequacy of the EIR and no further response is required.

3. Response to Comments on the DEIR

R33. Response to Comments from Charley Durnin, dated July 23, 2016 (Appendix A2, page A2-189).

R33-1 The comment expresses concerns about Project traffic impacts; supports the extension of Studebaker Road and Shopkeeper Road; and wishes that CEQA processing be streamlined for projects developed under the Specific Plan. The extension of Shopkeeper Road connecting Pacific Coast Highway with 2nd Street is part of the Specific Plan (see Chapter 3, *Project Description*, Page 3-14). The extension of Studebaker through the wetlands is not part of the Project, but was analyzed in the No Project/Adopted PD-1 Alternative. Subsequent environmental review would be conducted as outlined in Section 1.2.2 of the DEIR. Subsequent CEQA processing for development projects considered for approval under the Specific Plan would comply with CEQA Guidelines Section 15183 requiring site specific environmental review. The comment does not address the adequacy of the EIR and no further response is required.

3. Response to Comments on the DEIR

R34. Response to Comments from Jonathan Eldridge, dated August 1, 2016 (Appendix A2, page A2-190).

R34-1 The commenter is correct that the FHWA's 77-108 traffic noise model was used for this impact assessment. The commenter is also correct that if either the FHWA or Caltrans were involved as a lead agency use of the current TNM 2.5 model would be required. SEASP, by its very nature, a programmatic-level assessment, rather than a project-level evaluation. As such, it is not appropriate—as posited by the commenter—that the TNM assessment method be used for evaluating traffic noise impacts. Rather, the use of the 77-108 traffic noise model is an appropriate, fit-for-purpose, and cost-effective modeling tool for analyzing large-scale, programmatic-viewpoint traffic noise effects for the Specific Plan area. Using a more-detailed noise model, such as TNM, for a programmatic project would be wasteful of public funds since it would involve more technical effort, would necessitate the use of broad-brush assumptions (to synthesize details that are not known at this juncture), and would not provide any additional clarity or insights into traffic noise effects in the Specific Plan area. Note the highest Project-generated noise level increases for 2035 build-out were 0.8 dB or less, which are well below the +3/+5 dB thresholds; use of the TNM would not change the impact conclusions. The use of more detailed modeling applications, including TNM 2.5, would be much more appropriate on a project-by-project determination when finer definitions of input parameters are known, when the more detailed results would be appreciable, and when the additional subtleties would be beneficial for the impact determination. This broad-view approach for programmatic assessments, followed by refined-view approach for project-level assessments is common practice in the CEQA industry.

3. Response to Comments on the DEIR

R35. Response to Comments from Michael Ferrara, dated September 10, 2016 (Appendix A2, page A2-192).

R35-1 The comment expresses support for the proposed Specific Plan and the DEIR. No response is required.

3. Response to Comments on the DEIR

R36. Response to Comments from John Fries, dated September 19, 2016 (Appendix A2, page A2-193).

R36-1 The comment opposes the building heights that would be permitted under the Specific Plan and states that two- to three- stories is more aesthetically pleasing. Please note that aesthetic impacts were fully analyzed in Section 5.1.3 of the DEIR.

Additionally the commenter claims that the DEIR did not address impacts of building heights on bird flight paths. Bird-safe treatments for buildings to be developed under the Specific Plan are discussed on DEIR Pages 5.4-41 and -42 in Section 5.4, *Biological Resources*. Height limitations would also be required within 100 feet of a wetland. As determined in the DEIR, the increase in building height from existing two-story existing buildings to permitted buildings up to five and in some cases seven stories high is not expected to have substantial adverse effects on birds. No DEIR revision is required.

R36-2 The comment asserts that the consideration of alternatives reducing traffic impacts in the DEIR was inadequate and suggests a lower density or current level of SEADIP. However, the DEIR analyzed three alternatives consisting of lower permitted development intensity than the proposed Project: No Project/Adopted PD-1(SEADIP) Alternative; No Project/No Development Alternative; and Reduced Intensity Alternative in DEIR Sections 4.4, 4.5, and 4.6, respectively. Alternatives analysis in the DEIR met the requirements of CEQA.

R36-3 The comment asserts that the analysis of air quality impacts in the DEIR—especially mitigation measures and alternatives reducing air quality impacts—was not provided. DEIR Section 5.3, *Air Quality*, sets forth air quality impacts, which takes into account increased vehicle trips, and seven mitigation measures for air quality impacts. Impacts to air quality are identified as significant and unavoidable after mitigation. Three of the four alternatives analyzed in DEIR Chapter 7, Alternatives, were analyzed in part to reduce air quality impacts, including the No Project/Adopted PD-1(SEADIP) Alternative; No Project/No Development Alternative; and Reduced Intensity Alternative. The mitigation measures and alternatives analysis respecting air quality analysis comply with CEQA requirements.

3. Response to Comments on the DEIR

R37. Response to Comments from Andrew Garber, dated September 19, 2016 (Appendix A2, page A2-194).

- R37-1 The comment advocates that any proposed hotel or multifamily residential structure onsite (and especially at the intersection of 2nd Street and Pacific Coast Highway) be no more than five stories high. Permitted building heights are described in DEIR Chapter 3, *Project Description*; aesthetics impacts of proposed building heights are analyzed in Section 5.1, *Aesthetics*. These comments are acknowledged; no change to the DEIR is needed.
- R37-2 The comment requests that parking structures for future developments in the Marketplace site be set back away from 2nd Street and Pacific Coast Highway. Figure 7-8, Types of Parking, in SEASP provides examples of parking types that are suitable in the Project area. Required design features for parking structures are provided on Page 149 of SEASP (Hearing Draft dated 07/2016) and ensure aesthetic compatibility with the area.
- R37-3 The comment opposes pedestrian amenities other than sidewalks on Pacific Coast Highway due to the lack of housing nearby. The Specific Plan proposes a net increase of up to 5,439 residential units onsite; and Specific Plan objectives include expanding “multimodal transportation options through enhanced pedestrian and bicycle connectivity without compromising vehicular traffic flow.”
- R37-4 The comment opposes cycletracks such as those on Broadway and 3rd Street in downtown Long Beach in favor of simple bicycle lanes. The commenter prefers the Reduced Building Height Alternative. The comment does not address the adequacy of the EIR and no further response is warranted.

3. Response to Comments on the DEIR

R38. Response to Comments from Laurence Goodhue, dated July 24, 2016 (Appendix A2, page A2-195).

R38-1 The commenter expresses opposition to the Project. The comment does not address the adequacy of the EIR and no further response is warranted.

3. Response to Comments on the DEIR

R39. Response to Comments from Pete Grant, dated September 16, 2016 (Appendix A2, page A2-196).

R39-1 The comment provides support for the proposed Project. The comment does not address the adequacy of the EIR and no further response is warranted.

3. Response to Comments on the DEIR

R40. Response to Comments from Richard Hardt, dated September 6, 2016 (Appendix A2, page A2-197).

R40-1 The comment expresses opposition to the Project. The comment does not address the adequacy of the EIR and no further response is warranted.

3. Response to Comments on the DEIR

R41. Response to Comments from Lynne Harkins, dated September 19, 2016 (Appendix A2, page A2-198).

- R41-1 The commenter's opposition to the Project, due to traffic, wetland, aesthetic, and air quality impacts, is acknowledged; the comment does not address the adequacy of the EIR and no response is needed.
- R41-2 The comment expresses concern about Project air quality impacts and describes existing particulate pollution from an electric power plant onsite. Section 5.3, *Air Quality*, of the DEIR addresses the air quality impacts of the Project. The comment does not address the adequacy of the EIR and no response is needed.
- R41-3 The commenters' concerns about the Los Cerritos Wetlands Complex – particularly respecting recreation and bird habitat – are acknowledged. Impacts to biological resources are addressed in DEIR Section 5.4, *Biological Resources*.
- R41-4 The comment advocates that protection of the LCWC be the first priority for the SEASP. DEIR Section 5.4, *Biological Resources*, Page 5.4-37, states “The intent of the Specific Plan is to preserve, restore, and enhance sensitive biological habitat.” Project objectives regarding the LCWC are also described in DEIR Chapter 3, *Project Description*.
- R41-5 The commenter requests that permitted building heights be limited to three stories. Please note that aesthetics impacts are analyzed in DEIR Section 5.1, *Aesthetics* and a Reduced Building Height Alternative is analyzed in DEIR Section 7.7.
- R41-6 The commenter's requests that permitted residential intensity be reduced by at least half is acknowledged. The comment does not address the adequacy of the EIR and no further response is warranted.
- R41-7 The comment requests improved analysis and reduction of traffic impacts. However, the commenter does not state any specific inadequacies. Traffic impacts are fully analyzed in DEIR Section 5.16, *Transportation and Traffic*. The Transportation Impact Analysis included as DEIR Appendix J1 met the requirements of CEQA. No further response is warranted.
- R41-8 The comment requests no loss of wetlands and no road extensions through wetlands. Project impacts on the LCWC are analyzed in DEIR Section 5.4, *Biological Resources*. The Specific Plan would not allow the construction roads through wetlands. The extension of Shopkeeper Road to Studebaker Road, which connects to Pacific Coast Highway, would be designed to avoid impacts to wetlands. Additionally, Mitigation Measure BIO-2 set forth in DEIR Section 5.4, *Biological Resources*, would ensure not net loss of wetlands. The Specific Plan would permit limited development of coastal restoration, access, and visitor-serving recreation—such as ancillary office space, boat storage, trails, and an

3. Response to Comments on the DEIR

interpretive center – within the LCWC; such uses are intended to be developed in disturbed areas or ruderal uplands consisting of bare land or nonnative vegetation.

- R41-9 The comment requests the use of bird-safe glass in buildings and space between buildings for bird flight. Bird-safe treatments are included in the Specific Plan and are described in DEIR Section 5.4, *Biological Resources*. Refer also to General Response Section 2.3, *Bird-Safe Treatments*.
- R41-10 The comment urges that nighttime lighting impacts on animals and plants in wildlife habitat be minimized. The Specific Plan encourages lights out for birds programs (see Page 167 of SEASP). Buffers between wetlands and developments built under the Specific Plan are described in DEIR Section 5.4, *Biological Resources*, Pages 5.4-43 and -44.
- R41-11 The comment advocates that the Project site be made a gateway into Long Beach emphasizing the wetlands. Aesthetics impacts are discussed in DEIR Section 5.1, *Aesthetics*. This comment is acknowledged; no changes to the DEIR are needed.

3. Response to Comments on the DEIR

R42. Response to Comments from Bill & Margie Hearn, dated August 16, 2016 (Appendix A2, page A2-201).

R42-1 The comment expresses concerns about traffic impacts and increased building height, and a preference for open space including greenbelts. Project traffic impacts are analyzed in DEIR Section 5.16, *Transportation and Traffic*. Aesthetics impacts are described in Section 5.1, *Aesthetics*. Proposed open space preservation for protection of biological resources is described in Section 5.4, *Biological Resources*; and proposed recreational facilities and improvements are described in Section 5.15, *Recreation*. The commenters concerns are acknowledged. The comment does not claim any inadequacy of the EIR; no further response is needed.

3. Response to Comments on the DEIR

R43. Response to Comments from Mary Hochman, dated September 18, 2016 (Appendix A2, page A2-202).

R43-1 The comment expresses concerns about Project impacts on traffic, traffic and pedestrian safety, air quality, noise pollution, and light pollution; and asks how travel lanes, bicycle lanes, and on-road parking spaces will function together. These comments are acknowledged. Impacts to the various resources specified are analyzed in the corresponding sections of DEIR Chapter 5, Environmental Analysis. Proposed roadway cross-sections showing travel lanes and (in many cases) bicycle lanes and on-street parking are shown in Specific Plan Chapter 6, *Mobility*.

R43-2 The comment expresses concerns about the Los Cerritos Wetlands, especially protection of birds and other biological resources. *LACA* mentioned in the comment regarding the Wetlands is taken to be the Los Cerritos Wetlands Authority (LCWA). A search of LCWA's website and two documents on the aforementioned website for *bird-safe glass* yielded no results. Refer to General Response Section 2.3.

Buffers in most cases must be 100 feet wide; the City may determine that a buffer may be narrower than 100 feet if scientific documentation demonstrates that a proposed development may use a reduced, enhanced buffer to accomplish the avoidance and minimization measures related to edge effects; or the City may determine that a buffer must be wider than 100 feet to provide adequate protection of the wetland values. No DEIR revision is required.

3. Response to Comments on the DEIR

R44. Response to Comments from Jeff Hoffman, dated September 14, 2016 (Appendix A2, page A2-203).

R44-1 The comment expresses support for the Project and the EIR; no response is needed.

3. Response to Comments on the DEIR

R45. Response to Comments from Carol Holden, dated July 22, 2016 (Appendix A2, page A2-204).

R45-1 The commenter's opposition to the Project, on grounds including population growth impacts and roundabouts included in the Project design, is acknowledged. Population and housing impacts are analyzed in DEIR Section 5.13, *Population and Housing*. The comment does not claim an inadequacy in the EIR, and no further response is required.

3. Response to Comments on the DEIR

R46. Response to Comments from Glenn Ihrke, dated September 15, 2016 (Appendix A2, page A2-205).

- R46-1 The commenter expresses opposition to the Project and states the existing Seaport Hotel is an eyesore. These are introductory remarks; no response is needed.
- R46-2 The commenter is correct that mitigation measures that would improve the intersection at PCH and 2nd Street was determined to be infeasible for the reasons stated on Page 5.16-59 of the DEIR. Concerns related to traffic congestion are acknowledged.
- R46-3 The commenter opposes additional retail development onsite (the Specific Plan would permit a net increase of about 573,000 square feet of commercial/employment uses). The comment does not address the adequacy of the EIR and no response is required.
- R46-4 The comment expresses opposition to the proposed residential intensity, especially in the Mixed Use-Community Core land use designation. The comment relates to the plan itself and not the adequacy of the EIR and no further response is required.

3. Response to Comments on the DEIR

R47. Response to Comments from Bryan Jones, dated September 19, 2016 (Appendix A2, page A2-206).

R47-1 The comment introduces a review of the Specific Plan and DEIR by Alta Planning and Design Inc. and states that the letter expands on the SEASP DEIR recommendations related to active transportation and communities. No response is needed.

R47-2 The commenter explains Caltrans' new mission to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. It also references Caltrans' Complete Street Policy and Main Street Guide and describes the benefits of a multimodal system. Please note that the significance criteria used for the TIA is documented starting on Page 5.16-27 of the DEIR.

R47-3 The commenter questions the use of LOS methodology versus VMT. CEQA requires that the EIR address environmental impacts based on adopted thresholds of significance. Please note that the significance criteria used for the TIA is documented starting on Page 5.16-27 of the DEIR. With respect to VMT, The DEIR describes the changes required by SB 743 on page 5.16-2 of the DEIR and analyzes the Specific Plan's consistency with SB 743 on page 5.16-58 of the DEIR. As discussed in the DEIR, the City has not established VMT criteria. Since OPR has not yet amended the CEQA Guidelines to implement the change require by SB 743, automobile delay is still considered a significant impact, and the City of Long Beach will continue to use the established LOS criteria. As shown in Table 5.16-17 of the DEIR, the overall VMT would increase by approximately 305,044 compared to existing conditions, and the VMT per service population would decrease by approximately 5.84 or 13 percent. As shown in Table 5.16-18, with the incorporating of active transportation measure the net increase in VMT would be reduced by 56,267 vehicle miles.

A comparison of an analysis using LOS versus VMT metrics would not be meaningful because the metrics are measuring two completely different and competing performance criteria and policies.

R47-4 The City acknowledges the potential drawbacks of using a LOS based methodology and the potential for induced demand. Measuring auto delay at a particular intersection or street segment, focuses on moving more cars quickly and often lead to mitigation that increases roadway capacity to accommodate new vehicle trips. Therefore increased roadway capacity may result in increased VMT, energy consumption, and GHG emissions.

The commenter asks how the street cross-sections, parking, and transportation demand management strategies help to reduce the impact of induced demand. The proposed Project is not proposing in widen roadways or add lanes and therefore would not induce demand. An analysis of the TDM Plan is provided in Appendix J2 of the DEIR.

3. Response to Comments on the DEIR

- R47-5 The commenter provides examples of cities that have balanced the relationships between the visions, goals, and policies of the transportation and its impacts. These comments are noted.
- R47-6 Please refer to Appendix J2 of the DEIR for an analysis of the proposed TDM Plan and resulting trip reductions that can be achieved. The TDM program identifies the following targets for vehicle trip reductions as noted on page 6 of the plan (Page J2-6 of Appendix J2 of the DEIR):
1. Minimize Peak Hour Vehicle Trips
 - a. TDM programs reduce Net External Peak Hour Trips by an additional 10 percent:
 - i. AM Peak Hour Goal = 4,315 (4,795 trips * 90 percent). Stated another way: minimize the increase in external AM peak hour trips such that the overall increase with SEASP implementation is 47 percent instead of 57 percent.
 - ii. PM Peak Hour Goal = 6,980 (7,758 * 90 percent). Stated another way: minimize the increase in external PM peak hour trips such that the overall increase with SEASP implementation is 36 percent instead of 46 percent.
 2. Increase Bicycle, Pedestrian, and Transit Use
 - a. 4.9 percent bicycle and pedestrian mode share for trips within the SEASP Planning Area.
 - b. 10 percent increase in transit boarding and alighting at transit stops in the SEASP Planning Area.
 - c. 10 percent increase in bicycling and walking in SEASP.
- R47-7 The commenter provides examples of other metrics that could be considered. This comment is noted.
- R47-8 Refer to Response to Comment R47-6.
- R47-9 The Specific Plan does not dictate a change in speed limit for PCH and as such no further analysis is required.
- R47-10 The commenter discusses street sizing and its effect on walkability and vehicle delays. The commenter also provides examples corridors in other areas. These comments do not address the adequacy of the DEIR and no response is needed.

3. Response to Comments on the DEIR

- R47-11 The benefits of unbundled parking, shared parking, and incentives for reductions in parking are addressed in Appendix J2 of the DEIR.
- R47-12 The commenter states comments on street classifications and accommodating pedestrians and bicyclists. No response is needed.
- R47-13 The commenter provides a number of suggestions for reducing traffic impacts. Each of these measures were considered and incorporated into the Project as appropriate. Please refer to Appendix J2 of the DEIR.
- R47-14 The commenter offers concluding comments. Responses were provided in R47-1 through R14-13 above.

3. Response to Comments on the DEIR

R48. Response to Comments from Debi Jones, dated September 19, 2016 (Appendix A2, page A2-227).

R48-1 The comment asserts that the DEIR is inadequate due to insufficient consultation with Native American tribes. Project impacts related to biological resources and cultural resources, including tribal cultural resources, are fully analyzed in Section 5.4, *Biological Resources*, and 5.5, *Cultural Resources*, respectively. The City conducted Native American consultations pursuant to SB 18 and AB 52. The City received a list of tribal contacts made up of tribal contacts under both of the consultation processes from NAHC and written requests from tribal councils in 2015, consisting of 10 tribal representatives. Letters requesting consultation were mailed out to these representatives on December 8, 2015. The City received two responses, both of which requested tribal monitoring during ground disturbing activities. This request was acknowledged and incorporated into Mitigation Measure CUL-4.

3. Response to Comments on the DEIR

R49. Response to Comments from Gordana Kajer, dated September 18, 2016 (Appendix A2, page A2-228).

R49-1 The comment asserts that the conclusions of scenic vistas in DEIR Section 5.1, *Aesthetics*, is inadequate, as explained in following comments. Responses to detailed comments are provided below (R49-2 through R49-5).

R49-2 The comment describes existing views from the 2nd Street Bridge over the Marine Stadium. The existing character of the Project area, prominent feature and scenic views are described in Section 5.1.1.2 of the DEIR. Views from 2nd Street are shown in Figure 5.1-1a, *Project Area Viewsheds*.

R49-3 The comment references views from the aforementioned bridge of the San Gabriel Mountains to the east; the San Gabriel Mountains are actually north and northeast of the Project site. The mountain range visible to the east from the 2nd Street Bridge is the Santa Ana Mountains in Orange County.

The San Gabriel Mountains are currently visible to the north and northeast over – from west to east – Marine Stadium Park, the Marine Stadium, and the Marina Pacifica Condominium complex consisting of four-story and three-story buildings. Specific Plan buildout would not change the visual character of Marine Stadium Park or the Marine Stadium. Specific Plan buildout would permit redevelopment of the Marina Pacifica Mall with buildings up to five stories high, or up to seven stories high under certain conditions. Considering the distance of the Marina Pacifica Mall site from the 2nd Street Bridge – the southwest corner of the Mall site is about 1,120 feet to the east and the northwest corner of the Mall site about 1,860 feet to the north – and that buildings that could be redeveloped on the Mall site would only be one to three stories higher than existing Marina Pacifica condominium buildings interposed between the bridge and the Mall site – such redevelopment of the Mall site would not substantially block scenic vistas of the San Gabriel Mountains from the bridge.

Regarding vistas of the Santa Ana Mountains from the 2nd Street Bridge: the Santa Ana Mountains are visible to the east over – from north to south – the Marina Pacifica Condominium complex; 2nd Street; the City of Los Angeles Department of Water and Power Haynes Generating Station above 2nd Street; the Seaport Marina Hotel; street trees along Marina Drive; and boat masts in the Long Beach Marina in front of the Seaport Marina Hotel. The preceding analysis regarding redevelopment of the Marina Pacifica Mall complex with respect to the Marina Pacifica Condominium buildings also applies to the northern part of the view of the Santa Ana Mountains. Redevelopment of the Seaport Marina Hotel site would still allow views along the 2nd Street corridor. The boat docks in the Long Beach Marina would remain with Specific Plan buildout. Specific Plan buildout would permit redevelopment of the Marketplace site to the southeast with buildings up to seven stories high. However, considering the distance of

3. Response to Comments on the DEIR

nearly 1,800 feet from the midpoint of the Bridge to the nearest (northwest) corner of the Marketplace site, future redevelopments of the Marketplace site would be obscured behind street trees along Marina Drive and boat masts, and Specific Plan buildout would not substantially degrade scenic vistas of the Santa Ana Mountains from the Bridge.

- R49-4 See Response to Comment R49-3. As analyzed in detail under Impact 5.1-1 of the DEIR, scenic views from major roadways traversing the Project area would either be unchanged or improved due to 1) future restoration activities and consolidation of oil extraction infrastructure as encouraged by the Specific Plan, 2) preservation of roadway alignments that offer distant views of the San Gabriel Mountains, and 3) the required introduction of new view corridors in the portion of the Project area that would experience the most new urban development.
- R49-5 The comment suggests limiting permitted building height east of the 2nd Street Bridge to three stories to avoid adverse impacts on scenic views. Such limitation is unneeded, as substantiated in Response to Comment R49-3.

3. Response to Comments on the DEIR

R50. Response to Comments from James Kirkham, dated September 19, 2016 (Appendix A2, page A2-230).

R50-1 The comment advocates the No Project-No Development Alternative. The comment does not address the adequacy of the EIR and no response is needed.

3. Response to Comments on the DEIR

R51. Response to Comments from Robb Korinke, dated September 19, 2016 (Appendix A2, page A2-231).

R51-1 The comment expresses support for the Project and the DEIR; no response is needed.

3. Response to Comments on the DEIR

R52. Response to Comments from Jann Kronick-Gath, dated September 18, 2016 (Appendix A2, page A2-232).

R52-1 The comment expresses support for development at 2nd Street and Pacific Coast Highway and concerns about the wetlands and traffic. The comment does not address the adequacy of the EIR and no response is required.

3. Response to Comments on the DEIR

R53. Response to Comments from Bob Lane, dated September 17, 2016 (Appendix A2, page A2-233).

R53-1 The comment expresses support for the Project and the DEIR; no response is required.

3. Response to Comments on the DEIR

R54. Response to Comments from Iris Lovelace, dated September 19, 2016 (Appendix A2, page A2-235).

R54-1 The comment addresses potential upgrades to the AES Alamos electric generating station (AES). The proposed Specific Plan would change the land use designation of the AES property from Mixed Use District to Industrial; but would not affect operation of or future modifications to the AES facility. Upgrades to the AES plant are undergoing separate environmental review and approval. The comment does not address the adequacy of the EIR and no response is needed.

3. Response to Comments on the DEIR

R55. Response to Comments from Christine Martinovic, dated September 14, 2016 (Appendix A2, page A2-236).

R55-1 Refer to General Response Section 2.2 regarding traffic congestion measures at 2nd and PCH.

R55-2 The comment addresses traffic impacts and public participation regarding such impacts. Traffic impacts are analyzed in DEIR Section 5.16, *Transportation and Traffic*. Subsequent opportunities for public participation—Planning Commission and City Council hearings—will also be provided and noticed on Long Beach Planning’s website.

3. Response to Comments on the DEIR

R56. Response to Comments from B. Thomas Mayes, dated September 19, 2016 (Appendix A2, page A2-237).

- R56-1 The comment expresses concerns about proposed density under Specific Plan buildout. These comments are acknowledged. The DEIR fully analyzes impacts relating to population and housing (see Section 5.13, *Population and Housing*) and transportation and traffic (Section 5.16, *Transportation and Traffic*). Also refer to General Response Section 2.2. The comment does not address the adequacy of the EIR and no further response is required.
- R56-2 The comment asserts that use of the level of service F for intersection operation in both existing and with-project conditions appears to understate Project traffic impacts. Refer to Response to Comment R99-6.
- R56-3 The comment states that the Project seems to be designed for monetary return for developers and the City and states a preference for a lower-density alternative. Project objectives are set forth in DEIR Chapter 3, *Project Description*. A Reduced-Intensity Alternative is analyzed in DEIR Section 7.6, and a Reduced Building Height Alternative is analyzed in DEIR Section 7.7.

