



APPENDIX I
Summary



I.1

Initial Study (IS)



Initial Study for the Long Beach RiverPark Residential Project

PREPARED FOR:

City of Long Beach
411 W. Ocean Blvd., 3rd Fl.
Long Beach, CA 90802

PREPARED BY:

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February 2021

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ENVIRONMENTAL CHECKLIST FORM

- 1. Project Title:** River Park Residential Project
- 2. Lead Agency Name and Address:** City of Long Beach
Department of Development Services
Planning Bureau
333 West Ocean Boulevard, 5th Floor
Long Beach, CA 90802
- 3. Contact Person and Phone Number:** Amy L. Harbin, AICP,
Planner
(562) 570-6872
- 4. Project Location:** 701, 712 W Baker Street;
3501, 3539, 3701, 3801 Golden Avenue,
Long Beach, CA 90806
Assessor Parcel Numbers (APNs): 7203-002-001, 005,
007, 008, 009 and 010
The Project Site is bounded by W. Wardlow Road on the south, the Los Angeles River on the west, the San Diego Freeway on the north and Golden Ave. on the east.
- 5. Project Sponsors Name and Address:** Integral Communities,
888 San Clemente Drive, Ste 100
Newport Beach, CA 92660
- 6. General Plan designation:** Founding and Contemporary Neighborhood (FCN) and Open Space (OS)
- 7. Zoning:** Assessor Parcel Numbers (APNs):
- 7203-002-001, and 009: Commercial Storage (CS)
 - 7203-002-007, 008, and 010: CS, Horse Overlay District (H)
 - 7203-002-005: CS, and Single-Family Residential Standard Lot (R-1-N), Split Zoning.
- 8. Description of the Project:** **(On following pages)**

A. INTRODUCTION

Integral Communities proposes to develop 226 detached and attached single-family homes and a 5-acre recreational space on approximately 20-acres of vacant land (Project Site) on the west side of the Wrigley Heights neighborhood in the City of Long Beach (City). The Project Site is bounded by W Wardlow Road on the south, the Los Angeles River on the west, the San Diego Freeway on the north and Golden Ave. on the east.

Development of the southern 15 acres of the site includes a mix of residential housing types including detached single-family homes and attached single-family townhomes. A majority of the structures would be 2-stories in height while those closest to W. Wardlow Road would be 3-stories. Residential development is proposed on the portion of the Project Site located south of Baker Street and the area north of Baker Street would be landscaped as an open space and recreation area. This open space and recreation area would contain trails and a grass area. This grass area would be sufficient in size for use as a soccer field or for other active sports activities.

The Project Site, owned by Oil Operators Inc., previously contained facilities used to treat production water from oil wells located throughout Long Beach and Signal Hill. Beginning in the mid-1920s, water treatment facilities were operated on the site to treat water and other fluids recovered during oil production. Treated water was disposed of off-site, after being treated and held in on-site settling basins. Treatment operations ended in 1998 and the facilities were removed in 2001. Remediation of the residual oil in the settling basins has been ongoing since 2001 under the oversight of the City of Long Beach Environmental Health Department and the Los Angeles Regional Water Quality Control Board (RWQCB). All required remediation would be completed in accordance with a Remediation Action Plan approved by the RWQCB.

B. PROJECT LOCATION AND SURROUNDING USES

As illustrated in the Project Location Map in **Figure A.1**, the Project Site is located near the western edge of the City of Long Beach, south of the San Diego (I-405) Freeway and east of the Long Beach Freeway (I-710) and Los Angeles River. The Project Site is bounded by W. Wardlow Road on the south, Golden Avenue on the east, I-405 to the north, and the Los Angeles River (LA River) to the west. Regional access is provided by both the I-405 and I-710 Freeways. West of the Project Site, Wardlow Road is connected to the I-710 north onramp and I-710 south offramp.

To the east are detached single-family condominium units and single-family detached homes in the Wrigley Heights neighborhood. To the south and west of the channelized LA River are condominium communities that transition into single-family homes. Pedestrian and bike trails are provided adjacent to the LA River. Vacant land is located north of I-405 and east of the Los Angeles River. There are two public parks adjacent to the Project Site as shown in Figure A.2- Surrounding Land Uses Map, Baker Street Park is located north of the intersection of Golden Ave. and Baker Street. The Wrigley Heights Dog Park is located to the southeast corner of the Project Site at the intersection of W. Wardlow Road and west of Golden Avenue.



SOURCE: Google Earth - 2021

FIGURE A.1

Long Beach General Plan 2040

PlaceTypes and Height Standards
Approved by Resolution 19-0189
December 3, 2019

PlaceTypes

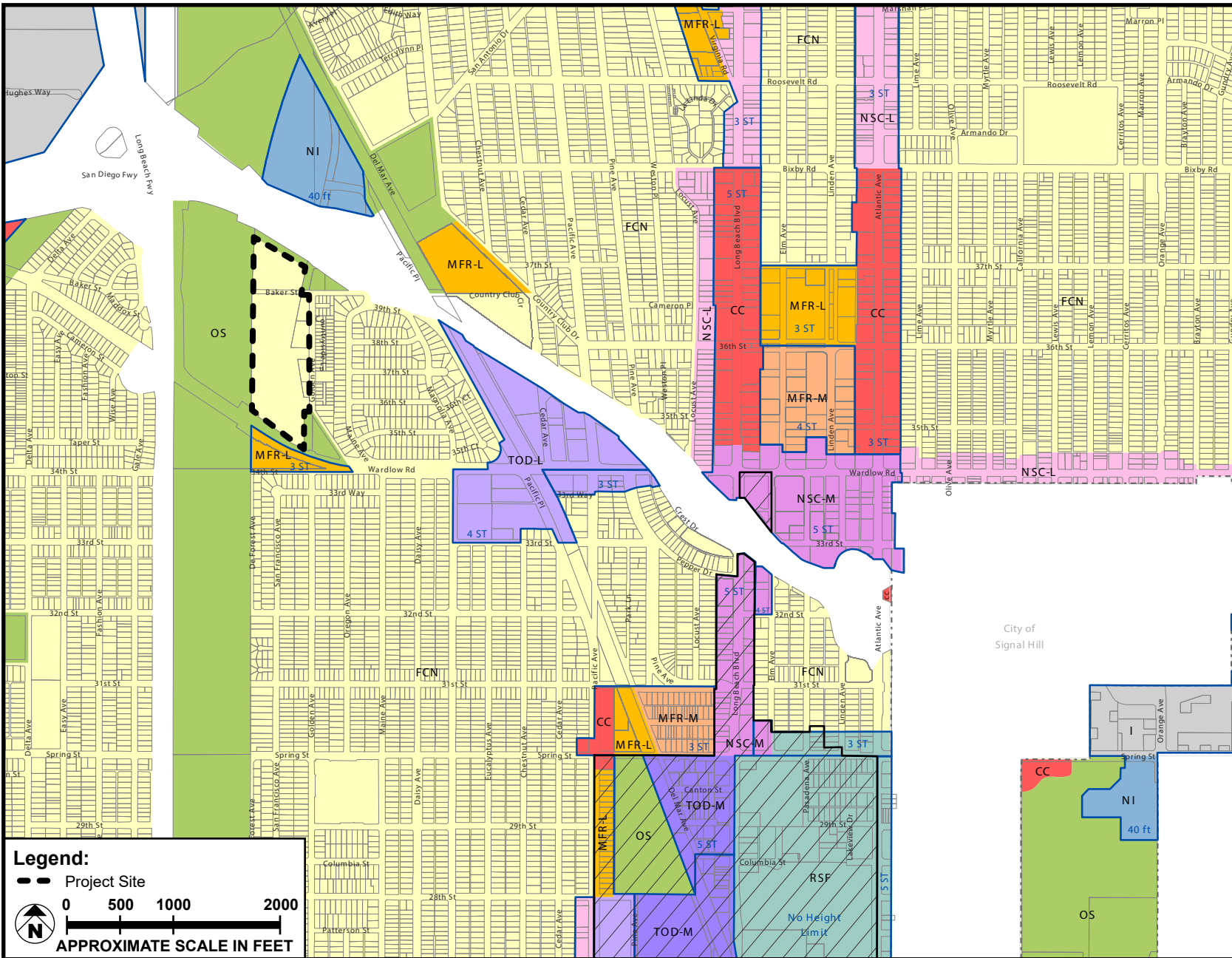
- CC, Community Commercial
- DT, Downtown
- FCN, Founding and Contemporary Neighborhood
- I, Industrial
- MFR-L, Multiple Family Residential Low Density
- MFR-M, Multiple Family Residential Moderate Density
- NI, Neo Industrial
- NSC-L, Neighborhood Serving Center or Corridor Low Density
- NSC-M, Neighborhood Serving Center or Corridor Moderate Density
- OS, Open Space
- RSF, Regional Serving Facility
- TOD-L, Transit-Oriented Development Low Density
- TOD-M, Transit-Oriented Development Moderate Density
- WF, Waterfront

Height Standards

- Height (ft - feet and/or ST - stories. If not indicated, standard is 2 stories.)

Other City Layers

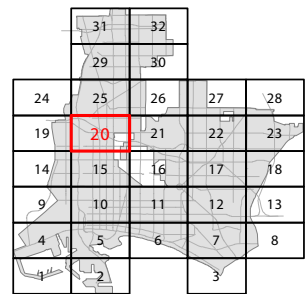
- Specific Plan and/or Downtown Plan Boundaries (shown for informational purposes only)
- Parcel
- Long Beach City Boundary



Legend:

- Project Site

0 500 1000 2000
APPROXIMATE SCALE IN FEET



SOURCE: City of Long Beach - 2020

FIGURE A.2

C. EXISTING PROJECT SITE CONDITIONS

The Project Site is vacant with the edges fenced off with a mix of chain link fences, wooden fences, and hedges. Access to the Project Site is currently secured by chain link fence gates and padlocks. As described above, the water quality treatment facilities on the site were removed in 2001. However, some old foundations, roads, and pipes are still present on the site. The Project Site contained several water treatment basins, which presents itself as larger flat areas separated by berms and roadways. Elevations on the property range from 20 to 40 feet. Remediation of the residual oil in the settling basins has been ongoing since 2001 and the soil in the settling basins have been regularly tilled as part of the remediation activities. Because of the long-term use of the Site as a wastewater collection and treatment facility and the ongoing remediation activities, the property is dominated by nonnative plant species, with a few native plant species present. Non-native tree species, including several eucalyptus species, Peruvian and Brazilian Pepper, and California and Canary Island Palm Trees are also present on the Site. Five native plant species, blue elderberry, mulefat, whiteflowered nightshade, saltwort, and telegraph weed, were observed at the time of the survey.

Land Use and Zoning

The Project Site is designated Land Use District (LUD) No. 20, Founding and Contemporary Neighborhood (FCN) PlaceType in the City's 2040 General Plan. The FCN PlaceType allows single-family residential, two-family residential, mobile homes, institutional, and park uses, as well as public right-of-way. Planned developments are also allowed. Design guidelines and standards are defined to encourage new developments with appropriate scale and massing in relation to its neighborhood context.¹

The Project Site is zoned for Commercial Storage (CS) and Single-Family Residential Standard Lot (R-1-N) use, with the properties along Golden Avenue situated within the Horse Overlay District (H). The Horse Overlay District was established to form uniform regulations, safeguards and controls for keeping and maintaining horses within the City. The overlay district must be used in conjunction with an underlying use district. The CS zone serves as the underlying district at the Project location and is intended to permit storage uses in areas which are particularly difficult to use due to parcel shape, access, adverse environmental conditions, or in areas where parcels are needed to form a buffer from incompatible uses.² The R-1-N District is a single-family district with standard lots. This District promotes an outdoor lifestyle and establishes areas to prevent overcrowding and conversion to higher densities.³

1 City of Long Beach. 2016 Land Use Element. Implementation. http://wpublww.longbeach.gov/globalassets/lbds/media-library/documents/planning/environmental/environmental-reports/pending/2016-land-use-element-lueurban-design-element-ude/final-appendices-2-of-3_2016. Accessed March 25, 2020.

2 City of Long Beach. Long Beach Municipal Code. Title 21- Zoning. Chapter 21.32- Commercial Districts. https://library.municode.com/ca/long_beach/codes/municipal_code?nodeId=TIT21ZO_CH21.32CODI. Accessed March 25, 2020.

3 Long Beach Municipal Code. Title 21- Zoning. Chapter 21.31- Residential Districts. https://library.municode.com/ca/long_beach/codes/municipal_code?nodeId=TIT21ZO_CH21.31REDI. Accessed March 25, 2020.

D. PROJECT CHARACTERISTICS

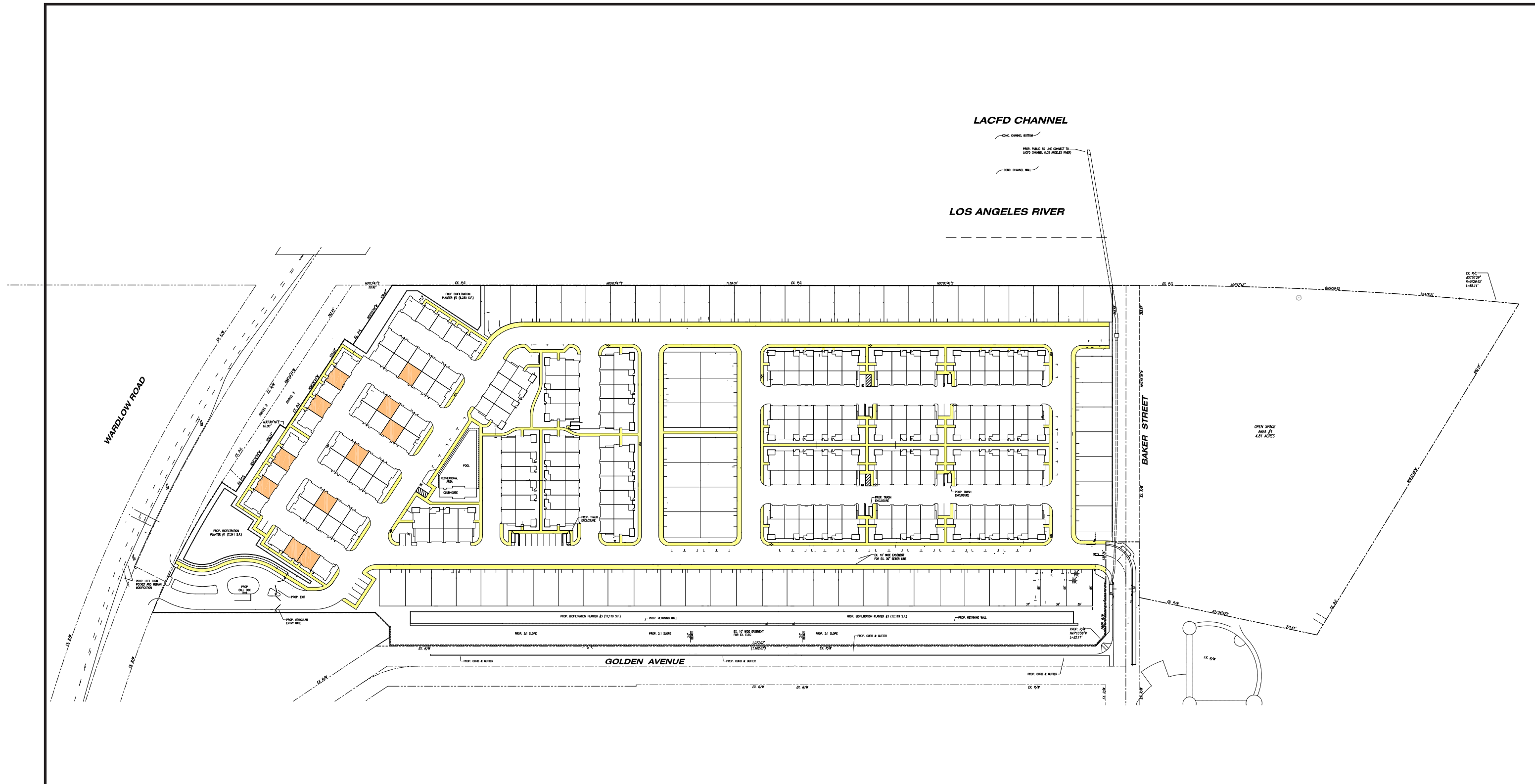
The applicant is requesting approval of a Zone Change, Vesting Tentative Tract Map, Street Vacation, Site Plan Review and Development Agreement to develop the proposed residential community. The proposed Project contains 226 detached and attached single-family units on approximately 15 acres of the 20-acre Project Site and a passive open space area on the remaining 5 acres as shown in **Figure A.3: Site Plan Map**. As described in **Table A.1: Summary of Proposed Development** and **Table A.2: Structure Development Summary**, the Project includes 74 detached single-family condominium units, 152 attached townhouse units, and 510 parking spaces for residents and guests. Of the 226 units proposed, 11 of the townhouses would be affordable housing units. All the buildings would be between 2- to 3-stories in height, with the exception of the 1- story clubhouse. The proposed density is 14.6 dwelling units (DU)/acre.