3. Response to Comments on the DEIR

R57. Response to Comments from Kelsea Mazzocco, dated September 19, 2016 (Appendix A2, page A2-238).

R57-1 The comment expresses support for the Project and the DEIR; no response is required.

3. Response to Comments on the DEIR

R58. Response to Comments from Donna Medine, dated August 28, 2016 (Appendix A2, page A2-239).

R58-1 The comment provides support for the Project, particularly retail development. The Specific Plan would permit a net increase of up to about 574,000 square feet of Commercial/Employment uses; proposed land uses per Land Use District are described in DEIR Table 3-1 in Chapter 3, *Project Description*.

3. Response to Comments on the DEIR

R59. Response to Comments from Jeff Miller, dated September 19, 2016 (Appendix A2, page A2-240).

R59-1 The comment expresses opposition to the Project, due to its effect on quality of life, views, noise, air quality, and wildlife. Note that view impacts are analyzed in DEIR Section 5.1, *Aesthetics*, and were found to be less than significant. The comment does not address the adequacy of the EIR; no response is needed.

R59-2 The comment asserts that the analysis of Project impacts to views of the San Gabriel Mountains is incorrect. The San Gabriel Mountains are currently visible to the north and northeast over – from west to east – Marine Stadium Park, the Marine Stadium, and the Marina Pacifica Condominium complex consisting of four-story and three-story buildings. Specific Plan buildout would not change the visual character of Marine Stadium Park or the Marine Stadium. Specific Plan buildout would permit redevelopment of the Marina Pacifica Mall with buildings up to five stories high, or up to seven stories high under certain conditions. Considering the distance of the Marina Pacifica Mall site from the 2nd Street Bridge – the southwest corner of the Mall site is about 1,120 feet to the east and the northwest corner of the Mall site about 1,860 feet to the north – and that buildings that could be redeveloped on the Mall site would only be one to three stories higher than existing Marina Pacifica condominium buildings interposed between the bridge and the Mall site – such redevelopment of the Mall site would not substantially block scenic vistas of the San Gabriel Mountains from the bridge.

The San Gabriel Mountains are also visible to the north from 2nd Street from Viewshed F which is about 400 feet west of Studebaker Road at 2nd Street, as shown on DEIR Figure 5.1-1a, *Project Area Viewsheds* (views of the San Gabriel Mountains to the northeast from Viewshed F are largely obstructed by the AES Alamitos electric generation facility). The scenic vista northward from Viewshed F would be improved by Specific Plan implementation by restoration of the Los Cerritos Wetlands, as noted in DEIR Section 5.1, *Aesthetics*. No DEIR revision is needed. Views of the San Gabriel Mountains from Viewshed D at the intersection of Marina Drive and 2nd Street are largely obstructed by buildings and trees.

As analyzed in detail under Impact 5.1-1 of the DEIR, scenic views from major roadways traversing the Project area would either be unchanged or improved due to 1) future restoration activities and consolidation of oil extraction infrastructure as encouraged by the Specific Plan, 2) preservation of roadway alignments that offer distant views of the San Gabriel Mountains, and 3) the required introduction of new view corridors in the portion of the Project area that would experience the most new urban development.

3. Response to Comments on the DEIR

R59-3 The comment states a view that the significant and unavoidable air quality impacts are unacceptable. This comment and all written comments on the DEIR will be considered by the Long Beach City Council before the Council considers the FEIR for certification.

R59-4 The commenter finds the significant and unavoidable traffic impacts and possible mitigation measures to be unacceptable.

R59-5 The comment is a summary of opposition to the proposed Project and support for the No Project/No Development Alternative.

3. Response to Comments on the DEIR

R60. Response to Comments from Jim Miller, dated September 19, 2016 (Appendix A2, page A2-241).

R60-1 Refer to General Response Section 2.2, *Transportation and Traffic*, related to analysis of additional intersections, including Bayshore and Second Street.

R60-2 The commenter asks why no weekend peak hour assessment was completed for the Project. This is a typical approach for traffic engineering assessment as professionals typically do not design roadways to handle traffic that fluctuates based on the season and in the worst case month of July would only occur four or five hours over the course of a year (e.g. the peak hour of a Saturday during the peak month). Instead, roadways are typically designed to handle typical traffic (e.g. weekday peak hour, which occurs approximately 150 days per year).

Fehr & Peers did pull available PeMS data from Caltrans at the monitoring station on Pacific Coast Highway at the Orange County/Los Angeles County border. The data, shown below, was pulled from July to show the worst case scenario for travel during off-peak hours and on weekends. Table R60-1 shows that the number of vehicles using the roadway during peak weekday periods is far greater than the number of vehicles using the roadway on a weekend during the busiest month. It should be noted that the only available data set for the month of July was from 2009; however, travel trends in the month should be generally consistent with that identified below. As such, the impact assessment is using the peak data in the study area (e.g. peak hours) and provides appropriate information for identifying impacts.

Table R60-1 Level of Service Descriptions for Signalized Intersections

Time Period	Total Vehicles	Percentage	No. of Samples	No. of Estimates
Weekday AM Peak Hour (6-10 am)	93217	14.12	1488	0
Weekday PM Peak Hour (3-7 pm)	151012	22.88	1488	0
Off-peak (10am-3pm)	143184	21.69	1488	0
Off-peak (7pm-6am)	100798	15.27	1488	0
Saturday	91332	13.84	1488	0
Sunday	80496	12.2	1488	0

Source: Fehr & Peers 2016

R60-3 The commenter asks why traffic counts were not taken during the week when school was in session. Existing morning (7:00 to 9:00 AM) and afternoon (4:00 to 6:00 PM) peak period vehicle counts at the 21 study intersections were conducted on July 14,

3. Response to Comments on the DEIR

2015. July was chosen based on comments received that summer travel patterns in this area are higher than non-summer travel patterns which was also confirmed with City staff. As stated in Section 5.16.1.3 of the DEIR, existing morning (7:00 to 9:00 AM) and afternoon (4:00 to 6:00 PM) peak period vehicle counts at the 21 study intersections were conducted on July 14, 2015. July was chosen based on comments received that summer travel patterns in this area are higher than non-summer travel patterns which was also confirmed with City staff.

- R60-4 The comment expresses opposition to the proposed Project in favor of a reduced-intensity alternative to reduce traffic impacts. A Reduced Intensity Alternative is analyzed in DEIR Section 7.6.

3. Response to Comments on the DEIR

R61. Response to Comments from La Vonne Miller, dated September 19, 2016 (Appendix A2, page A2-242).

R61-1 The commenter's opposition to the proposed Project, on grounds of impacts to traffic, wetlands, and quality of life is acknowledged. The comment does not address the adequacy of the EIR and no further response is required.

3. Response to Comments on the DEIR

R62. Response to Comments from Susan Miller, dated September 9, 2016 (Appendix A2, page A2-243).

- R62-1 The comment expresses opposition to the Project in favor of protecting wetlands, and asserts that the mitigation set forth in the DEIR for protection of the Los Cerritos Wetlands Complex is inadequate. The comment does not specify how the mitigation measure(s) for protection of wetlands are inadequate. Mitigation Measure BIO-2 requires avoidance of wetlands; or, if avoidance is impossible, creation of wetlands or purchase of mitigation bank credits such that no net loss of wetlands occurs. Mitigation Measure BIO-4 would reduce noise impacts to wildlife. Mitigation Measures BIO-5 requires that lights installed next to wetlands be designed and shielded so that the nighttime lighting shall be no greater than 0.10 foot-candles at the edge of the habitat. Mitigation measures set forth in the DEIR meet the requirements of CEQA.
- R62-2 The commenter's opposition to trails within the Los Cerritos Wetlands Complex is acknowledged. DEIR Section 5.4, *Biological Resources*, page 5.4-37 states "...trails, if allowed, would be developed on upland or unvegetated areas, thus minimizing direct impacts to native vegetation". SEASP Section 5.11 states "The proposed location of bike and pedestrian trails within SEASP provides public access to the perimeter of the Los Cerritos Wetlands." Further, Mitigation Measures BIO-6 and -7 address the potential effects of human intrusion into wetland areas. The comment does not address the adequacy of the EIR and no further response is needed.
- R62-3 The commenter's opposition to the Project on the grounds that no uses should be allowed within or near the wetlands. The comment does not address the adequacy of the EIR and no response is required.
- R62-4 The comment provides information on the acuity of vision and hearing in birds in support of the commenter's opposition to developments in the wetlands. The comment states that development would violate/harass wildlife. Impacts to biological resources were fully evaluated in Section 5.4 of the DEIR. Mitigation measures were incorporated to reduce impacts to less than significant. The comment does not address the adequacy of the EIR and no response is required.

3. Response to Comments on the DEIR

R63. Response to Comments from David Moore, dated September 10, 2016 (Appendix A2, page A2-244).

R63-1 The commenter's opposition to the proposed Project, on grounds of impacts to traffic, wetlands and other natural habitat, and residents' quality of life is acknowledged. The comment does not address the adequacy of the EIR and no further response is required.

3. Response to Comments on the DEIR

R64. Response to Comments from Wendy Munster, dated August 6, 2016 (Appendix A2, page A2-245).

R64-1 The commenter's opposition to the Project, on grounds of traffic impacts, population growth and building height, and impacts to wildlife and wetlands, is acknowledged. Transportation and traffic impacts are analyzed in DEIR Section 5.16, *Transportation and Traffic*; population impacts in Section 5.13, *Population and Housing*; and biological resources impacts in Section 5.4, *Biological Resources*. The comment does not assert an inadequacy in the DEIR and no further response is needed.

3. Response to Comments on the DEIR

R65. Response to Comments from Robert C. Myrtle, dated September 8, 2016 (Appendix A2, page A2-246).

- R65-1 The commenter's opposition to the Project, on grounds of building height, traffic impacts, quality of life, and aesthetic issues, is acknowledged. The comment does not assert an inadequacy in the DEIR and no further response is needed.
- R65-2 The comment relates some of the commenter's past involvements with planning efforts in the City and expresses some support for some past economic changes in and near the Project site—Naples, Belmont Shore, and Peninsula neighborhoods. The commenter values reasonable economic development efforts and the commercial district that has been upgraded over the years. The comment does not address the adequacy of the EIR and no further response is needed.
- R65-3 The comment expresses opposition to the proposed Project due to traffic impacts. Such impacts were found to be significant and unavoidable in DEIR Section 5.16, *Transportation and Traffic*. The comment does not address the adequacy of the EIR and no further response is needed.
- R65-4 The comment expresses opposition to the proposed Project stating that the plan improvements do not lead to the quality of life. The comment does not address the adequacy of the DEIR and no response is required.

3. Response to Comments on the DEIR

R66. Response to Comments from Ronald W. Novotny, dated August 18, 2016 (Appendix A2, page A2-248).

R66-1 The commenters opposition to the proposed Project due to traffic impacts is acknowledged. The comment does not address the adequacy of the DEIR and no response is needed.

R66-2 The comment expresses opposition to the proposed Project due to traffic impacts, specifically driving west on 2nd Street from Studebaker. The comment does not address the adequacy of the DEIR and no response is needed.

3. Response to Comments on the DEIR

R67. Response to Comments from Patrick O’Sullivan, dated September 18, 2016 (Appendix A2, page A2-249).

R67-1 The commenters opposition to the proposed Project due to traffic, wetlands, building height, and density impacts is acknowledged. The comment does not address the adequacy of the EIR and no response is needed.

3. Response to Comments on the DEIR

R68. Response to Comments from Diane Paull, dated July 22, 2016 (Appendix A2, page A2-250).

R68-1 The comment urges that building height under the Specific Plan be limited to five stories. This comment is acknowledged. The comment does not address the adequacy of the EIR and no response is required.

3. Response to Comments on the DEIR

R69. Response to Comments from Amy Pearson, dated September 18, 2016 (Appendix A2, page A2-251).

R69-1 The commenter's opposition to the proposed Project, on grounds of impacts to traffic, building height, quality of life, are acknowledged. The comment does not address the adequacy of the EIR and no further response is required.

3. Response to Comments on the DEIR

R70. Response to Comments from Randy Peck, dated September 12, 2016 (Appendix A2, page A2-253).

R70-1 The commenter's opposition to the proposed Project due to concerns about impacts to traffic, population growth, and building height are acknowledged. The comment does not address the adequacy of the EIR and no further response is required.

3. Response to Comments on the DEIR

R71. Response to Comments from Linda Pemberton, dated September 19, 2016 (Appendix A2, page A2-254).

- R71-1 Existing public transit that services the Project area is described starting on Page 5.16-17 of the DEIR. The most frequent existing transit service onsite is the Long Beach Transit routes on 7th Street and serving CSULB – routes 91, 92, 93, 94, and 96 combined – which operate at frequencies of up to 16 times per hour during weekday peak hours. Project implementation contemplates a circulator bus route operated by a business improvement district; a conceptual route for a circulator is shown on DEIR Figure 5.16-4, *Study Area Transit Service*.
- R71-2 The Specific Plan and the DEIR do not identify the proposed Project as transit-oriented development.
- R71-3 The Specific Plan, at buildout, would contain single-family neighborhood, multi-family neighborhood, community commercial center, neighborhood-serving center, waterfront, industrial, regional-serving facility, and open space land uses.
- R71-4 Traffic signal timing on Pacific Coast Highway is controlled by Caltrans. Synchronization of the referenced traffic signals requires a cooperative effort between the City and Caltrans or relinquishment of part of Pacific Coast Highway by Caltrans to the City, as described on DEIR Page 5.16-53. The City is currently in conversations with Caltrans to effectuate synchronization and relinquishment.
- R71-5 Please refer to Appendix J2 of the DEIR. Transportation Demand Management (TDM) measures have worked well across many developments in California. As stated in the TDM Plan, the CAPCOA document quantifies vehicle reductions associated with TDM measures and identifies an approach to quantify the reduction potential of TDM measures. Based on the CAPCOA document, suburban areas can reduce VMT by 15 to 25 percent depending on the suite of measures that are implemented. Since the CAPCOA document is based on research of locations where TDM was implemented, it provides the location for identifying where it can work and how effective it can be.
- R71-6 Refer to General Response Section 2.2, *Transportation and Traffic*, relating to the City's TDM.
- R71-7 The comment expresses support for the Reduced Intensity Alternative with building heights limited to four stories (the Reduced Intensity Alternative analyzed in DEIR Section 7.6 has the same permitted building height – seven stories – as the proposed Project; the Reduced Building Height Alternative would limit buildings to five stories high). The commenter's statements that this alternative would best meet the Project objectives, would reduce significant and unavoidable impacts to air quality, greenhouse gas emissions, and traffic and would address the Project's top priorities—traffic, wetland preservation, and views—are acknowledged. Comments also relate to how the plan was

3. Response to Comments on the DEIR

- derived. This is not a comment on the adequacy of the DEIR; no further response is needed.
- R71-8 The comment asks that the City prioritize clean air, mobility, and wetlands protection over increasing density. A Reduced Intensity Alternative is analyzed in DEIR Section 7.6. Alternatives analysis in the DEIR complied with CEQA.
- R71-9 The comment addresses public benefits of the Specific Plan compared to costs arising from environmental impacts of Specific Plan implementation, particularly traffic and air quality impacts. Funding for public benefits ensuing from the Project is outside of the purview of CEQA. However, these comments are acknowledged.
- R71-10 The comment asserts that mitigation measures set forth in the DEIR would be more workable if the Reduced Intensity Alternative were approved.
- R71-11 The comment consists of transcriptions of text from DEIR Section 3.2, *Statement of Objectives*, and Chapter 6, *Significant and Unavoidable Impacts*, and SEASP Section 3.2, *Priorities*. The comment does not address the adequacy of the DEIR and no response is required.
- R71-12 The comment consists of duplications of DEIR Table 5.13-5 in Section 5.13, *Population and Housing*, and part of a page from Specific Plan Chapter Two. The comment does not address the adequacy of the DEIR and information is provided to support the prior comments; no response is required.
- R71-13 The comment consists of a graphics and a table from a presentation on the DEIR. The comment does not address the adequacy of the DEIR and no response is required.
- R71-14 Please note that the number of intersection locations analyzed was expanded and provided in a recirculated traffic section. General Response Section 2.2.1.

3. Response to Comments on the DEIR

R72. Response to Comments from Susan G. Phillips, dated September 9, 2016 (Appendix A2, page A2-263).

- R72-1 The comment expresses opposition to the proposed Project on grounds of traffic impacts and aesthetics impacts due to building height and massing. Section 7.1.7 of the SEASP provides standards for building placement and orientation which require building separation to create open space and view corridors. This would ensure that development would not result in a “walled corridor.” The comment does not address the adequacy of the EIR and no response is required.
- R72-2 The comment claims that there are a number of environmental impacts for which mitigation has been deemed ineffective. There are mitigation measures that were considered and rejected related to traffic impacts. However, several mitigation measures have been incorporated into the Project which would reduce significant unavoidable impacts to in all other categories.
- R72-3 The commenter’s statement that the financial rewards of proposed development should not outweigh costs of health effects, air quality, greenhouse gas, and traffic impacts are acknowledged. No response is needed.
- R72-4 The comment requests that the DEIR identify impacts to parking lots opposite East Marina Drive from the Project site that may affect the Sunday Farmers Markets. This area is outside of the Project area. The proposed Specific Plan provides allowable land uses however, it does not dictate any site specific development proposal. Therefore, potential impacts to the adjacent parking lot properties are unexpected and unknown at this time.
- R72-5 Refer to Response to Comment R72-4. Also TDM measures proposed for the Specific Plan would apply to residents and employees on the Project area (see Appendix J2 of the DEIR).
- R72-6 The comment requests additional analysis of health impacts of air pollutant emissions. The Project’s contribution to regional criteria air pollutant emissions describes the Project’s contribution to cumulative air quality problems in the South Coast Air Basin (SoCAB). The DEIR includes a discussion on the relationship between the regional criteria air pollutant thresholds of significance and the health effects of the criteria air pollutants experienced by sensitive receptors in the SoCAB (refer to Section 5.3.1.1, *Regulatory Background*, under *Criteria Air Pollutants* and under *Air Quality Management Planning* and also Section 5.3.2 *Thresholds of Significance*, under *SCAQMD Regional Significance Thresholds*). As described under Impact 5.3-2 and Impact 5.3-3, the Project would cumulatively contribute to the nonattainment designations in the SoCAB and its health effects, which are listed on Page 5.3-19 of the DEIR. Air quality impacts were identified as a significant and unavoidable impact of the proposed Project.

3. Response to Comments on the DEIR

R72-7 The commenter requests that the EIR state why the benefits of emissions overrides health impacts. As required by CEQA, the purpose of the EIR is to disclose environmental impacts. A statement of overriding considerations will be prepared and is required to be adopted in order to approve a project with significant unavoidable impacts. CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed Project against its unavoidable environmental risks when determining whether to approve the Project. This would be documented in the statement of overriding considerations.

Potential industrial sources of emissions are described under Impact 5.3-5. However, as described in this section, at this programmatic level of review, it is too speculative to determine what new types of industrial/permitted sources of emissions would be generated by the proposed Project. Additionally, these sources undergo an additional level of environmental review by the South Coast Air Quality Management District (SCAQMD).

Construction-related air quality impacts are described under Impact 5.3-2 (regional) and Impact 5.3-4 (localized). The DEIR identified the potential sources of air pollutant emissions from construction activities. As described in this section, these sources include onsite heavy-duty construction vehicles, vehicles hauling materials to and from the site, and motor vehicles transporting the construction crew. Site preparation activities produce fugitive dust emissions (PM₁₀ and PM_{2.5}) from grading, excavation, and demolition. Construction-related air quality impacts were identified as a significant unavoidable impact of the proposed Project.

R72-8 The comment requests additional analysis of Project GHG emissions and the effort required to meet the GHG efficiency target. No additional measures were identified by the Commenter for the City to consider that would substantially reduce GHG emissions beyond those already proposed. The DEIR identifies GHG emissions as a significant unavoidable impact of the proposed Project. Over 67 percent of Project-related emissions are from transportation sources. Consequently, mitigation measures that reduce Project-related trips and vehicle miles traveled are the primary means of reducing GHG emissions associated with the proposed Project. The DEIR identifies project design features, including implementation of a Transportation Management Association (TMA) (PDF-1), preparation of Transportation Demand Management (TDM) Plans (PDF-2), reduced parking requirements to discourage driving (PDF-3), expansion of the pedestrian network (PDF-4), expansion of the bicycle network (PDF-5) to reduce trips and VMT. Additional mitigation measures from the California Green Building Standards Code voluntary measures were considered to encourage use of alternative modes of transportation and to encourage use of electric vehicles when using vehicular modes of transportation (see Mitigation Measures AQ-5 and AQ-6). Additionally, the DEIR describes that while the state is on-track to achieving the Assembly Bill 32 GHG reduction target for 2020, the state will need to consider additional, more aggressive,

3. Response to Comments on the DEIR

GHG reduction measures to achieve the GHG reduction target for year 2030. Because the state has only just begun to investigate the types of programs and measures needed to achieve the Senate Bill 32 target for year 2030 as part of the *Target Year 2030 Scoping Plan Update*, it is not unexpected that individual projects do not achieve an efficiency target that achieves the more aggressive GHG reduction trajectory for post-2020 conditions.

- R72-9 The comment requests that traffic delays at intersections due to Project traffic be identified in both minutes and percentage increase. Delays were provided in seconds and/or volume to capacity ratio as required and described in Section 5.16 of the DEIR.
- R72-10 Refer to General Response Section 2.2, *Transportation and Traffic*, related to significant and unavoidable impacts.
- R72-11 The comment requests that the costs of implementation of project design features be identified in the DEIR. However, costs of Project implementation are outside the purview of CEQA.
- R72-12 Refer to General Response Section 2.2, *Transportation and Traffic*, related to TDM measures.
- R72-13 The comment requests analysis of impacts to free parking lots onsite. Refer to Appendix J2 of the DEIR.
- R72-14 The comment requests analysis of costs and benefits of implementation of the proposed bicycle network. This is outside the purview of CEQA. A cost benefit analysis of bicycle improvements is not required for in the EIR.
- R72-15 The comment requests analysis of effect of traffic light synchronization on study area traffic in with-project conditions. Comment noted. The City is in the process of coordinating with Caltrans to effectuate light synchronization.
- R72-16 The comment requests analysis of the costs, timing, and impacts of implementation of each improvement proposed in Section 5.16, *Transportation and Traffic*, of the DEIR.
- R72-17 The comment requests that proposed permitted building heights be clearly stated. Permitted building heights in each proposed land use designation are referenced in the project description and detailed in Chapter 5, Development Standards, of SEASP (see also Tables 5-4, 5-6, 5-8 of SEASP). Building height is also analyzed in Section 5.1, *Aesthetics*, of the DEIR.

3. Response to Comments on the DEIR

R73. Response to Comments from Linda Piera-Avila, dated September 19, 2016 (Appendix A2, page A2-271).

R73-1 The City conducted Native American consultations pursuant to SB 18 and AB 52. The City received a list of tribal contacts made up of tribal contacts under both of the consultation processes from NAHC and written requests from tribal councils in 2015, consisting of 10 tribal representatives. Letters requesting consultation were mailed out to these representatives on December 8, 2015. The City received two responses, both of which requested tribal monitoring during ground disturbing activities. Tribal consultation was properly conducted and described in Section 5.5, *Cultural Resources*, of the DEIR (see Pages 5.5-5, -6 -14, -15, -21, and -29).

An accurate summary of the correspondence with Rebecca Robles is provided in the DEIR. Rebecca Robles' reviewed the cultural resources the investigation and submitted a comment on the DEIR; responses are included herein (see Responses to Comments A15-1 through A15-4). Her comments are acknowledged.

3. Response to Comments on the DEIR

R74. Response to Comments from Maureen Poe, dated September 16, 2016 (Appendix A2, page A2-272).

R74-1 The comment expresses opposition to the Project due to impacts on traffic, mobility for persons with disabilities, air quality impacts, and density. These comments are acknowledged. The comment does not address the adequacy of the EIR and no additional response is needed.

3. Response to Comments on the DEIR

R75. Response to Comments from Hailey Rafter, dated September 16, 2016 (Appendix A2, page A2-273).

R75-1 The comment expresses support for the proposed Project. The comment does not address the adequacy of the EIR and no response is required.

3. Response to Comments on the DEIR

R76. Response to Comments from Cheryl Rodi, dated August 29, 2016 (Appendix A2, page A2-274).

R76-1 The comment states that the SEASP plans to preserve the wetlands.

R76-2 The commenter's statement that she is not in favor of increased building is acknowledged. Development is expected to occur over time as market demand allows.

R76-3 The comment expresses concern about effectiveness of the proposed Transportation Demand Management Plan and concerns about vehicles using local roadways as alternatives to arterial roadways. Refer to General Response Section 2.2, *Transportation and Traffic*.

3. Response to Comments on the DEIR

R77. Response to Comments from Kia Ross, dated September 19, 2016 (Appendix A2, page A2-275).

R77-1 The comment expresses support for the proposed Project and the opinion that the DEIR was adequate. No response is needed.

3. Response to Comments on the DEIR

R78. Response to Comments from Jeffrey Sanchez, dated September 5, 2016 (Appendix A2, page A2-277).

R78-1 The comment expresses opposition to the Project based in part on impacts to biological resources. The comment does not address the adequacy of the DEIR and no response is needed.

3. Response to Comments on the DEIR

R79. Response to Comments from Kenneth H. Seiff, dated August 11, 2016 (Appendix A2, page A2-278).

R79-1 The comment states that these comments were submitted on the SEASP and are being resubmitted for the EIR. Please note that all comments are provided to the decision-makers (City Council) for their consideration prior to deciding on the Project. The purpose of this document is to respond to comments made on the adequacy of the EIR.

The comment refers to the area and roadways at the Studebaker Road/SR-22/7th Street interchange. The comment agrees with the need to upgrade this area. The commenter states that this area is degraded, with deteriorating infrastructure, unsightly with unsafe roadways. This comment addresses existing conditions and the adequacy of the EIR; no response is required.

R79-2 The commenter acknowledges the need to upgrade this area with landscape treatments, but states that infrastructure improvements should begin right away. The commenter's example of other cooperative approaches taken to improve infrastructure in the area is acknowledged. Note also that proposed improvements to the aforementioned interchange are set forth in Mitigation Measure TRAF-3 in DEIR Section 5.16, *Transportation and Traffic*. The comment does not assert an inadequacy in the DEIR and no further response is needed.

R79-3 The comment addresses planning for improvements along major roadways onsite including Studebaker Road and Pacific Coast Highway. Such improvements included in the Specific Plan are set forth in Project Design Features 4 through 7 and in Mitigation Measure TRAF-3 in DEIR Section 5.16, *Transportation and Traffic*.

R79-4 The comment summarizes concerns presented in the preceding three comments. No response is required.

3. Response to Comments on the DEIR

R80. Response to Comments from Dave Shukla, dated September 19, 2016 (Appendix A2, page A2-282).

- R80-1 The comment is introductory in nature; no response is required.
- R80-2 The industrial component of SEASP was discussed along with the remaining SEASP plan.
- R80-3 The AEC proposal is an independent process undergoing separate environmental review.
- R80-4 The comment requests a detailed discussion of alternative land uses in the Industrial land use designation. The Specific Plan does not propose land use intensification, or a change in permitted land use category, from the existing industrial uses in the Industrial land use designation. Thus, a detailed parcel-by-parcel discussion of alternative land uses in the Industrial designation is unnecessary. However, note that alternative land uses for this area were considered during the environmental review for the Project and rejected for the reasons set forth in Section 7.2.2 of the DEIR.
- R80-5 The comment expresses a desire for participation in the SEASP planning process.

3. Response to Comments on the DEIR

R81. Response to Comments from Todd Smith, dated September 13, 2016 (Appendix A2, page A2-284).

R81-1 The comment expresses opposition to the proposed Project due to traffic impacts, insufficient traffic impact mitigation, and proposed building heights. Refer also to General Response Section 2.2, *Transportation and Traffic*. The comment does not assert any specific inadequacy of the EIR; no further response is needed.

3. Response to Comments on the DEIR

R82. Response to Comments from Michael E. Solt, dated September 13, 2016 (Appendix A2, page A2-285).

R82-1 The comment expresses support for the Project; no response is required.

3. Response to Comments on the DEIR

R83. Response to Comments from Douglas W. Sprague, dated August 9, 2016 (Appendix A2, page A2-287).

R83-1 The commenter states that a number of values shown in the traffic study were reported as >80 for cumulative conditions, which does not show actual delay. The tables below summarize the level of service for all locations that were reported with delays greater than 80 seconds. However, note that the Highway Capacity Manual Methodology employed as part of this effort lacks sensitivity when intersections become saturated and the resulting delay estimates tend to be overstated. Therefore, standard practice is to report the results as >80 seconds because the delays greater than 80 seconds are not as precise and are likely overstated. This also explains why the change in delay is reported as N/A as the methodology likely reports over-estimated changes in delay under these conditions.

As noted in the DEIR Section 5.16, Transportation Traffic, all of the locations where the delay was greater than 80 seconds were identified as significant impacts. As such, the additional information does not change the findings of significance in the EIR.

Table R83-1 Existing With Project Intersection Impact Summary – HCM Intersections >80 sec delay

Intersection	Control	Peak Hour	No Project		With Project			Significant Impact?
			V/C ¹ or Delay ²	LOS	V/C ¹ or Delay ²	LOS	Project Change	
3. Studebaker Rd & SR-22 Westbound Ramps	Signal	AM	30.6	C	40.2	D	9.6	Yes
		PM	97.4	F	197.0	F	N/A	Yes
12. Pacific Coast Hwy & Loynes Dr	Signal	PM	38.3	D	81.3	F	-	Yes
16. Pacific Coast Hwy & 2nd St	Signal	AM	56.5	E	75.6	E	19.1	Yes
		PM	68.8	E	126.0	F	-	Yes

Source: Fehr & Peers

Notes: V/C = Volume / Capacity Ratio

Intersections operating below acceptable LOS are shown in **bold**

¹ V/C for signalized intersections based on ICU methodology using Traffix 7.9 software.

² Delay for unsignalized intersections based on HCM 2010 methodology using Synchro 8 Build 806 software.

³ Highway Capacity Manual 2010 methodology cannot accurately estimate the change in delay for intersections operating at an average delay of 80 seconds or more.

⁴ Does not satisfy the Peak Hour Volume Warrant for Traffic Signal installation.

3. Response to Comments on the DEIR

Table R83-2 Cumulative 2035 With Project Intersection Impact Summary – HCM Intersections >80 sec delay

Intersection	Control	Peak Hour	No Project		With Project			Significant Impact?
			V/C ¹ or Delay ²	LOS	V/C ¹ or Delay ²	LOS	Project Change	
3. Studebaker Rd & SR-22 Westbound Ramps	Signal	AM	36.9	D	47.1	D	10.2	Yes
		PM	141.1	F	245.2	F	N/A	Yes
5. Pacific Coast Hwy & 7th St	Signal	AM	84.2	F	93.0	F	N/A	Yes
		PM	113.7	F	143.5	F	N/A	Yes
7. Channel Dr & 7th St	Signal	PM	123.9	F	148.7	F	N/A	Yes
12. Pacific Coast Hwy & Loynes Dr	Signal	PM	57.7	E	121.6	F	N/A	Yes
16. Pacific Coast Hwy & 2nd St	Signal	AM	69.8	E	105.5	F	N/A	Yes
		PM	146.0	F	234.9	F	N/A	Yes
24. SR-22 at Studebaker Rd & College Park Dr	Side-Street Stop	PM	73.7	F	154.4	F	N/A	No ³

Source: Fehr & Peers 2017.

Notes: V/C = Volume / Capacity Ratio

¹ V/C for signalized intersections based on ICU methodology using Traffix 7.9 software.

² Delay for unsignalized intersections based on HCM 2010 methodology using Synchro 8 Build 806 software. Delay for side-street stop is reported as the worst-case approach delay.

³ Intersection does not satisfy the Peak Hour Volume Warrant for Traffic Signal Installation.

R83-2 The commenter requests that the circulation improvements identified in the SEASP occur prior to any approved construction occurs. This comment is noted. Please also see the Mitigation Measures TRAF-1 through TRAF-6 and Appendix J2 of the DEIR, for additional mitigation and project design features that would occur as part of the Project.

3. Response to Comments on the DEIR

R84. Response to Comments from Catherine Steisel, dated September 7, 2016 (Appendix A2, page A2-289).

R84-1 The commenters' concerns about the Specific Plan including density, size of residential units, building height, type of hotel permitted, and noise are acknowledged. The comment does not address the adequacy of the DEIR and no response is needed.

3. Response to Comments on the DEIR

R85. Response to Comments from Dianne Sundstrom, dated September 19, 2016 (Appendix A2, page A2-291).

- R85-1 The comment is introduces subsequent comments; no response is required.
- R85-2 The proposed land uses and buildout for SEASP were developed through an extensive public outreach, planning, and design process. Please refer to Chapter 1 of SEASP for additional background information. The comment also expresses concerns about density and affordable housing in a small part of the City of Long Beach. The Specific Plan would provide a range of residential uses and incentives to develop residential uses. An analysis of the projected housing and consistency with the City's Housing Element and Regional Housing Needs Assessment (RHNA) is provided in Section 5.13, *Population and Housing*, in the DEIR (see pages 5.13-1 through 5.13-6). As stated, the City has demonstrated its ability to meet its affordable housing RHNA allocation through identification of 31 sites in central and western Long Beach. There are currently no sites identified in the Project area or surrounding vicinity.
- R85-3 The comment asks how the Project population growth impact was determined to be less than significant. The conclusion in DEIR Section 5.13, *Population and Housing*, that Project-generated population growth would be a less than significant impact refers to Project-generated growth compared to regional population forecasts only and not to other impacts such as traffic, air quality or greenhouse gas emissions. Significant and unavoidable impacts were identified for traffic, air quality, and greenhouse gas emissions.
- R85-4 The comment expresses concerns about increased density of development bordering the LCWC. Please refer to Chapter 1 of SEASP for information on the purpose and intent of the plan. Impacts to biological resources were fully analyzed in DEIR Section 5.4, *Biological Resources*.
- R85-5 The comment asks why traffic counts for the TIA were taken on a Summer weekday. The comment summarizes the trip generation information and summarizes results of the traffic study related to the number of impacted locations. The summary of why July was chosen to collect count data is correct. At the outset of the Project, both input received from residents in the community and input from City staff indicated that traffic volumes are higher in the SEASP area during summer months. As such, counts were collected in this area during that time period.
- R85-6 The comment asks whether a more thorough traffic study would have identified additional impacts. The Project was scoped with input from City staff, based on comments received during the Notice of Preparation, and input received during the Specific Plan development to identify a comprehensive study area and study approach for inclusion in this assessment. The traffic study makes conservative assumptions and analyzes full buildout of the Specific Plan representing the worst case analysis. The

3. Response to Comments on the DEIR

traffic study was updated to analyze an expanded study area and recirculated for public review on February 17, 2017.

R85-7 The comment asks whether the DEIR considered the planned widening of the I-405. The growth forecasts developed as part of this effort were consistent with forecasts identified and recommended in the Congestion Management Program. These forecasts were developed from the SCAG travel demand forecasting model which is based on the Regional Transportation Plan that includes all funded roadway improvements. As such, the I-405 project was included in the development of the growth rates utilized in the study.

R85-8 The comment requests an assessment of the current effectiveness of the City's Sustainability Action Plan. Table 5.7-8 of the DEIR demonstrates how the Project is consistent with the City's Sustainable City Action Plan. This table is shown to demonstrate how the Specific Plan aligns with other City plans to reduce GHG emissions. It is beyond the scope of this EIR to demonstrate the effectiveness of the citywide plan.

The analysis of the Projects GHG emissions does not rely on the effectiveness of the City's Sustainable City Action Plan. As detailed in Section 5.7, *Greenhouse Gas Emissions* of the DEIR, implementation of SEASP would result in a decrease in GHG emissions per capita. However, it would not meet the SCAQMD Year 2035 target efficiency metric of 2.2 MTCO_{2e}/year/SP based on the long-term GHG reduction goals of Executive Order S-03-05 and Executive Order B-30-15. Additional state and local actions are necessary to achieve the post-2020 GHG reduction goals for the state. CARB has released the 2014 Scoping Plan Update to identify a path for the date to achieve additional GHG reductions. The new Executive Order B-30-15 requires CARB to prepare another update to the Scoping Plan to address the 2030 target for the state. However, at this time, no additional GHG reductions programs have been outlined that get the state to the post-2020 targets identified in Executive Order S-03-05, which are an 80 percent reduction in 1990 emissions by 2050, or the Executive Order B-30-15, which are a 40 percent reduction in 1990 emissions by 2035. As identified by the California Council on Science and Technology, the state cannot meet the 2050 goal without major advances in technology (CCST 2012). Therefore, SEASP's cumulative contribution to the long-term GHG emissions in the state would be considered potentially significant.

Several project design features and mitigation measure have been identified to reduce impacts related to GHG emissions (see DEIR Section 5.7.7).

R85-9 The comment requests analysis of impacts of air pollutants including GHG emissions on plants and animals in the LCWC. Air quality impacts are analyzed in Section 5.1, *Air Quality*, of the DEIR and GHG emissions are analyzed in Section 5.7. As identified in Section 5.3, *Air Quality*, of the DEIR, the proposed Project would not result a

3. Response to Comments on the DEIR

substantial impact to localized air quality from operation of the Project (see Impact 5.3-5) and a comparison of Table 5.3 (Existing SEASP Criteria Pollutant Emissions Inventory) and Table 5.3-9 (Maximum Daily SEASP Operation Phase Regional Emissions) redevelopment of the Project area would result in a decrease in operational VOC, NO_x, and CO emissions and an insignificant change in operational SO₂ emissions and particulate matter. As shown in Table 5.76 of the DEIR, the Project would result in an increase of 30,357 Metric Tons of Carbon Dioxide-Equivalent (without TDM measures).

The commenter fails to provide a causal link between Project related GHG emissions and regional air basin impacts on wetland ecosystems. There is no accepted methodology or criteria to relate a quantification of a Project's GHG emissions to the health of adjacent ecosystems or species. This issue is too speculative to reliably evaluate in the DEIR.

- R85-10 The comment asks what Project benefits could justify the City adopting a Statement of Overriding Considerations respecting significant and unavoidable air quality impacts. Note that a Statement of Overriding Considerations is required prior to adoption of SEASP. This document is required to be adopted by City Council and will be prepared for the City Council staff report for the public hearing on the Project. Some of the benefits the City would hope to achieve by Specific Plan implementation are summarized in the Statement of Objectives in DEIR Section 3.2.
- R85-11 The commenter opposes impacts to the LCWC and mitigation of such impacts outside of the LCWC. Mitigation Measure BIO-2 requires no net loss of wetlands and states that "any mitigation, replacement, and/or restoration of habitat shall occur in the LCWC or in an approved coastal mitigation bank that covers this area." Mitigation could only occur outside of the area if "the applicant can demonstrate that there are no logistically viable opportunities for mitigation within the LCWC." Such mitigation must be approved by the City and the resource agencies. Demonstrating that there are no viable opportunities within LCWC would be a difficult threshold to achieve, however, the mitigation is written to ensure that wetlands would be mitigated to less than significant.
- R85-12 The comment summarizes preceding comments and recommends the Reduced Intensity Alternative with a limit of five-stories; no response is required.

3. Response to Comments on the DEIR

R86. Response to Comments from Kristin Tarnofsky, dated September 19, 2016 (Appendix A2, page A2-294).

- R86-1 The commenter expresses concerns related to the proposed density and its resulting unmitigated traffic impact. These comments are acknowledged. The comment does not address the adequacy of the DEIR and no further response is needed.
- R86-2 Biological resources impacts, including impacts to wetlands, were fully evaluated in Section 5.4, *Biological Resources*, of the DEIR. Impacts to biological resources were found to be less than significant after incorporation of mitigation measures.
- R86-3 The commenter expresses concerns related to emergency evacuation. This issue was addressed in the DEIR (see Impact 5.8-5) and was found to be less than significant.
- R86-4 The commenter states that the proposed Project's height and density is not what Long Beach needs or wants. The comment is noted; it does not address the adequacy of the DEIR and no further response is needed.

3. Response to Comments on the DEIR

R87. Response to Comments from Regina Taylor, dated September 19, 2016 (Appendix A2, page A2-295).

R87-1 The commenter states that the health of the wetlands should be the primary concern and offers suggestions for further minimizing Project impacts to the wetlands. The following provides further detail on each of the suggested measures:

- Reduced intensity and building height alternatives were analyzed in Sections 7.6 and 7.7, respectively, in the DEIR.
- Refer to SEASP Section 7.2.14, Bird-Safe Treatments, regarding building façade treatments. Pursuant to the SEASP, the use of large planes of transparent glass or freestanding clear glass walls with uninterrupted glazed segments 24 feet and large in size are prohibited.
- Building setback requirements are provided in Tables 5-25-5, and 5-7 of the SEASP. Building to building setbacks must meet building code requirements.
- SEASP requires that nighttime lighting shall be minimized to levels necessary to provide pedestrian security.
- Refer to SEASP Section 5.10 Wetland Buffers. As stated, buffers are intended to serve as a transition from urbanized areas to natural areas. No new residential, commercial, or industrial buildings will be located within 100 feet of a delineated wetland. Public facilities or buildings and uses in compliance with the Coastal Habitat, Wetland, and Recreation land use designation may be allowed in the 100-foot buffer. Existing roadways are allowed within buffers. In addition, the future alignment and completion of Shopkeeper Road between 2nd Street and Studebaker Road shall be designed so that it does not impact any delineated wetland.
- Refer to SEASP Section 5.11, Standards Applicable to All Areas Adjacent to Jurisdictional Waters and Wetlands regarding trails.

The commenter also recommends the No Project/No Development Alternative. This comment is acknowledged.

3. Response to Comments on the DEIR

R88. Response to Comments from Ray and Becky Thorn, dated August 10, 2016 (Appendix A2, page A2-296).

R88-1 The commenter states that there is a lack of traffic mitigation efforts and opposes the plan unless impacts can be mitigated. The comment does not address the adequacy of the DEIR and no response is needed.

3. Response to Comments on the DEIR

R89. Response to Comments from Lawrence Triesch, dated September 18, 2016 (Appendix A2, page A2-297).

- R89-1 The commenter questions motivation behind the plan. The comment does not address the adequacy of the DEIR and no response is needed.
- R89-2 The commenter expresses concerns related to building height, wetlands, the extension of Shopkeeper Road, and runoff. These issues were fully addressed in the DEIR. Impacts to biological resources were addressed in Section 5.4 of the DEIR; with incorporation of Mitigation Measures BIO-1 through BIO-8 impacts to wetlands and other sensitive wildlife would be less than significant. Pursuant to the Specific Plan, the extension of Shopkeeper Road would not be constructed on a delineated wetland (see SEASP Section 4.3.8, v. Hearing Draft May 2017. Refer to SEASP Section 5.10 for a discussion of wetland buffers. Future development within the SEASP area will be required to comply with the City's Low Impact Development Ordinance requiring implementation of project features to treat runoff.
- R89-3 Wildlife corridors and movement were analyzed on Page Page 5.4-44 of the DEIR (see Impact 5.4-4). Impacts were determined to be less than significant.
- R89-4 The commenter expresses concerns related to wetlands, traffic, and the purpose of the plan. The comment does not address the adequacy of the DEIR and no response is needed.

3. Response to Comments on the DEIR

R90. Response to Comments from Lona Tucker, dated August 22, 2016 (Appendix A2, page A2-298).

R90-1 The commenter expresses concerns generally related to unmitigated traffic, special events, noise, and air quality impacts. The comment does not address the adequacy of the DEIR; no response is required. Please note that roadways are typically designed to meet the transportation demands that typically occur on the weekdays which is experienced throughout the year. Roadways are not designed to satisfy the occasional peak event that occurs irregularly throughout the year or during summary weekends. As such, although these events do increase traffic in the area for a short period of time, identifying potential Project impacts during these atypical events is not required.

R90-2 The commenter expresses concern related to the Projects impact on home values. CEQA requires an analysis of impact to the physical environment; the DEIR is not required to address issues related to home values or economic impacts.

R90-3 The commenter expresses concerns related to increased traffic congestion, emergency and emergency evacuation. Please note that the City has started discussions with Caltrans to synchronize signal timing along PCH. Impact related to emergency evacuation under Impact 5.8-5 of the DEIR.

R90-4 Refer to Response to Comment R90-1.

R90-5 Refer to Response to Comment R90-2.

R90-6 Refer to Response to Comment R90-3.

3. Response to Comments on the DEIR

R91. Response to Comments from Charles F. Ward, dated August 8, 2016 (Appendix A2, page A2-301).

R91-1 The commenter expresses opposition to the Project and recommends the area to be converted to sea life refuge similar to Bolsa Chica Wetlands. These comments related to the Project are acknowledged; however, they do not address the adequacy of the DEIR; no response is required.

3. Response to Comments on the DEIR

R92. Response to Comments from Cindy Wederich, dated August 10, 2016 (Appendix A2, page A2-302).

R92-1 These comments are introductory in nature. The comment does not address the adequacy of the DEIR and no response is needed.

R92-2 The commenter suggests the incorporation of pedestrian overpasses. Pedestrian overpasses are not included in the plan; however, the proposed Project includes a number of project design features to enhance pedestrian connectivity, as described on Page 3-17 of the DEIR.

R92-3 The commenter states concerns regarding water supply and the ability to provide water to the Project under shortage conditions. An analysis of water availability was provided in Section 5.17.2 of the DEIR. Additionally, a water supply assessment was prepared, which requires a determination that water supply would be adequate for 20 years (see Appendix L of the DEIR). Generally, redevelopment saves water because it replaces older buildings and infrastructure with new buildings required to meet the most recent building code with stricter water saving measures.

R92-4 The comment discusses how traffic leaving the Belmont Shore/Naples area has increased during peak periods in the past ten years. The comment goes on to question how increasing population and adding retail with minor rerouting of roadways will ameliorate the current congestion.

The Project does improve mobility for all users by providing improved bicycle and pedestrian facilities and the potential for a shuttle in the study area. Additionally, the Project will improve connectivity for vehicles; providing more options to circulate throughout the study area. However, as noted in the traffic study, the addition of Project trips is expected to increase delay and/or volume to capacity ratios at most study intersections even with the improved connectivity.

The proposed Project would increase traffic in the Project area and result in impacts to 18 intersections (see Section 5.16 of the DEIR). Refer to Table 5.16-20 for a summary of impacts to study area intersections, mitigation measures proposed, and feasibility of intersection improvements. Additionally, a transportation demand management (TDM) Plan has been prepared to further reduce traffic impacts (see Appendix J2 of the DEIR).

R92-5 Impacts related to emergency vehicle access were analyzed starting on Page 5.16-55 of the DEIR.

R92-6 Parking is addressed in Section 6.3 of the SEASP.

R92-7 Impacts related to energy use are provided in Section 5.17.5 of the DEIR.

3. Response to Comments on the DEIR

- R92-8 There are certain grants that are tied to specific types of development. For example, the ATP grants discussed in Section 9.3.3 of the SEASP are tied to multi-modal transportation improvements.
- R92-9 As discussed in Section 5.13 of the DEIR, regional growth is projected to occur. The City has the option of planning for that growth as outlined in the SEASP or allowing it to occur under the existing zoning designations. One of the guiding principles of the SEASP is to “balance responsible growth with resource preservation through a flexible land use plan that provides a greater mix of uses and through an implementation strategy that is tailored to the local economy.”
- R92-10 The commenter would prefer to see redevelopment of the area without increasing population and traffic.

3. Response to Comments on the DEIR

R93. Response to Comments from Alaine Weiss, dated September 19, 2016 (Appendix A2, page A2-304).

R93-1 These comments are introductory in nature and are addressed in Responses to Comments R93-2 through R93-4.

R93-2 The comment discusses concerns related to traffic in the study area. It notes that the proposed mitigation measures do not appear well thought out and, although the commenter is happy to see improved pedestrian facilities in the area, doubts that vehicle trips will shift over to pedestrian trips. The comment also note that many people drive to this area, park, then walk once here and goes on to question why improvements such as signal timing will not be implemented sooner and why they would be contingent on the proposed Project.

The specific plan provides improved bicycle and pedestrian facilities in the study area. It also provides additional roadways in the study area, providing improved connectivity and route options for people in the study area. However, as noted in Section 5.16, *Transportation and Traffic* of the DEIR, traffic is expected to increase in the study area with the Project and impacts associated with those trips have been identified. Please note that the City has already began coordination with Caltrans to improve signal timing in the study area and these improvements are not dependent on the proposed Project; however, the Project will contribute funding to improving signal timing in the study area as part of the mitigation for the Project.

R93-3 The commenter notes that the wetlands in the Project area have been much degraded due to oil operations. The commenter also states that the wetlands enhances the community's connection to nature and preserves species. The commenter states that the wetlands are at risk for encroachment.

As documented throughout the SEASP and Section 5.4, *Biological Resources* of the DEIR, the intent of the Specific Plan is to preserve, restore, and enhance sensitive biological habitat. Buildout would result in a net increase in native vegetation and wetland habitats. This effort is being ensured through a number of project design features. For example, jurisdictional delineations are required for any new development activity in the Coastal Habitat; Wetlands & Recreation land use (see Section 5.8 of SEASP). Uses would be reviewed and designed to avoid direct impacts to wetlands and other sensitive habitats by placing development within existing roads, buildings, or ruderal upland area. Additionally, trails, if allowed, would be developed on upland or unvegetated areas, thus minimizing direct impacts to native vegetation. The Specific Plan also establishes a Wetland Conservation and Monitoring Fund (SEASP Section 5.9), which will provide revenue in perpetuity for the long-term management of the wetlands, thereby protecting native vegetation and sensitive habitats.

3. Response to Comments on the DEIR

No site specific development Project is being proposed in the Coastal Habitat, Wetlands & Recreation area as part of the Specific Plan. However, the Coastal Habitat, Wetlands & Recreation land use designation lies entirely within the coastal zone and provides for coastal restoration, access, and visitor-serving recreation—ancillary office space, boat storage, trails, and an interpretive center. These uses are intended to be complementary to the surrounding habitat and consistent with the Coastal Act. While these uses are intended to be developed in disturbed areas or ruderal uplands consisting of bare land or nonnative vegetation, development of these uses could impact sensitive habitat or result in the loss of native vegetation supporting sensitive species. However, with incorporation of Mitigation Measures BIO-1 through BIO-7, potential impacts would be reduced to less than significant.