The Project would locate 28 of the 74 detached single-family condominium units around the east edge of the property fronting Golden Avenue. The detached single-family condominium units would be 2-stories tall and would include 54-feet of biofiltration basin between the proposed condominiums and Golden Avenue. Landscaping would consist of a variety of flowering accent trees, evergreen trees, shrubs, and grass. The Project would also locate 25 detached single-family condominium units to the west abutting the Los Angeles River. Fifty-three of the 152 attached townhouse units would be located towards the southern portion of the property with 10 townhouse units placed along the southern edge fronting Wardlow Road. All attached townhouse units would be 3-stories tall. The remaining 21 detached single-family condominium units and 99 attached townhouse units would be located towards the center of the housing development.

The Project would set aside approximately 4 acres for streets and parking areas within the complex, including 452 off-street garage parking spaces, and 59 guest parking spaces, 3 of which would be Americans With Disability's (ADA) parking spaces.

The development would include a clubhouse, recreation area, and pool area composed of approximately 0.1 acres in the interior of the housing development and 0.8 acres of biofiltration basins distributed across the development site. The housing development area would have approximately 4 acres of combined common, passive, and sloped open areas.

North of the intersection of Baker Street and Golden Avenue is the proposed active open space area totaling approximately 5 acres. The active open space area would include a walking trail with parcours exercise equipment, a look-out point, an open turf area that can accommodate a youth soccer field, a butterfly garden, and sitewide landscaping.



Legend:

- Affordable Housing Units
- Sidewalk

0 50 100 200
 APPROXIMATE SCALE IN FEET

Long Beach RiverPark Residential Project

SOURCE: KHR Associates - March 2020

FIGURE A.3



Site Plan Map

Table A.1
Summary of Proposed Development

Land Use	Area (Acres)
Developed Site Area	15.53
<i>Single Family Detached</i>	3.54
<i>Multi-Family Detached</i>	1.02
<i>Multi-Family Attached</i>	2.68
<i>Clubhouses & Recreation Area</i>	0.09
<i>Streets and Parking Areas</i>	3.94
<i>Open Space Areas</i>	0.37
<i>Open Space (Passive) Areas</i>	2.24
<i>Open Space Slope</i>	0.91
<i>Biofiltration Areas</i>	0.74
Active Open Space Site Area	4.81
Total Site Area	20.34

Table A.2
Structure Development Summary

Type of Structure	Number of Structures
<i>Single Family Detached</i>	74
<i>Multi-Family Detached</i>	53
<i>Multi-Family Attached</i>	99
Clubhouse	1
Total Number of Structures	227

Architectural Design

The development would feature three different styles of homes- Spanish Colonial, Italianate, and Santa Barbara. Each style would feature unique color schemes and decorative elements which complement each other and add to the overall character of the community. All homes would be 2- to 3-stories in height, with two- to four-bedrooms, and a single ground level two-car garage. The home sizes, including garage and courtyard and/or balcony, would range from approximately 1,500 square-foot (SF) to 2,400 SF. A list of materials included for each of the building type can be found in **Table A.3: Material List By Building Type**.

**Table A.3:
Material List By Building Type**

Multi-Family Detached	Multi-Family Attached	Detached Single-Family-Spanish Colonial	Detached Single-Family- Italianate	Detached Single-Family-Santa Barbara
<ul style="list-style-type: none"> • Concrete 'S' Roof Tile • Stucco • 6x6 Decorative Tile Accents • Cementitious 'Wood' Siding • Stucco Trim • Decorative Wood Brackets • Decorative Shutters 	<ul style="list-style-type: none"> • Concrete 'S' Roof Tile • Stucco • Decorative Corbels • Cementitious 'Wood' Siding • Stucco Trim • Decorative Wood Brackets • Awning Shutters • Wood Posts • Wrought Iron Railing • Terracotta Tile 	<ul style="list-style-type: none"> • Concrete 'S' Roof Tile • 6x6 Decorative Tile Accents • Stucco Over Foam Trim • Garage Door With Glass Panels • Decorative Shutters • Tile Accent At Gable Ends 	<ul style="list-style-type: none"> • Concrete 'S' Roof Tile • Decorative Shutters • Stucco Over Foam Trim • Decorative Foam Corbels • Garage Door With Glass At Top Panel 	<ul style="list-style-type: none"> • Concrete 'S' Roof Tile • Stucco Over Foam Trim • Decorative Outlookers • Decorative Foam Corbels • Garage Door With Glass At Top Panel • Decorative Shutters

Access

Two gated access points are proposed for the Project. Primary access would be provided from W. Wardlow Road with traffic signals used to facilitate safe traffic flow. An emergency access is proposed at the northeast corner of the complex, providing access at the intersection of Baker Street and Golden Avenue. The proposed circulation system within the complex is comprised of a looped roadway system with internal connections to each of the proposed residential housing units.

Pedestrian access would be provided through both primary and emergency entrances. A pedestrian path off of Wardlow Road would be provided through the north side of the primary entrance and connect to pedestrian paths throughout the residential complex. The sidewalks within the residential development would connect to the open space area, creating a seamless pedestrian connection between the residential complex and the recreational open space to the north.

Landscaping and Open Space

Landscaping would be incorporated throughout the developed site area and the Active Open Space area. The Active Open Space would include established walking trails, look-out points, a youth soccer field, a butterfly garden, and exercise equipment. Vegetation on site would utilize climate appropriate plants that are suitable to the California's Mediterranean climate. Various shrubs and 145 trees would occupy the Active Open Space area. The tree species in the park area

would compose of five different types of trees- California Sycamore, Chitalpa, Black Elder, Coast Live Oak, and Torrey Pine.

The residential development area would include approximately 4.36 acres of landscaping with approximately 375 trees planted throughout the development area. Vegetation within the condominium area would also utilize climate appropriate plants that are suitable to the Mediterranean climate. Ten different species make up the tree list for the condominium area and it includes Tipu Tree, Purple Orchid Tree, Magnolia, Marina Arbutus, Australian Wouldow, Brisbane Box, New Zealand Christmas Tree, Chanticleer Pear, Crape Myrtle, and N.C.N. (Majestic Beauty).

In combination, the Project would provide approximately 9.17 acres of landscaped area and open space, with an estimated 520 trees planted. Any on site trees or street trees removed during construction would be replaced in accordance with the City's Tree Maintenance Policy, LBMC Chapter 14.28 pertaining to street trees, and other applicable City requirements.

Project Construction and Scheduling

Project construction would cover approximately 44 months, beginning with site clearing starting in October 2022, followed by bioremediation from October 2022 to June 2023. Project grading would require the import of an estimated 43,468 cubic yards of soil starting from August 2023 and ending in December 2023. Wet and dry utility installation and street implementation would take place from December 2023 to July 2024. Lastly, construction of homes would take place from August 2023 to June 2026.

Necessary Approvals

The City of Long Beach has the principal responsibility for approving the Project. Approvals required for Project development may include, but are not limited to, the following:

1. Zone Change to remove the Horse (H) Overlay District
2. Zone Change from Commercial Storage (CS) and Single-Family Residential Standard Lot (R-1-N) to residential Planned Unit Development (RP)
3. Waiver of height standard for providing 5% Very Low Income Housing
4. Vesting Tentative Tract Map
5. Street Vacation for General Plan conformity
6. Site Plan Review
7. Development Agreement

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| <input checked="" type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture/Forestry | <input checked="" type="checkbox"/> Hazards/Hazardous Materials | <input checked="" type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Transportation |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use/Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Utilities/Services |
| <input checked="" type="checkbox"/> Energy | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input checked="" type="checkbox"/> Geology/Soils | <input type="checkbox"/> Population/Housing | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

ENVIRONMENTAL IMPACTS. (Explanations for all answers are required):

1. AESTHETICS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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**Would the project:
Except as provided in Public Resources Code Section
21099, would the project:**

a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A significant impact regarding a scenic vista could occur if the Project were to introduce incompatible visual elements within a field of view containing a scenic vista or substantially blocked views of a scenic vista. Scenic vistas generally include panoramic views of natural features, unusual terrain, or unique urban or historic features, for which the field of view can be wide and extend into the distance, and focal views that focus on a particular object, scene, or feature of interest.

Scenic vistas afforded to the City include views of the Pacific Ocean and the Port of Long Beach to the south, distant views of the San Gabriel and San Bernardino Mountains to the north, and distant views of the Santa Ana Mountains to the east.

As such, the nearest scenic view is approximately 4.0 miles south of the Project Site including the Pacific Ocean coastline and the Port of Long Beach. Due to the distance of the Project Site to the coast, and the existing developments between the Project Site and the coast, the proposed Project would not be visible from the coastal areas. Given the surrounding topography, intervening development, and limited views under existing conditions, the Project would not have an adverse effect on scenic vistas. Therefore, impacts would be considered less than significant, and no mitigation measures are required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

Less Than Significant Impact. According to the Caltrans Scenic Highway Mapping System, there are no State-designated scenic highways near the Project Site. The nearest Eligible State Scenic Highway is State Route 1, located 7.3 miles to the southeast.⁴ The Long Beach General Plan Mobility Element designates Ocean Boulevard as the closest scenic route, located 3.6 miles to the south of the Project Site. Views of Ocean Boulevard are distant and largely obstructed by surrounding developments.

⁴ Caltrans, Scenic Highway Mapping, <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways/>, accessed May 2020).

On a local scale, the Long Beach General Plan Urban Design Element designates the Los Angeles River as a scenic route as it provides a viewshed that is worthy of protection and enhancement, and also serves as a non-motorized trail.⁵ The Project would be constructed directly east of the Los Angeles River, east of the existing trail. Although the Project has the potential to be visible from the Los Angeles River trail, views of the proposed residential development would be similar to current views of residences available from this trail along the Los Angeles River, and the Project would not substantially alter the existing views along the Los Angeles River.

With regard to scenic resources, there are no protected trees or rock outcroppings within the Project Site. The vegetation on the Project Site is dominated by non-native plant species, including ornamental trees. The removal of the trees on the site would occur in accordance with the City’s Tree Maintenance Policy, which sets forth guidelines to administer Long Beach Municipal Code (LBMC) Chapter 14.28. Additionally, as part of the Project, the development would include approximately 9.17 acres of landscaped area and open space, with an estimated 520 trees planted throughout the site.

According to the Long Beach General Plan Historic Preservation Element, the Project Site does not contain historic resources and is not in a historic district.⁶ Moreover, the Project Site and its surrounding area does not contain structures which would be eligible or designated as a historic resource under the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register). As such, no features on the Project Site would be considered a scenic resource for purposes of this analysis. Therefore, the Project would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway and impacts to scenic resources would be less than significant.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Potentially Significant Impact. As previously discussed, the Project Site is located in an urbanized area with a General Plan designation of Founding and Contemporary Neighborhood (FCN). According to the City’s General Plan Land Use Element, structures at the Project Site are limited to a height of 2-stories. 3-story buildings are proposed on the southern portion of the Project Site along W. Wardlow Road west of the main entry. Because and the height of buildings on the site is currently limited to 2 stories by the General Plan, additional analysis is required to determine the consistency of the Project with applicable zoning and regulations governing scenic quality.

5 City of Long Beach General Plan, Urban Design Element, <http://www.longbeach.gov/globalassets/lbds/media-library/documents/planning/advance/lueude/urban-design-element-final-adopted-december-2019>, accessed May 2020.
6 City of Long Beach General Plan, Historic Preservation Element, http://www.longbeach.gov/globalassets/lbds/media-library/documents/planning/advance/general-plan/final-long-beach-historic-preservation-element_6-22-2010, accessed May 2020.

d) Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Less Than Significant Impact. The Project Site is located in an urbanized area, with existing sources of light and glare. Construction of the Project would introduce construction vehicles and equipment during daytime hours that could potentially create glare for surrounding land uses. However, pursuant to Sections 8.80.202A through 8.80.202C of the Long Beach Municipal Code (LBMC), construction activities are prohibited between the hours of 7:00 p.m. and 7:00 a.m. on weekdays and Federal holidays, between the hours of 7:00 p.m. on Friday and 9:00 a.m. on Saturday and after 6:00 p.m. on Saturday, and any time on Sunday. These limits would reduce impacts from vehicle headlamps and any associated impacts to nighttime views during construction. Since proposed construction would be required to adhere to the timing restrictions laid out in the LBMC, no construction would occur at night when light would potentially be required. In addition, any lighting or generated glare during construction would be temporary.

Operation of the Project would not substantially increase lighting and glare in the surrounding area relative to existing levels. The Project Site is located in an existing residential area that includes single- and multi-family residences. The Project would include nighttime security lighting and general lighting associated with residential development within and outside the residential complex. Lighting fixtures would be aimed downwards to minimize glare. Operational lighting sources generated by the Project would be similar to and consistent with the surrounding uses in the area and would not adversely affect day or nighttime views. Additionally, non-glare materials would be used for the exterior of the housing structures and proposed facilities at the development. Non-glare materials would minimize the potential for glare to the extent feasible. Because the project would not generate substantial sources of light or glare, impacts would be less than significant.

2. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. The Project Site is located on vacant land in the City of Long Beach and does not include any agricultural land. In addition, the Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Department of Conservation’s Division of Land Resource Protection.⁷ The Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required.

b) Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Wouldiamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. The Project Site is not zoned for agricultural use under the Long Beach Municipal Code, and no agricultural zoning is present in the surrounding area.⁸ The Project Site and surrounding area are not enrolled under a Wouldiamson Act Contract.⁹ Therefore, the Project would not conflict with existing

7 California Department of Conservation, California Important Farmland Finder, <https://www.conservation.ca.gov/dlrp/fmmp>, accessed May 2020.

8 City of Long Beach, Zoning Map, http://www.longbeach.gov/globalassets/lbds/media-library/documents/planning/maps/zoning-maps/zoning_color_15, accessed July 2020.

9 California Department of Conservation, California Important Farmland Finder, <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed May 2020.

zoning for agricultural uses or a Wouldiamson Act Contract. No impacts would occur, and no mitigation measures are required.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))?

No Impact. The Project Site is located in a developed portion of the City and does not include any forest land or timberland. Additionally, the Project Site is currently zoned R-1-N and CS, and is not zoned for forest land, and is not used as forest land.¹⁰ Therefore, the Project would not rezone forest land or timberland as defined by the Public Resources Code (PRC). No impacts would occur, and no mitigation measures are required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As mentioned above, the Project Site is located in a developed area of the City, is not zoned for forest land, and does not include any forest or timberland. Therefore, the Project would not result in the loss or conversion of forest land. No impacts would occur, and no mitigation measures are required.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As noted above, the Project Site is located in a developed area of the City and does not contain any agricultural or forest uses, nor are any agricultural or forest uses located in the Project vicinity. Thus, Project development would not convert any farmland or forest land to non-agricultural or non-forest use. No impacts would occur, and no mitigation measures are required.

¹⁰ City of Long Beach, Zoning Map, http://www.longbeach.gov/globalassets/lbds/media-library/documents/planning/maps/zoning-maps/zoning_color_15, accessed July 2020.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Conflict with or obstruct implementation of applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than ten microns in size [PM10], and particulate matter less than 2.5 microns in size [PM2.5]). The SCAQMD’s 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. With regard to future growth, SCAG has prepared the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2020– 2045 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG’s planning area.

Construction and operation of the Project would result in an increase in stationary and mobile source air emissions. As a result, Project development could conflict with, or obstruct implementation, of the AQMP. Additional analysis is required to determine whether the Project would conflict with or obstruct implementation of the AQMP.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Potentially Significant Impact. Construction and operation of the Project would result in the emission of air pollutants in the Basin, which is currently in nonattainment of both federal and State air quality standards for ozone and PM2.5, as well as nonattainment for State air quality standards for PM10. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could

cause a cumulative impact when combined with other existing and future emissions sources in the area. Additional analysis is required to determine the whether the Project would result in a cumulatively considerable net increase of PM2.5 or PM10.

c) **Expose sensitive receptors to substantial pollutant concentrations?**

Potentially Significant Impact. The Project would contribute to regional and localized air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Some population groups, including children, the elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases) are considered more sensitive to air pollution than others. The SCAQMD CEQA Air Quality Handbook provides examples of typical sensitive receptors, including long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities. Sensitive receptors in the Project vicinity include multi-family residences. Additional studies would be conducted to address any exposure of sensitive receptors to pollutant concentrations and potential need for mitigation measures. Additionally, the Project Site is bound by Interstate 405 to the north and W. Wardlow Rd. to the south. The proximity to these existing highways and roadways could pose a potential risk to sensitive receptors. Additional studies would be prepared to assess any potential health risks. Additional analysis is required to determine whether the Project would expose sensitive receptors to substantial pollutant concentrations.

d) **Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

Less Than Significant Impacts. No objectionable odors are anticipated as a result of either remediation, construction, or operation of the Project. Specifically, Project construction would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

Bioremediation activities on-site were undertaken in response to the Consent Decree issued in 2002, under the oversight of the City of Long Beach Department of Health and Human Services, Division of Hazardous Materials (LBDHHS). The bioremediation activities would continue to ensure all contamination on-site are removed prior to construction of the project. These ongoing bioremediation activities would continue from the efforts started in 2002, no increase in odors is anticipated as the bioremediation activities continue to be carried out. Additionally, as the site conditions improve, any and all odors on-site should decrease overtime.

With respect to operation of the Project, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. The residential uses proposed typically generate odors from vehicles, trash receptacles, and activities such as outdoor barbecues. These activities are consistent

with existing residential uses in surrounding neighborhoods and is not expected to significantly degrade overall residential experience. All trash receptacles would be contained, located, and maintained in a manner that promotes odor control and would not result in substantially adverse odor impacts. Because of this, operational activities from the Project would not pose a significant odor exposure for nearby residents.

Construction and operation of the Project would also comply with SCAQMD Rules 401 and 403 regarding visible emissions violations, as well as SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.^{11,12}

Based on the analysis provided, the Project would not create objectionable odors affecting a substantial number of people during either construction or operation of the Project, and impacts would be less than significant.

11 SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, <http://www.aqmd.gov/home/rules-compliance/compliance>, accessed June 2020.

12 SCAQMD, Rule 402, Nuisance, <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>, accessed June 2020.

4. BIOLOGICAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact. The Project Site consists of disturbed vacant land previously used to treat water generated by oil production activities in the area. The site is subject to ongoing disturbance related to testing and remediation of the existing contamination of soil on the site and for vegetation clearance. A preliminary biological survey of the site was conducted on May 19, 2020.¹³ Due to the long history of site disturbance and ongoing disturbance, the site is dominated by nonnative, plant species, with a few native plants, representing five species, observed at the time of the survey. The native plants present were blue elderberry (*Sambucus nigra*), mulefat (*Baccharis salicifolia*), whiteflowered nightshade (*Solanum douglasii*), saltwort (*Salicornia* sp.), and telegraph weed (*Heterotheca grandiflora*). The remainder of the site is occupied by nonnative plant species and a few likely remnants of landscaping in the form of trees. Many of the species present are halophytes or salt-tolerant plants indicating that the soils on-site may have originated as dredge materials from the LA River channel when the area was within the tidally influenced area and salt-water intrusion was occurring. A few other are commonly associated with standing water or stream courses that may be the result of the use of portions of the site as holding ponds for water being treated. A list of plant species found on site can be found in **Table 4.1: Native Plants, Table 4.2: Non-Native Trees, Table 4.3: Non-Native Grasses and Mustards, Table 4.4: Wildlife Species, and Table 4.5: Bird Species.**

The remainder of the site is occupied by nonnative plant species, the majority of which are weedy, including the non-native tree species shown in **Table 4.2** that are likely the remnants of previous landscaping

The remainder of the plants found on the site were nonnative weedy species including several grasses and mustards, as shown in **Table 4.3.**

**Table 4.1
Native Plants**

Common Name	Species Name
Blue Elderberry	Sambucus nigra
Mulefat	Baccharis salicifolia
White-Flowered Nightshade	Solanum douglasii
Saltwort	Salicornia sp.
Telegraph Weed	Heterotheca grandiflora

Source: Biological Resources Constraints Analysis, Biological Assessment Services, May 19, 2020.

**Table 4.2
Non-Native Trees**

Common Name	Species Name
Eucalyptus	Eucalyptus sp.
Peruvian Pepper	Schinus molle
California Fan Palm	Washingtonia filifera
Canary Island Palm	Phoenix canaryensis
Brazilian Pepper	Schinus teribenthifolia

Source: Biological Resources Constraints Analysis, Biological Assessment Services, May 19, 2020.

**Table 4.3
Non-Native Grasses and Mustards**

Common Name	Species Name
Fountain Grass	Pennisetum setaceum
Hare Barley	Hordeum leporinum
Red Brome	Bromus maditensis rubens
Ripgut Brome	B. Diandrus
London Rocket	Sisymbrium irio
Wild Radish	Raphanus sativus
Redstem Filaree	Erodium cicutarium,
Storksbill	E. Botrys
Dwarf Nettle	Urtica urens
Yellow Sweetclover	Melilotus indicus
Cheeseweed	Malva parviflora
Russian Thistle	Salsola kali

Flax-Leaved Fleabane	Erigeron bonariensis
Brass-Buttons	Cotula australis
Five-Hook Bassia	Bassia hyssopifolia
Prickly Lettuce	Lactuca serriola
Tree Tobacco	Nicotiana glauca

Source: Biological Resources Constraints Analysis, Biological Assessment Services, May 19, 2020.

Due to the lack of vegetation on the site, relatively few wildlife species were observed. A list of wildlife species observed during the survey can be found in **Table 4.4** which identifies the common wildlife species encountered during biological survey of the site.

**Table 4.4
Wildlife Species**

Common Name	Species Name
Western Fence Lizard	Sceloporus occidentalis
California Ground Squirrel	Otospermophilus beecheyi
Raccoon	Procyon lotor
Striped Skunk	Mephitis
Virginia Opossum	Didelphis virginiana
Coyote	Canus latrans

Source: Biological Resources Constraints Analysis, Biological Assessment Services, May 19, 2020.

Additionally, seven bird species were identified during the field survey, as shown in **Table 4.5**.

**Table 4.5
Bird Species**

Common Name	Species Name
Audubon's Warbler	Setophaga auduboni
House Finch	Haemorhous mexicanus
Mourning Dove	Zenaida macroura
Anna's Hummingbird	Calypte anna
American Kestrel	Falco sparverius
Western Meadowlark	Sturnella neglecta
Killdeer	Charadrius vociferus

Source: Biological Resources Constraints Analysis, Biological Assessment Services, May 19, 2020.

The meadowlarks were present in large migratory flocks but are not likely to nest or reside on the site. The remaining species are local breeders and may nest on-site. There are likely other avian species that utilize the site, among the most common of which are likely California towhee, American crow, and bush tit. None of these species are considered particularly sensitive and none are specifically protected by State or federal law. However, as identified in the **Appendix A: Biological Resources Constraints Analysis**, a review of the Community Natural Diversity Database (CNDDDB) identifies 124 biological resources listed as sensitive and reported in the area contained in the 9 USGS quadrangle topographic maps containing the site and the surrounding area. Of these sensitive species, 23 are listed as threatened or endangered. Additionally, the Crotch's bumblebee is a State Candidate for listing as Endangered. Since the Project would develop the 20 acre site and modify the existing vegetation, including trees which may be used as nesting habitat, additional analysis is required to determine the potential impact of the Project on sensitive species.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?

No Impact. The Project Site and adjacent areas do not contain any riparian or other sensitive natural communities. The Los Angeles River located adjacent to the western edge of the Project Site is channelized with concrete banks and does not support any riparian habitat. No adverse impact to riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Department of Fish and Wildlife would occur as a result of Project development or operation.^{14,15} No impact would result and no mitigation measures are required.

c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, and drainages) or waters of the United States or California, as defined by § 404 of the federal Clean Water Act or California Fish & Wildlife code § 1600, et seq. through direct removal, filling, hydrological interruption, or other means?

Less Than Significant Impact. No wetlands protected under federal or State law exist on the Project Site. The nearest jurisdictional wetland area is located approximately 365 feet to the west within the Los Angeles River.¹⁶ The Project would not discharge dredged or fill material into the Los Angeles River during construction or operation in accordance with Section 404 of the federal Clean Water Act. Any

14 California Department of Fish and Wildlife, <https://wildlife.ca.gov/Data/GIS/Map-Services>, accessed May 2020.
15 United States Department of Fish and Wildlife, the Information, Planning, and Consultation System, <https://www.fws.gov/ipac/>, accessed May 2020.
16 U.S. Fish & Wildlife Service, National Wetlands Inventory, <https://www.fws.gov/wetlands/data/mapper.html>, accessed June 2020.

materials removed on-site would be hauled to an off-site location for proper disposal and treatment. Movement of soil on-site would be contained within the Project Site through use of stormwater BMPs and in accordance with the SWPPP BMPs outlined within the permit. Therefore, no soil or solid waste would impact the wetland area. Additionally, the Project would not divert, obstruct, or change the natural flow of the Los Angeles River and no materials would be taken from the streambed in accordance with California Fish and Wildlife code Section 1600. As previously mentioned, this section of the Los Angeles River is channelized by concrete and contains no materials from the natural and original streambed. Lastly, all stormwater runoff on-site would be captured by built in stormwater systems and the 0.8 acres of biofiltration areas on-site. Based on the *Preliminary Drainage Study*, no substantial change in the peak discharge of runoff would result from the Project. (**Appendix B**).

Based on the analysis provided, construction and operation of the proposed residential units would not result in a substantial adverse effect to wetlands protected under federal or State law through diversion, obstruction, disposal, or changes to the river and no materials would be removed from the river. As such, potential impacts to federally protected wetlands as defined by Section 404 of the Clean Water Act would be less than significant, and no mitigation measures are required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Potentially Significant Impact. The City of Long Beach General Plan Conservation Element does not identify any significant wildlife resources within the Project Site.¹⁷ The Project Site consists of disturbed vacant land surrounded by existing residential development and urban infrastructure. As discussed in **Question 4.a**, the site contains existing vegetation and trees that may be used for nesting and nursery sites by bird species. Additional analysis is needed to determine the potential impact of the Project on wildlife species.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The City does not have tree policies or ordinances governing trees or other biological resources on private properties. Accordingly, the Project would not conflict with local policies or ordinances protecting trees on private properties. In the event a removal of any street trees are required for the removal in accordance with the City’s Tree Maintenance Policy for street trees, which sets forth guidelines to administer Long Beach Municipal Code (LBMC) Chapter 14.28. Therefore, the Project would not conflict with local policies or ordinances protecting biological resources. No impacts would occur, and no mitigation measures are required.

¹⁷ City of Long Beach General Plan, Conservation Element, <http://www.longbeach.gov/globalassets/lbds/media-library/documents/planning/advance/general-plan/1973-conservation-element>, accessed May 2020.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved State, regional, or local habitat conservation plan?

No Impact. A *Biological Resources Constraints Analysis (Appendix A)* was prepared that included review of the CNDDDB. Neither the CNDDDB nor the City’s General Plan identifies any approved habitat conservation plans that include the Project Site or surrounding areas. The Project Site is not subject to a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Therefore, the Project would not conflict with the provisions of any habitat conservation plans, and no mitigation measures are required.

5. CULTURAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact. CEQA Guidelines Section 15064.5 defines a historic resource as one that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources; (2) included in a local register of historical resources (pursuant to PRC Section 5020.1(k)); or (3) identified as significant in an historical resources survey (meeting the criteria in PRC Section 5024.1(g)). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered “historically significant” by the lead agency if the resource meets the criteria for listing on the California Register of Historical Resources.

The Project Site is not identified by the City of Long Beach General Plan Historic Preservation Element as a historical resource and is not in a historic district.¹⁸ Based on a records search conducted by the South Central Coastal Information Center (SCCIC) at California State University, Fullerton, included as part of the *Cultural Resources Inventory Records Search* or **Appendix C** of this Initial Study, no historical or prehistoric resources were identified. The Project Site consists of disturbed vacant land previously used to treat water from oil production in the area and does not contain any existing buildings or structures. Remnants of the water treatment facility previously located on the site, and demolished within the last 10 years, remain on the site. Additionally, a review of historic topographic maps and aerial photographs indicates that West Baker Street had been constructed by 1930 with the water treatment facility built on the southern portion of the property in the 1950s or early 1960s. Additional analysis is required to determine if the site contains any features with historic significance.

18 City of Long Beach General Plan, Historic Preservation Element, http://www.longbeach.gov/globalassets/lbds/media-library/documents/planning/advance/general-plan/final-long-beach-historic-preservation-element_6-22-2010, accessed May 2020.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?

Potentially Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important to prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The Project Site is not identified by the City of Long Beach General Plan Historic Preservation Element as containing any archaeological resources. The cultural resources records search included the area of a quarter-mile radius around the Project Site, for the purpose of identifying any known cultural resources within the vicinity of the Project Site. This records search included a review of the Office of Historic Preservation Archaeological Determination of Eligibility, the Office of Historic Preservation Directory of Historic Properties Data File, and a literature review by the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

The records search indicated that the Project Site has been developed since the 1950s and no prehistoric or historical archaeological resources have been previously identified on the site.¹⁹ However, remnants of the water treatment facility previously located on the site, and demolished within the last 10 years, remain on the site. Additional analysis is required to determine if the site contains any features with archaeological significance.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact with Mitigation Incorporated. The Project would require excavation and grading of an estimated 43,468 cubic yards for placement of building footings and foundations. Thus, there is a possibility of encountering human remains within native soils. Accordingly, impacts with regard to archaeological resources and the discovery of human remains would be potentially significant. However, this impact would be mitigated to a less than significant level with implementation of **Mitigation Measure (MM) CUL-1** set forth below.

¹⁹ City of Long Beach General Plan, Historic Preservation Element, http://www.longbeach.gov/globalassets/lbds/media-library/documents/planning/advance/general-plan/final-long-beach-historic-preservation-element_6-22-2010, accessed May 2020.

Mitigation Measure

The following mitigation measure is proposed to reduce potential impacts to archaeological resources to a less than significant level:

MM CUL-1: If human remains are encountered unexpectedly during ground-disturbing activities, work in the affected area and the immediate vicinity shall be halted immediately. The construction manager at the Project Site shall be contacted and shall notify the County Coroner. If the County Coroner determines the remains to be Native American, the Archaeologist and Native American monitor shall then be contacted, if they are not on-site at the time, as well as the responsible lead agency of the discovery, who in turn shall notify the Native American Heritage Commission. Disposition of the human remains and any associated grave goods shall be in accordance with California Health and Safety Code Section 7050.5 and Public Resources Code Sections 5097.91 and 5097.98. The Archaeologist and the Native American monitor, with the concurrence of the City, shall determine the area of potential impact and the timing when construction activities can resume. Preservation of the remains in place shall be considered as a possible course of action by the Project Applicant, the City, and the Most Likely Descendent.

6. ENERGY

Would the project:	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<p>a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact. The Project would involve construction of 226 units over an estimated construction duration of 44 months. Construction activities and operation of the Project would require additional energy resources. Additional analysis is required to determine the potential for environmental impacts to result from the energy consumption that would be associated with the Project.

<p>b) Conflict with or obstruct a State or local plan for renewal energy or energy efficiency?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Potentially Significant Impact. The Project would involve the construction of 226 housing units which would require the use of energy resources on site during construction and operation. The site is currently vacant and does not use energy resources in its current state. Therefore, the Project would require additional energy use. Additional analysis is required to determine if the Project would conflict with or obstruct a State or local plan for renewal energy or energy efficiency.

7. GEOLOGY AND SOILS

	<i>Less Than Significant</i>		
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known active fault trace? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Ground rupture or displacement occurs as a fault breaks the ground surface during a seismic event, this hazard is usually anticipated to occur along pre-existing faults during an earthquake.

The Project Site is not located within a currently designated State of California Earthquake Fault Zone (formerly Alquist-Priolo Special Studies Zones) for surface fault rupture, see *Geohazards Report* included as **Appendix D**. The Alquist Priolo Earthquake Fault Zoning Act requires the California Geologic Survey to zone “active faults” within the State of California. An “active fault” refers to faults that has exhibited surface displacement within Holocene time or within the last 11,700 years. Surface displacement within this timeframe displays the active nature of the fault, hence constituting a potential hazard to structures that may be located across it. Essential service structures are required to be set-back at least 50 feet from an active fault. The active fault set-back distance is measured perpendicular from the dip of the fault plane. Based on review of existing geologic information, no known active faults project through or toward the site. The nearest mapped active fault trace is the Newport-Inglewood fault zone located approximately 0.18 mile to 0.37 mile east of the Project Site. The potential for surface rupture resulting from the movement of nearby major faults, or currently unknown faults, is considered low.

Based on this information, the Project would have a less than significant impact exposing people or structures to adverse effects involving rupture of a known earthquake fault. No mitigation measures are required.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is situated in a seismically active region as is the case for most areas of Southern California. Ground shaking resulting from earthquakes associated with nearby and more distant faults may occur at the Project Site. During the life of the project, seismic activity associated with active faults can be expected to generate moderate to strong ground shaking at the site. The closest active fault is the Newport-Inglewood Fault Zone which is located approximately 0.18 mile to 0.37 mile east of the Project Site. Additional active faults influencing the area include the Whittier Fault and the Puente Hill Blind Thrust Fault.

Newport Inglewood Fault: The Newport-Inglewood fault zone boundary is located approximately 0.18 mile to 0.37 mile east of the Project Site. The Newport-Inglewood fault system is approximately 66 km long on shore and extends northwest from Huntington Beach through Long Beach to Culver City and the Cheviot Hills. The Newport-Inglewood fault continues offshore to the southeast of Huntington Beach and makes landfall in La Jolla as the Rose Canyon fault. The Newport-Inglewood fault is considered to be active and capable of producing a maximum moment magnitude (Mw) 7.1 earthquake.

The active Newport-Inglewood fault zone dominates the geologic structure in the Long Beach area. The northwest-trending Newport-Inglewood fault zone exhibits surface geomorphic features including low eroded scarps along side-stepping fault segments and a series of northwest trending elongated low hills and mesas that extend from Newport Bay in Orange County northwestward to Beverly Hills. The major fault segments of the Newport-Inglewood fault zone in the Long Beach area include the Cherry Hill fault, Pickler fault, Northeast Flank fault, Reservoir Hill fault and Seal Beach fault. The orientation of these fault segments is generally attributed to right-lateral, strike-slip faulting at depth.