- R93-4 The commenter notes that they have a view from their residences and the Naples community of the Project site and any construction over the height to the Marina Pacifica condominiums will be visible. The commenter has concerns related to the visual character of the proposed Project. The commenter prefers that buildings of any height to be set back from waterways to allow for public access.

This comment does not address the adequacy of the DEIR. Please note that an analysis of impacts to scenic vistas and resources as well as community character was provided in Section 5.1, *Aesthetics*, of the DEIR. Also as discussed in the Specific Plan, public plazas shall be located along view edges (Waterway Promenade) to provide public access to the water. See also SEASP Table 5-2 regarding setback requirements.

- R93-5 The commenter expresses concerns related to the process for developing the proposed Project, the density, and view impacts. The commenter does not want to live in a urban, high-rise community. The public process related to the DEIR met the requirements of CEQA. Refer also to Response to Comment R93-4. The comment does not address the adequacy of the DEIR and no response is needed.

- R93-6 These comments reflect closing remarks. The comment does not address the adequacy of the DEIR and no response is needed.

3. Response to Comments on the DEIR

R94. Response to Comments from John Weiss, dated September 19, 2016 (Appendix A2, page A2-307).

R94-1 The commenter asserts that the only provision for alleviating congestion analyzed is coordination of signal timing with Caltrans. This statement is not correct. All feasible mitigation measures were considered. Please see Section 5.16.7, Table 5.16.20, and Appendix J2 of the DEIR, which provides a comprehensive analysis of the mitigation measures considered.

R94-2 Comment noted.

R94-3 Please refer to Section 5.14 of the DEIR for an analysis of the Projects impacts to public service providers.

R94-4 The commenter states a preference for further height limitations. Comment noted.

R94-5 The commenter states that the effects upon the wetland sand remediation are not fully addressed. The commenter alleges that buffers, flyways and bird safe structures need to be addressed and built into the Specific Plan.

All of these issues have been address in the Specific Plan (see SEASP Sections 5.10, Wetland Buffers, and 7.2.14, Bird-Safe Treatments) and fully analyzed in Section 5.4 of the DEIR.

R94-6 The commenter provides concluding remarks. No response is needed.

3. Response to Comments on the DEIR

R95. Response to Comments from Terry Welsh, dated September 18, 2016 (Appendix A2, page A2-309).

R95-1 As documented in Section 5.4 *Biological Resources* of the DEIR, a biological resources assessments relying on several reports and databases documented the biological conditions of the Project area. Sensitive plant and animal species known to occur in the Project area were also documented (see Tables 5.4-2 through 5.4-3). Please note that the Project does not propose any site specific development at this time. Further biological resources studies would be required as development is proposed (see Mitigation Measures BIO-1 through BIO-3).

3. Response to Comments on the DEIR

R96. Response to Comments from Sara Wescott, dated August 9, 2016 (Appendix A2, page A2-310).

R96-1 The commenter expresses concerns related to increased development at 2nd and PCH and related traffic and aesthetic impacts. The comment does not address the adequacy of the DEIR and no response is needed.

3. Response to Comments on the DEIR

R97. Response to Comments from Karen Yberico, dated August 25, 2016 (Appendix A2, page A2-312).

R97-1 The commenter expresses concerns about the increase in traffic. The comment does not address the adequacy of the DEIR and no response is needed.

3. Response to Comments on the DEIR

L1. Response to Comments from Dana Brounstein, dated September 20, 2016 (Appendix A3, page A3-1).

L1-1 The commenter expresses concerns related to increased traffic and building heights. The comment does not address the adequacy of the DEIR and no response is needed.

3. Response to Comments on the DEIR

L2. Response to Comments from Amber Chitty, dated September 20, 2016 (Appendix A3, page A3-2).

L2-1 The commenter expresses support for the proposed Project, including forward thinking measures to accommodate growth, pedestrian friendly commercial corridor, and the DEIR's environmental impact analysis. The comment does not address the adequacy of the DEIR and no response is needed.

3. Response to Comments on the DEIR

L3. Response to Comments from Julie Dean, dated September 20, 2016 (Appendix A3, page A3-3).

- L3-1 This comment regarding traffic impacts is acknowledged.
- L3-2 This comment regarding the increased growth that would occur with the Project is acknowledged.
- L3-3 The commenter's preference for a three story height limitation is acknowledged.
- L3-4 The commenter expresses concerns related to building height and bird flight. Please note that an analysis of the Project's potential impact to migratory birds and the Pacific Flyway was analyzed under Impact 5.4-4 of the DEIR.
- L3-5 The commenter expresses concerns related to the wetland buffer widths. The comment does not address the adequacy of the DEIR and no response is needed.
- L3-6 This comment states that there would be no net loss of wetlands and no road extensions through wetlands. Please note that the SEASP does not allow construction of a road through delineated wetlands. Refer also to Mitigation Measure BIO-2, which ensures no net loss of wetlands.
- L3-7 The proposed Specific Plan was revised to require that landscaping shall comply with SEASP Appendix D, Plant Palette (v. Hearing Draft May 2017).
- L3-8 This comment regarding traffic impacts is acknowledged.
- L3-9 This comment regarding traffic signal timing is acknowledged. Please note that the City has already begun coordination with Caltrans to improve signal timing in the study area and these improvements are not dependent on the proposed Project; however, the Project will contribute funding to improving signal timing in the study area as part of the mitigation for the Project.
- L3-10 This comment regarding traffic, air quality, and biological resources impacts is acknowledged.
- L3-11 This comment regarding community benefits is acknowledged.
- L3-12 Comment noted.

3. Response to Comments on the DEIR

L4. Response to Comments from Laura L. Greco, dated September 23, 2016 (Appendix A3, page A3-5).

L4-1 These comments relate to the City's General Plan update and not the proposed Project. No response is needed.

3. Response to Comments on the DEIR

L5. Response to Comments from Denny Lund, dated September 20, 2016 (Appendix A3, page A3-7).

L5-1 The commenter expresses support for the proposed Project, including increasing density and heights, revitalization of shopping centers, expansion of businesses and shopping, and economic benefits. The comment does not address the adequacy of the DEIR and no response is needed.

3. Response to Comments on the DEIR

L6. Response to Comments from Jeff Severson, dated September 20, 2016 (Appendix A3, page A3-8).

L6-1 The commenter expresses support for the proposed Project, including great public spaces, entertainment options, and economic benefits. The comment does not address the adequacy of the DEIR and no response is needed.

3. Response to Comments on the DEIR

L7. Response to Comments from City of Seal Beach, dated October 13, 2016 (Appendix A3, page A3-9).

- L7-1 The commenter provides introductory remarks. Concerns related to impacts on Seal Beach are addressed in Responses to Comments L7-1 through L7-8.
- L7-2 The commenter summarizes the intersection locations evaluated in the DEIR and mitigation proposed for the intersection of Seal Beach Boulevard and 2nd Street/Westminster Boulevard. The City of Seal Beach requested that the fair share contribution shall be required at issuance of building permits (not certificate of occupancy) and that improvements and fees will be agreed to separately between the City's of Seal Beach and Long Beach. Please note that pursuant to the City's request Mitigation Measure TRAF-4 has been revised and recirculated for public review in a revised traffic section from February 17th through April 3rd, 2017.
- L7-3 The commenter states that the Project borders Seal Beach and has a high potential for impacting additional intersections. Pursuant to the City's request, the City of Long Beach updated the traffic analysis and recirculated it for public review in a revised traffic section from February 17th through April 3rd, 2017. The revised traffic analysis analyzed impacts to Pacific Coast Highway at Seal Beach Boulevard (#22), College Park Drive/7th Street/SR-22 Westbound Off-Ramp (#24), and Marina Drive at 1st Street (#23), as requested by the commenter. As a result of this analysis impacts were identified at PCH and Seal Beach Boulevard and mitigation measures were considered (see Page 5.16-88 of the DEIR).
- L7-4 The comment identifies that impacts were identified in the City using Los Angeles CMP guidelines but should have used OCTA CMP guidelines. As noted in the traffic study (Page J-22 and J-23), for intersections in Seal Beach, OCTA specific parameters were also utilized in the significance criteria for identifying impacts in Seal Beach. As such, the analysis was completed consistent with OCTA standards.
- L7-5 The City recognizes that the City of Long Beach maintains a Joint Mutual assistance agreement with OCFA. However, future development is subject to the regulations and standards of Lbfd, not OCFA.
- L7-6 Pursuant to the City's request, Page 5.16-33 of the DEIR has been revised as follows:
- The City of Seal Beach also directed Fehr & Peers to add another approved and pending development project:
- ~~3028~~-home residential subdivision southwest of 1st Street & Pacific Coast Highway.
- L7-7 This statement provides concluding comments. No further response is necessary.

3. Response to Comments on the DEIR

L7-8 The commenter provided attachments, which were reviewed and considered when revising the TIA..

3. Response to Comments on the DEIR

Response to Comments from Public Comment received at the Planning Commission Study Session on August 18, 2016 (Appendix F).

Number Reference	Commenting Person	Response to Comment	Issue area addressed in the following section(s) of the DEIR
PC1	Several	This portion of the transcript is a presentation on the project, the CEQA review process; and introductory comments. No response is needed.	n/a
PC2	Jan Hall	States concerns about the proposed height limit and impacts on views and traffic.	Section 5.1, <i>Aesthetics</i> Section 5.16, <i>Transportation and Traffic</i>
PC3		Expresses support for improved bicycle facilities but the facilities are not usable for some trips.	Section 5.16, <i>Transportation and Traffic</i>
PC4		Expresses concerns about drought respecting the project increasing water demands.	Section 5.17, <i>Utilities and Service Systems</i>
PC5		Conveys concern about protecting wetlands.	Section 5.4, <i>Biological Resources</i>
PC6		Expresses concerns about police and fire access and response times relative to increased traffic.	Section 5.16, <i>Transportation and Traffic</i>
PC7		The comment questions the need for the proposed land use changes and expresses concerns about impacts to nearby areas such as traffic congestion and reduced property values.	Chapter 3, <i>Project Description</i> Section 5.16, <i>Transportation and Traffic</i>
PC8		Bob Ladd	Expresses support for project; Recommends extending Studebaker Avenue to Pacific Coast Highway.
PC9	Extending Studebaker Avenue to Pacific Coast Highway would enable development of an interpretive center, etc.		
PC10	Supports proposed density, as it reduces pressure to develop open space.		
PC11	Ken Croft	Expresses concerns about traffic impacts from thousands of new residents on current residents of the region; future project residents; and property values.	Section 5.16, <i>Transportation and Traffic</i>
PC12	Howard Davis	States concerns about traffic impacts, especially on Second Street Bridge. Recommends connecting Shopkeeper Road to Studebaker Road, and adjusting signal timing.	Section 5.16, <i>Transportation and Traffic</i> Responses to Comment Letter R119
PC13	Douglas Sprague	Conveys concerns about traffic impacts; recommends extending Shopkeeper Road and synchronizing signals.	Section 5.16, <i>Transportation and Traffic</i>
PC14		States that the project alternatives – including the <i>No Project</i> alternative – would result in Level of Service F on some area roadways.	Chapter 7, <i>Alternatives</i>
PC15	Janice Dahl	Expresses concerns about the City not acting on public input and traffic.	Chapter 2, <i>Introduction</i> Section 5.16, <i>Transportation and Traffic</i> Responses to Comment Letters R28 and R116
PC16		States concern about impacts to biological resources respecting Pacific Flyway which the project site underlies.	Section 5.4, <i>Biological Resources</i> Responses to Comment Letters R28 and R116
PC17	Dustin Batten	Expresses support for project.	No response needed

3. Response to Comments on the DEIR

Number Reference	Commenting Person	Response to Comment	Issue area addressed in the following section(s) of the DEIR
PC18	Linda Pemberton	States concern about traffic impacts.	Section 5.16, <i>Transportation and Traffic</i> Responses to Comment Letters R71 and R151
PC19		Suggests 35 to 55 percent reduction in residential density to reduce traffic impacts.	Chapter 7, <i>Alternatives</i> Responses to Comment Letters R71 and R151
PC20	Julie Dean	Expresses concern about traffic impacts, including impacts to visitors and existing residents; opposes proposed density. Prospective residents can't be forced to bike/walk/use transit.	Section 5.16, <i>Transportation and Traffic</i> Responses to Comment Letter R120
PC21	Ann Cantrell	States opposition to proposed building heights due in part to concern about birds colliding with buildings.	Section 5.4, <i>Biological Resources</i> Responses to Comment Letter R19
PC22	Dave Schukland	Conveys concern about the acreage designated for industrial use; concerned that a proposed reconstruction of the AES Alamitos Generating Station [not part of the proposed project] may not be subject to CEQA; requests that the reconstruction be analyzed under CEQA.	Chapter 3, <i>Project Description</i> No response regarding the Alamitos Generating Station is needed. Responses to Comment Letter R80
PC23	Richard Roth	Opposes density increase and adding commercial uses; notes that a currently proposed development in the Plan Area conforms to the old SEADIP permitted density.	Section 5.10, <i>Land Use and Planning</i> ; Section 5.13, <i>Population and Housing</i>
PC24	Jeff Miller	Opposes project due to density and his assertion that project benefits would accrue to developers, not Long Beach residents.	Responses to Comment Letter R59
PC25	Mel Nutter	Asserts that traffic analysis inadequate: traffic counts conducted on 1 summer day (July 14, 2015) in an area used by recreational traffic and when gasoline cost was reported to have increased 67 cents in the previous week.	Section 5.16, <i>Transportation and Traffic</i>
PC26	Carrie Aley	Concerned that under SB 743 adding residential uses to a commercial use within 0.5 mile of transit not a significant impact.	Section 5.16, <i>Transportation and Traffic</i> Responses to Comment Letters R1 and R99
PC27		Opposes proposed density; notes that using transit (especially for longer trips) impractical for many. Asserts that mitigation for past projects has not been implemented.	Responses to Comment Letters R1 and R99
PC28	Alan Songer	States opposition to project. Opposes mixed use; claims that much existing mixed use is vacant. Local retail businesses are failing despite numerous City incentives.	Section 5.13, <i>Population and Housing</i> Responses to Comment Letter R1
PC29		Asks City to stop planning process and start over.	
PC30	Susan Miller	States concerns about sea level rise and seismic hazards including liquefaction. Asks if buildings, walkways, etc. will be elevated; and, if so, impacts of such on wildlife.	Section 5.6, <i>Geology and Soils</i> Responses to Comment Letter R62
PC31	Anna Christensen	Expresses concerns about impacts to archaeological resources and human remains.	Section 5.5, <i>Cultural Resources</i>
PC32		States that AB 52 (Assembly Bill 52 pertaining to tribal cultural resources) process is inadequate because City	Section 5.5, <i>Cultural Resources</i>

3. Response to Comments on the DEIR

Number Reference	Commenting Person	Response to Comment	Issue area addressed in the following section(s) of the DEIR
		"only needs to talk to one Indian".	
PC33	Melinda Cotton	Opposes exclusion of affordable housing from project.	Section 5.13, <i>Population and Housing</i> Responses to Comment Letters R25 and R114
PC34		Opposes proposed addition of intersections to Pacific Coast Highway due to consequent increase in congestion.	Section 5.16, <i>Transportation and Traffic</i> Responses to Comment Letters R25 and R114
PC35	Gordona Cager	Asserts that public outreach, and opportunities for public participation, have been inadequate.	Chapter 2, <i>Introduction</i>
PC36	Elizabeth Lambe	Concerned about proposed density; asserts that Long Beach has historically limited density onsite for protection of wetlands and has directed dense development downtown, where there is adequate infrastructure for such development.	Section 5.4, <i>Biological Resources</i> Responses to Comment Letter A7
PC37	Pat Towner	Opposes project on grounds of excess density, and cumulative impacts (respecting projects at Long Beach Airport, Department of Veterans Affairs hospital, Southern California Edison property, etc.).	
PC38		The comment is introductory and does not require a response.	
PC39	Andy McAfee	Asserts that analysis of hazards from existing and future oil field operations onsite is inadequate – for instance, regarding diseases resulting from exposure to chemicals from oil operations (asthma, cancer, watery eyes). Requests that analysis be redone by an industrial hygienist.	- Current and historic land uses onsite, and petroleum-contaminated soil, are described on page 5.8-7 of the DEIR - Environmental site assessments are required for future developments – would address soil, soil vapor, or groundwater contamination Section 5.8.7 of the DEIR
PC40	Caudillo Jones	Opposes project due to increased traffic congestion. Suggests improving signal timing, transit, and parking.	Section 5.16, <i>Transportation and Traffic</i>
PC41	Larry Goodhue	Opposes reverting part of site from Specific Plan to conventional zoning.	Section 5.10, <i>Land Use and Planning</i> Responses to Comment Letter R38
PC42	Mike Buhbe	Expresses opposition to project due to increased height limits and proposed additional retail uses.	Section 5.1, <i>Aesthetics</i> Responses to Comment Letter R17
PC43	Diane Sundstrom	Expresses concerns about air quality and greenhouse gas emissions.	Section 5.3, <i>Air Quality</i> Section 5.7, <i>Greenhouse Gas Emissions</i> Responses to Comment Letter R85
PC44		Asserts that project development would hinder City's achieving goals of its 2010 Sustainable Action Plan regarding vehicle emissions.	Section 5.3, <i>Air Quality</i> Section 5.7, <i>Greenhouse Gas Emissions</i> Responses to Comment Letter R85

3. Response to Comments on the DEIR

PC45	Christopher Koontz	Following public testimony City staff provided follow up information to the Commissioners related to the project and environmental impacts. No response is needed.	Various
PC46	Commissioner Templin		
PC47	Chairman Christoffels		
PC48			
PC49			
PC50	Commissioner Verduzco-Vega		
PC51	Commissioner Van Horik		
PC52	Commissioner Van Horik		
PC53	Commissioner Fox		
PC54	Commissioner Cruz		
PC55	Commissioner Templin		
PC56	Chairman Christoffels		

3. Response to Comments on the DEIR

This page intentionally left blank.

4. Response to Comments on Recirculated Traffic Section

As stated in Section 3 of this Draft Response to Comments document, Section 15088 of the CEQA Guidelines requires the Lead Agency (City of Long Beach) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DEIR and prepare written responses. Pursuant to CEQA Guidelines Section 15088.5(c), the City of Long Beach is recirculated the portion of the EIR that triggered the need for recirculation under CEQA Guidelines Section 15088.5(a)—Section 5.16, Transportation and Traffic, and Appendix J (Traffic Reports). The Recirculated Traffic Section of the DEIR was circulated for a 45-day public review period, from February 17, 2017 to April 3, 2017.

This section provides all written responses received on the recirculated transportation and traffic section of the DEIR and the City of Long Beach’s responses to each comment.

Comment letters are provided in Appendix B1 and B2 and specific comments are given letters and numbers for reference purposes. The numbering was continued from the numbering established in Section 3 for ease of reference. Where sections of the DEIR are excerpted in this document, the sections are shown indented. Changes to the DEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies, organizations and persons that submitted comments on the recirculated transportation and traffic section during the public review period.

Number Reference	Appendix Page No.	Commenting Person/Agency	Date of Comment	Page No.
Agencies & Organizations (Appendix B1)				
A16	B1-1	Caltrans District 7	April 5, 2017	4-5
A17	B1-4	El Dorado Audubon Society	April 3, 2017	4-7
A18	B1-7	Los Cerritos Wetlands Land Trust	April 7, 2017	4-8
A19	B1-72	Metro	April 3, 2017	4-16
A20	B1-74	Native American Heritage Commission	February 28, 2017	4-17
A21	B1-78	State Clearinghouse	April 4, 2017 April 7, 2017	N/A
Residents (Appendix B2)				
R98	B2-1	Caren Adler	March 3, 2017	4-18
R99	B2-2	Kerrie Aley	April 3, 2017 February 21, 2017	4-19
R100	B2-12	David Baker	March 8, 2017 February 17, 2017	4-25
R101	B2-14	Jane Wilson Barboza	February 25, 2017	4-26
R102	B2-15	Sandy Bauer	March 1, 2017	4-27

4. Response to Comments on Recirculated Traffic Section

Number Reference	Appendix Page No.	Commenting Person/Agency	Date of Comment	Page No.
R103	B2-16	Christine Beur-Mortezai	March 2, 2017	4-28
R104	B2-17	Cathy Black	April 3, 2017 March 1, 2017	4-29
R105	B2-18	Dick Blankenship	February 24, 2017	4-30
R106	B2-19	Johnathan Blitzer	March 1, 2017	4-31
R107	B2-20	Carole Bramble	March 1, 2017	4-32
R108	B2-21	Kevin Brown	March 29, 2017 February 19, 2017	4-33
R109	B2-23	Judy Cannavo-McKeever	March 1, 2017	4-34
R110	B2-24	Rebecca Caudillo	April 3, 2017	4-35
R111	B2-25	Madonna Cavagnaro	March 31, 2017 March 2, 2017	4-36
R112	B2-26	Juerg Ciceri	March 30, 2017	4-37
R113	B2-28	Lynne Clarke	March 1, 2017	4-38
R114	B2-29	Melinda Cotton	April 30, 2017	4-39
R115	B2-30	Will Cullen	April 3, 2017	4-40
R116	B2-32	Janice Dahl	April 10, 2017	4-41
R117	B2-33	Tarek Damerji	November 8, 2016	4-42
R118	B2-35	Phil Dandrige	April 2, 2017	4-43
R119	B2-36	W H Davis	March 31, 2017	4-44
R120	B2-37	Julie Dean	April 3, 2017	4-45
R121	B2-38	Tami Donald	March 9, 2017	4-46
R122	B2-39	Charley Durnin	March 1, 2017	4-47
R123	B2-40	Bruce Foat	April 2, 2017 March 30, 2017	4-48
R124	B2-41	Douglas Domingo-Forasté	March 30, 2017	4-49
R125	B2-42	John Fries	April 3, 2017	4-50
R126	B2-43	Janice Furman	April 3, 2017	4-51
R127	B2-44	Brent Griffin	March 30, 2017	4-52
R128	B2-45	Jon Hales	March 30, 2017	4-53
R129	B2-46	Jeff Hoffman	April 3, 2017	4-54
R130	B2-47	Glenn Ihrke	March 1, 2017	4-55
R131	B2-48	Gary Johnson	March 1, 2017	4-56
R132	B2-49	Marta Kirkwood	March 4, 2017	4-57
R133	B2-50	Donna Kraus	March 29, 2017	4-58
R134	B2-51	Bob Lane	April 3, 2017	4-59
R135	B2-52	James Lent	February 28, 2017	4-60
R136	B2-53	Michel Litt	March 1, 2017	4-61
R137	B2-54	Elena Marty	March 30, 2017	4-62
R138	B2-55	Kerry Maxwell	March 31, 2017	4-63
R139	B2-57	Keith McClellan	March 1, 2017	4-64
R140	B2-58	Karen McDonough	March 3, 2017	4-65
R141	B2-59	Craig McLaughlin	March 10, 2017	4-66
R142	B2-60	Donna Medine	March 1, 2017	4-67

4. Response to Comments on Recirculated Traffic Section

Number Reference	Appendix Page No.	Commenting Person/Agency	Date of Comment	Page No.
R143	B2-61	Linda Merrill	March 1, 2017	4-68
R144	B2-64	Diane Moos	March 30, 2017	4-69
R145	B2-65	Mike Muttart	March 9, 2017	4-70
R146	B2-66	Bill Napier	February 27, 2017	4-71
R147	B2-67	Kate Olsen	March 13, 2017	4-72
R148	B2-68	Margo Parmenter	March 29, 2017 March 1, 2017	4-73
R149	B2-70	Diane Paull	March 29, 2017 March 1, 2017	4-74
R150	B2-72	Amy Pearson	March 8, 2017	4-75
R151	B2-73	Linda Pemberton	April 3, 2017	4-76
R152	B2-76	Dorothy Perley	April 3, 2017	4-78
R153	B2-77	Braden Phillips	April 2, 2017	4-79
R154	B2-82	Vince Q	March 7, 2017	4-82
R155	B2-83	Chis Richgels	March 30, 2017	4-83
R156	B2-84	Michael Rinella	March 1, 2017	4-84
R157	B2-85	Jeff Salisbury	March 1, 2017	4-85
R158	B2-87	Kenneth H. Seiff (Attachment photographs provided in Appendix B3)	April 3, 2017	4-86
R159	B2-93	Lynn Shober	April 3, 2017	4-88
R160	B2-94	Howard Shopenn	April 3, 2017	4-89
R161	B2-95	Andy Seinkiewich	April 3, 2017	4-90
R162	B2-96	Sydney Simon	March 30, 2017	4-91
R163	B2-97	Daniel Siskin	March 1, 2017	4-92
R164	B2-98	Alyse Smith	March 1, 2017	4-93
R165	B2-99	Laurie Smith	April 3, 2017	4-94
R166	B2-100	Todd R. Smith	March 31, 2017	4-95
R167	B2-101	Becki Snellen	March 6, 2017	4-96
R168	B2-102	Jason Stack	April 3, 2017	4-97
R169	B2-110	Anne Conneen Thompson	April 3, 2017	4-98
R170	B2-111	Susan Tiso	March 2, 2017	4-99
R171	B2-112	Lona Tucker	March 29, 2017	4-100
R172	B2-113	Melanie and Ernie Wallner	March 2, 2017	4-101
R173	B2-114	Charles F. Ward	April 2, 2017 February 19, 2017	4-102
R174	B2-116	William L. Waterhouse	April 3, 2017	4-103
R175	B2-120	Alaine Weiss	April 3, 2017	4-105
R176	B2-122	John Weiss	April 3, 2017	4-106
R177	B2-123	Janice Wierzbicki	April 2, 2017	4-107
R178	B2-124	Carol Williams	March 1, 2017	4-108
R179	B2-125	Paul Yost	March 1, 2017	4-109

4. Response to Comments on Recirculated Traffic Section

This page intentionally left blank.