Whittier Fault: The mapped trace of the Whittier Fault is located approximately 16 miles northeast of the Project Site in the Puente Hills. The revised official map for the La Habra Quadrangle effective November 1, 1991, shows the Whittier Fault traces located northeast of the site in the Puente Hills to be zoned as an active fault trace with potential for surface fault rupture. The Whittier Fault is considered capable of producing a magnitude Mw 6.8 earthquake.

Puente Hills Blind Thrust: The Puente Hills Blind Thrust has been interpreted to be approximately 42 km long and 19 km wide with a depth range of 3 km to 13 km below ground surface. The thrust fault dips northward from the Montebello Hills and Puente Hills beneath the San Gabriel basin. Paleoseismic studies of the Puente Hills Blind Thrust have indicated the occurrence of at least four large Mw 7.2 to 7.5 earthquakes on this fault during the past 11,000 years.

Subsurface Profile

The Project Site is located in the southeast portion of the Los Angeles Basin near the western end of Signal Hill. Previous grading and earthwork has been performed along the edges of the Project Site to create the fill embankments for the Los Angeles River Flood Control Channel to the west of the site and for support of the San Diego Freeway (Interstate 405) raised freeway level and embankments to the

north. The property is reported to be underlain by up to 26 feet of undocumented fill place during previous site grading and earthwork activities. The depth of undocumented fill varies across the Project Site and within the basins. The fill soils consist of fine-grained silty sand, sandy silts, silts, clayey silts and silty clays. The fill soils are underlain by non-marine and marine alluvial sediments that have gradually filled the coastal basin over time to form a broad coastal plain. Based on the exploratory soil borings and Cone Penetration Tests (CPTs), the native alluvial site soils consist of fine-grained, interbedded layers of sands, silty sands, sandy silts, silts, clayey silts and clays to the maximum explored depth of approximately 60 feet below ground surface (bgs).

The Project would increase the amount of development on-site, thereby increasing the number of residents on-site. However, all new developments in the state of California are required to conform to the current seismic design provisions of the California Building Code. The 2019 California Building Code incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to reduce potential loss from earthquakes and ensure safety of residents on-site. Local seismic safety requirements contained in the Long Beach Building Standards Code, as well as the applicable recommendations provided in the geotechnical investigations are required by the City to minimize seismic-related hazards. Compliance with existing building codes and required studies during design and construction would reduce ground shaking hazards to future residents to a level of less than significant and would minimize the potential to expose people or structures to substantial risk, loss, or injury. No mitigation measures are required.

iii) Seismic-related ground failure, including
liquefaction and lateral spreading?

Less Significant Impact with Mitigation Measures Incorporated. A portion of the Project Site is in a liquefaction potential moderate area as found in the California Geologic Survey (CGS) and the City’s General Plan Seismic Safety Element.^{20,21} As mentioned previously, developments in California are required to conform to the current seismic design provisions of the California Building Code. The 2019 California Building Code incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to reduce potential loss from earthquakes and ensure safety of residents on-site. Local seismic safety requirements contained in the Long Beach Building Standards Code, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. Compliance with existing building codes and required studies during design and construction would reduce ground shaking hazards to future residents. Additionally, recommendations from **Appendix D: Geohazards Report** would be incorporated as **MM GEO-1** to further reduce risk of loss and injury to people and structures. Implementation of **MM GEO-1** below would mitigate the potential impact of seismic-related ground failure, including liquefaction and lateral spreading to people and structures to a less than significant level.

20 California Geologic Survey, Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed May 2020.
21 City of Long Beach General Plan, Seismic Safety Element, http://www.longbeach.gov/globalassets/lbds/media-library/documents/planning/advance/general-plan/seismic-safety-element_reduced, accessed May 2020.

Mitigation Measures

The following mitigation measure is proposed to reduce potential impacts to risk, loss, or injury to people and structures based on seismic-related ground shaking, including liquefaction and lateral spreading to a less than significant level:

MM GEO-1: A site specific geotechnical investigation with subsurface exploration, soil sampling, laboratory testing and engineering analyses should be performed prior to project design to further evaluate the subsurface soil condition and potential geologic hazards for residential development. It is proposed to coordinate the site grading work with implementation of environmental mitigation measures. Geotechnical recommendations and mitigation measures for site development shall then be provided for site clearing, grading, over-excavation and recompaction, environmental mitigation, vapor membranes, foundation designs, corrosion and pavement designs. The geotechnical consultant should then review the plans and specifications as the project design progresses. Such review is necessary to identify design elements, assumptions, or new conditions which require revisions or additions to the geotechnical recommendations.

The project geotechnical consultant should then be present to observe conditions during grading and construction. Geotechnical observation and testing should be performed as needed to verify compliance with project specifications and building codes. Additional geotechnical recommendations may be required based on subsurface conditions encountered during construction.

iv) Landslides?

Less Than Significant Impact. Topography on the Project Site and surrounding areas is relatively flat. Fill slope embankments for the Los Angeles River channel embankment are located along the west side of the Project Site and along the north side of the property along the San Diego Freeway (Interstate 405). These engineered fill slope embankments range from 20 to 25 feet in vertical height. No earthquake-induced landslide areas are shown on the Earthquake Zones of Required Investigation – Long Beach Quadrangle by the California Geologic Survey for the Project Site. In the absence of significant ground slopes, the potential for seismically induced landslides to affect the proposed site is considered to be very low (see **Appendix D**). Therefore, less than significant impacts would occur, and no mitigation measures are required.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Development of the Project would require grading, limited excavation to support the building foundations, and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. However, construction activities would occur in accordance with erosion control requirements, including grading and dust control measures, imposed by the City pursuant to grading permit requirements. Specifically, Project construction would comply with the Long Beach Building Standards Code (LBMC Title 18), which requires necessary permits, plans, plan checks, and inspections to ensure that the Project would reduce erosion effects. In addition, as part of the plan check requirements, the Project would be required to have a stormwater management program, including a Storm Water Pollution Prevention Plan (SWPPP)

pursuant to NPDES permit requirements. As part of the SWPPP, BMPs would be implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible. Based on compliance with regulatory requirements, including the implementation of BMPs, impacts from construction would be less than significant, and no mitigation measures are required.

According to the *Preliminary Drainage Study (Appendix B)*, the stormwater from the Project would be collected by an on-site drainage system that would connect into a proposed City of Long Beach maintained storm drain system that discharges into the Los Angeles River. Since the stormwater would eventually discharge into a tidally influenced portion of the Los Angeles River, no erosion or negative downstream impacts are projected. Based on the analysis provided, impacts from operation would be less than significant, and no mitigation measures are required.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Significant Impact with Mitigation Measures. As discussed above, in Response to **Questions 6.a.iii**, the Project would be located in an area susceptible to seismic-related ground failure, including liquefaction and lateral spreading. The Project Site is not located in an area designated by the City or State as being prone to landslides. The Project Site is within a land subsidence area caused by oil extraction.²² Compliance with existing building codes and required studies during design and construction would reduce ground shaking hazards to future residents including lateral spreading, subsidence, liquefaction or collapse., Implementation of **MM GEO-1** would mitigate the potential impact of lateral spreading, liquefaction and subsidence, assuring that all proposed structures and facilities on the Project Site are adequately supported. With the implementation of **MM GEO-1**, impacts from geologic unit or soil that is unstable would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. According to **Appendix D**, exploratory soil borings and Cone Penetration Tests (CPTs) show the native alluvial site soils consist of fine-grained, interbedded layers of sands, silty sands, sandy silts, silts, clayey silts and clays to the maximum explored depth of approximately 60 feet below ground surface (bgs). The near surface soils consist predominantly of cohesionless soils such as sand, silty sand, and sandy silt that are generally medium to very dense. Cohesive soils such as clayey silt and silty clay are present but less dominant in these surficial deposits. The consistency of these units is described as ranging from stiff to hard.²³ As

22 USGS, Areas of Land Subsidence in California, https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html, accessed May 2020.

23 City of Long Beach General Plan, Seismic Safety Element, http://www.longbeach.gov/globalassets/lbds/media-library/documents/planning/advance/general-plan/seismic-safety-element_reduced, accessed May 2020.

such, impacts from expansive soils would be less than significant, and no mitigation measures are required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project Site is located within a community served by existing sewage infrastructure. Therefore, wastewater generated by the Project would be accommodated via connections to the existing sewage infrastructure located in the Project area. An 8-inch sewer main would connect the on-site system at the Project Site to an existing 30-inch sewer main. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. The Project would not result in impacts related to the ability of soils to support septic tanks or alternative wastewater disposal systems, and no mitigation measures are required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. PRC Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

Based on a records search conducted by the Natural History Museum of Los Angeles County (NHMLA) (See **Appendix E**), there are no fossil localities that lie directly within the boundaries of the Project Site. However, the records search indicates that within the Project area, there are fossil localities nearby from the same sedimentary deposits that occur in the proposed Project area, either at the surface or at depth. Excavations into older Quaternary deposits and underlying units may well encounter significant fossils.

The nearest fossil locality from these deposits is from LACM IP 424, located near Interstate 405 and Atlantic Boulevard, approximately 1.1 miles southeast of the Project Site. This location produced invertebrates at unknown depths. The next closest fossil locality, LACM VP 4129, located near 223rd Street and Alameda Street, approximately 1.3 miles west of the Project Site, produced fossil specimens of proboscidea and camelidae, at depths of approximately 24 feet below ground surface (bgs). Further to the west, near Carson Street and Alameda Street, approximately 1.4 miles northwest of the Project Site, LACM VP 3319 produced a specimen of a fossil mammoth at a depth of 30 feet bgs. The furthest fossil locality, LACM VP 3660, located near Clover Street and Pixie Avenue, approximately 2.4 miles northeast of the Project Site, produced a specimen of a fossil mammoth at a depth of 19 feet bgs.

The Project would involve ground disturbing activities during construction and additional analysis is needed to determine the potential for impacts to paleontological resources.

8. GREENHOUSE GAS EMISSIONS

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere and are referred to as greenhouse gases since they have effects that are analogous to the way in which a greenhouse retains heat. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere regulates the earth’s temperature. The State of California has undertaken initiatives designed to address the effects of GHG emissions and establish targets and emission reduction strategies for GHG emissions in California.

Construction

During construction of the project, GHGs would be emitted through the operation of construction equipment and from worker and vendor vehicles, which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs (e.g., carbon dioxide [CO₂], methane [CH₄], and nitrous oxide [N₂O]). Furthermore, CH₄ is emitted during the fueling of heavy equipment. Construction duration for the Project would be approximately 44 months.

Operation

Transportation associated with the operation of the Project and the private vehicles operated by the new residents of the Project would result in GHG emissions from the combustion of fossil fuels in daily automobile trips. Additionally, energy usage including electricity and natural gas would also result in GHG production, in electricity’s case if the electricity is generated using a method that produces GHG. California’s water conveyance system is also energy-intensive. The Project would install efficient irrigation and plumbing systems in compliance with City Municipal Code, Title 21 Zoning, Chapter 21.42 Landscaping Standards. Solid waste generated by the Project could contribute to GHG emissions in a variety of ways. Landfilling and other methods of disposal use energy for transporting and managing the waste and produce additional GHGs to varying degrees. Landfilling, the most common waste management practice, results in the release of CH₄ from the anaerobic decomposition of organic materials. CH₄ is 25 times more potent a GHG than CO₂. However, many materials in landfills do not

decompose fully and the carbon that remains is sequestered in the landfill and not released into the atmosphere.

These construction and operational activities associated with the Project would generate human activity-related greenhouse gas emissions. Additional analysis, including preparation of a quantified estimate of greenhouse gas emissions that would be generated by construction and operation of the Project, is needed to determine the significance of the Project greenhouse gas emissions.

b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. As discussed above, construction and operational activities associated with the Project would generate human activity-related greenhouse gas emissions. Additional analysis of the consistency of the Project with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gases, is needed to determine the significance of the Project's greenhouse gas emissions.

9. HAZARDS AND HAZARDOUS MATERIALS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?

Less Than Significant Impact. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, operation and maintenance of the proposed residential Project would not involve the routine transport, use, or disposal of hazardous materials. Materials used by the operation and maintenance of the Project would be similar to those found in common household projects such as surface and floor cleaning products utilized for routine janitorial cleaning procedures. All potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers’ instructions and handled in accordance with all applicable standards and regulations, including but not limited to, those set forth by the federal and State Occupational Safety and Health Acts. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Impacts would be less than significant and no mitigation measure is required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?

Potentially Significant Impact.

Construction

Construction of the Project would involve the temporary use of hazardous materials including vehicle fuels, oils, and transmission fluids. Such use which could pose risks to construction workers or lead to soil and groundwater contamination, if not properly stored, used, or disposed. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature. Project construction workers would be trained in safe handling and hazardous materials use.

Additionally, the use, storage, transport, and disposal of construction-related hazardous materials and waste would be required to conform to existing laws and regulations. These include the Hazardous Material Transportation Act, the Resource Conservation and Recovery Act, the California Hazardous Waste Control Act, Certified Unified Program Agency (CUPA), and the California Accidental Release Prevention Program. As required by law, notification to Underground Service Alert would be made. Prior to construction an attempt to coordinate with the owners/operators of high priority underground lines would be made in order to avoid damage to high-pressure pipelines and natural gas/petroleum pipelines in the area. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. For example, if a spill or leakage of petroleum products occurs during construction activities, it would be immediately contained, the hazardous material identified, and the impacted area would be remediated in compliance with applicable State and local regulations for the cleanup and disposal of that contaminant.

The Project Site was previously used to treat production water from oil wells. The Remedial Action Plan (RAP) indicates that there are residual pollutants in the subsurface and potential for additional subsurface features. As the proposed remediation activities would involve excavation and disturbance of on-site soil, there is a potential for the accidental release of these materials into the environment or groundwater. Further analysis is required to determine the potential for accidental release of these materials.

Operation

Operation of the residential Project would not create a significant hazard to the public or the environment and would not emit hazardous emissions. Routine maintenance and upkeep of the residential development would involve handling of small quantities of hazardous materials for activities including cleaning and local upgrades. However, as discussed in Question 9a, handling of such materials would follow manufacturer’s instructions and properly stored when not in use. Therefore, potential impacts associated with upset or accident conditions would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or prosed school?

No Impact. The nearest school to the Project Site is Los Cerritos Elementary, located approximately 0.35 mile to the northeast. Therefore, the Project Site would not emit hazardous emissions or handle hazardous materials within a quarter mile of a school. No impacts would occur, and no mitigation measures are required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Potentially Significant Impact. California Government Code Section 65962.5 specifies lists of the following types of hazardous materials sites: hazardous waste facilities; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated. While Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the DTSC, the State Water Resources Control Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred. The database provides a listing of federal Superfund sites, State response sites, voluntary cleanup sites, and school cleanup sites.

The EnviroStor database is maintained by California Department of Toxic Substances Control (DTSC) and provides access to detailed information on hazardous waste permitted sites and corrective action facilities, as well as existing site cleanup information. EnviroStor also provides information on investigation, cleanup, permitting, and/or corrective actions that are planned, being conducted, or have been completed under DTSC’s oversight. The State Water Resource Control Board (RWQCB) maintains the GeoTracker database which manages sites that impact, or have the potential to impact, water quality in California. The GeoTracker database includes sites that require cleanup, are under current investigation/remediation, or have been closed with a status not requiring further investigation.

The Project Site is identified in two listings. The Project Site used to operate as a water treatment facility for treating produced water recovered during oil well production. This operation continued from 1926 to 1998. During this time, the land was owned by Oil Operators Inc. Because of presence of hazardous materials during the water treatment operation an evaluation of the site and the subsequent remediation effort was initiated in the 1980s. In 1996 a Preliminary Assessment (Re-assessment) was completed under a U.S. EPA grant. The site does not qualify for further remedial site assessment under Comprehensive Environmental Response, Compensation, and Liability Act. The City enforced the remediation of the site under the supervision of RWQCB and requires additional site soil assessment and groundwater assessment prior to redevelopment. The primary COCs associated with the on-site releases are oil, concentrations of lead, and arsenic (See **Appendix F: Document Review- Remedial Action Plan**).

In July 2011, Oil Operators Inc. conducted a soil gas survey under the direction of the Regional Board. The survey included the Project Site and extended into the Wrigley Heights residences as far east as Maine Avenue. The survey found that benzene vapors were present below the ground in some Wrigley Heights areas near Golden Avenue. The levels of benzene found presented no immediate risks to human health. To address any potential for long-term human health impacts, the Regional Board directed Oil

Operators Inc. to install and operate a soil vapor extraction (SVE) system. A SVE system reduces the risk of vapor intrusion by depressurizing the subsurface below the impacted areas. Additionally, SVE removes the contaminants from the soil by applying a vacuum and creating a controlled air flow. The gas leaving the soil is treated aboveground to remove the contaminants, and then released into the air in accordance with applicable air quality regulations. Oil Operators Inc. installed an SVE system and operated it from September 2012 to September 2014.

After further review of data from the investigations performed by Oil Operators Inc., the Regional Board determined that the benzene present underneath the ground in the residential neighborhood originates from a BP pipeline release along Golden Avenue. West Coast Products LLC, ARCO, and ARCO Terminal Services Corporation (collectively BP) previously owned and operated petroleum pipelines that extend beneath Golden Avenue in Long Beach, California, to the west of the Wrigley Heights residences. On June 1, 2013, Tesoro bought the pipelines, and assumed responsibility for assessment and remediation activities related to them.

The Regional Board issued BP a tentative clean-up and abatement order (CAO) on April 26, 2013, and a CAO on September 19, 2014. The order requires BP (now Tesoro) to assume the responsibility of soil vapor intrusion mitigation for the Wrigley Heights residences. At this time, Tesoro has taken over soil vapor mitigation activities from Oil Operators Inc. A new SVE aboveground treatment compound owned and operated by Tesoro to treat the extracted vapors has been constructed on the Project Site; no new extraction wells are planned for construction at this time. Tesoro resumed soil vapor extraction activities with their new system in the beginning of April 2015. An additional soil, soil vapor, and groundwater investigation has been completed by Tesoro, and the investigation report is under review. A human health risk assessment has been prepared and reviewed by the Office of Environmental Health Hazard Assessment. The Regional Board is currently directing additional actions to address the areas of concern.

Previous operations from the Project Site resulted in discharges of contaminants into the subsurface, including volatile organic compounds. Volatile organic compounds are chemical compounds found in cleaning solvents and other products, and used in industrial operations. Due to the listing of the Project Site on available hazardous waste tracking databases, and its proximity to other listed sites, further analysis is required to determine the potential for significant hazards to the public or the environment.

e) For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The Project Site is not located within a two-mile vicinity of an any private airstrip and is not within an airport land use plan or an airport influence area. Therefore, the Project would not expose residents or workers to safety hazards or excessive noise associated with airport or private air strip

operations. The closest airport is the Long Beach Municipal Airport, located 2.1 miles east of the Project Site.²⁴ No project impact would occur and no mitigation measures are required.

f) Substantially impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. As discussed in the City’s General Plan Public Safety Element, emergency response and emergency evacuation in the City is based on the availability of through streets, multiple access routes, and bridges. The City’s Emergency Operations Plan (August 2015) outlines the City’s emergency response organization and policies. This plan also identifies ways in which the City and its residents can minimize risk and prevent loss from natural hazard events. Emergency events addressed in this plan include those associated with earthquakes, flooding, windstorm, tsunamis, public health events, technological and human-caused events, and drought.

During Project construction, the majority of construction activities would be confined to the Project Site itself; however, limited off-site infrastructure improvements may require some construction activities in adjacent street rights-of-way. As such, some partial lane closures adjacent to the Project Site, including on W. Wardlow Road, Golden Avenue, and Baker Street, may occur. However, these closures would be temporary in nature and both directions of travel on area roadways would be maintained so as not to physically impair access to and around the Project Site. The contractor would collaborate with the City on any partial road closures to maintain access for emergency services. Therefore, impacts related to emergency response and evacuation plans associated with construction of the Project would be less than significant.

Design of the Project does not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would physically impair or otherwise conflict with an emergency response plan or emergency evacuation plan. The Project would include two access points on-site and would comply with LBMC Section 503.2.1 of Chapter 5 to include unobstructed width of not less than 26 feet for planned, internal roadways and an unobstructed vertical clearance of 15 feet. Compliance with this Section would ensure access is available for emergency services. In terms of existing external roadways, the Project does not include any changes to any public or private roadways that would interfere with the City’s Emergency Operations Plan or another adopted emergency response plan or emergency evacuation plan. Further, the Project would not obstruct or alter any transportation routes that could be used as evacuation routes during emergency events. Access to and from the Project Site for emergency vehicles would be reviewed and approved by the Long Beach Fire Department (LBFD) as part of the Project approval process to ensure the Project is compliant with all applicable codes and ordinances for emergency vehicle access. Impacts related to interference with an emergency response plan are considered less than significant. No mitigation is required.

24 County of Los Angeles, Airport Land Use Commission, http://planning.lacounty.gov/assets/upl/project/aluc_airport-long-beach.pdf, accessed May 2020.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. Wildland fires occur in geographic areas that contain the types and conditions of vegetation, topography, weather, and structure density susceptible to risks associated with uncontrolled fires that can be started by lightning, improperly managed camp fires, cigarettes, sparks from automobiles, and other ignition sources.

The Project Site is located in a developed area where wildfire is not considered a likely risk to people or structures. The Project is not designated in or in the vicinity of a State Responsibility Area (SRA) or Local Responsibility Area (LRA) fire hazard severity zone as mapped by the California Department of Forestry and Fire Protection.²⁵ The SRA is the area of the state where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within city boundaries or in federal ownership. The LRA is the area where local governments have financial responsibility for wildland fire protection. In addition, the Project Site and the surrounding areas do not include brush- and grass-covered areas typically found in areas susceptible to wildfires. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death from wildland fires and no impact would occur. No mitigation measures are required.

25 CALFIRE, Fire Hazard Severity Zones Maps, <https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>, accessed May 2020.

10. HYDROLOGY AND WATER QUALITY

Would the project:	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact.

Construction

During construction of the Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Therefore, Project-related construction activities could potentially result in adverse effects on water quality. However, as Project construction would disturb more than one acre of soil, the Project would be required to obtain coverage under the NPDES Construction General Permit (Order No. 2009-0009-DWQ, as well as its subsequent amendments 2010-0014-DWQ and 2012-0006-DWQ) pursuant to NPDES requirements. In accordance with the permit requirements, a SWPPP would be developed and implemented during construction of the Project. The SWPPP would set forth BMPs, including erosion control, sediment control, non-stormwater management, and materials management measures, to minimize the discharge of pollutants in stormwater runoff. In addition, the Applicant would be required to comply with all applicable City grading permit regulations, including implementation of appropriate measures, plans, and inspections to reduce sedimentation and erosion. Furthermore, BMPs such as sandbag barriers, earthen drainage dikes, swales, and/or sediment traps during construction would help ensure that existing drainage patterns are maintained.

Construction activities such as earth moving, maintenance/operation of construction equipment, and the handling, storage, and disposal of construction materials could contribute to pollutant loading in stormwater runoff. On-site watering activities to reduce airborne dust also could contribute to pollutant loading in runoff. The main pollutant of concern during construction would be sediment or soil particles that could become detached by water and wind. However, as noted above, the Project Applicant would prepare and implement a SWPPP that would specify BMPs to target pollutants of concern and reduce or eliminate pollutants in stormwater discharges. In addition, as discussed further below, any temporary dewatering system(s) would treat groundwater prior to

discharge to the public storm drain system, as authorized by a NPDES General Permit issued by the LARWQCB and a storm drain connection permit issued by the City of Long Beach Department of Public Works.

Through compliance with NPDES requirements and local regulations, including the implementation of BMPs, construction of the Project would not result in discharges that would violate any water quality standards or waste discharge requirements. As such, construction related impacts to surface water quality would be less than significant.

Operation

Operation of the Project would introduce sources of potential stormwater pollution that are typical of residential uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. However, the Project would comply with current National Pollutant Discharge Elimination System (NPDES), which regulates discharges into surface waters, and Los Angeles County MS4 permit regulations pertaining to the retention of erosion and detention of site runoff into storm drains and receiving waters and include storm water Low Impact Development (LID) Best Management Practices (BMPs). Additionally, Chapter 18.74 of the LBMC regulates the implementation of the LIDs and BMPs for projects in the City. Compliance with these requirements would reduce potential impacts to local storm water drainage facilities to a less than significant level.

Remediation

As discussed in **Section 9: Hazards and Hazardous Materials**, due to the operational history and identified COCs associated with ground water quality, there are ongoing soil remediation activities on the site as well as continued plans for future remediation. The Project has the potential to discharge sediment and pollutants to storm drains and receiving waters, thereby leading to a potential water quality impact. This impact is potentially significant and additional analysis to determine significance is required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The major aquifers beneath Long Beach are known as the 400-foot Gravel, the 200-foot Sand, and the Gaspur Zone.²⁶ These aquifers have a capacity for storing approximately 30 million acre-feet of water. The Project would involve construction of residential buildings with minimal excavation. As discussed in **Section 19: Utilities and Service Systems**, water supply requirements associated with the Project would not deplete local groundwater supplies. Therefore, a less than significant impact would occur.

26 City of Long Beach General Plan, Conservation Element, <http://www.longbeach.gov/globalassets/lbds/media-library/documents/planning/advance/general-plan/1973-conservation-element>, accessed August 2020

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(i) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. No streams or rivers traverse the Project Site, which is disturbed and largely flat. The nearest river to the Project Site is the Los Angeles River, located approximately 120 feet west of the Project Site. This section of the Los Angeles River is a concrete lined channel and the Project would not involve any alteration of this channel.

Development of the Project would require grading, limited excavation to support the building foundations, and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. However, construction activities would occur in accordance with erosion control requirements, including grading and dust control measures, imposed by the City pursuant to grading permit requirements. Specifically, Project construction would comply with the Long Beach Building Standards Code (LBMC Title 18), which requires necessary permits, plans, plan checks, and inspections to ensure that the Project would reduce erosion effects. In addition, as part of the plan check requirements, the Project would be required to have a stormwater management program, including a Storm Water Pollution Prevention Plan (SWPPP) pursuant to NPDES permit requirements. As part of the SWPPP, BMPs would be implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible.

A analysis *Conceptual LID BMP Calculations (Appendix G)* assessed the feasibility of infiltration, capture and use, and/or biofiltration BMPs of the first flush. Infiltration along with Capture & Use was determined to be infeasible due to potential soil contamination from historic site use by oil companies and the open status as a cleanup site on the State’s GeoTracker website. Biofiltration planters (flow through planters) were determined to be feasible for management of the residential portion of the Project’s water quality design volume. The proposed residential area is divided into three drainage management areas that are collected by catch basins with each drainage area discharging to a flow through planter for biofiltration of the water quality design volume. A small portion, 902 square feet, of the driveway off Wardlow Road would drain off-site untreated. The open space area at the northern portion of the site is approximately six percent impervious, walk area that drains into the adjacent landscaping. Once treated, the Project’s stormwater would be directed to a proposed city storm drain system that discharges into the Los Angeles River. The Project Site in total is 62 percent impervious and 38 percent pervious and provides 30,916 square feet of biofiltration of the required 30,574 square feet (**Appendix G**).

Based on the above and compliance with regulatory requirements, including the implementation of BMPs, impacts would be less than significant.

(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. The implementation of the Project would result in a total of 62 percent impervious and 38 percent pervious surfaces, thus potentially increasing the amount and/or rate of surface runoff.

According to FEMA’s Flood Insurance Rate Map (FIRM) Map Number 06037C1964F, effective since September 26, 2008, the Project Site is not located in a designated 100-year flood hazard area.²⁷ Per the FEMA FIRM Map, the Project Site is located in Zone X, which includes areas determined to be outside the 0.2 percent annual chance floodplain (500 year floodplain) and areas of one percent annual chance flood (100 year floodplain) with average depths of less than one foot or with drainage areas less than one square mile.

According to the Preliminary Drainage Study (**Appendix B**), the Project Site is divided into five subareas. Stormwater runoff in each of the proposed subareas (P1 through P3) would be collected by private on-site catch basins that drain to the subarea’s respective biofiltration planter (flow through planter) for treatment. Filtered and high flows are directed from the biofiltration planters to a private storm drain network that would connect to a new City storm drain line located within a portion of the vacated Baker Street near at the intersection with the westerly on-site private road. Subarea P5 is mostly vegetated open space that is collected by area drains that connect to the new City storm drains within the vacated Baker Street. Two City catch basins would be constructed in the right-of-way of Baker Street near the site’s entrance to collect runoff from a portion of Golden Avenue and Baker Street that currently drains into the Project Site. The catch basins would be collected by a new proposed City storm drain main that runs westerly through the Project Site and discharges into the Los Angeles River. Subarea P4 is a small portion of the Project Site’s entrance that would sheet flow untreated into the right-of-way of Wardlow Road.

27 Federal Emergency Management Agency, “FEMA Flood Map,” <https://msc.fema.gov/portal/home>, accessed August 2020.

LEGEND

DRAINAGE AREA BOUNDARY

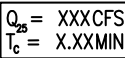


DRAINAGE AREA ID



DRAINAGE AREA

RUNOFF
TIME OF CONCENTRATION



FLOW PATH

SLOPE

S

SLOPE HEIGHT

H

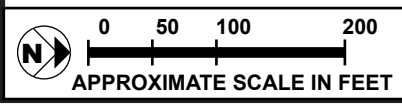
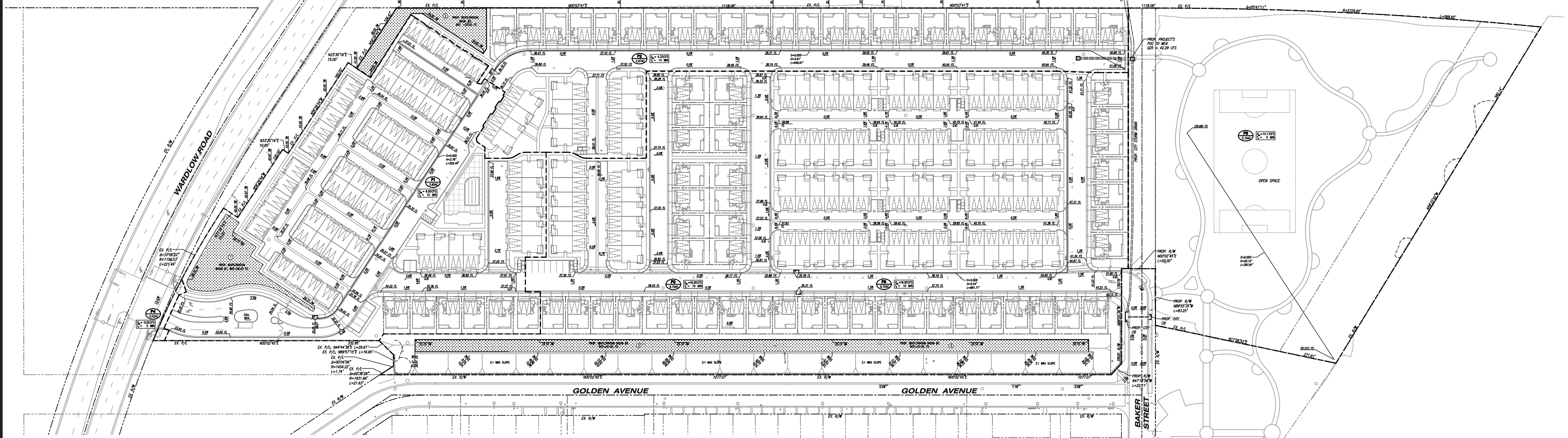
SLOPE LENGTH

L

BIOFILTRATION (LID BMP) ID



PROPOSED BIOFILTRATION AREA



SOURCE: KHR Associates - April 2020

FIGURE 10-1



Proposed Hydrology

Table 10.1: Peak Runoff Existing Conditions and **Table 10.2: Peak Runoff Proposed Conditions** below summarize the results of the total peak runoff for the site. Implementation of the Project would decrease flow to a net total of 2.91 cubic feet per second (CFS).

**Table 10.1
Peak Runoff Existing Conditions**

Subarea	Flow Rate (CFS)
E1	1.76
E2	2.56
E3	8.86
E4	18.32
E5	13.75
Total	45.25

Source: Preliminary Drainage Study, KHR Associates, April 22, 2020.

**Table 10.2
Peak Runoff Proposed Conditions**

Outlet Point	Q ₂₅ (CFS)
P1	6.90
P2	4.33
P3	16.95
P4	0.05
P5	14.11
Total	42.34

Source: Preliminary Drainage Study, KHR Associates, April 22, 2020.

Therefore, impacts related to an increase in rate or amount of surface runoff in a manner which would result in flooding on- or off-site would be less than significant.

(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As discussed in **Question 10.c.ii**, through the use of existing storm drains and the development of new City storm drains, the Project would not create or contribute runoff water

which would exceed the capacity of existing or planned stormwater drainage systems. Additionally, as seen in **Table 10.1** and **Table 10.2**, proposed conditions would decrease flow to a net total of 2.91 CFS.

With regard to providing substantial additional sources of polluted runoff, and as discussed in **Question 10.c.i**, a feasibility analysis for the Project was performed by the *Conceptual LID BMP Calculations (Appendix G)* for infiltration, capture and use, and/or biofiltration BMPs of the first flush. Infiltration along with Capture & Use was deemed infeasible due to potential soil contamination from historic site use by oil companies and the open status as a cleanup site on the State’s GeoTracker website. Biofiltration planters (flow through planters) were chosen for management of the residential portion of the Project’s water quality design volume. The proposed residential area is divided into three drainage management areas that are collected by catch basins with each drainage area discharging to a flow through planter for biofiltration of the water quality design volume. A small portion, 902 square feet, of the driveway off Wardlow Road would drain off-site untreated. The open space area at the northern portion of the site is approximately six percent impervious, walk area that drains into the adjacent landscaping. Once treated, the Project’s stormwater would be directed to a proposed city storm drain system that discharges into the Los Angeles River. The Project Site in total is 62 percent impervious and 38 percent pervious and provides 30,916 square feet of biofiltration of the required 30,574 square feet (**Appendix G**). Therefore, the Project would not create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and a less than significant impact would occur.

(iv) Impede or redirect flood flows?