4. Response to Comments on Recirculated Traffic Section

A16. Response to Comments from Caltrans dated April 5, 2017 (Appendix B1, page B1-1).

A16-1 The proposed Specific Plan provides for the implementation of complete streets and pedestrian safety measures (see Chapter 3 of the DEIR and Chapter 6, Mobility, of SEASP). Information pertaining to SB 743 is on Pages 5.16-2, 5.16-3, 5.16-58, 5.16-59, 5.16-60 of the DEIR.

A16-2 The comment requests that the queue results be confirmed and that the Queuing assessment be completed with methodologies consistent with the Highway Capacity Manual. The commenter also requests that the analysis utilize actual signal timing data, incorporate passenger care equivalency factors, and ensure that the queue does not exceed 85 percent of the available storage to the gore point. Finally, the comment requests that the source of the data be submitted for review.

The source of the analysis is the Traffic Study, which is circulated as an Appendix J1 to the DEIR. As noted in the traffic study, the ramp intersections were evaluated using the Highway Capacity Manual and utilized signal timing obtained from Caltrans. Additionally, the HCM analysis incorporates a heavy vehicle factor and, as such, the Synchro queuing estimates already account for the presence of heavy vehicles. Additionally, the queues did not come close to approaching the available storage. As such, the queuing assessment is complete and appropriate.

A16-3 The comment notes numerous impacts occur to Caltrans facilities. Additionally, the comment notes that they do not consider these impacts to be significant and unavoidable. However, even if the City did collect a fair share funding program to implement the identified improvements, the improvements would still need to be approved by Caltrans. Given that none of the improvements have begun the appropriate process with Caltrans to make the identified improvements as outlined within the Caltrans Project Development Procedures Manual, there is no mechanism for Caltrans to guarantee implementation of the improvements that would reduce impacts to less than significant. As such, the improvements are identified as significant and unavoidable as the improvements cannot be guaranteed by and would require approval from Caltrans.

A16-4 The comments notes potential options for improvements to reduce significant impacts and requests that the City contact Caltrans to develop reasonable measures and a plan. The City is required to identify feasible improvements and necessary fair share funding in consultation with Caltrans pursuant to Mitigation Measure TRAF-6.

A16-5 The commenters recommended policies would be addressed through implementation of Mitigation Measure TRAF-6. Additionally, numerous locations in the SEASP discuss the need to coordinate with Caltrans.

A16-6 Comment noted.

4. Response to Comments on Recirculated Traffic Section

- A16-7 The City acknowledges that any work performed within State right-of-way requires an encroachment permit from Caltrans. Additionally, the City recognizes the need for a storm water management plan when discharging to a State facility and a transportation permit when oversized-transport vehicles use State highways. The use of heavy construction equipment during peak hours is prohibited pursuant to Mitigation Measure TRAF-5.

4. Response to Comments on Recirculated Traffic Section

A17. Response to Comments from El Dorado Audubon Society dated April 3, 2017 (Appendix B1, page B1-4).

A17-1 The commenter requests protection of the wetlands, habitat, birds, and wildlife with respect to roadway improvements and mitigation. The commenter is correct regarding the identification of Coastal Commission jurisdiction for intersections within the coastal zone. Please note that the improvement proposed at PCH and Studebaker (#20) would not encroach onto wetlands and the ultimate alignment of Shopkeeper shall not impact delineated wetlands pursuant to the Specific Plan (see SEASP Sections 4.3.8 and 6.6.8, v. Hearing Draft May 2017).

4. Response to Comments on Recirculated Traffic Section

A18. Response to Comments from Chatten-Brown & Carstens LLP on behalf of Los Cerritos Wetlands Land Trust dated April 7, 2017 (Appendix B1, page B1-7).

A18-1 The commenter summarizes comments made by Tom Brohard and Associates, which are also included in the comment letter. Please refer to Response to Comments A18-4 through A18-17 for responses to these comments.

A18-2 The commenter states that the air quality and GHG emissions analysis should be updated based on the updated Transportation Impact Analysis (TIA). The changes to the Updated TIA do not change the vehicle miles traveled (VMT) estimates identified for the existing or proposed Project conditions and changes to the air quality and GHG analysis were not warranted.

The commenter states that increased nitrogen emissions associated with the Project would result in indirect impacts to the wetlands ecosystem. The commenter does not identify the primary nitrogen source that affects wetland ecosystems. Additionally, the referenced study states that it rarely had data to distinguish the biotic or ecosystem response to reduced forms of nitrogen versus oxidized forms of nitrogen; responses vary by species and functional type. The commenter fails to provide substantial evidence on the amount of atmospheric nitrogen or tailpipe emissions needed to trigger changes to the wetland ecosystem.

More importantly, the proposed Project would not result in substantial changes in the NO₂ levels compared to existing conditions. The South Coast Air Basin (SoCAB) is in attainment of the state and federal ambient air quality standards (AAQS) for NO₂. NO₂ in the atmosphere is primarily associated with background concentrations in the SoCAB; and, as identified in Section 5.3, *Air Quality*, of the DEIR, the proposed Project would not result a substantial impact to localized air quality from operation of the Project (see Impact 5.3-5). However, because the SoCAB is designated as nonattainment for ozone and particulate matter, the South Coast Air Quality Management District (SCAQMD) is tasked with reducing NO₂ emissions by approximately 68 percent by 2023 and 80 percent by 2031 from 2012 levels since NO₂ is a precursor to the formation of ozone and fine particulates. As a result NO₂ levels in the SoCAB are forecast to be substantially lower in the future. Therefore, it is likely the effect of atmospheric nitrogen on the wetlands environment is likely to play a limited role in the overall nitrogen levels at buildout.

Further, the modeling in the DEIR is consistent with SCAQMD's regional projections for a decrease in regional NO_x levels. The DEIR identifies that at buildout the proposed Project generates less NO_x emissions than existing conditions because of the turn-over of vehicles and replacement with cleaner fleets. Table 5.3-4 in the DEIR identifies that existing land uses within the Specific Plan area currently (2015) generates 1,237 pounds per day of NO_x and Table 5.3-9 shows that at Project buildout in 2035 the plan area

4. Response to Comments on Recirculated Traffic Section

would only generate 615 pounds per day of NO_x. As a result, compared to existing conditions the plan area would have lower NO_x levels (622 pounds per day of NO_x less). Therefore, the proposed Project's effect on nitrogen levels in the wetlands environment would not be significant.

A18-3 The commenter provides concluding comments; no response is required.

A18-4 The commenter states that he peer reviewed the recirculated traffic section along with Appendix J1, J2, and J3. These comments are introductory in nature and do not require a response.

The commenter also states that the traffic section did not address all of the comments provided in his September 13, 2016. Please refer to Responses to Comments A7-102 through A7-149.

A18-5 Refer to Response to Comment A7-103.

A18-6 Refer to Response to Comment A7-108.

A18-7 Refer to Response to Comment A7-103. The recirculated traffic section identified new significant impacts at three intersections: PCH and Seal Beach Boulevard (#22), 7th at Park Avenue (#26), and 2nd Street at Bay Shore Avenue (#27). Impact to intersection #22 can be mitigated under Seal Beach jurisdiction and the impact to intersection #27 can be mitigated for existing plus project conditions. Additional impacts to freeway facilities were also identified.

A18-8 The comment suggests that the TDM Plan contains no effective enforcement measures or penalties for non-compliance. However, the TDM program identifies the following targets for vehicle trip reductions as noted on page 6 of the plan (Page J2-6 of Appendix J2 of the DEIR):

1. Minimize Peak Hour Vehicle Trips

- a. TDM programs reduce Net External Peak Hour Trips by an additional 10 percent:

- i. AM Peak Hour Goal = 4,315 (4,795 trips * 90 percent). Stated another way: minimize the increase in external AM peak hour trips such that the overall increase with SEASP implementation is 47 percent instead of 57 percent.
- ii. PM Peak Hour Goal = 6,980 (7,758 * 90 percent). Stated another way: minimize the increase in external PM peak hour trips such that the overall increase with SEASP implementation is 36 percent instead of 46 percent.

4. Response to Comments on Recirculated Traffic Section

2. Increase Bicycle, Pedestrian, and Transit Use

- a. 4.9 percent bicycle and pedestrian mode share for trips within the SEASP Planning Area.
- b. 10 percent increase in transit boarding and alighting at transit stops in the SEASP Planning Area.
- c. 10 percent increase in bicycling and walking in SEASP.

Additionally, Pages 17-20 of the plan (Pages J2-17 through J2-20 of Appendix J2) identify the monitoring program that will be implemented to ensure that the targets noted above are being met; in particular, the additional reduction of peak hour trip generation by 10 percent. This is further documented in the DEIR as PDF-1 through PDF-3, which requires the 10 percent TDM reduction and implementation of the monitoring program to ensure that the TDM requirements are being realized. At such time as individual development projects are proposed and undergo the Site Plan Review process, specific conditions of approval will be added to those individual development projects to effectuate PDF-1 through PDF-3.

A18-9 The comment identifies several components of the updated traffic study. These components are described and responded to below:

The comment notes that the locations identified in the traffic study are actually intersections that are in the study area but were omitted in the original traffic study whereas the text identifies that they are included as part of an expanded study area. It should be noted that the specific plan area did not change between the original traffic study and the revised study. However, the revised study did expand the number and location where intersections were evaluated; as such, the study area for the traffic study did expand with the expanded study locations. It should also be noted that these locations were not omitted from the original study. Rather, the original traffic study worked with City staff to identify the study intersections. No comments on expansion of the study area were identified during the Notice of Preparation; as such, the original study area was not expanded at that time. However, comments received on the DEIR requested additional study locations. All requested study locations identified in the comments received on the Draft EIR were included in the updated traffic study.

The comment notes that the original traffic counts were made in July of 2015 and traffic counts at the seven new intersections were made in September 2016, November 2016, and January 2017. The comment correctly identifies that the traffic counts were made at different times of year and no seasonal adjustments were made to the traffic counts. Pursuant to CEQA Guidelines Section 15125(a) the environmental setting should "...include a description of the physical environmental conditions in the vicinity of the Project, as they exist at the time the notice of preparation is published . . . from both a

4. Response to Comments on Recirculated Traffic Section

local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. . .” As explained in the DEIR, the existing conditions were properly documented in accordance with CEQA.

Since no traffic counts were available at the additional study facilities from July 2015 to address the comments received regarding the additional study locations, additional counts were either provided by the commenting agency or new counts were collected. Fehr & Peers reviewed the counts to ensure that the upstream and downstream intersections adjacent to the new counts were generally consistent and appropriate prior to using them in the traffic study. Given the above information, the new counts were deemed appropriate for use in the study.

The comment notes that the raw traffic counts were included in the appendices and that the technical calculations for the expanded study area were not included with the updated traffic study. The traffic counts and calculations are provided in Appendix D3 of this response to comments document.

The comment notes that the updated traffic study and DEIR graphics and summary tables do not include the updated study locations. Figure 5.16-1 shows the updated study area locations. Some of the graphics in the TIA (Appendix J1 of the DEIR) were not updated to mark the additional studied intersections. These graphics have been updated and are provided in Appendix C of this document. However, all of the summary tables in the traffic study and in the DEIR include the additional locations. This can be seen in the Traffic Study Tables 1-1, 3-2, 4-5, 4-6, 5-1, 6-1, and 6-2 (Appendix J1 of the DEIR). The DEIR tables that were updated to include the additional study intersections are also shown in the DEIR Tables 5.16-2, 5.16-6, 5.16-7, 5.16-8, 5.16-9, 5.16-10, and 5.16-20.

- A18-10 The comment notes that the bicycle network enhancements will be difficult to achieve and the additional sidewalks on some streets will not result in significant reductions in VMT as claimed in Tables 5.16-17 and 5.16-18 of the DEIR. The commenter provides no basis for his opinion regarding VMT reductions. The VMT reduction was estimated based on information from the California Air Pollution Control Officers Association (CAPCOA) document Quantifying Greenhouse Gas Mitigation Measures (August 2010) which is the best available information for quantifying VMT reductions associated with TDM plans such as improved bicycle and pedestrian facilities in the study area.

Furthermore, all of the proposed additional bikeways shown in the proposed Specific Plan can be implemented within the existing curb-to-curb sections of the roadway with minor repurposing of the pavement as shown on the proposed roadway cross-sections. The only bicycle improvement that is proposed that is not inside of the existing curb-to-curb section of the roadway is the proposed Class I shared use path on the north side of the Los Cerritos Channel between Loynes Drive and Pacific Coast Highway. This

4. Response to Comments on Recirculated Traffic Section

proposed off-street facility is an ideal location because it is largely comprised of a maintenance access roadway, vacant land, and a paved pathway along the marina area.

A18-11 The comment suggests that the identified bicycle facilities noted in the specific plan are not achievable as they will require Caltrans approval, will require additional right of way, or eliminate travel lanes in the study area. However, as discussed in Response to Comment A18-10, all of the proposed bikeways along these roadways can be accommodated within the existing curb-to-curb width of all study roadways as shown in the Specific Plan. Given that the traffic study accounted for the proposed Project (which includes the identified configurations noted in the Specific Plan), all impacts associated with repurposing the existing pavement have been identified in the traffic study. Additionally, the City has acknowledged the need for Caltrans to approve the bicycle facilities on Pacific Coast Highway and have already engaged Caltrans to discuss potential changes to this roadway and mechanisms to implement the facilities. Furthermore, the proposed improvements along Pacific Coast Highway are consistent with current Caltrans Complete Streets policies and are consistent with direction provided in the Main Street, California: A Guide for Improving Community and Transportation Vitality (Caltrans 2013) guidance. Given that the facilities were evaluated in the traffic study and are consistent with Caltrans guidance, the DEIR's conclusion related to the beneficial impact to bicycle facilities is appropriate. Since the proposed Project complies with adopted policies, plans, and programs for alternative transportation, impacts are considered less than significant.

A18-12 The comment notes that the TIA (Appendix J1 of the DEIR) states that existing pedestrian facilities through SEASP are continuous and present on both sides of the street and that the proposed pedestrian connections within the Project site and off-site. The comment also notes that the conclusion that the expanded pedestrian facilities may not be viable as they would require additional right of way which could result in significant impacts.

Page 78 of the TIA summarizes impacts to the pedestrian environment. The comment is correct related to the summary of the existing pedestrian connectivity. In fact, the traffic study identifies on Page 16 that, "Existing pedestrian facilities in the SEASP area are limited. Most major roadways lack sidewalks on one or more sides of the street. 7th Street (between Ximeno Avenue and Studebaker Road) and 2nd Street (between Naples Plaza and Marina Drive) have well-developed sidewalks on both sides of the street. Most intersections have crosswalks and appropriate pedestrian crossing controls, allowing for connectivity to local activity centers." However, the proposed Specific Plan will improve the pedestrian experience by increasing the total number of facilities, increasing the pedestrian buffer from the travel way, and improving overall pedestrian safety in the area.

The TIA section on Page 78 will be revised as follows:

4. Response to Comments on Recirculated Traffic Section

As previously discussed, existing pedestrian facilities in the SEASP area are limited. Most major roadways lack sidewalks on one or more sides of the street. 7th Street (between Ximeno Avenue and Studebaker Road) and 2nd Street (between Naples Plaza and Marina Drive) have well-developed sidewalks on both sides of the street. Most intersections have crosswalks and appropriate pedestrian crossing controls, allowing for connectivity to local activity centers.~~The existing pedestrian facilities throughout the SEASP are continuous and present on both sides of the street. The SEASP proposed pedestrian connections within the project site and off-site.~~ Major roadways throughout the SEASP will provide sidewalks on both sides of the road, increasing the performance of the pedestrian facilities. Additionally, certain locations will have a buffered sidewalk, providing enhanced pedestrian comfort and safety. As such, the Project would have a beneficial impact to pedestrian facilities and is considered **less than significant**.

The vast majority of pedestrian improvements planned in the Specific Plan would occur within the existing available right-of-way. The need for the City to acquire right-of-way along vacant parcels does not make the improvement infeasible. Given that the plan would improve and enhance pedestrian travel in the study area, the significance conclusion is appropriate.

A18-13 The comment states that the TIA identifies that bike and pedestrian facility improvements will result in a 4.9 percent reduction in vehicle trip generation. The commenter is incorrect that the calculation of vehicle trip reductions lack foundation. Refer to Response to Comment A18-10 related to the technical basis for identifying reductions associated with bicycle/pedestrian improvements. The CAPCOA documentation provides substantial evidence to support the quantification of trip reductions.

CEQA requires an analysis of the “whole of the project.” The proposed Project includes the bike and pedestrian facility improvements as part of the Project. Although the maximum percentage trip reduction cannot be achieved until all of the facilities are implemented, the total vehicle trips will also not be realized until all of the development is achieved. As such, as long as the bicycle/pedestrian improvements are implemented concurrent with the proposed land use, the trip reduction and VMT estimates are appropriate for the assessment.

The comment states that there is insufficient data to support the finding that the maximum VMT reductions associated with the proposed Project would approach 40 percent. The identified VMT reduction is in comparison to an isolated development that would otherwise occur. The VMT reduction is a combination of built environment variables such as the mixed-use nature of the Project and its ability to internalize trips (estimated at 13 percent), built environment variables that shorten trip lengths (such as the Projects geographic location to major service and employment centers and improved bicycle and pedestrian facilities) (estimated at 17 percent), and the additional reduction

4. Response to Comments on Recirculated Traffic Section

due to the TDM plan noted in the specific plan (identified at 10 percent). As such, the cumulative reduction is the aggregate of these estimates, or approximately 40 percent. The technical analysis for the VMT estimates are based on substantial evidence. Specifically, these estimates rely on the best available technical information such as the EPA's Mixed-Use Trip Generation Methodology (MXD) to estimate trip internalization, use of the SCAG travel demand forecasting model to account for average trip lengths, and the CAPCOA guidance used to estimate VMT reduction associated with improved bicycle and pedestrian facilities and the 10 percent TDM reduction.

- A18-14 The comment notes that one noted freeway segment in the traffic study is identified as Northbound I-605 From Katella Avenue – AM and PM Peak Hour (LOS F) but does not give the limits of the impacted segment. This is a typo in the report; however, the summary provided in Table 8-3 of the TIA is correct as are the summaries in the DEIR.

The traffic study will be revised as follows:

Northbound I-605 from I-405 to Katella Avenue – AM and PM Peak Hour.

- A18-15 The commenter quotes two sentences from DEIR and states that the analysis of inadequate emergency access is inadequate. As provided on Page 5.16-55 of the DEIR, the Project provides for the needs of pedestrian, bicyclists, vehicles, and transit uses. The proposed mobility plan would provide greater connectivity as well as convenient, efficient, and safe access to uses within the proposed Project. The Project is situated in a congested area that experiences vehicle delay at intersections with and without the proposed Project during peak hours. During peak periods emergency vehicles have the ability to use the entire roadway right-of-way, as is done under existing conditions. The Long Beach Fire Department (LBFD) indicated that it is currently meeting its response time goals and expects to do so in the future (see Section 5.14, *Public Services*). Additionally, the Specific Plan's additional connectivity in the area will provide additional route choices for emergency responders, which would assist in improving response times in the area.

To address fire and emergency access needs, the traffic and circulation components of the proposed Project would be designed and constructed in accordance with all applicable LBFD design standards for emergency access (e.g., minimum lane width and turning radius). For example, new site access driveways and drives aisles would be designed to meet the minimum width requirements of LBFD to allow the passing of emergency vehicles. Future development projects under the proposed Project would also be required to incorporate all applicable design and safety requirements in the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the City and LBFD, such as those outlined in Chapter 18.48 (Fire Code) of the City's municipal code, which incorporates by reference the 2013 California Fire

4. Response to Comments on Recirculated Traffic Section

Code. Compliance with these codes and standards is ensured through the City's and LBFD's development review and building permit process.

Additionally, during the building plan check and development review process, the City would coordinate with LBFD and LBPD to ensure that the necessary fire prevention and emergency response features are incorporated into the proposed Project and that adequate circulation and access (e.g., adequate turning radii for fire trucks) is provided within the traffic and circulation components of the proposed Project. All site and building improvements proposed under the Project would be subject to review and approval by the City, LBFD, and LBPD prior to building permit and certificate of occupancy issuance. New development is also required to pay fire and police impact fees to assure the adequate facilities exist to serve current and future needs. Therefore, impacts on emergency access would be less than significant.

- A18-16 The comment notes that the TDM plan identifies that the bicycle and pedestrian VMT trip reduction of 7.4 percent is higher than what is reported in the TIA. The 4.9 percent reduction was related to trip generation estimates for the Project; not VMT for the study area. As such, the reductions noted for VMT reduction include existing trips on the network that would shift over to the improved bicycle facilities in order to capture the VMT reduction associated with that portion of the Project. It should be noted that the proposed Project includes more than 7 additional lane miles of bicycle lanes alone – which is part of what is reflected in the VMT reduction as CAPCOA notes a 1 percent reduction per bicycle lane mile (plus, the pedestrian facilities will add to that number). As such, the VMT reductions are appropriate and correct for use in the study.

The comment also suggests that VMT per service population will decrease by 19 percent compared to existing conditions is unfounded. As previously stated, the technical assessment for estimating VMT utilizes the best available information to estimate the reduction, as noted in Response to Comment A18-13. The comment goes on to note that the decrease of 19 percent per service population compared to existing conditions appears to be based on a significant increase in population associated with occupancy of the proposed Project rather than installation of the identified bicycle and pedestrian facilities. It should be noted that the 19 percent reduction is inclusive of the proposed Project, the trip internalization estimates, and the active transportation reductions (not just the active transportation reductions).

- A18-17 Comments on the September 13, 2016 letter were addressed in Responses to Comments A7-102 through A7-149.

4. Response to Comments on Recirculated Traffic Section

A19. Response to Comments from Los Angeles County Metropolitan Transportation Authority dated April 3, 2017 (Appendix B1, page B1-72).

A19-1 The commenter provides introductory comments regarding the goals of the agency and project description; no further response is needed.

A19-2 The City acknowledges that future development activity in close proximity to Metro facilities requires advanced notification and coordination of construction activities.

4. Response to Comments on Recirculated Traffic Section

A20. Response to Comments from Native American Heritage Commission dated February 28, 2017 (Appendix B1, page B1-74).

A20-1 These comments do not relate to the recirculated traffic section of the DEIR. Note that the City complied with AB 52 and SB 18 for this Project. Please refer to Section 5.5, Cultural Resources of the DEIR.

4. Response to Comments on Recirculated Traffic Section

R98. Response to Comments from Caren Adler, dated March 3, 2017 (Appendix B1, page B1-78).

R98-1 The commenter expresses her opinion on the Project itself and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R99. Response to Comments from Kerrie Aley, dated April 3, 2017 (Appendix B2, page B2-1).

- R99-1 The commenter cites portions of the notice of availability sent out with the recirculated traffic section along with CEQA Guidelines Section 15088.5. The commenter states there is confusion on whether comments should be submitted on the entire Section 5.16 *Transportation and Traffic* and Appendix J or only the revised text from those portions. As stated in the notice, the City requests that commenters “limit their comments to the revised **chapters** only.” This means the chapters that were recirculated for public review—the entire Section 5.16 and Appendix J. The summary of revisions that were made to these DEIR chapters were provided for clarity to the public and as required pursuant to CEQA Guidelines Section 15088.5(g).
- R99-2 Pursuant to CEQA the City is only required to respond to traffic comments that were received on the recirculated traffic section. However, the City has provided responses to comments received during the initial public review period (July 20, 2016 to September 19, 2016) and during the public review period for the recirculated traffic section (February 17, 2016 to April 3, 2017).
- R99-3 The City provided the NOA and summary of revisions along with the recirculated traffic section. Responses to the initial comments on the original DEIR traffic section circulated on July 20, 2016 are not required by CEQA. However, as stated in Response to Comments R99-1 and R99-2, responses will be provided as part of the Final EIR.
- R99-4 The NOA was clear and will not be recirculated. Please refer to Response to Comments R99-1 and R99-2.
- R99-5 The City uses both ICU and HCM methodology to calculate LOS depending on the intersection type. As discussed on Page 5.16-11 of the DEIR, for signalized intersections, the traffic analysis was evaluated in accordance with the CMP guidelines using the Intersection Capacity Utilization (ICU) methodology. It reports the volume-to-capacity (V/C) ratio, which evaluates the critical movements for each signal and compares that to the critical movement capacity of the intersection. For unsignalized intersections and Caltrans-owned intersections, methodologies consistent with the Highway Capacity Manual 2010 (HCM 2010) were used.
- R99-6 The commenter states that a number of values shown in the traffic study were reported as >80 for cumulative conditions, which does not show actual delay. The tables below summarize the Level of Service for all locations that were reported with delays greater than 80 seconds. However, note that the Highway Capacity Manual Methodology employed as part of this effort lacks sensitivity when intersections become saturated and the resulting delay estimates tend to be overstated. Therefore, standard practice is to report the results as >80 seconds because the delays greater than 80 seconds are not as precise and are likely overstated. This also explains why the change in delay is reported

4. Response to Comments on Recirculated Traffic Section

as N/A as the methodology likely reports over-estimated changes in delay under these conditions.