Less Than Significant Impact. According to the Federal Emergency Management Agency’s (FEMA) Flood Insurance Rate Maps (FIRM), The Project Site is in a Zone X flood hazard zone as designated by FEMA, indicating that the site is protected from 100-year floods by levees.²⁸ Therefore, impact would be less than significant. No mitigation measure would be required.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. According to the FEMA FIRMs Map Number 06037C1955F, effective since September 26, 2008, the Project Site is not located in a designated 100-year flood hazard area.²⁹ Per the FEMA FIRM Map, the Project Site is located in a Zone X, which includes areas determined to be outside the 0.2 percent annual chance floodplain, areas of 1 percent annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile. According to the same map, the Los Angeles River, which runs north to south along the west of the Project Site, is within Flood Zone A, defined as those areas with a one percent annual chance of flooding.

Tsunamis are large ocean waves caused by the sudden water displacement that results from an underwater earthquake, landslide, or volcanic eruption that affect low-lying areas along the coastline. The Project Site is located 1.4 miles north of the mapped tsunami inundation run up area from the Los

28 Federal Emergency Management Agency, FEMA Flood Map, <https://msc.fema.gov/portal/home>, accessed May 2020.

29 Federal Emergency Management Agency, FEMA Flood Map, <https://msc.fema.gov/portal/home>, accessed May 2020.

Angeles River flood channel, an area south of Willow Street. Seiches are large waves generated within enclosed bodies of water. Based on site locations away from lakes and reservoirs, seiches do not pose a hazard.

Additionally, according to the findings in the **Appendix D: Geohazards Report**, tsunamis and seiches do not pose a hazard at the Project Site. Based on this information, a less than significant impact would occur from a flood hazard, tsunami, pollutant release due to inundation from a seiche.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Potentially Significant Impact. The Project would comply with all requirements of the City of LBMC related to water quality, the 2015 Urban Water Management Plan, the City’s Stormwater Management Plan, and the City’s Waste Discharge Requirements for Municipal Separate Storm Sewer System Discharges from the City of Long Beach (City of Long Beach MS4 Permit). Due to the increase in impervious surfaces, the Project would be required to implement post-construction BMPs to mitigate stormwater pollution during operation and prepare a LID Plan or equivalent, in compliance with the City of Long Beach LID BMPs Design Manual. Project construction and operation would not conflict with or obstruct implementation of a water quality control plans or sustainable groundwater management plans and a less than significant impact would occur.

As discussed in the **Question 10.a** above, Project remediation could have the potential to discharge sediment and pollutants. LARQWCB would also require a WQMP to be prepared and implement BMPs for site-specific runoff controls and treatments. Further analysis is needed to assess potential conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

11. LAND USE AND PLANNING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Physically divide an established community?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact. As previously described, the Project Site is located on a vacant site at the western edge of the Wrigley Heights neighborhood. The Wrigley Heights neighborhood is bounded by Wardlow Road to the south, LA River to the West, the 405 Freeway to the north and the Pacific Place Road to the east. Neighborhoods immediately adjacent to the Project Site include Bixby Knolls across Interstate 405 to the north and North Wrigley to the south across Wardlow Road. Majority of the Project Site is surrounded by residential neighborhoods, with commercial and office uses across the Interstate 710 and 405 interchange to the northwest, in the City of Carson.

The Project proposes to develop 226 single family detached and attached homes with a 5-acre open space recreational area on 20-acres of vacant land on the western edge of the Wrigley Heights neighborhood. Primary access would be provided from W. Wardlow Road at a new signalized intersection. Emergency access would be provided from the intersection of Baker Street and Golden Avenue. Both would be private gated access points. No off-site improvements, including street improvements are proposed that would physically divide or disrupt the Wrigley Heights neighborhood or isolate any of the established surrounding neighborhoods. The Project would add additional residential units to the existing residential Wrigley Heights neighborhood and an open space area that would complement the existing Baker Street Park. Based on the location of the site and the characteristics of the Project as proposed, on the Project would not physically divide an established community, and no mitigation measures would be required.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact. As previously discussed, the Project Site is located in an urbanized area with a General Plan designation for Founding and Contemporary Neighborhood (FCN). A waiver for the height limitation is requested by the applicant in exchange for providing 5% affordable housing on-site. The Project would offer 11 affordable housing units out of the proposed 226 units. The waiver is consistent with the California Density Bonus Law, State of California Government Code Section 65915 and the LBMC Chapter 21.63- Incentives for Affordable Housing. The height limitation waiver would

allow the Project to include 3-story buildings in an area designated for 2-story buildings under the General Plan.

The Project Site is currently zoned for Commercial Storage (CS) and Single Family Residential Standard Lot (R-1-N) use, with a Horse Overlay District over the parcels on the east side of the Project Site. A zone change of the Project Site to Residential Planned Unit Development (PUD) is proposed with this Project. Residential PUD is established to achieve greater flexibility and encourage innovative and creative design through good urban planning principals, with efficient use of land, a mixture of densities, and diverse housing opportunities and on-site community facilities. This proposed zoning would be consistent with the General Plan. The Project would have a less than significant impact on project conflict with applicable zoning and other regulations after the height waiver and the implementation of the proposed zone change, no mitigation measure is required.

12. MINERAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

Less Than Significant Impact. The Project Site is located within a developed area and has been previously disturbed by its use as a water treatment facility for oil well production. While the Project Site is mapped within the Long Beach Oil Field, there are no indications of any production or exploratory wells being drilled on or in the immediate vicinity of the site.³⁰ The nearest active production well is located 0.5 miles east of the Project Site.³¹ Based on the lack of historic and/or active mineral extraction activities on or surrounding the Project Site, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. The Project Site is also not located in a Mineral Resource Zone.³² A less than significant impact would occur, and no mitigation measures would be required.

- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Less Than Significant Impact. As noted above, the Project Site is mapped within the Long Beach Oil Field, but there are no active oil wells on-site. In addition, the Project Site is not classified by the California Department of Conservation as an area containing significant mineral deposits nor is the Project Site located in an aggregate producing area as classified by the California Geological Survey.^{33,34} Therefore, the Project would not result in the loss of availability of a locally important mineral resource recovery site. A less than significant impact would occur, and no mitigation measures would be required.

30 California Department of Conservation, Geologic Energy Management Division, <https://maps.conservation.ca.gov/doggr/>, accessed May 2020.

31 California Department of Conservation, Geologic Energy Management Division, <https://maps.conservation.ca.gov/doggr/>, accessed May 2020.

32 California Department of Conservation, Mineral Land Classification, <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>, accessed May 2020.

33 California Department of Conservation, Mineral Land Classification, <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>, accessed May 2020.

34 State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, https://www.conservation.ca.gov/cgs/Documents/MS_052_California_Aggregates_Map_201807.pdf, accessed May 2020.

13. NOISE

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<i>Potentially Significant Impact</i>			

Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. The Project Site is located within an urbanized area that contains various sources of noise and uses considered sensitive to noise levels. The predominate noise source in the vicinity is associated with vehicular traffic. Existing sensitive receptors include single-family and multi-family residential dwellings located east of Golden Avenue within 100 feet of the Project Site. During Project construction, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a temporary, short-term basis.

In addition, because the Project would introduce new residential uses and increase local density, noise levels from these uses would also increase. Furthermore, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways.

Additional analysis of the changes in noise levels that would result from construction and operation of the Project is required to determine the significance of these changes and the consistency of the Project with the General Plan Noise Element and City Noise Ordinance.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. The Project may produce groundborne vibration or groundborne noise during construction of the Project. As discussed in **Question 9.a**, the Project Site is located within 100 feet of existing residential uses sensitive to noise levels. To accurately assess for the noise impacts of Project construction on the surrounding area, additional studies is needed to evaluate noise generating sources of the Project for conformance with City Noise Ordinances and the General Plan. The Project’s proposed residential structures would not generate ground-borne vibration that could be felt at surrounding uses. The Project would not involve railroads or substantial heavy truck operations, and therefore would not result in vibration impacts at surrounding uses.

Analysis of the changes in groundborne vibration or groundborne noise levels that would result from construction of the Project is needed to determine the significance of these changes and the consistency of the Project with the General Plan Noise Element and City Noise Ordinance.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. As described in **Question 9.e**, the Project Site is not located within a two-mile vicinity of an any private airstrip and is not within an airport land use plan or an airport influence area and would therefore not expose residents or workers to hazards associated with airport or private air strip operations. The closest airport is the Long Beach Municipal Airport, located 2.1 miles east of the Project Site.³⁵ Therefore, no project impact would occur and no mitigation measures is needed.

35 County of Los Angeles, Airport Land Use Commission, http://planning.lacounty.gov/assets/upl/project/aluc_airport-long-beach.pdf, accessed May 2020.

14. POPULATION AND HOUSING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact. The Project proposes 226 single-family detached and attached dwelling units. Project construction would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, new permanent residents generally would not be generated during Project construction.

According to the United States Census Bureau, the average household size for the City of Long Beach is 2.76 persons per household.³⁶ Based on this average household size, the Project is expected to result in an increase of approximately 624 residents. The Southern California Association of Governments' (SCAG) 2045 population projections for the City estimates that population would increase from 470,900 residents in 2016 to 489,600 in 2045, an increase of 18,700 residents.³⁷ Therefore, Project generated population increase would represent approximately 3.3 percent of the anticipated increase in residents within the SCAG region between 2016 and 2045. Operation of the Project would not induce substantial unplanned population growth in the Project area, either directly or indirectly and would not exceed regional or local growth projections. Therefore, impacts would be less than significant and no mitigation is required.

b) Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact. The Project Site is vacant and does not contain any existing housing. Therefore, the Project would not displace any existing housing. No impacts would occur, and no mitigation measures are required.

36 United States Census Bureau, City of Long Beach Quick Facts, <https://www.census.gov/quickfacts/longbeachcitycalifornia>, accessed May 2020.

37 The Southern California Association of Governments, Demographics & Growth Forecast, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579, accessed February 2021.

15. PUBLIC SERVICES

	<i>Less Than Significant</i>		
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>

a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?

Less Than Significant Impact. The Long Beach Fire Department (LBFD) provides fire protection throughout the City. The LBFD maintains 1 fire headquarter, 1 beach operation facility, and 23 fire stations within the City.³⁸ The nearest fire station to the Project Site is Fire Station No. 9, located at 3917 Long Beach Boulevard, approximately 1.1 mile northeast of the Project Site.

While the Project would introduce additional residents to the Project Site, the Project does not include uses that pose a significant fire hazard. Project design would be subject to the requirements set forth in the California Fire Code, California Building Code, the LBMC, and LBFD requirements for fire access. The Project plans would be subject to LBFD site/building plan review, which would ensure adequate emergency access, fire hydrant availability, and compliance with all applicable codes. As such, LBFD access and response times would not be significantly impacted by the addition of Project traffic.

Nevertheless, the increase in development on the Project Site could increase the demand for fire protection services in the area. LBMC Chapter 18.23, Fire Facilities Impact Fee, was adopted to ensure development projects pay their fair share of the costs required to support needed fire facilities and related costs necessary to accommodate such development. Compliance with LBMC Chapter 18.23, which requires payment of the fire facilities impact fee, would ensure Project implementation would result in a less than significant impact on fire protection services. Therefore, compliance with existing California Fire Code, California Building Code, LBMC, and LBFD requirements, including payment of the fire facilities impact fee, impacts with respect to fire protection services would be less than significant, and no mitigation measures are required.

38 Long Beach Fire Department, Station Locations, <http://www.longbeach.gov/fire/about-us/station-locations/>, accessed May 2020.

Police protection?

Less Than Significant Impact. The Long Beach Police Department (LBPD) provides police protection throughout the City. The LBPD is the second largest municipal police agency in Los Angeles County, with over 800 sworn officers and a total staff of over 1,200 personnel.³⁹ LBPD has many specialized service units to fulfill a variety of public safety functions and responsibilities. These specialized teams include, but are not limited to, the Special Weapons and Tactics (SWAT) team, Police Service Dog Unit, Motor Patrol Officers, Mental Evaluation Team (MET), Hostage Negotiators, Air Support Unit, and Detectives. The current citywide officer to resident ratio is 1.73 officers per 1,000 residents.⁴⁰

The City of Long Beach is organized into quadrants. The Patrol Bureau includes one specialized Field Support Division and three geographical divisions: North, East and West. The Patrol Bureau focuses on community policing accomplished by community policing teams consisting of sworn employees and civilian support staff. These proactive teams promote personal safety and crime prevention.⁴¹

The Project Site is located in LBPD’s North Patrol Division, which is headquartered at 4891 Atlantic Avenue, approximately 3.1 miles northeast of the Project Site. While the Project would increase residents in the area, the proposed residential use is consistent with the Long Beach General Plan Land Use Element update.⁴²

In accordance with LBMC Chapter 18.22, which requires “new residential and nonresidential development for the purpose of assuring that the impacts created by the proposed development shall pay its fair share of the costs required to support needed police facilities and related costs necessary to accommodate the development.” The City’s impact fee for police service would be collected to reduce the impacts of the Project on local police services. The Project would not cause substantially delayed response times, degraded service ratios or necessitate construction of new facilities, due to the size of the development and the location in an already developed and well served area. Impacts would be less than significant.

Schools?

Less Than Significant Impact. The Project Site is served by Long Beach Unified School District (LBUSD). LBUSD operates 85 facilities serving grade levels pre-K through high school and has a current enrollment of 72,000 students.⁴³ Schools serving the Project Sites include Los Cerritos Elementary School, located at 515 West San Antonio Drive, which serves grades K through 5th, Hughes Middle School, located at

39 Long Beach Police Department, About the LBPD, <http://longbeach.gov/police/about-the-lbpd/>, accessed May 2020.

40 Based on United States Census Bureau population estimates of 462,628, City of Long Beach Quick Facts, <https://www.census.gov/quickfacts/longbeachcitycalifornia>, accessed May 2020.

41 Long Beach Police Department, Patrol Bureau, <http://www.longbeach.gov/police/about-the-lbpd/bureaus/patrol-bureau/>, accessed May 2020.

42 City of Long Beach General Plan, Land Use Element, <http://www.longbeach.gov/globalassets/lbds/media-library/documents/planning/advance/lueude/land-use-element-final-adopted-december-2019>, accessed May 2020.

43 Long Beach Unified School District, About, www.lbschools.net/District/, accessed May 2020.

3846 California Avenue, which serves grades 6th through 8th, and Polytechnic High School, located at 1600 Atlantic Avenue, which serves grades 9th through 12th.⁴⁴

As show in **Table 15.1: Students Generated by The Project**, generation factors from the Long Beach Unified School District Residential Development School Fee Justification Study were used to calculate the number of students that would be generated by the 226 new single-family attached and detached homes proposed.⁴⁵

**Table 15.1
Students Generated by the Project**

School Level	School Students
Elementary School	45
Middle School	24
High School	33
Total	102

Source: Long Beach Unified School District, Residential Development School Fee Justification Study (2018).

As shown in **Table 15.2: Projected Student Enrollment from Future Single-Family Units (2035)**, projected student enrollment for calendar year 2035. Table 15.3: Existing School Facilities Capacity and Student Enrollment shows enrollment for schools in the City is currently below capacity.⁴⁶

**Table 15.2
Projected Student Enrollment from Future Single-Family Units (2035)**

School Level	Projected Student Enrollment
Elementary School	1,302
Middle School	687
High School	939
Total	2928

Source: Long Beach Unified School District, Residential Development School Fee Justification Study (2018).

44 Long Beach Unified School District, School Finder, https://www.lbschools.net/Schools/school_finder_results_streets.cfm, accessed May 2020.

45 Long Beach Unified School District, Residential Development School Fee Justification Study, http://www.lbschools.net/Asset/Files/Business_Services/Developer_Fees/2018/2018-Residential-Fee-Justification-Study.pdf, accessed May 2020.

46 Long Beach Unified School District, Residential Development School Fee Justification Study, http://www.lbschools.net/Asset/Files/Business_Services/Developer_Fees/2018/2018-Residential-Fee-Justification-Study.pdf, accessed May 2020.

**Table 15.3
Existing School Facilities Capacity and Student Enrollment**

School Level	2017/2018 Facilities Capacity	2017/2018 Student Enrollment	Excess/ (Shortage) Capacity
Elementary School	44,779	40,138	4,641
Middle School	13,776	11,274	2,502
High School	23,750	23,165	585
Total	82,305	74,577	7,728

Source: Long Beach Unified School District, Residential Development School Fee Justification Study (2018).

As such, the Project would generate: 1.8 percent of the remaining capacity of 4,641 elementary school students, 1.0 percent of the remaining capacity of 2,502 middle school students, and 5.6 percent of the remaining capacity of 585 high school students.

Therefore, the incremental increase in the number of students generated by the Project would not result in the need for new or physically altered school facilities as sufficient capacity is available. Impacts to the existing school system would be less than significant and no mitigation measures is needed.

Parks?

Less Than Significant Impact. Recreational amenities in the City of Long Beach include 170 parks and 26 community centers, providing more than 3,100 acres of recreational space.⁴⁷ Based on a population of 462,628 residents, the City’s current parkland ratio is approximately 6.7 parkland acres per 1,000 residents. As stated in the City’s General Plan Open Space and Recreation Element, the City of Long Beach’s goal for providing adequate park and recreational facilities to its residents is 8 acres per 1,000 residents.⁴⁸

The Project would generate an estimated 624 residents and would incrementally increase the demand for usage of existing parks in the City. The Project proposes to include 5-acres of open space that would include walking trails, look-out points, an open grass area that can accommodate a youth soccer field, a butterfly garden, and exercise equipment, which would offset some demand on park and recreational facilities in the City. Additionally, in accordance with the Quimby Act, the City assesses open space development fees for new residential development. Pursuant to Chapter 18.18 of the LBMC, all residential development are required to pay a park fees prior to the issuance of a certificate of occupancy. This fee is intended to be used for the acquisition, improvement, and expansion of public parks and/or recreational facilities. Pursuant to Chapter 18.18.100 of the LBMC, any applicant who

47 Long Beach Parks, Recreation, and Marine, About the Department, <http://www.longbeach.gov/park/business-operations/about/>, accessed May 2020.