As noted in the DEIR Section 5.16, *Transportation Traffic*, all of the locations where the delay was greater than 80 seconds were identified as significant impacts. As such, the additional information does not change the findings of significance in the EIR.

Table R99-1 Existing With Project Intersection Impact Summary – HCM Intersections >80 sec delay

Intersection	Control	Peak Hour	No Project		With Project			Significant Impact?
			V/C ¹ or Delay ²	LOS	V/C ¹ or Delay ²	LOS	Project Change	
3. Studebaker Rd & SR-22 Westbound Ramps	Signal	AM	30.6	C	40.2	D	9.6	Yes
		PM	97.4	F	197.0	F	N/A	Yes
12. Pacific Coast Hwy & Loynes Dr	Signal	PM	38.3	D	81.3	F	-	Yes
16. Pacific Coast Hwy & 2nd St	Signal	AM	56.5	E	75.6	E	19.1	Yes
		PM	68.8	E	126.0	F	-	Yes

Source: Fehr & Peers

Notes: V/C = Volume / Capacity Ratio

Intersections operating below acceptable LOS are shown in **bold**

¹ V/C for signalized intersections based on ICU methodology using Traffix 7.9 software.

² Delay for unsignalized intersections based on HCM 2010 methodology using Synchro 8 Build 806 software.

³ Highway Capacity Manual 2010 methodology cannot accurately estimate the change in delay for intersections operating at an average delay of 80 seconds or more.

⁴ Does not satisfy the Peak Hour Volume Warrant for Traffic Signal installation.

4. Response to Comments on Recirculated Traffic Section

Table R99-2 Cumulative 2035 With Project Intersection Impact Summary – HCM Intersections >80 sec delay

Intersection	Control	Peak Hour	No Project		With Project			Significant Impact?
			V/C ¹ or Delay ²	LOS	V/C ¹ or Delay ²	LOS	Project Change	
3. Studebaker Rd & SR-22 Westbound Ramps	Signal	AM	36.9	D	47.1	D	10.2	Yes
		PM	141.1	F	245.2	F	N/A	Yes
5. Pacific Coast Hwy & 7th St	Signal	AM	84.2	F	93.0	F	N/A	Yes
		PM	113.7	F	143.5	F	N/A	Yes
7. Channel Dr & 7th St	Signal	PM	123.9	F	148.7	F	N/A	Yes
12. Pacific Coast Hwy & Loynes Dr	Signal	PM	57.7	E	121.6	F	N/A	Yes
16. Pacific Coast Hwy & 2nd St	Signal	AM	69.8	E	105.5	F	N/A	Yes
		PM	146.0	F	234.9	F	N/A	Yes
24. SR-22 at Studebaker Rd & College Park Dr	Side-Street Stop	PM	73.7	F	154.4	F	N/A	No ³

Source: Fehr & Peers 2017.

Notes: V/C = Volume / Capacity Ratio

¹ V/C for signalized intersections based on ICU methodology using Traffix 7.9 software.

² Delay for unsignalized intersections based on HCM 2010 methodology using Synchro 8 Build 806 software. Delay for side-street stop is reported as the worst-case approach delay.

³ Intersection does not satisfy the Peak Hour Volume Warrant for Traffic Signal Installation.

R99-7 As stated on Page 5.16-59, the TDM Plan includes strategies to reduce peak hour trips by 10 percent. To achieve a 10 percent reduction in peak hour trips the TDM Plan detailed in Appendix J2 of the DEIR assumes a 4.9 percent bicycle and pedestrian mode share for trips within the SEASP Project area, a 10 percent increase in transit boarding and alighting at transit stops, and a 10 percent increase in bicycling and walking. While pedestrian and bicycle infrastructure improvements are part of the strategy to reduce peak hour trips, several other strategies are incorporated into the TDM Plan, as summarized in Table 2 of Appendix J2.

R99-8 Please refer to Appendix D2 of this document for traffic data on 7th Street at Santiago and 7th Street at Park.

4. Response to Comments on Recirculated Traffic Section

Regarding seasonal fluctuations in traffic volumes, the original traffic counts were made in July of 2015 and traffic counts at the seven new intersections were made in September 2016, November 2016, and January 2017. Traffic counts were made at different times of year and no seasonal adjustments were made to the traffic counts. The original counts taken in July were based on input from City staff and residents in the community, who indicated that traffic volumes are higher in the SEASP area during summer months. However, when preparing updated traffic analysis for the recirculated traffic section, no traffic counts were available at the additional study facilities from July 2015. In order to address the comments received regarding the additional study locations, additional counts were either provided by the commenting agency or new counts were collected. Fehr & Peers reviewed the counts to ensure that the upstream and downstream intersections adjacent to the new counts were generally consistent and appropriate prior to using them in the traffic study. Given the above information, the new counts were deemed appropriate for use in the study.

- R99-9 The comment suggests that “big data”, as noted in the TDM plan, be used to estimate trip distribution for the Project. This data can inform us as to existing travel patterns in the area for which the data is reviewed. However, the proposed land uses in the SEASP Project will change the makeup of land use in the area such that travel patterns will change significantly. Therefore, the methodology employed in the traffic study (which combined employer-household dynamics information, accounts for the locations of key transportation infrastructure, and utilized engineering judgement) was the most appropriate way to estimate trip distribution associated with the future proposed Project. Additionally, the Project distribution was reviewed and approved by City staff as part of the assessment.

Please note that “big data” would be more appropriate to assist with the TDM program as it will provide additional travel patterns in the area after the Project is developed that will assist with ride-matching potential and other targeted TDM measures that would reduce the number of single occupant vehicles

- R99-10 The proposed Mobility Plan for SEASP was designed to limit cut through traffic by creating a mix of uses to capture more internal trips to the area, shorter block lengths, and enhanced connectivity for pedestrians and bicycles (see SEASP Section 6.1).

In order to ensure that site specific traffic studies consider the effects of cut through traffic on adjacent neighborhoods, DEIR Section 5.16.7, Mitigation Measure TRAF-2 has been revised as follows:

- TRAF-2 As part of the subsequent environmental review for development projects that would be accommodated by the SEASP, a site-specific traffic study shall be prepared by the project applicant/developer to evaluate the project’s potential traffic and transportation impacts consistent with the

4. Response to Comments on Recirculated Traffic Section

City of Long Beach Guidelines for Signalized Intersections and the Los Angeles County CMP Guidelines to identify specific improvements, as deemed necessary, to provide safe and efficient onsite circulation and access, and limit cut through traffic on adjacent neighborhoods. The traffic study for the first development project to be considered under the SEASP shall include an analysis of signal timing of 2nd Street through Naples to identify timing adjustments needed to improve signal synchronization. The traffic study shall be approved by the Public Works Department. Payment of fees, construction of improvements, and signal timing shall be implemented prior to issuance of a building permit.

- R99-11 The commenter is asserting that the traffic analysis did not consider cumulative growth, including the Downtown Plan. Future volumes for Cumulative Year (2035) Without and With Project conditions were developed using a 0.505 percent per year growth rate, consistent with the Los Angeles County CMP Guidelines. The growth rate accounts for pending and approved projects in the City of Long Beach as well as regional growth anticipated by Year 2035. This background growth rate captures all cumulative development (locally and regionally) including the Downtown Plan. This is a conservative analysis since the area surrounding the Project area is largely built out.
- R99-12 The Transportation Impact Analysis (Appendix J1 of the DEIR) analyzed buildout of the Project as required by CEQA. However, as required by Mitigation Measure TRAF-2, site specific traffic studies would be required for future development projects within SEASP.
- R99-13 The feasibility of traffic mitigation and the ability to take additional right-of-way was based on the existing development conditions, not on potential future building placement. Future development would be required to ensure adequate access for service trucks as needed.
- R99-14 The commenter is incorrect; the TIA was reviewed by the City of Long Beach Public Works Department. Collision rates are dependent upon human behavior and future changes to vehicle safety systems and not density. There is no evidence to suggest that collision rates would change from existing conditions due to implementation of the Specific Plan. Furthermore, the SEASP is designed to ensure compatibility between land uses and the existing built environment. As detailed starting on Page 3-17 of the DEIR and the SEASP Mobility Plan, SEASP would enhance the pedestrian and bicycle connectivity to promote safe walking and bicycling.
- R99-15 Information on the City's approach to SB 743 is provided on Pages 5.16-2, 5.16-3, 5.16-58, 5.16-59, 5.16-60. Mitigation Measure TRAF-1 sets forth the requirements for traffic impact fees.

4. Response to Comments on Recirculated Traffic Section

- R99-16 The commenter expresses her opinion on the Project itself and not the adequacy of the EIR; no response is required.
- R99-17 This comment is an article to back up the commenters assertions in Comment R99-10. Refer to Response to Comment R99-10.
- R99-18 As summarized in Table 5.16-20 of the DEIR, mitigation measures were identified to reduce impacts at Ximeno Avenue at 7th Street and Park Avenue at 7th Street. However, these mitigation measures are not feasible because it would encroach onto existing buildings and sidewalks as shown in Figure 5.16-5 of the DEIR (intersections #4 and #26). Therefore, the DEIR is not proposing additional through lanes and is identifying these impacts as significant and unavoidable.

4. Response to Comments on Recirculated Traffic Section

R100. Response to Comments from David P. Baker, dated March 8, 2017 (Appendix B2, page B2-12).

- R100-1 The Transportation Impact Analysis (Appendix J1 of the DEIR) takes into consideration the existing and planned circulation system, including the bridges along PCH, 7th Street, and Loynes Drive.
- R100-2 Mitigation proposed for Studebaker and the SR-22 Ramps includes the option to improve the intersection with a roundabout. Please note that traffic circles are different than roundabouts. Roundabouts are proven to enhance safety compared to signalized intersections (Transportation Research Board 2010). Improvements to the ramps would be required to go through Caltrans development process.
- R100-3 The commenter expresses concern about the number of significant unavoidable intersection impacts and the potential for gridlock. The commenter recommends a scaled back version of the plan. This comment is noted; no further response is required.
- R100-4 The commenter states that the traffic study did not account for vehicles entering and existing the Davies Launch Ramp. For all Caltrans intersections, a heavy vehicle factor of was included to account for the presence of heavy vehicles on the system (which could include vehicles towing boats). Additionally, the capacities utilized on the volume to capacity assessment also incorporate measured capacities on roadways that account for heavy vehicles. As such, vehicles towing boats have been reflected in the transportation assessment. Additionally, site specific traffic studies will be required pursuant to Mitigation Measure TRAF-2 as development projects are proposed.

The California Coastal Commission was consulted during development of the Specific Plan and a copy of the DEIR was submitted during the public review periods. The Coastal Commission also has discretionary approval authority over the adoption of the LCP.

4. Response to Comments on Recirculated Traffic Section

R101. Response to Comments from Jane Wilson Barboza, dated February 25, 2017 (Appendix B2, page B2-14).

R101-1 The commenter expresses support of the Project itself and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R102. Response to Comments from Sandy Bauer, dated March 1, 2017 (Appendix B2, page B2-15).

R102-1 The commenter expresses an opinion of the Project and traffic plan and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R103. Response to Comments from Christine Beaur Mortezaie, dated March 2, 2017 (Appendix B2, page B2-16).

R103-1 The commenter expresses opposition to the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R104. Response to Comments from Cathy Black, dated April 3, 2017 (Appendix B2, page B2-17).

R104-1 The commenter expresses opposition to the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R105. Response to Comments from Dick Blankenship, dated February 24, 2017 (Appendix B2, page B2-18).

R105-1 The commenter expresses support for the extension of Studebaker Street and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R106. Response to Comments from Jonathan B. Blitzler, dated March 1, 2017 (Appendix B2, page B2-19).

R106-1 The commenter expresses support for traffic mitigation other than road widening such as optimization of signal timing and length, moving curb cuts, grade separation, and roundabouts. The commenter expresses his opinion of the traffic impacts and not the adequacy of the EIR; these comments are noted and no response is required.

4. Response to Comments on Recirculated Traffic Section

R107. Response to Comments from Carole Bramble, dated March 1, 2017 (Appendix B2, page B2-20).

R107-1 The commenter expresses her opinion on traffic impacts of the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R108. Response to Comments from Kevin Brown, dated March 29, 2017 (Appendix B2, page B2-21).

R108-1 The commenter expresses her opinion on traffic impacts of the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R109. Response to Comments from Judy Cannavo-McKeever, dated March 1, 2017 (Appendix B2, page B2-23).

R109-1 The commenter expresses her opinion on traffic impacts of the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R110. Response to Comments from Rebecca Caudillo, dated April 3, 2017 (Appendix B2, page B2-24).

R110-1 The TDM Plan (Appendix J2 of the DEIR) requires monitoring and reporting to ensure that the goals of the TDM Plan are met (see Page J2-20). The City has analyzed and considered a Reduced Intensity Alternative, which would result in a 10 percent decrease in daily trips.

The SEASP Project is a separate project that is intended to guide future development of the SEASP Project area; this processing of the SEASP Project will continue separately from any redevelopment proposal at the Seaport Marina Hotel property.

4. Response to Comments on Recirculated Traffic Section

R111. Response to Comments from Madonna Cavagnaro, dated March 31, 2017 (Appendix B2, page B2-25).

R111-1 The commenter expresses her opinion on traffic impacts of the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R112. Response to Comments from Juerg Ciceri, dated March 30, 2017 (Appendix B2, page B2-26).

- R112-1 The commenter expresses her opinion on traffic impacts of the Project and not the adequacy of the EIR; no response is required.
- R112-2 The commenter supports a reduced density plan and requests additional details on density, units, commercial space, and increase in traffic. Please note that these issues are detailed throughout the DEIR and the recirculated portion of the DEIR only included the traffic section.

4. Response to Comments on Recirculated Traffic Section

R113. Response to Comments from Tom and Lynne Clarke, dated March 1, 2017 (Appendix B2, page B2-27).

R113-1 The commenter expresses her opinion on traffic impacts of the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R114. Response to Comments from Melinda Cotton, dated April 3, 2017 (Appendix B2, page B2-29).

R114-1 The commenter expresses her opinion on traffic impacts and opposition to the Project, not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R115. Response to Comments from Will Cullen, dated April 3, 2017 (Appendix B2, page B2-30).

R115-1 The commenter expresses his opinion on traffic impacts and opposition to the Project, not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R116. Response to Comments from Janice Dahl, dated April 10, 2017 (Appendix B2, page B2-31).

- R116-1 Mitigation measures are fully analyzed in Section 5.16.7 of the DEIR (see also Appendix J2 of the DEIR). The commenter expresses her opinion on traffic impacts and opposition to the Project, not the adequacy of the EIR; no response is required.
- R116-2 Biological resources impacts were fully evaluated in Section 5.4 of the DEIR. Impacts to wetland resources are not appropriate in the traffic section of the DEIR. Furthermore, the commenter provides no evidence of the link between traffic impacts and wetland impacts.
- R116-3 A Reduced Intensity Alternative was analyzed in Section 7.6 of the DEIR.
- R116-4 Comment noted.

4. Response to Comments on Recirculated Traffic Section

R117. Response to Comments from Tarek Damerji, dated November 8, 2016 (Appendix B2, page B2-33).

R117-1 The commenter expresses support for the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R118. Response to Comments from Phil Dandrige, dated April 2, 2017 (Appendix B2, page B2-35).

R118-1 The commenter expresses concern related to traffic impacts and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R119. Response to Comments from W H Davis, dated March 31, 2017 (Appendix B2, page B2-36).

R119-1 The commenter expresses concern related to traffic impacts and balancing the benefits of the Project against the impacts. The comment does not relate to the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R120. Response to Comments from Julie Dean, dated April 3, 2017 (Appendix B2, page B2-37).

R120-1 The commenter expresses opposition to the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R121. Response to Comments from Tami Donald, dated March 9, 2017 (Appendix B2, page B2-38).

R121-1 The commenter expresses opinions on the Project itself and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R122. Response to Comments from Charley Durnin, dated March 1, 2017 (Appendix B2, page B2-39).

R122-1 The commenter expresses opinions on the Project itself and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R123. Response to Comments from Bruce Foat, dated April 2, 2017 (Appendix B2, page B2-40).

- R123-1 This comment does not relate to the traffic section of the DEIR, rather the commenter has concerns relating to sea level rise. Information on sea level rise was provided in Appendix H, *Infrastructure Technical Report*, of the DEIR.
- R123-2 The commenter expresses concerns related to traffic impacts and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R124. Response to Comments from Douglas Domingo-Forasté, dated March 30, 2017 (Appendix B2, page B2-41).

R124-1 The commenter expresses opinions on the Project and concerns related to traffic impacts and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R125. Response to Comments from John Fries, dated April 3, 2017 (Appendix B2, page B2-42).

R125-1 The commenter expresses support for the Reduced Intensity Alternative and does not comment on the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R126. Response to Comments from Janice Furman, dated April 3, 2017 (Appendix B2, page B2-43).

R126-1 The commenter expresses support a reduced development alternative to alleviate traffic impacts. The comment does not related to the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R127. Response to Comments from Brent Griffin, dated March 30, 2017 (Appendix B2, page B2-44).

R127-1 The commenter expresses opposition to the Project and does not comment on the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R128. Response to Comments from Jon Hales, dated March 30, 2017 (Appendix B2, page B2-45).

R128-1 The commenter expresses support for the extension of Studebaker Road and giving priority for minimizing traffic. The comment does not related to the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R129. Response to Comments from Jeff Hoffman, dated April 3, 2017 (Appendix B2, page B2-46).

R129-1 The commenter expresses support for the Project and does not comment on the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R130. Response to Comments from Glenn Ihrke, dated March 1, 2017 (Appendix B2, page B2-47).

R130-1 The commenter expresses his opinion on Project itself and states that there is no need for further traffic studies. The comment does not relate to the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R131. Response to Comments from Gary Johnson, dated March 1, 2017 (Appendix B2, page B2-48).

R131-1 The commenter expresses concerns related to the traffic impacts of the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R132. Response to Comments from Marta Kirkwood, dated March 4, 2017 (Appendix B2, page B2-49).

R132-1 The commenter expresses concerns related to the traffic impacts of the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R133. Response to Comments from Donna Kraus, dated March 29, 2017 (Appendix B2, page B2-50).

R133-1 The commenter expresses concerns related to the traffic impacts of the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R134. Response to Comments from Bob Lane, dated April 3, 2017 (Appendix B2, page B2-51).

R134-1 The commenter expresses support for the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R135. Response to Comments from James Lent, dated February 28, 2017 (Appendix B2, page B2-52).

R135-1 The commenter expresses support for the extension of both Studebaker Road to PCH and Shopkeeper Road to PCH and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R136. Response to Comments from Michel Litt, dated March 1, 2017 (Appendix B2, page B2-53).

R136-1 The commenter expresses concerns related to the traffic impacts of the Project, particularly the intersection of 2nd at PCH, and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R137. Response to Comments from Elena Marty, dated March 30, 2017 (Appendix B2, page B2-54).

R137-1 The commenter expresses concerns related to the traffic impacts of the Project and not the adequacy of the EIR. It should be noted that all feasible transportation mitigation measures were considered for the Project due to the level of congestion in the Project area. Additionally, an alternative was considered to reduce traffic impacts compared to the proposed Project (see Section 7.6, *Reduced Intensity Alternative*, in the DEIR).

4. Response to Comments on Recirculated Traffic Section

R138. Response to Comments from Kerry Maxwell, dated March 31, 2017 (Appendix B2, page B2-55).

R138-1 The commenter expresses concerns related to the traffic impacts of the Project and not the adequacy of the EIR; no response is required. Please note that transportation improvements provided as part of the Project are described in Chapter 3, Project Description of the DEIR and Section 5.16, *Transportation and Traffic*, starting on Page 5.16-30. A thorough discussion of mitigation measures is provided in Section 5.16.7 of the DEIR.

4. Response to Comments on Recirculated Traffic Section

R139. Response to Comments from Keith McClellan, dated March 1, 2017 (Appendix B2, page B2-57).

R139-1 The commenter expresses concerns related to the traffic impacts of the Project and not the adequacy of the EIR; no response is required. Project traffic impacts were analyzed at the intersections of PCH at 2nd Street and Marina Drive and 2nd. As summarized in Table 5.16-20, the intersection of Marina Drive at 2nd Street can be mitigated to less than significant; however, the intersection at PCH at 2nd Street cannot be fully mitigated.

4. Response to Comments on Recirculated Traffic Section

R140. Response to Comments from Karen McDonough, dated March 3, 2017 (Appendix B2, page B2-58).

R140-1 The commenter expresses concerns related to the traffic impacts of the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R141. Response to Comments from Craig McLaughlin, dated March 10, 2017 (Appendix B2, page B2-59).

R141-1 The commenter expresses concerns related to the traffic impacts of the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R142. Response to Comments from Donna Medine, dated March 1, 2017 (Appendix B2, page B2-60).

R142-1 The commenter expresses support for the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R143. Response to Comments from Linda Merrill, dated March 1, 2017 (Appendix B2, page B2-61).

R143-1 The commenter expresses concerns related to the traffic impacts of the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R144. Response to Comments from Diane Moos, dated March 30, 2017 (Appendix B2, page B2-64).

R144-1 The commenter expresses opposition to the Project and concerns related to the traffic impacts of the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R145. Response to Comments from Mike Muttart, dated March 9, 2017 (Appendix B2, page B2-65).

R145-1 The commenter expresses concerns related to the traffic impacts of the Project and supports an extension of Studebaker to PCH. The comment does not relate the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R146. Response to Comments from Bill Napier, dated February 27, 2017 (Appendix B2, page B2-66).

R146-1 The commenter expresses concerns about placing roads through the wetlands and not the adequacy of the EIR; no response is required. Please note that the City does not propose to extend roads through the wetlands.

4. Response to Comments on Recirculated Traffic Section

R147. Response to Comments from Kate Olsen, dated March 13, 2017 (Appendix B2, page B2-67).

R147-1 The commenter expresses concerns related to the traffic impacts of the Project (i.e. signal timing and spacing between vehicles) and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R148. Response to Comments from Margo Parmenter, dated March 29 and March 1, 2017 (Appendix B2, page B2-68).

R148-1 The commenter expresses concerns related to the traffic impacts of the Project and supports a reduced density alternative. The comment does not relate to the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R149. Response to Comments from Diane Paull, dated March 29 and March 1, 2017 (Appendix B2, page B2-70).

R149-1 The commenter expresses concerns related to the traffic impacts of the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R150. Response to Comments from Amy Pearson, dated March 8, 2017 (Appendix B2, page B2-72).

R150-1 The commenter expresses concerns related to the traffic impacts of the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R151. Response to Comments from Linda Pemberton, dated April 3, 2017 (Appendix B2, page B2-73).

- R151-1 The commenter expresses concerns related to the traffic impacts of the Project and not the adequacy of the EIR; no response is required.
- R151-2 No weekend peak hour assessment was completed for the Project. This is a typical approach for traffic engineering assessment as professionals typically do not design roadways to handle traffic that fluctuates based on the season and in the worst case month of July would only occur four or five hours over the course of a year (e.g. the peak hour of a Saturday during the peak month). Instead, roadways are typically designed to handle typical traffic (e.g. weekday peak hour, which occurs approximately 150 days per year). Refer also to Response to Comment A7-18.
- R151-3 The TDM Plan includes a monitoring and reporting program (see Appendix J2 of the DEIR). As described, monitoring would be completed every two years and summarized in a technical memorandum. The City would monitor the efficacy of the TDM Plan using transportation counts, surveys, and other data sources (See “Monitoring Framework” in Appendix J2).
- R151-4 There are a number of examples of TDM plans and programs throughout the state. The TDM Plan prepared for SEASP was based on reductions documented by the California Air Pollution Control Officers Association (CAPCOA). Fehr & Peers worked with CAPCOA to develop the transportation section of the report Quantifying Greenhouse Gas Mitigation Measures. This report is now used as a set of guidelines for quantifying the trip reduction and greenhouse gas benefits of TDM strategies. The CAPCOA guidelines were developed by conducting a comprehensive literature review of studies documenting the effects of TDM strategies on reducing vehicle miles traveled (VMT) (for further reference, see the CAPCOA Quantifying Greenhouse Gas Mitigation Measures report and fact sheets, available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>).
- R151-5 Right-of-way acquisition and the need for Caltrans approval is not necessarily a barrier to development. The feasibility of acquiring additional right-of-way depends on the existing physical improvements that are within the area subject to a taking. For example, if right-of-way acquisition requires the take of a building, the cost make the improvement is often infeasible. All of the proposed bikeways along these roadways can be accommodated within the existing curb-to-curb width of all study roadways as shown in the Specific Plan.

Additionally, the City is the implementing agency for the pedestrian and bicycle improvements. The City has acknowledged the need for Caltrans to approve the bicycle facilities on Pacific Coast Highway and have already engaged Caltrans to discuss potential changes to this roadway and mechanisms to implement the facilities.

4. Response to Comments on Recirculated Traffic Section

Furthermore, the proposed improvements along Pacific Coast Highway are consistent with current Caltrans Complete Streets policies and are consistent with direction provided in the Main Street, California: A Guide for Improving Community and Transportation Vitality (Caltrans 2013) guidance. Given that the facilities were evaluated in the traffic study and are consistent with Caltrans guidance, the DEIR's conclusion related to the beneficial impact to bicycle facilities is appropriate.