48 Long Beach, General Plan, Open Space and Recreation Element, <http://www.longbeach.gov/globalassets/lbds/media-library/documents/planning/open-space-and-recreation-element>, accessed May 2020.

contributes improvements to the City for the acquisition of park land or the construction of recreation improvements, may be eligible for a credit for such contribution against the park fee otherwise due. With the open space and recreational facilities included in the Project and payment of park fees as required, impacts to park facilities would be less than significant.

Other public facilities?

Less Than Significant Impact. Implementation of the Project would increase the local population by approximately 624 residents. The Project would contribute incrementally toward impacts to City public services and facilities such as public parks, solid waste disposal, discussed in Section 19, Utilities and Service Systems, water usage and wastewater disposal, discussed in more detail in Section 19, Utilities and Service Systems, and libraries. With respect to storm drain usage, discussed in Section 10, Hydrology and Water Quality, the Project would not increase impervious surfaces, as such, a less than significant impact to storm drains would occur. Nevertheless, the Project’s contribution would be offset through payment of fees that are used to fund school facility expansions and other public utility services, as well as by the Project specific features incorporated to minimize Project related impacts analyzed in this document.

The Project would be served by the Dana Neighborhood Library, located at 3680 Atlantic Avenue, approximately 1.1 miles northeast of the Project Site. The Dana Neighborhood Library opened in September 1958 and includes a 6,800 square feet facility. Library amenities include public computers, free wifi, wireless printing, copier, community meeting room, family learning center, air conditioning, and exterior book drop for after-hours returns. In addition, the City opened the new Michelle Obama Neighborhood Library in 2016. The new library encompasses 24,655 square-foot of space with its single-story facility and has three public community meeting spaces including areas for children, teens, and adults. Therefore, increased demand on other public resources would be nominal, and the addition of the Michelle Obama Library would continue to accommodate the needs of the residents. Overall, impacts to other public facilities would be less than significant.

16. RECREATION

- | | <i>Potentially
Significant
Impact</i> | <i>Less Than
Significant
Impact with
Mitigation
Incorporated</i> | <i>Less Than
Significant
Impact</i> | <i>No
Impact</i> |
|--|---|--|---|--------------------------|
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Potentially Significant Impact. Development of the Project would generate an estimated 624 residents and provide 5-acres of recreational open space. The open space would include walking trails, look-out points, a grass area available for use as a youth soccer field and for similar recreational activities, a butterfly garden, and exercise equipment. Additional analysis is required to determine the potential effects of the Project on existing parks and recreation facilities.

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| b) Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|

Potentially Significant Impact. As discussed in **Question 16.a**, the Project would include the development of 5-acres of recreational open space. The open space would include walking trails, look-out points, a grass area available for use as a youth soccer field and for similar recreational activities, a butterfly garden, and exercise equipment. Additional analysis is required to determine the potential for impacts from development and use of this recreation open space area.

17. TRANSPORTATION

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

- a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Potentially Significant Impact. The City of Long Beach adopted the Mobility Element of the General Plan in October 2013. The Mobility Element establishes the vision, goals, policies, and implementation measures required to improve and enhance the City’s local and regional transportation networks.⁴⁹ Additionally, the City of Long Beach published the updated Traffic Impact Analysis Guidelines (TIA Guidelines) in June 2020. The TIA Guidelines provide direction for reviews consistent with the General Plan Mobility Element vision and identify the suggested format and methodology that is generally required to be utilized in preparing traffic studies. A TIA is generally required when there is a potential for significant transportation impact under a local policy or CEQA.

Development of the Project would result in the generation of additional vehicular traffic in the area and the region. Additional analysis is required to determine the Project’s consistency with existing programs, plans, ordinances, and policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

- b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Potentially Significant Impact. CEQA Guidelines section 15064.3, subdivision (b) describes specific considerations for evaluating a project’s transportation impact. Generally, Vehicle Miles Traveled (VMT) is the most appropriate measure of transportation impacts. Per CEQA Guidelines section 15064.3, subdivision (b), a project’s effect on automobile delay shall not constitute a significant environmental impact unless the proposed project is a transportation project affecting roadway capacity.

As mentioned previously, the City of Long Beach published updated TIA Guidelines in June 2020 which provide direction for review consistent with the General Plan Mobility Element and identifying the format and methodology that is generally required to be utilized in preparing traffic studies. A TIA is generally required when there is a potential for significant transportation impact under a local policy or CEQA.

49 City of Long Beach, General Plan- Mobility Element, October 15, 2013, http://www.longbeach.gov/globalassets/lbds/media-library/documents/planning/advance/general-plan/320615_lbds_mobility_element_web, Accessed January 26, 2021.

As noted in **Question 17.a**, development of the Project would result in the generation of additional vehicular traffic in the area and region and additional analysis is needed to determine the consistency of the Project with CEQA Guidelines section 15064.3, subdivision (b) related to Vehicle Miles Traveled (VMT) that will be generated by the Project.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Potentially Significant Impact. The Project proposes a new traffic signal at the primary entrance to the site on Wardlow Road and an emergency access would be provided at the intersection of Baker Street and Golden Avenue. The location of the proposed entrances and the proposed new traffic signal would require additional analysis to determine if increase hazards due to a geometric design feature or incompatible uses would occur. Additional studies is needed to determine the Project impacts on increasing hazards due to a geometric design feature or incompatible uses.

d) Result in inadequate emergency access?

Potentially Significant Impact. To address fire and emergency access needs, the Project includes the establishment of an emergency access entrance in addition to the primary entrance and an established network of emergency vehicle access routes, which would connect to the existing street network. New fire lanes would be developed concurrent with housing development to ensure adequate emergency access is maintained throughout implementation of the Project. Future development projects under the Project would be required to incorporate all applicable design and safety requirements from 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 2016 California Fire Code. The City and LBFD would be responsible for reviewing Project compliance with related codes and standards prior to issuance of building permits. Review from the City’s Department of Public Works would also be required for building plan check and traffic control plan review.

Additionally, during the building plan check and development review process, the City would coordinate with the LBFD and LBPD to ensure that the necessary fire prevention and emergency response features are incorporated into the Project, and that adequate circulation and access (e.g., adequate turning radii for fire trucks) is provided in the traffic and circulation components of the Project. However, as mentioned in **Question 17.a**, the Project would cause increased traffic in the local area and impacts on emergency access could potentially be significant. Additional analysis is needed to determine the effects of the Project impacts on emergency access.

18. TRIBAL CULTURAL RESOURCES

	<i>Less Than Significant</i>			
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k), or
-

Potentially Significant Impact. A records search was conducted, which included the Project Site and a quarter-mile radius, for the purpose of identifying any known cultural resources within the vicinity of the Project Site. The records search included a review of the Office of Historic Preservation Archaeological Determination of Eligibility, the Office of Historic Preservation Directory of Historic Properties Data File, and a literature review by the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

The records search indicated that the Project Site has been developed since the 1950s and historical archaeological resources may exist on site (**Appendix C**). Additional study is needed to determine the Project's effect on archaeological resources.

- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.
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Potentially Significant Impact. AB 52 establishes a formal consultation process for California Native American as specified in AB 52, lead agencies must provide notice to tribes that are traditionally and

culturally affiliated with the geographic area of a Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

AB 52 consultation letters were sent out on January 28, 2020, by the City to contacts on a list provided by the Native American Heritage Commission, and the 30-day period for responses ended on March 2, 2020. Copies of the AB 52 consultation letters are provided in **Appendix H** of this Initial Study. A request for consultation was received from the Gabrieleno Band of Mission Indians-Kizh Nation dated February 3, 2020. This letter can be found in **Appendix I** of this Initial Study. Due to the unusual circumstances surrounding the COVID-19 pandemic, an in-person consultation was not conducted. However, continuous consultation including phone calls and emails were conducted to ensure sufficient consultation took place.

In April 2020, the City received the *Protection of Tribal Cultural Resources (TCRs) Letter* including mitigation measures recommended by the Gabrieleño Band of Mission Indians—Kizh Nation. The letter can be found in **Appendix J** of this Initial Study. The Draft EIR will incorporate information from this consultation to determine the effect of the Project on TCRs.

19. UTILITIES AND SERVICE SYSTEMS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water draining, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>Potentially Significant Impact.</u> Development of the Project would the extension of existing utility systems to the site. Additional analysis is needed to determine if construction of the utilities needed to serve the Project would result in any significant environmental effects.				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>Potentially Significant Impact.</u> The proposed Project would increase water demand in the Cit. Additional analysis is needed to determine if the City’s water supplies are sufficient to serve the Project and other projected growth.				
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>Potentially Significant Impact.</u> As discussed in Question 19 a) , Development of the Project would generate an estimated 624 residents and provide 5-acres of recreational open space. The additional residents to be generated by the Project and nearby multi-family developments would require additional utilities and resources that currently does not exist on the vacant Project Site. Therefore, additional analysis to determine the effect of the Project and other nearby housing projects on existing wastewater treatment facilities is needed.				
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Potentially Significant Impact. As discussed in **Question 19 a)**, Development of the Project would generate an estimated 624 residents and provide 5-acres of recreational open space. The additional residents to be generated by the Project and nearby multi-family developments would require additional utilities and resources that currently does not exist on the vacant Project Site. Therefore, additional analysis to determine the effect of the Project and other nearby housing projects on existing solid waste infrastructure and solid waste reduction goals is needed.

e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Potentially Significant Impact. Development of the Project would result in the generation of additional solid waste. Additional analysis is needed to determine the consistency of the Project with applicable solid waste statutes and regulations. generate an estimated 624 residents and provide 5-acres of recreational open space. The additional and regulations is needed.

20. WILDFIRE

	<i>Less Than Significant</i>		
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, Would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Wildland fire protection in California is the responsibility of either the local government, State, or the federal government. State Responsibility Areas (SRA) are the areas in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA forms one large area over 31 million acres to which the California Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services.

Local responsibility areas (LRA) include incorporated cities, cultivated agriculture lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government.⁵⁰ LBFD provides fire protection and emergency medical services to the County. CAL FIRE uses an extension of the SRA Fire Hazard Severity Zone model as the basis for evaluating fire hazard in LRAs. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area. Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in an LRA. The Project Site is not in or near an SRA or LRA or lands classified as FHSZ. The nearest FHSZ is approximately 6.9 miles to the southwest at Rolling Hills Estates.⁵¹

As such, the Project would not impair an adopted emergency response plan or emergency evacuation plan and no impacts would occur, no mitigation measure is required.

50 CALFIRE, Fire Hazard Severity Zones Maps, <https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>, accessed May 2020.
 51 CALFIRE, FHSZ Viewer, <https://egis.fire.ca.gov/FHSZ/>, accessed May 2020.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As previously discussed, the Project Site is not in or near an SRA or LRA or lands classified as FHSZ.⁵² As such, slope, prevailing winds, or other factors would not exacerbate wildfire risks or contribute toward the uncontrolled spread of a wildfire and no impact would occur, no mitigation measure is required.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project Site is not in or near an SRA or LRA or lands classified as FHSZ.⁵³ While development would involve infrastructure improvements along streets adjacent to the Project Site, improvements would not be located in or near wildfire areas. Therefore, the Project would not require additional roads, fuel breaks, emergency water sources, power lines or other utilities that would exacerbate fire risk and no temporary or ongoing impacts to the environment would occur. The project would have no impacts on installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment, no mitigation measures is required.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is not in or near an SRA or LRA or lands classified as FHSZ.⁵⁴ Therefore, development would not expose people or structures downslope or downstream from the Project Site to substantial risks resulting from wildfires, such as flooding or landslides. No impact would occur and no mitigation measures would be required.

52 CALFIRE, FHSZ Viewer, <https://egis.fire.ca.gov/FHSZ/>, accessed May 2020.

53 CALFIRE, FHSZ Viewer, <https://egis.fire.ca.gov/FHSZ/>, accessed May 2020.

54 CALFIRE, FHSZ Viewer, <https://egis.fire.ca.gov/FHSZ/>, accessed May 2020.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact with Mitigation Incorporated. As described in **Section 4: Biological Resources**, construction of the Project would occur over the entire Project Site which is currently vacant. As identified in the **Appendix A: Biological Resources Constraints Analysis**, a review of the Community Natural Diversity Database (CNDDDB) identifies 124 biological resources listed as sensitive and reported in the area contained in the 9 USGS quadrangle topographic maps containing the site and the surrounding area. Of these sensitive species, 23 are listed as threatened or endangered. Additionally, the Crotch’s bumblebee is a State Candidate for listing as Endangered. Since the Project would utilize the entire area of the 20-acre site and modify the existing vegetation, including trees which may be used as nesting habitat, additional analysis is required to determine the potential impact of the Project on the natural resources on-site.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with impacts from other development in the surrounding area to result in impacts that are greater than the impacts of the Project alone. Located within the Project vicinity are other current and reasonably foreseeable projects whose development, in conjunction with that of the Project, may contribute to potential cumulative impacts. Specifically, the Long beach Riverlink project is directly west of the Project Site abutting the Los Angeles River. Additionally, the LA River Master Plan is currently in the planning phase and the draft plan was published on January 13, 2021. Impacts of the Project on both an individual and cumulative basis would be addressed in an EIR.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. As indicated by the analyses provided in this document, the Project could produce potentially significant impacts with regard to air quality, geology and soils, greenhouse gas emissions, hazardous waste, hydrology and water quality, land use and planning, noise, and transportation. As a result, these potential effects would be analyzed further in an EIR.

APPENDICES

Appendix A: Biological Resources Constraints Analysis

Appendix B: Preliminary Drainage Study

Appendix C: Cultural Resources Inventory Records Search

Appendix D: Geohazards Report

Appendix E: Natural History Museum Paleontological Resources Records Search

Appendix F: Document Review- Remedial Action Plan

Appendix G: Conceptual LID BMP Calculations

Appendix H: AB 52 Consultation Letters

Appendix I: Gabrieleno Band of Mission Indians- Kizh Nation: Request For Consultation

Appendix J: Protection of Tribal Cultural Resources (TCRs) Letter

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TERMS, DEFINITIONS, AND ACRONYMS

AB	Assembly Bill
ADA	Americans with Disabilities Act
af	acre feet
AQMP	Air Quality Management Plan
ARFVTP	Alternative and Renewable Fuel and Vehicle Technology Program
Bgs	below ground surface
BMPs	best management practices
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
CAFE	Corporate Average Fuel Economy
CAO	Cleanup Abatement Order
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFS	cubic feet per second
CGS	California Geologic Survey
CH ₄	methane
CS	Commercial Storage
CO ₂	carbon dioxide
COC	Contaminants of Concern
CNDDDB	Community Natural Diversity Database

CPT	Cone Penetration Test
CUPA	Certified Unified Program Agency
DWQ	Division of Water Quality
DU	Dwelling Unit
DTSC	Department of Toxic Substances Control
FCN	Founding and Contemporary Neighborhood
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Safety Zone
FIRM	Flood Insurance Rate Map
GHG	greenhouse gas
I (I-)	Interstate freeway
JWPCP	Joint Water Pollution Control Plant
LACM	Natural History Museum of Los Angeles County
LARWQCB	Los Angeles Regional Water Quality Control Board
LBMC	Long Beach Municipal Code
LBDHHS	Long Beach Department of Health and Human Services
LBER	Long Beach Energy Resources Department
LBFD	Long Beach Fire Department
LBPD	Long Beach Police Department
LBWRP	Long Beach Water Reclamation Plant
LBUSD	Long Beach Unified School District
LBWD	Long Beach Water Department
LCWRP	Los Coyotes Water Reclamation Plant
LEED	Leadership in Energy and Environmental Design

LID	Low Impact Development
LRA	Local Responsibility Area
LUD	Land Use District
MET	Mental Evaluation Team
MMcf	millions of cubic feet
Mgd	million gallon per day
MRZ	Mineral Resource Zone
MWD	Metropolitan Water District
Mw	Magnitude
NHMLA	Natural History Museum Los Angeles
N2O	nitrous oxide
NPDES	National Pollutant Discharge Elimination System
PM _{2.5}	fine particulate matter
PM ₁₀	inhalable particles, with diameters that are generally 10 micrometers and smaller
PRC	Public Resource Code
R-1-N	Single Family Residential Standard Lot
RAP	Remedial Action Plan
PUD	Planned Unit Development
RWQCB	Regional Water Quality Control Board
RTP	Regional Transportation Plan
SB	Senate Bill
SCAG	Southern California Association of Governments
SCE	Southern California Edison
SCAQMD	South Coast Air Quality Management District

SCCIC	South Central Coastal Information Center
SCS	Sustainable Communities Strategy
SRA	State Responsibility Area
SVE	Soil Vapor Extraction
SWAT	Special Weapons and Tactics
SWPPP	Stormwater Pollution Prevention Plan
TCR	Tribal Cultural Resources
TIA	Traffic Impact Analysis
USFWS	U.S. Fish and Wildlife Service
USGS	United States Geological Survey
USPS	United States Postal Service
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled
WQMP	Water Quality Management Plans



I.2a

Notice of Preparation (NOP)





Notice of Preparation

TO: Agencies, Organizations, and Interested Parties

FROM: City of Long Beach Development
Services 411 W. Ocean Boulevard
Long Beach, CA 90802
Contact: Amy L. Harbin, Planner, Development Services Department

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report and Public Scoping Meeting for the Long Beach RiverPark Residential Project

Pursuant to Public Resources Code Section 21165 and the California Environmental Quality Act Guidelines (CEQA Guidelines) Section 15050, the City of Long Beach (City) is the Lead Agency responsible for preparation of an Environmental Impact Report (EIR) addressing potential impacts associated with the proposed Project.