- R151-6 The commenter asks what the city is doing to correct existing dangerous intersections with traffic light problems. It is unclear from the comment what intersections have traffic light problems. The City's management of the citywide circulation system is beyond the scope of the DEIR.
- R151-7 The Transportation Impact Analysis (Appendix J1 of the DEIR) did not include an analysis of collision reports for each of the study area intersections. However, the City keeps a record of collisions that are reported within its boundaries.
- R151-8 Collision rates are dependent upon human behavior and future changes to vehicle safety systems and not density. There is no evidence to suggest that collision rates would change from existing conditions due to implementation of the Specific Plan. Furthermore, the SEASP is designed to ensure compatibility between land uses and the existing built environment. As detailed starting on Page 3-17 of the DEIR and the SEASP Mobility Plan, SEASP would enhance the pedestrian and bicycle connectivity to promote safe walking and bicycling.
- R151-9 The commenter supports an alternative with 30-50 percent less density and a maximum height of four-stories. This comment is noted.

4. Response to Comments on Recirculated Traffic Section

R152. Response to Comments from Dorothy Perley, dated April 3, 2017 (Appendix B2, page B2-76).

R152-1 The commenter provides additional options for traffic solutions—underpasses, overpasses, ferries, making 2nd street a non-thoroughfare, using autopilot cars, and limiting parking. The comment also asks if the Project can be phased to coincide with technology and if homes/businesses be implemented without parking and provide off-site parking with shuttles.

Many of these options were considered as part of the SEASP process. Underpasses and overpasses, particularly at the 2nd Street/Pacific Coast Highway intersection, were considered and rejected as they generally disconnect areas from one-another and would not be consistent with the purpose and need for the proposed Project to create a main street feel in the mixed use area and make the SEASP area a destination. Underpasses and overpasses would also require significant right-of-way in area that is constrained by existing development and wetlands and would not be consistent with the City's General Plan.

Ferries and water taxis are good suggestions and are documented in SEASP Section 6.2.2 as options to alleviate traffic impacts. Long Beach Transit cannot commit to increased service until they have sufficient ridership. However, coordination between future employers and Long Beach Transit may be included as potential treatments for the TDM plan.

Reducing capacity on 2nd Street and on Pacific Coast Highway were also considered to reduce these roadways as being used as a thoroughfare; however, this option was also dismissed as, during the public outreach process, it became clear that reducing the number of lanes through the study area would not be supported by the community and is inconsistent with the purpose and need identified in the specific plan.

Autonomous vehicles (e.g. autopilot cars) will become available at some point in the future. However, the timing of when fully autonomous vehicles will make up the majority of the vehicle fleet and the impact on travel patterns is unknown. Therefore, an assessment of autonomous vehicles would be speculative. CEQA does not require the lead agency to engage in speculative analysis. (*Sacramento Old City Ass'n v. City Council* (1991) 229 Cal.App.3d 1011, 1025.). Finally, providing off-site parking and providing shuttle service in this area for residents and employees is an option that could be incorporated into the TDM Plan.

The comment also suggests phasing development concurrent with technology. As required by Mitigation Measure TRAF-2, subsequent developments in the SEASP area to prepare focused traffic studies to ensure that improvements are identified and implemented as needed. As technology changes in the future, these travel choices will be reflected in the subsequent traffic assessments.

4. Response to Comments on Recirculated Traffic Section

R153. Response to Comments from Braden Phillip, dated April 2, 2017 (Appendix B2, page B2-77).

R153-1 These comments are introductory in nature and do not require a response. The commenter states that three- to five-stories is more in keeping with the nature of development in the area. The commenter also introduces traffic concerns related to the number of intersections operating at LOS E/F, mitigation and pedestrian/bicycle modes of travel. Responses are provided in Responses to Comments R153-2 to R153-11, below.

R153-2 The commenter is citing the portions of the vision of the City's General Plan, Mobility Element. There are a number of examples of TDM plans and programs throughout the state. The TDM Plan prepared for SEASP was based on reductions documented by the California Air Pollution Control Officers Association (CAPCOA). Fehr & Peers worked with CAPCOA to develop the transportation section of the report Quantifying Greenhouse Gas Mitigation Measures. This report is now used as a set of guidelines for quantifying the trip reduction and greenhouse gas benefits of TDM strategies. The CAPCOA guidelines were developed by conducting a comprehensive literature review of studies documenting the effects of TDM strategies on reducing vehicle miles traveled (VMT) (for further reference, see the CAPCOA Quantifying Greenhouse Gas Mitigation Measures report and fact sheets, available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>).

R153-3 The City's Mobility Element aims to implement a context-sensitive and multimodal approach to street planning and design and increase the efficiency of the roadway and highway system. As detailed in Section 6, Mobility, of SEASP, the proposed Specific Plan supports this vision by improving and promoting pedestrian and bicycle facilities while accommodating motor vehicles and public transit. As stated in Response to Comment 153-2, CAPCOA guidelines were based on studies documenting the effects of implementing measures to increase walkability.

The comment notes that the 2nd Street and Pacific Coast Highway intersection is very wide in all directions. The comment further notes that the plan, which proposes to provide a more balanced mobility system in the area and increase pedestrian use in the area will only worsen traffic wait times and congestion due to pedestrians "calls" at the intersections.

Please note that the analysis in the traffic study at the study intersection was completed using Synchro level of service software and the Highway Capacity Manual methodology. This method utilizes traffic signal timing to evaluate operations. As such, the analysis accounts for pedestrian calls at the intersection and it is included in the impact assessment.

The comment also suggests that walking, biking, and other innovations and technologies to improve traffic flow sounds good but, without successful examples of

4. Response to Comments on Recirculated Traffic Section

implementation in the area, it provides no measureable mitigation. National Transportation Operations Coalition has identified that implementation of appropriate signal timing would result in a reduction in traffic delays ranging from 15 to 40 percent and reductions in travel time up to 25 pedestrian. Additionally, with these mitigation measures being identified in the Mitigation Monitoring and Reporting Program for the Project, they will be required to be implemented. As such, the city will be required to implement the identified improvements.

Finally, the comment notes that convincing people to be more physically active is more difficult than putting in sidewalks and bike lanes and is not a substitute for measureable mitigation for traffic impacts and notes our current obesity statistics as evidence that people are not partaking in active transportation. Please note that the trip reductions associated with implementation of bicycle lanes is based on information from CAPCOA and is based on research documenting reductions in travel behavior associated with the implementation of bicycle lanes

- R153-4 Implementation and makeup of the TMA is described in the TDM Plan, provided in Appendix J2 of the DEIR. Strategies, TDM measures, and reporting requirements are also provided in the TDM Plan. Table 2 outlines TDM strategies and efficacies, which does not include alternative routing through neighborhoods (cut through traffic).
- R153-5 The commenter states that the Project should not encourage development that would exacerbate existing failing intersections, freeway mainlines and ramps. This comment is noted.
- R153-6 Refer to Response to Comment R153-2.
- R153-7 The specific plan proposes increased block density in the study area which would increase the options for travel and ability for pedestrians to cross the roadway in the study area. Although access to these areas would be evaluated concurrent with proposed development, depending on how much traffic they generate, traffic signals will likely be warranted at these locations where pedestrians would cross. The traffic signals would be interconnected with adjacent signals and timed so that traffic progression would occur smoothly and at a reasonable rate of speed.
- R153-8 The City has been and continues to coordinate with Caltrans regarding traffic light synchronization.
- R153-9 The commenter provides an opinion as to the need for traffic mitigation fees and the use of fees toward the TMA. This comment is noted.
- R153-10 This comment related to traffic conditions is noted.

4. Response to Comments on Recirculated Traffic Section

- R153-11 Pursuant to CEQA, environmental impacts that are identified as significant and unavoidable must include all feasible mitigation measures. Future development is required to comply with Mitigation Measures TRAF-1 through TRAF-6.

4. Response to Comments on Recirculated Traffic Section

R154. Response to Comments from Vince Q, dated March 7, 2017 (Appendix B2, page B2-82).

R154-1 The commenter expresses concern related to traffic impacts and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R155. Response to Comments from Chris Richgels, dated March 30, 2017 (Appendix B2, page B2-83).

R155-1 The commenter expresses support for the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R156. Response to Comments from Michael Rinella, dated March 1, 2017 (Appendix B2, page B2-84).

R156-1 The commenter expresses concerns related to traffic impacts and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R157. Response to Comments from Jeff Salisbury, dated March 1, 2017 (Appendix B2, page B2-85).

R157-1 The commenter expresses concerns related to traffic impacts, homelessness, and criminal activity. This is a comment on the Project itself and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R158. Response to Comments from Kenneth H. Seiff, dated April 3, 2017 (Appendix B2, page B2-87).

- R158-1 These comments are introductory in nature and no response is required.
- R158-2 The commenter describes the existing conditions near Studebaker and the SR-22 Ramps. The City acknowledges the existing design deficiencies documented by the commenter.
- R158-3 The commenter suggests that all mitigation must be implemented to achieve a successful Project. Please note that CEQA requires specific findings where a change to the project (such as a mitigation measure) is under the jurisdiction and responsibility of another agency (see CEQA Guidelines Section 15091[a][2]). If an intersection improvement is under the jurisdiction and control of Caltrans, the City is required to identify that impact as significant and unavoidable. However, this does not mean that the improvement cannot or will not be constructed. In fact, Mitigation Measure TRAF-3 has been incorporated into the Project to mitigate Project impacts at Studebaker Road and the SR-22 Ramps (intersections #3 and #11). Improvements to this intersection would need to comply with Caltrans standards. Note there was no impact identified at intersection #24.
- R158-4 Comment noted.
- R158-5 Emergency vehicle access is fully analyzed under Impact 5.16-5 of the DEIR. As stated, the LBFD is currently meeting response time goals. This occurs despite the existing congestion experienced during peak hours. The mobility plan for SEASP identifies greater accessibility for emergency vehicles following implementation.
- R158-6 There is no requirement under CEQA to mitigate for existing deficiencies. CEQA requires the lead agency to evaluate Project impacts compared to the existing baseline conditions and to incorporate mitigation measures to reduce Project and cumulative impacts. This analysis has been conducted in the DEIR.
- R158-7 The commenter states that he does not believe the Project is consistent with the City's General Plan MOP Policy 1-1. However, the commenter does not state why or provide data for this conclusion. The comment is acknowledged.

The commenter states that the construction impact analysis is abbreviated and cursory. Please note that this is a program-level environmental document. The proposed Project includes the adoption of the Specific Plan with buildout assumed to occur over an approximate 20 year period. No site specific development is being proposed at this time and construction phasing is dependent on a variety of factors, including market demand. Additionally, the size of any particular development or developments and anticipated construction schedule is unknown. Therefore, construction trip generation associated with future development under the proposed Specific Plan is unknown at this time.

4. Response to Comments on Recirculated Traffic Section

Therefore, a site specific analysis of construction trips, routes, etc. cannot be provided at this time.

R158-8 Refer to Response to Comment R158-3.

R158-9 The comment notes that the intersection of SR-22 and Studebaker Road and College Park Drive is not mentioned in Table 5-16-20 even though it operates at LOS F. The note acknowledges that it is not identified as a significant impact as it is not expected to satisfy the peak hour signal warrant for traffic signal installation. The comment goes on to note that the increased traffic at this location will further exacerbate the ability for residents to utilize this intersection. The comment notes that Caltrans has considered installation of a traffic signal at this location in the past.

As noted in the DEIR (Page 5.16-27), the intersection significance criteria identifies that an unsignalized intersection operating at an unacceptable level would also need to satisfy the Peak Hour Volume Warrant for traffic signal installation. Although long delays are expected from the minor street approach at this intersection, the peak hour volume warrant is not expected to be satisfied and, as such, the impact of the Project is considered to be less than significant. As such, no mitigation is required.

R158-10 These concluding comments are acknowledged.

4. Response to Comments on Recirculated Traffic Section

R159. Response to Comments from Lynn Shober, dated April 3, 2017 (Appendix B2, page B2-93).

R159-1 The commenter expresses concerns related to traffic impacts and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R160. Response to Comments from Howard Shopenn, dated April 3, 2017 (Appendix B2, page B2-94).

R160-1 The commenter expresses opposition to the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R161. Response to Comments from Andy Seinkiewich, dated April 3, 2017 (Appendix B2, page B2-95).

R161-1 The commenter expresses opposition to the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R162. Response to Comments from Sydney Simon, dated March 30, 2017 (Appendix B2, page B2-96).

R162-1 The commenter expresses concerns related to traffic impacts and support for a reduced density alternative, not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R163. Response to Comments from Daniel Siskin, dated March 1, 2017 (Appendix B2, page B2-97).

R163-1 The commenter expresses support for the redevelopment of the Seaport Motel and does address the not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R164. Response to Comments from Alyse Smith, dated March 1, 2017 (Appendix B2, page B2-98).

R164-1 The commenter expresses concerns related to traffic impacts and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R165. Response to Comments from Laurie Smith, dated April 3, 2017 (Appendix B2, page B2-99).

R165-1 The commenter expresses concerns related to traffic impacts and support for a reduced density option. The comment does not address the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R166. Response to Comments from Todd R. Smith, dated March 31, 2017 (Appendix B2, page B2-100).

R166-1 The commenter expresses opposition to the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R167. Response to Comments from Becki Snellen, dated March 6, 2017 (Appendix B2, page B2-101).

R167-1 The commenter expresses concerns related to traffic impacts of the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R168. Response to Comments from Jason Stack, dated April 3, 2017 (Appendix B2, page B2-102).

- R168-1 These comments are introductory in nature and no response is required. Responses to the remaining comments are provided in Responses to Comments R168-2 through R168-5.
- R168-2 The commenter distinguishes the difference between the existing traffic congestion in SEASP versus gridlock (standstill conditions). The commenter also provides detailed information on the City and Caltrans role in managing and maintaining their own traffic systems. These comments are noted; no response is necessary.
- R168-3 The commenter expresses the need for modernization of traffic systems so that engineers can monitor traffic through the City in real-time from their office. The commenter recommends relinquishment PCH but notes the timing and costs associated with the process. The comments are acknowledged. It should be noted that the City has separately entered into discussions with Caltrans to initiate the process of relinquishing state facilities in the SEASP area.
- R168-4 The commenter discusses the benefits of a traffic synchronization plan, its components, and monitoring. The commenter recommends that the synchronization plan for SEASP include specific measures to provide consistency with the City's preparation of the Intelligent Transportation System Master Plan. This comment is acknowledged and will be implemented as part of the mitigation measures noting signal timing improvements; no further response is needed.
- R168-5 The commenter acknowledges the opportunity provided by SEASP to implement traffic synchronization and the benefits it will have on travel times and roadway safety.

4. Response to Comments on Recirculated Traffic Section

R169. Response to Comments from Anne Conneen Thompson, dated April 3, 2017 (Appendix B2, page B2-110).

R169-1 The commenter expresses support for the Project and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R170. Response to Comments from Susan Tiso, dated March 2, 2017 (Appendix B2, page B2-111).

R170-1 The commenter expresses support for redevelopment of Seaport Marina Hotel and concerns related to traffic impacts at 2nd Street and PCH; the comment does not address the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R171. Response to Comments from Lona Tucker, dated March 29, 2017 (Appendix B2, page B2-112).

R171-1 The commenter expresses concerns related to traffic impacts and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R172. Response to Comments from Melanie and Ernie Wallner, dated March 2, 2017 (Appendix B2, page B2-113).

R172-1 The commenter expresses concerns related to traffic impacts and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R173. Response to Comments from Charles F. Ward, dated April 2, 2017 (Appendix B2, page B2-114).

R173-1 The commenter expresses concerns related to traffic congestion, suggests widening 2nd Street bridge through Naples to 8 lanes to Ocean Boulevard, and provide trails through wetlands. The comment does not relate to the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R174. Response to Comments from William L. Waterhouse, dated April 3, 2017 (Appendix B2, page B2-116).

R174-1 The commenter restates a summary of the Project. Please note one correction, the Project would allow a net increase of 5,439 residential units, not over 8,000. The commenter is correct that many intersections were identified as significant and unavoidable (17 intersections). Implementation of Mitigation Measures TRAF-1 through TRAF-4 would reduce impacts to less than significant at five intersections. The commenter states that the Project should not be approved without mitigating all intersections to less than significant.

With regard to the analysis of actual design of future Projects, the DEIR analyzed the environmental impacts of the proposed Specific Plan at a program-level. Although no physical development is proposed at this time, an environmental analysis that analyzes the changes to land uses and buildout is required by CEQA. However, once future site-specific development Projects are proposed, the project applicant would be required to incorporate the mitigation measures identified in the DEIR, including future studies, and undergo CEQA environmental review as applicable.

R174-2 Pursuant to the proposed Specific Plan, the alignment of Shopkeeper Road shall be designed to avoid impacting delineated wetlands (see SEASP Section 4.3.8, v. Hearing Draft May 2017).

R174-3 The comment notes that a grade separation for the 2nd Street/Pacific Coast Highway intersection was considered and rejected and suggests that the grade separation should be included as feasible mitigation. Grade separation was considered and rejected as they generally disconnect areas from one-another and would not be consistent with the purpose and need for the proposed Project to create a main street feel in the mixed use area and make the SEASP area a destination. Grade separation would also require significant right-of-way in area that is constrained by existing development and wetlands and would not be consistent with the City's General Plan.

It should also be noted that using the 2nd Street bridge over the waterway as comparison to a grade separation of this intersection is not entirely applicable. Rather, a freeway interchange would be a more applicable analogy. As seen in past planning when freeways were implemented through Cities throughout the United States, freeway construction with interchanges divided communities, reduced property values, and made walking and bicycling more difficult. As such, the grade separation at this location was not considered as it was not consistent with the purpose and need for the Project.

R174-4 The comment suggests that alternative intersection control should be considered at the 2nd Street/Pacific Coast Highway intersection, including a roundabout. A roundabout was considered at this location; however, given the high number of conflicting left-turns at this location, a roundabout was found to operate less efficiently than a signalized

4. Response to Comments on Recirculated Traffic Section

intersection (high left-turn volumes will occupy more of the roundabout capacity limiting the ability for vehicles to enter the roundabout from other approaches). As such, a roundabout was considered but dismissed as it was a less efficient form of traffic control than a signalized intersection.

The comment also notes that the relocation of Shopkeeper Road and extension of Marina Drive would reduce VMT through this intersection. The comment is correct that these roadways would distribute traffic more efficiently and would reduce left-turns at the 2nd Street and Pacific Coast Highway intersection. However, this connectivity was assumed in the technical analysis and was assumed when a roundabout was considered at this location, which ultimately found a traffic signal to be the most appropriate form of traffic control.

- R174-5 The proposed Specific Plan requires new Projects to provide additional vehicular and pedestrian access by creating a new, smaller internal block or grid (see SEASP, Chapter 4, Community Structure, Chapter 7, Design Guidelines, and Section 6.6.9, Internal Streets).
- R175-6 CEQA requires that the DEIR consider all feasible mitigation measures. While the DEIR includes an analysis of roadway improvements to alleviate congestion at intersections, several other mitigation measures have been identified and considered. There are several components built into the Project that would alleviate transportation impact (see DEIR Pages 3-14 through 3-18), project design features (see PDF-1 through PDF-7), including formation of a TMA and TDM Plan (see Appendix J2 of the DEIR). Refer also to Responses to Comments R174-3 and R174-4.
- R174-7 The application for the redevelopment of the Seaport Marina Hotel by CenterCal Properties is a separate project and project applicant undergoing independent environmental review. This proposal is not a part of the proposed Specific Plan.
- R174-8 Comment noted.
- R174-9 Impacts relating to ruptures of known earthquake faults were fully analyzed in Section 5.6, *Geology and Soils*, of the DEIR.
- R174-10 The commenter provides a summary of his comments. Refer to Responses to Comments R174-1 through R174-9, above.

4. Response to Comments on Recirculated Traffic Section

R175. Response to Comments from Alaine Weiss, dated April 3, 2017 (Appendix B2, page B2-120).

R175-1 The commenter expresses concerns over the existing and future traffic congestion in the Project area. This comment does not relate to the adequacy of the EIR; no response is required.

R175-2 The commenter is correct that the proposed street, bicycle, and pedestrian improvements will not reduce all traffic impacts to less than significant levels. As discussed in Section 5.16.8 of the DEIR, several intersections would remain significantly impacted after incorporation of all feasible mitigation measures.

The SEASP Mobility Plan places an emphasis on increasing pedestrian and bicycle safety. For example, curb extensions are recommended at pedestrian crossings and along internal streets. The bicycle facility classification recognize all modes of travel while calming traffic on key roadways to increase bicycle and pedestrian safety (see SEASP, Chapter 6, Bicycle Network).

Refer also to SEASP Section 6.6.2. Safety for pedestrians is a critical factor in the operation and functionality of PCH, as its current configuration gives highest priority to the automobile. Bicycles are accommodated on a Class IV bike lane, also know, as a cycle track, that is separated by either a raised buffer or rolled curbed similar to other streets in the City. Proposed improvements include the addition of a buffered bike lane, reduced travel lanes, as well as a landscaped median. An increased pedestrian zone allows for improvements to landscaping and lighting. The proposed Specific Plan would enhance safety for pedestrians and bicyclist, while accommodating all modes of travel.

R175-3 The commenter would like to see the infrastructure improvement constructed before any new development is allowed. This comment does not relate to the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R176. Response to Comments from John Weiss, dated April 3, 2017 (Appendix B2, page B2-122).

R176-1 The commenter expresses concerns related to traffic impacts of the Project and supports refinements to the Project to further reduce traffic impacts. The comment does not relate to the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R177. Response to Comments from Janice Weirzbicki, dated April 2, 2017 (Appendix B2, page B2-123).

R177-1 The commenter expresses concern related to traffic impacts and supports the Reduced Intensity Alternative. The comment does not address the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R178. Response to Comments from Carol Williams, dated March 1, 2017 (Appendix B2, page B2-124).

R178-1 The commenter expresses concerns related to traffic impacts and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

R179. Response to Comments from Paul Yost, dated March 1, 2017 (Appendix B2, page B2-125).

R179-1 The commenter expresses concerns related to traffic impacts and not the adequacy of the EIR; no response is required.

4. Response to Comments on Recirculated Traffic Section

This page intentionally left blank.

5. Revisions to the Draft EIR

5.1 DEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments received on the DEIR.

Figure 3-2, Page 3-5, Section 3, *Project Description*, has been revised in response to Comment A9-1 from Naval Weapons Station, Seal Beach.

Figure 3-2 has been revised to indicate the location of Leisure World in the City of Seal Beach where a label previously identified “Seal Beach Naval Weapon Station.”

Mitigation Measure AQ-2, Page 5.3-38, Section 5.3, *Air Quality*, is hereby modified as follows in response to Comment A3-9 from Caltrans.

AQ-2 Applicants for new development projects within the Southeast Area Specific Plan shall require the construction contractor to prepare a dust control plan and implement the following measures during ground-disturbing activities—in addition to the existing requirements for fugitive dust control under South Coast Air Quality Management District (SCAQMD) Rule 403—to further reduce PM10 and PM2.5 emissions. The City of Long Beach shall verify that these measures have been implemented during normal construction site inspections.

- Following all grading activities, the construction contractor shall reestablish ground cover on the construction site through seeding and watering.
- During all construction activities, the construction contractor shall sweep streets with SCAQMD Rule 1186–compliant, PM10-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling.
- During all construction activities, the construction contractor shall maintain a minimum 24-inch freeboard on trucks hauling dirt, sand, soil, or other loose materials and shall tarp materials with a fabric cover or other cover that achieves the same amount of protection.
- During all construction activities, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of three times per day.
- During all construction activities, the construction contractor shall limit onsite vehicle speeds on unpaved roads to no more than 15 miles per hour.
- Heavy construction vehicles trips shall be limited to off-peak hours.

5. Revisions to the Draft EIR

Page 5.4-1, Section 5.4, *Biological Resources*, is hereby modified as follows in response to Comment A7-59 from Los Cerritos Wetlands Land Trust.

Marine Mammal Protection Act

Marine Mammal Protection Act (MMPA) was enacted on October 21, 1972 to prohibit the take of marine mammals in U.S. waters. The MMPA protects all marine mammals. A person may not harass, fee, hunt, capture, collect, or kill any marine mammal or part of a marine mammal. A permit may be issued for incidental take under limited exceptions.

Page 5.4-10, Section 5.4, *Biological Resources*, is hereby modified as follows in response to Comment A7-61 from Los Cerritos Wetlands Land Trust.

5.4.1.2 CURRENT PLANNING

Current planning efforts have resulted in focused consideration on the future of the remaining wetlands within the Project area. While the decisions regarding the future of the wetlands are still in flux, it is anticipated that the majority of the wetlands and potential wetlands will be protected in perpetuity from development. LCWA does not intend to allow development that is inconsistent with wetland preservation on its property. Synergy Oil is in the process of creating a wetland mitigation bank and does not intend to develop on its property. The City of Long Beach, which owns Marketplace Marsh, is also contemplating the establishment of a wetland mitigation bank on this parcel and, if so, would not allow development inconsistent with the banking operation or existing oil extraction operations on its property. These three properties comprise the majority of the undeveloped wetlands in the Project area. Bryant properties, are anticipated to be sold to LCWA and included in the Los Cerritos Wetland Complex. The remaining wetlands identified in this report may undergo some form of development.

LCWA has prepared a Conceptual Restoration Plan to restore the wetlands by creating ideal hydrology and soil conditions. Wetland habitat presently exists on portions of the site, but is desired to occupy all appropriate areas, and be complemented by transitional and upland habitat along the perimeter. The plan requires a connection to reliable and relatively unrestricted seawater sources. The restoration plan is in progress and is operating independently of the SEASP process.

Page 5.4-10, Section 5.4, *Biological Resources*, is hereby modified as follows in response to Comment A7-88 from Los Cerritos Wetlands Land Trust.

The Project area is a stand-alone section of the City's LCP, which was certified by the Coastal Commission in 1980.

5. Revisions to the Draft EIR

Page 5.4-19, Section 5.4, *Biological Resources*, is hereby modified as follows in response to Comment A7-66 from Los Cerritos Wetlands Land Trust.

Marketplace Marsh

The Marketplace Marsh, about 35 acres, is currently owned by the City of Long Beach. A jurisdictional delineation report prepared by AECOM in 2012 documented 21.8 acres of Coastal Commission ~~CDFW~~ jurisdictional and 19.9 acres of Corps jurisdictional wetlands.

Over 90 percent of the Waters of the U.S. identified in Marketplace Marsh were southern brackish marsh (12.69 acres) and southern coastal saltmarsh (6.0 acres). Other vegetation consisted of alkali meadow, mulefat scrub and southern willow scrub. All wetland communities in the marsh were degraded and disturbed. Habitat types are mapped on Figure 10, *Marketplace Marsh Vegetation*, of the biological resources assessment included as Appendix D of this DEIR. A list of plant and wildlife species observed in Marketplace Marsh are provided in Tables 4.2-1 and 4.2-2, respectively, of the biological resources assessment (Appendix D of this DEIR).

Page 5.4-20, Section 5.4, *Biological Resources*, is hereby modified as follows in response to Comment A7-67 from Los Cerritos Wetlands Land Trust.

The wetlands support dominant stands of cordgrass and two species of pickleweed that provide microenvironments for algae, juvenile fish, and crustaceans and nesting of certain birds, such as Belding's savannah sparrow, a ~~state~~^{federally} listed endangered species. At the invertebrate and microscopic levels, the wealth and diversity of species, despite the twice daily foraging by shore birds, is characteristic of a long-standing, healthy mudflat-estuarine ecosystem.

Page 5.4-25, Section 5.4, *Biological Resources*, is hereby modified as follows in response to Comment A7-68 from Los Cerritos Wetlands Land Trust.

LCWA Wetlands

LCWA Wetlands, ~~encompassing three areas adjacent to the San Gabriel River and~~ totaling about 67 acres, comprise several habitat types: mulefat scrub, ruderal wetlands, salt flat, southern coastal brackish marsh, southern coastal salt marsh, and alkali meadow.

Page 5.4-27, Section 5.4, *Biological Resources*, is hereby modified as follows in response to Comment A7-88 from Los Cerritos Wetlands Land Trust.

Open Water habitats include the San Gabriel River, ~~Los~~^{El} Cerritos Channel/Steamshovel Slough, Bahia Marina, and the Haynes Cooling Channel.

5. Revisions to the Draft EIR

Page 5.4-32, Section 5.4, *Biological Resources*, is hereby modified as follows in response to Comment A7-88 from Los Cerritos Wetlands Land Trust.

Riparian areas in the Project area include the San Gabriel River, ~~Los El~~ Cerritos Channel/Steamshovel Slough, Bahia Marina, and the Haynes Cooling Channel. Habitats along San Gabriel River, El Cerritos Channel, and the Haynes Cooling Channel are channelized within the Project area.

Page 5.4-34, Section 5.4, *Biological Resources*, is hereby modified as follows in response to Comment A7-80 from Los Cerritos Wetlands Land Trust.

Regional Wildlife Movement

The Pacific Flyway is a major north-south flyway for migratory birds in America, extending from Alaska to Argentina and Chile. Migratory birds travel on an annual migration some or all of this distance both in spring and in fall. The Los Cerritos Wetlands are part of this migration, providing food and resting places; some species seek breeding grounds onsite.

Other wildlife movement within the region is limited to the San Gabriel River and other drainage corridors, such as Los Cerritos Channel. The majority of the Project area and its surroundings are developed with residential, commercial, and industrial development. This developed area surrounds the open space and wetland areas of the Project. Additionally, the Project boundaries are surrounded by urbanized development and, with the exception of the trail along the San Gabriel River, these land uses do not provide access to larger open space areas for larger mammals.

Page 5.4-38, Section 5.4, *Biological Resources*, is hereby modified as follows in response to Comment A7-6 from Los Cerritos Wetlands Land Trust.

No site specific development project is being proposed in the Coastal Habitat, Wetlands & Recreation area as part of the Specific Plan. However, the Coastal Habitat, Wetlands & Recreation land use designation lies entirely within the coastal zone and provides for coastal restoration, access, and visitor-serving recreation—ancillary office space, boat storage, trails, ~~and~~ an interpretive center, access and the Shopkeeper Road extension. These uses are intended to be complementary to the surrounding habitat and consistent with the Coastal Act. While these uses are intended to be developed in disturbed areas or ruderal uplands consisting of bare land or nonnative vegetation, development of these uses could impact sensitive habitat or result in the loss of native vegetation supporting sensitive species. For example, implementation of the Specific Plan could allow development of dry-stack boat storage on the Alamitos Bay Partnership property—about six acres in the LCWC at the southeast corner of Pacific Coast Highway and the Los Cerritos Channel—which includes about one acre of jurisdictional wetlands and sensitive plant species. Development on this property could result in a significant impact.

5. Revisions to the Draft EIR

Page 5.4-40, Section 5.4, *Biological Resources*, is hereby modified as follows in response to Comment A7-88 from Los Cerritos Wetlands Land Trust.

Additionally, landscaping within 500 feet of natural areas like the edge of Shopkeeper Road shall consist of California Native species or varieties that will not invade habitat or hybridize with existing native vegetation to create a more seamless transition between the natural wetlands and development (per CalGreen and Cal-IPC standards) (SEASP Section 7.1.5).

Page 5.4-43, Section 5.4, *Biological Resources*, is hereby modified as follows in response to Comment A7-89 from Los Cerritos Wetlands Land Trust.

Riparian habitats found within the Project area include the San Gabriel River and, to lesser extent, the ~~Los~~ Cerrito Channel and Haynes Cooling Channel.

Page 5.4-45, Section 5.4, *Biological Resources*, is hereby modified as follows in response to Comment A7-90 from Los Cerritos Wetlands Land Trust.

The cumulative study area for biological resources is the southeast Long Beach area consisting of ~~of~~ urbanized uses.

Page 5.4-46, Section 5.4, *Biological Resources*, is hereby modified to provide consistency with changes requested in SEASP Section 5.9

PDF-BIO-2 The City shall establish a Wetland Conservation and Monitoring Fund and establish fees pursuant to a Property Analysis Record (PAR). Each development or redevelopment shall contribute its fair share based on the size of the development to this fund, which will be created to provide long-term management to the wetlands within SEASP. (SEASP Section 5.9).

Page 5.4-48, Section 5.4, *Biological Resources*, is hereby modified as follows in for clarification.

BIO-3 If sensitive biological resources are identified within or ~~abutting adjacent~~ to the proposed development area, the project applicant shall submit evidence to the Long Beach Development Services Department that a qualified biologist has been retained to prepare a construction management plan. The construction limits shall be clearly flagged and/or fenced. No construction access, parking, storage of equipment, or waste dirt or rubble will be permitted within such marked areas. A monitoring biologist shall be onsite during any grading activities. The qualified biologist shall also develop and implement a project specific contractor training program to educate project contractors on the sensitive biological resources within and adjacent to the proposed development project area and oversee measures to avoid and/or minimize impacts to these species.

5. Revisions to the Draft EIR

Page 5.4-49, Section 5.4, *Biological Resources*, is hereby modified as follows in for clarification.

BIO-5 Prior to approval of any development adjacent to jurisdictional waters or habitat for special status species and all land within the Coastal Habitat, Wetlands & Recreation land use, the project applicant shall submit a photometric plan demonstrating that the project will be designed and shielded so that the project's contribution of nighttime lighting shall be no greater than 0.10 foot-candles at the edge of the habitat. This would ensure that spill light does not result in exposure of artificial light at levels exceeding the intensity of moonlight (approximately 0.5 foot-candles).

Page 5.4-49, Section 5.4, *Biological Resources*, is hereby modified as follows in response to Appendix C1.

BIO-7 Prior to the issuance of building permits, the project applicant and/or subsequent builder shall prepare an urban-open space interface brochure to be approved by the Long Beach Development Services Department to educate residents on the responsibilities associated with living near sensitive biological habitat. The brochure shall address relevant issues, including the role of natural predators in the wildlands and how to minimize impacts of human and domestic pets on native communities and their inhabitants, including the "Light's Out for Birds" programs. The approved brochure, along with attachments, shall be included as part of the rental/lease agreements and as part of the sales literature for future developments.

Mitigation Measure CUL-4 on Page 5.5-29, Section 5.5, *Cultural Resources*, is hereby modified as follows in response to Comment A15-3 from United Coalition to Protect Panhe.

CUL-4 At least 30 days prior to ground disturbance by each project development or redevelopment in conformance with the Specific Plan, the City of Long Beach would notify the three Native American tribal representatives who requested Native American monitoring of ground-disturbing activities. For each project, the project applicant would retain one certified Native American monitor who would accompany the professional archaeological monitor during on-call monitoring. The Native American monitor would have the same authority to halt activities that could adversely impact archaeological or tribal cultural resources that the professional archaeological monitor would. The Native American monitor would recommend measures to avoid, preserve and/or recover Native American archaeological and/or tribal cultural resources, as practicable, and would convey such resources to the pertinent tribe or most likely descendant, as applicable.

Page 5.16-33, Section 5.16, *Transportation and Traffic*, is hereby modified as follows in response to Comment L7-6 from City of Seal Beach.

- 3028-home residential subdivision southwest of 1st Street & Pacific Coast Highway.

5. Revisions to the Draft EIR

Mitigation Measure TRAF-2 on Page 5.16-66, Section 5.16, *Transportation and Traffic*, of the Recirculated DEIR is hereby modified as follows in response to Comment R99-10 from City of Seal Beach.

TRAF-2 As part of the subsequent environmental review for development projects that would be accommodated by the SEASP, a site-specific traffic study shall be prepared by the project applicant/developer to evaluate the project's potential traffic and transportation impacts consistent with the City of Long Beach Guidelines for Signalized Intersections and the Los Angeles County CMP Guidelines to identify specific improvements, as deemed necessary, to provide safe and efficient onsite circulation and access, and limit cut through traffic on adjacent neighborhoods. The traffic study for the first development project to be considered under the SEASP shall include an analysis of signal timing of 2nd Street through Naples to identify timing adjustments needed to improve signal synchronization. The traffic study shall be approved by the Public Works Department. Payment of fees, construction of improvements, and signal timing shall be implemented prior to issuance of a building permit.

Page 5.17-1, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows in response to Comment A12-1 from Sanitation Districts of Los Angeles County.

Regulatory Background

Local

County Sanitation Districts of Los Angeles County

Capital improvements to the Los Angeles County Sanitation District's (LACSD) water reclamation plants are funded from connection fees charged to new developments, redevelopments, and expansions of existing land uses. LACSD is 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 quantified of wastewater discharged from connected facilities. The connection fee is a capital facilities fee used to provide additional conveyance, treatment, and disposal facilities (capital facilities) required by new users connecting to the LACSD's sewerage system or by existing users who significantly increase the quantity or strength of their wastewater discharge. The fee is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed Project. The Connection Fee Program ensures that all users pay their fair share for any necessary expansion of the system. Estimated wastewater generation factors used in determining connection fees in LACSD's 22 member districts are set forth in the Connection Fee Ordinance for each respective district available on LACSD's website. Most of the City of Long Beach, including the Project area, is in District 3 of the Sanitation District; (LACSD 2016a).

5. Revisions to the Draft EIR

Page 5.17-6, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows in response to Comment A12-3 from Sanitation Districts of Los Angeles County.

Wastewater Treatment

Wastewater from the City of Long Beach is treated at LACSD's Joint Water Pollution Control Plant (JWPCP) in the City of Carson and Long Beach Water Reclamation Plant (LBWRP) in the City of Long Beach.¹ The JWPCP has capacity of 400 mgd and, in 2014, treated average daily flows of about 263 mgd; it currently processes an average flow of 256.8 mgd. The LBWRP has capacity of 25 mgd and, in 2014, treated average daily flows of about 15.6 mgd (LACSD 2015b); it currently processes an average flow of 13.9 mgd. Treated effluent from the JWPCP is discharged through an ocean outfall pipe. Nearly 6 mgd of treated wastewater from the LBWRP is used for irrigation, groundwater recharge, and re-pressurization of oil-bearing rocks; the remainder is discharged to Coyote Creek (LACSD 2016b).

Figure 5.17-2 on Page 5.17-9, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows in response to Comment A12-4 from Sanitation Districts of Los Angeles County.

Notation on Figure 5.17-2 was corrected to show a larger projected sewer demand for the Multi-family Residential land use designation (23,127 GPD instead of 20,134 GPD).

Page 5.17-2, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows in response to Comment A12-5 from Sanitation Districts of Los Angeles County.

Existing Conditions

Sewers

The sewer system serving the Project area is extensive and includes a variety of pipe sizes ranging from 2- to 27-inches including numerous force mains. There is approximately 103,345 linear feet (LF) of pipe of 8-inches diameter or less; 14,400 LF of pipe ranging from 10- to 12-inches diameter, and 15,925 LF of sewer pipe 15-inches diameter or greater. The sewer system is operated and maintained by the City of Long Beach Water Department (LBWD) and the Los Angeles County Sanitation District (LACSD). Typically, the LBWD owns and operates sewer lines 15-inches or smaller while LACSD owns and operates the lines 15-inches or greater within the Project area. The primary sewer systems include LACSD's sewer system draining northerly along Pacific Coast Highway (15- to 18-inches ceramic) and the sewer system (18- to 21-inches ceramic) along Colorado Street draining westerly. There are also two LACSD pumping plants within the study area to assist with the conveyance of sewerage flows along the Pacific Coast Highway corridor. Sewer lines serving several portions of the Project area are described below and shown on Figure 5.17-1, *Existing Sewer System*.

¹ The Project area is in LACSD District 3, which is within the sewer shed of the JWPCP (LACSD 2016a; LARWQCB 2011).

5. Revisions to the Draft EIR

Page 5.17-5, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows in response to Comment A12-5 from Sanitation Districts of Los Angeles County.

- The hotel and surrounding area on the east side of PCH north of Los Cerritos Channel, The Mixed Use Marina, is served primarily by 8-inch City lines. These lines ultimately discharge to an 18-inch City line and then into the 15-inch LACSD trunk line along PCH. This area includes Marina #1 Pumping Plant.
- Marina Pacifica, the Marketplace, and Marina Shores areas are served by a combination of City and LACSD sewer facilities. City lines throughout the area range from 8- to 12-inches and ultimately tie into the 15-inch LACSD trunk line along the southern portion of PCH. This area includes Marina #2 Pumping Plant.

Page 5.17-5, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows in response to Comment A12-5 from Sanitation Districts of Los Angeles County.

LACSD has identified a few segments along the PCH corridor where maximum peak flows have almost reached exceeded their specific design criteria. Such findings do not warrant immediate replacement or upsizing but rather allows LACSD to effectively monitor these lines more closely. They also assist LACSD in identifying which sewer lines may require additional study as growth occurs.

LACSD also has mechanisms in place that account for proposed sewer demand changes related to General Plans, Specific Plans, and individual projects. This information is use to issue will-serve letters for individual projects, establish connection fees and also helps LACSD determine when the lines will need to by upsized in the future.

Page 5.17-7, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows in response to Comment A12-5 from Sanitation Districts of Los Angeles County.

Impact Analysis: Specific Plan buildout is forecast to increase wastewater generation from the Project area by 1.16 mgd, as shown below in Figure 5.17-2, *Proposed Sewer Demands*. The increase in flows are generally focused within the proposed Mixed Use Community Core and Mixed Use Marina land use areas, thereby potentially impacting numerous city sewer lines and LACSD trunk lines within these areas.

Long Beach Water Department Sewer System

It is anticipated that several of the 8-inch sewer lines serving the Mixed Use Community Core and the Mixed Use Marina will require upsizing to 10- or 12-inch lines dependent upon the size, density and location of the individual projects. The requirement to evaluate existing lines and determine if upsizing is required is covered in the LBWD Sewer Design Guidelines.

All sanitary sewers must be designed in accordance with certain design standards, Long Beach Water Department (LBWD) Rules and Regulations, and to accepted engineering principles. In all newly development areas and/or in all existing areas where new sanitary sewers are required, the design must

5. Revisions to the Draft EIR

include the provisions that the sewer systems' size and capacity can adequately accommodate the ultimate anticipated conditions.

Flow monitoring and sewer capacity studies ~~are is~~ required under certain scenarios. These include when a proposed development intensifies the land use from the existing development on the site or a proposed development requires a general plan amendment to a more intense use. Typically, the modeling of an "existing condition" scenario will be compared to an "existing condition with proposed development" scenario to determine any significant increases in sewer flows. The capacity study is to ensure the sewer system can accommodate a proposed development, and if it cannot, to identify improvements required for the development. The developer is required to cover the costs associated with flow monitoring, sewer capacity study, and sewer modeling.

Proponents of projects developed pursuant to the Specific Plan may need to make improvements to the sewer system at their own cost and request reimbursement agreement to recover a portion of the costs from other developments that tie into the system and benefit from the improvements. These agreements typically run about 20 years and are not guaranteed to be paid in full.

Los Angeles County Sanitation District's Sewer System

In addition to impacts to the LBWD sewer system, impacts ~~could may~~ occur to the LACSD trunk lines and pumping plants, which provide regional sewer service and collect flows from the tributary LBWD sewer lines. Maximum peak flow data and maximum design capacities were ~~was~~ obtained from LACSD to evaluate long term impacts. LACSD trunk lines serving the site are designed to accommodate on average over 3.26 mgd, and the maximum flow rates from 2007-2012 averaged approximately 1.15 mgd, indicating there is sufficient regional capacity to accept the 1.16 mgd projected increase. ~~The addition of the 1.11 mgd to the existing trunk lines would not increase the flows beyond the total design capacity of these larger trunk lines, and implementation of the Project would not impact the regional system.~~

However, numerous trunk lines serve the PCH corridor and Colorado Street and individual LACSD trunk lines could potentially be impacted dependent upon the individual project locations. Implementation of the Specific Plan may require upsizing to an individual trunk line. To prevent sewer lines from reaching their maximum capacity, LACSD has regional mechanisms and databases in place to track growth projections, changes in land use, and flow monitors to determine if certain trunk lines may be impacted in the future. In addition, all site specific flow monitoring required by LBWD is provided to LACSD so they can track the capacity of the lines connecting with LACSD trunk lines within a certain region. Through this process, long term capacity is monitored closely to determine when trunk lines are nearing their design capacity. If LACSD identifies that, over time, specific trunk lines are nearing their design capacity, the line will be added to their comprehensive Capital Improvement Project list for future upgrade.

Based on correspondence with LACSD, the addition of 1.16 MGD would impact the ability of three existing pumping plants (two within the Project area in PCH) and one upstream and outside of the Project area in Colorado Blvd) to accommodate the increase in sewer flows. The current capacity of the three pumping plants is not sufficient to accommodate the full build out of the proposed plan and the increase of 1.16 MGD. Since the proposed land plan changes are anticipated to occur over many years, it provides sufficient

5. Revisions to the Draft EIR

time for planning and design to evaluate the ability to expand the capacities of the existing pumping stations and/or add new pumping stations as the proposed land uses are converted into actual projects. As projects are built in accordance with the proposed land use changes, LACSD will evaluate the pump stations and identify means to either upgrade the existing pumping stations or add new pumping stations through the connection fees specific to the service region. In addition, an individual developer may also be required to build a new pumping station in accordance with LACSD design standards to offset impacts on the existing conveyance and pumping station systems; partial reimbursement may be available based on future connection fees in the region.

Project applicants are required to pay their fair share fees for any necessary expansion of the sewer system pursuant to LACSD's Connection Fee Program. If upgrades are required, conformance with the General Construction Permit for Linear Projects would be followed which serves to reduce the impacts of construction through the use of sediment and erosion based best management practices (BMPs).

Page 5.17-11, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows in response to Comment A12-3 from Sanitation Districts of Los Angeles County.

Both wastewater treatment plants serving the Project are have adequate capacity to treat the increase in sewer generation associated with the proposed Project. JWPCP currently has a remaining capacity of ~~143~~137 mgd and LBWRP has a remaining capacity of ~~11.19~~9.4 mgd. The proposed Project has the potential to increase sewer flows by 1.16 mgd. Therefore both JWPCP and LBWRP have adequate remaining treatment capacity to serve the Project at buildout.

Page 5.17-12, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows in response to Comment A12-3 from Sanitation Districts of Los Angeles County.

Both wastewater treatment plants serving the Project are have adequate capacity to treat the increase in sewer generation associated with the proposed Project. JWPCP currently has a remaining capacity of 137 mgd and LBWRP has a remaining capacity of 9.4 mgd. The proposed Project has the potential to increase sewer flows by 1.16 mgd. Therefore both JWPCP and LBWRP have adequate remaining treatment capacity to serve the Project at buildout.

Implementation of the Southeast Area Project would not require upsizing of the LACSD treatment plant facilities as the trunk lines serving the site are designed to accommodate on average over 3.26 mgd. The maximum flow rates from 2007-2012 averaged approximately 1.15 mgd. The addition of the 1.16 mgd to the existing trunk lines would not increase the flows beyond the total design capacity of these larger trunk lines nor would it exceed the design capacity of the wastewater treatment plants.

~~There are a variety of LACSD trunk lines serving the Project area including main lines and relief lines along PCH and Colorado Blvd. In total, there is sufficient capacity to accommodate the entire SEASP sewer increase projection. However, individual trunk lines may be impacted dependent upon the orientation and sewer loadings of the specific projects within SEASP. LACSD tracks and monitors the capacity of their trunk lines through flow tests and projected sewer flows. In the event a particular trunk line is identified as nearing~~

5. Revisions to the Draft EIR

~~design capacity over time, LACSD would include the particular line to its capital improvement project list. LACSD can also request that the SEASP projects modify their sewer alignment to tie into a different LBWD line that does not impact the specific LACSD trunk line. Through these requirements, LACSD can commit to providing sufficient sewer capacity for the proposed Project and impacts related to sewer treatment capacity would be less than significant.~~

Page 78 of Appendix J1, *Transportation Demand Management Plan*, is hereby modified as follows in response to Comment A12-3 from Sanitation Districts of Los Angeles County.

As previously discussed, existing pedestrian facilities in the SEASP area are limited. Most major roadways lack sidewalks on one or more sides of the street. 7th Street (between Ximeno Avenue and Studebaker Road) and 2nd Street (between Naples Plaza and Marina Drive) have well-developed sidewalks on both sides of the street. Most intersections have crosswalks and appropriate pedestrian crossing controls, allowing for connectivity to local activity centers.~~The existing pedestrian facilities throughout the SEASP are continuous and present on both sides of the street. The SEASP proposed pedestrian connections within the project site and off-site.~~ Major roadways throughout the SEASP will provide sidewalks on both sides of the road, increasing the performance of the pedestrian facilities. Additionally, certain locations will have a buffered sidewalk, providing enhanced pedestrian comfort and safety. As such, the Project would have a beneficial impact to pedestrian facilities and is considered **less than significant**.

6. References

- California Department of Fish and Wildlife (CDFW). 2016, December 8. Biogeographic Information and Observation System (BIOS). <https://www.wildlife.ca.gov/Data/BIOS>. WBD HUC8 Watersheds layer.
- City of Long Beach. 2002. General Plan Open Space and Recreation Element. <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=2540>.
- LSA Associates, Inc. (LSA). 2017, January. Final Environmental Impact Report General Plan Land Use and Urban Design Elements, Response to Comments and Errata, City of Long Beach, SCH No. 2015051054.
- State Water Resources Control Board (SWRCB). 2016, May 5. Impaired Water Bodies. http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2012.shtml.
- Transportation Research Board, 2010. National Cooperative Highway Research Program (NCHRP) Report 672, Roundabouts: An Informational Guide.
- US Geological Survey (USGS). 2016, December 8. Topoview [National Geologic Map Database]. <https://ngmdb.usgs.gov/maps/TopoView/>.

6. References

Appendix A. Comment Letters on DEIR

A1. Agency and Organization

A2. Residents

A3. Late Letters

Appendix

This page intentionally left blank.

Appendix B. Comment Letters on DEIR Recirculated Traffic Section

B1. Agency and Organization

B2. Residents

Appendix

This page intentionally left blank.

Appendix C. Biological Resources

C1. WRA Memo on Bird Safe Measures

C2. WRA SEASP DEIR RTC Memo

Appendix

This page intentionally left blank.

Appendix D. Traffic Data

D1. Traffic Data Sheets on Intersection #10

D2. New Intersections: Freeway Figures

D3. Public Records Request Memo

Appendix

This page intentionally left blank.

Appendix E. Infrastructure Report

Appendix

This page intentionally left blank.

Appendix F. PC Study Session Meeting Minutes August 18, 2016

Appendix

This page intentionally left blank.

Appendix G. Petitions

Appendix

This page intentionally left blank.