The purpose of this notice is: (1) to serve as a Notice of Preparation (NOP) of an EIR pursuant to the CEQA Guidelines Section 15082; (2) to advise and solicit comments and suggestions regarding the scope and content of the EIR to be prepared for the proposed Project; and (3) to serve as a notice of a Public Scoping Meeting to be held by the City. The City, as Lead Agency, respectfully requests that any Responsible or Trustee Agency responding to this notice respond in a manner consistent with State CEQA Guidelines Section 15082(b). Comments and suggestions should, at a minimum, identify the significant environmental issues, reasonable alternatives, and mitigation measures that should be explored in the EIR, in addition to whether the responding agency will be a responsible or trustee agency for the proposed Project, and any related issues raised by interested parties other than potential responsible or trustee agencies, including interested or affected members of the public.

PROJECT TITLE: Long Beach RiverPark Residential Project

PROJECT LOCATION: The proposed Project is located on an approximately 20-acre Project site, which was formerly a facility used to treat production water from oil wells in the City of Long Beach. The Project site is located in the neighborhood of Wrigley Heights in the City of Long Beach, within Los Angeles County. The Project site borders the Los Angeles River to the west, Interstate 405 (I-405) to the north, Golden Avenue to the east, and Wardlow Road to the south.

Regional access to the project area is provided by I-405 and Interstate 710 (I-710). I-405 runs east-west and connects to the regional roadway on Pacific Avenue east of the Project site, while I-710 runs north-south and connects to Wardlow Road south of the Project site (N/B on-ramp and S/B off-ramp only).

PROJECT DESCRIPTION: The Project Applicant, Integral Communities, proposes a residential development project on 20 acres of vacant land in the neighborhood of Wrigley Heights in the City of Long Beach. The gated residential development will include 226 single-family detached and attached homes, with 11 affordable housing units. The residential project will include a mix of single-family detached homes, carriage townhouses, row townhouses, streets, parking areas, and open space with built in trails. Three quarters of the site will be used for residential development at approximately 15 acres, and 5 acres of the site will be used for open space with recreational facilities. The primary components of the development area are further divided into single-family

lots with 74 condominium units, carriage townhouses with 53 dwelling units, row townhouses with 99 dwelling units, and 510 parking spaces for both residents and guests. The site will be remediated prior to construction according to a Remediation Action Plan approved by RWQCB.

POTENTIAL ENVIRONMENTAL EFFECTS: Potentially significant adverse environmental impacts associated with the proposed Project include Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, and Transportation. These topics will be addressed in the EIR. In addition, the EIR will describe and evaluate project alternatives that may reduce or avoid any identified significant adverse impacts of the project. Unless new information identifying other potential impacts is presented during the scoping process, the following topics will not be discussed further in the EIR: Aesthetics, Agriculture and Forestry, Energy, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities, and Wildfire.

PUBLIC REVIEW PERIOD: Pursuant to CEQA Guidelines Section 15082, responsible and trustee agencies and other interested parties, including members of the public, must submit any comments in response to this notice no later than 30 days after receipt. The Notice of Preparation (NOP) and accompanying Initial Study are available for a 30-day public review period beginning **February 25, 2021** and ending **March 29, 2021**.

Due to the COVID-19 pandemic, all City facilities including City Hall and the Libraries have been closed until further notice. The Initial Study, proposed Negative Declaration, and supporting materials are available for public review on the City's website at: <http://www.longbeach.gov/lbds/planning/environmental/reports/> and at the State Clearinghouse website at: <https://ceqanet.opr.ca.gov>

Additionally, a copy of the NOP was published in the Long Beach Press Telegram.

RESPONSES AND COMMENTS: The City will accept written comments only during the aforementioned public review period. Please indicate a contact person for your agency or organization and send your written comments to Amy Harbin, Planner, Development Services Department, of the City of Long Beach at the above address, or by e-mail at LBDS-EIR-Comments@longbeach.gov

SCOPING MEETING: As a part of the NOP process, the City will conduct a Public Scoping Meeting in order to present the proposed Project and environmental process and to receive public comments and suggestions regarding the proposed Project. The Scoping Meeting will be held via webconference per Executive Order N-25-20, signed by the California governor Gavin Newsom.

Meeting Information

Date: March 24th, 2021

Time: 5:00 pm to 7:00 pm

Meeting Link:

<https://longbeachcity.webex.com/longbeachcity/onstage/g.php?MTID=ef60c06607793aa1b8d41c6ba02555adf>

Event Passcode: scope

Call In Number: 408-418-9388 | Access Code: 187 638 8067

If you are interested in receiving project updates and future notices please provide your contact information to the City and ask to be put on the notice list. Please send your name, e-mail, phone number, and address by e-mail to LBDS-EIR-Comments@longbeach.gov. Put 'Long Beach RiverPark' in the subject line.



1.2b

Revised Notice of Preparation (Revised NOP)





Notice of Preparation—UPDATED

TO: Agencies, Organizations, and Interested Parties

FROM: City of Long Beach
Department of Development Services, Planning Bureau
411 W. Ocean Blvd., 3rd Floor
Long Beach, CA 90802

Contact: Amy L. Harbin, Planner, Development Services Department

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report and Public Scoping Meeting for the Long Beach River Park Residential Development Project

Pursuant to Public Resources Code Section 21165 and the California Environmental Quality Act Guidelines (CEQA Guidelines) Section 15050, the City of Long Beach (City) is the Lead Agency responsible for preparation of an Environmental Impact Report (EIR) addressing potential impacts associated with the proposed Project.

The purpose of this notice is: (1) to serve as a Notice of Preparation (NOP) of an EIR pursuant to the CEQA Guidelines Section 15082; (2) to advise and solicit comments and suggestions regarding the scope and content of the EIR to be prepared for the proposed Project; and (3) to serve as a notice of a Public Scoping Meeting to be held by the City. The City, as Lead Agency, respectfully requests that any Responsible or Trustee Agency responding to this notice respond in a manner consistent with State CEQA Guidelines Section 15082(b). Comments and suggestions should, at a minimum, identify the significant environmental issues, reasonable alternatives, and mitigation measures that should be explored in the EIR, in addition to whether the responding agency will be a responsible or trustee agency for the proposed Project, and any related issues raised by interested parties other than potential responsible or trustee agencies, including interested or affected members of the public.

PROJECT TITLE: River Park Residential Development Project

PROJECT LOCATION: The proposed Project is located on an approximately 20-acre Project site, which was formerly a facility used to treat production water from oil wells in the City of Long Beach. The Project site is located in the neighborhood of Wrigley Heights in the City of Long Beach, within Los Angeles County. The Project site borders the Los Angeles River to the west, Interstate 405 (I-405) to the north, Golden Avenue to the east, and Wardlow Road to the south.

Regional access to the project area is provided by I-405 and Interstate 710 (I-710). I-405 runs east-west and connects to the regional roadway on Pacific Avenue east of the Project site, while I-710 runs north-south and connects to Wardlow Road south of the Project site (N/B on-ramp and S/B off-ramp only).

PROJECT DESCRIPTION: The Project Applicant, Integral Communities, proposes a residential development project on 20 acres of vacant land in the neighborhood of Wrigley Heights in the City of Long Beach. The gated residential development will include 226 single-family detached and attached homes, with 11 affordable housing units. The residential project will include a mix of single-family detached homes, carriage townhouses, row townhouses, streets, parking areas, and open space with built in trails. Three-quarters of the site will be used for residential development at approximately 15 acres, and 5 acres of the site will be used for open space with recreational facilities. The primary components of the development area are further divided into single-family lots with 74 condominium units, carriage townhouses with 53 dwelling units, row townhouses with 99 dwelling units,

and 510 parking spaces for both residents and guests. The site will be remediated prior to construction according to a Remediation Action Plan approved by RWQCB.

POTENTIAL ENVIRONMENTAL EFFECTS: Potentially significant adverse environmental impacts associated with the proposed Project include Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Recreation, Tribal Cultural Resources, Utilities, and Transportation. These topics will be addressed in the EIR. In addition, the EIR will describe and evaluate project alternatives that may reduce or avoid any identified significant adverse impacts of the project. Unless new information identifying other potential impacts is presented during the scoping process, the following topics will not be discussed further in the EIR: Agriculture and Forestry, Energy, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, and Wildfire.

PUBLIC REVIEW PERIOD UPDATED: Pursuant to CEQA Guidelines Section 15082, responsible and trustee agencies and other interested parties, including members of the public, must submit any comments in response to a Notice of Preparation no later than 30 days after receipt, unless the comment period is extended. The NOP and accompanying Initial Study are available for an extended public review period, which began **February 25, 2021 and has been extended from the initial closure date of March 29, 2021, to April 12, 2021 at 4:30pm.**

Due to the COVID-19 pandemic, all City facilities including City Hall and the Libraries have been closed until further notice. The Initial Study, proposed Negative Declaration, and supporting materials are available for public review on the City's website at: <http://www.longbeach.gov/lbds/planning/environmental/reports/> and at the State Clearinghouse website at: <https://ceqanet.opr.ca.gov>

Additionally, a copy of the updated NOP was published in the Long Beach Press Telegram.

RESPONSES AND COMMENTS: The City will accept written comments only during the aforementioned public review period. Comments must be submitted via letter or email to the contact below. Comments made via other means, including social media, or delivered to other recipients, will not be accepted or considered. Please indicate a contact person for your agency or organization and send your written comments to Amy Harbin, Planner, Development Services Department, of the City of Long Beach at the above address, or by e-mail at:

LBDS-EIR-Comments@longbeach.gov

SCOPING MEETING: As a part of the NOP process, the City will conduct a Public Scoping Meeting in order to present the proposed Project and environmental process and to receive public comments and suggestions regarding the proposed Project. The Scoping Meeting will be held via web conference per Executive Order N-25-20, signed by the California governor Gavin Newsom.

Meeting Information

Date: April 8, 2021

Time: 5:00 pm to 7:00 pm

Meeting Link: <https://longbeachcity.webex.com/longbeachcity/onstage/g.php?MTID=e96afbc153c7e2daa4b6be40d848afc7b>

Event number: 187 638 8067

Event password: scope

If you are interested in receiving project updates and future notices please provide your contact information to the City and ask to be put on the notice list. Please send your name, e-mail, phone number, and address by e-mail to LBDS-EIR-Comments@longbeach.gov. Put 'River Park Project' in the subject line.

Long Beach RiverPark Residential Project INITIAL STUDY PUBLIC COMMENTS

To: Amy Harbin, AICP, Planner
Long Beach Development Services, Planning

RE: Initial Study Comments regarding the Long Beach RiverPark Residential Project at 712 Baker Street

Dear Ms. Harbin,

Please include my comments for the Initial Study for the Draft Environmental Impact Report (EIR) on this proposed project.

This proposed project will have significant impacts in numerous areas referenced in the Initial Study as noted below.

Aesthetics

Yes, there will be Potentially Significant Impacts. The assessment that aesthetics would be less than significant is false. The minimal open space the project may provide is absolutely no substitute for broad scenic vistas and unobstructed, solemn, unrestricted, natural spaces which are the unique aspects open space along the river provides.

In addition, the continuity of access to the LA River is critical for the numbers of individuals and families that travel along the river in various modes of transportation. Each requires an independent, safe and contiguous, unobstructed access. This project impedes on the intent of numerous LA River plans, including RiverLink, the Lower LA River Revitalization and several others.

Open and green space along the River is anticipated in numerous planning documents and legislative efforts. The health of our community, the River and the Bay require open space.

Watershed and healthy access is grossly inhibited by continuing to concrete over and develop our last remaining open space. This project contributes to the heat island effect and climate change incrementally as all poor land use decisions do. This area must remain open space.

Residents should not have to drive to a scenic highway when they have access nearby. Why destroy what is here and what is available. We should not have to travel any distance for scenic views if they exist right here right now. The real issue is in destroying open space and habitat.

I agree that this project will substantially degrade the existing visual character of public view, its surrounding and access to same.

Long Beach RiverPark Residential Project

INITIAL STUDY PUBLIC COMMENTS

Air Quality

Yes, there will be Potentially Significant Impacts. In the early 2000's a final EIR was rejected by the City Council for a self storage and RV parking site where this housing project is proposed. The rejection was due to traffic impacts which of course contribute to known extensive air quality issues that already exist along the I710. This site also is dangerously close to the SR405.

The combination of traffic and air quality impacts caused by multiple mobile and stationary sources (the ports of Long Beach and Los Angeles, several freeways and refineries) make any development a contributor to more severe air quality, traffic and noise causing even greater health risks.

On the west side of Long Beach health risks are heightened, asthma rates are very high and life expectancy is decreased due to these uses. That is specifically why the project should not be permitted to add to it. In conjunction with a planned self-storage and RV parking site for nearly 600 vehicles right across the street from Baker both projects will be major contributors to these issues. Both should never be permitted. Open space is what the city needs for the west side to ameliorate some of these continues. Taking away open space for concrete and buildings will not help these issues. They will exacerbate them.

Tailpipe emissions do contribute to toxins in the air and odors. They are significant, not less than.

This project is will only make so many issues so much worse for this area of the city and should never be permitted to advance.

Biological Resources

Yes, there will be Potentially Significant Impacts as stated. We continue to destroy habitat for important flora and fauna. There are very limited opportunities to retain the type of habitats that exist along the LA River. We need to be responsible to ensure we retain and improve these habitats. We can no longer continue to remove them. We continue to put species at risk. It has to stop for our own health and sustainability. We need to improve environments, not destroy them.

This project will cause the loss of significant habitat. The LA River offers resources for a large variety of bird species according to the Audubon Society. Anyone that regularly frequents the river is aware of the various birds utilizing the river and it's natural growth, even with the unfortunate concrete bottom and sides. The loss of that natural habitat makes any habitat along the river that much more critical for the survival and health of the flora and fauna that exist and could be made to flourish even more if extensive efforts were made to better clean up toxins in the soil. Natives need to be cultivated in this unique environment.

Long Beach RiverPark Residential Project INITIAL STUDY PUBLIC COMMENTS

There are numerous sea birds including sea gulls and others such as white egrets and great blue herons that are absolutely magnificent that frequent the river that are not on the very puny list of Bird Species in Table 4.5. Please contact the Audubon Society for a more complete field study.

If the list of birds is lacking since they populate in close proximity to this specific site. I would suggest that the list of other species is also lacking requiring a much more robust review. If remediated and rehabilitated there is no reason to believe that this project site would better serve as habitat for the natural environment than the proposed housing use which can be placed in less sensitive areas.

Contrary to your comment that there will be no impact on riparian habitat, if the site were properly and extensively evaluated for open space and improved accordingly a variety of habitats would be restored and species would return and flourish. It is our responsibility to do that. Because this site has not yet been rehabilitated does not mean it can not be. The project will only eliminate any possibility of rehabilitation. We need more habitat for a full range of species. The option for open space must be extensively explored because of its important to the region.

Any effort to remove potential sites for habitat will only add to a huge number of issues. We can bring back more species to benefit the region in a variety of habitats if the site is more appropriately rehabilitated back to its natural state – long before the destructive industrial uses. This will enhance the health of the entire region – for the flora, fauna, community, river, water and bay. We can not continue to chip away at these valuable resources. Their potential has not yet been addressed but certainly can be if given the opportunity. Funding is available. This is the intent of all of the LA River plans and RiverLink. The housing project will cause irreversible damage to this effort and potential habitat.

Humans can do better in protecting the few remaining open spaces with such close and important access to water. Water is the life source. It is absolutely critical for the survival of every species. The river can sustain an incredible ecosystem if the effort is made. The potential for an improving ecosystem is much greater than the permanent destruction and concreting over these lands can do. These encroachments must be stopped along the river.

In fact, the current councilmember representing this area requested funding for a park in this very site in 2017.

<https://www.google.com/amp/s/www.prestelegram.com/2016/05/18/long-beach-to-seek-funding-for-wrigley-heights-land-purchase/amp/>

“Long Beach’s city government will try to figure out whether officials can come up with the \$20 million or so that may be required to buy now-vacant oil company land that Councilman Roberto Uranga [wants to transform into a park](#).”

Long Beach RiverPark Residential Project INITIAL STUDY PUBLIC COMMENTS

“The City Council voted 8-0 Tuesday night to assign the City Manager’s office to the task of seeking funding to acquire the land, which is currently in the city’s Wrigley Heights neighborhood, southeast of where the 405 and 710 freeways meet.

“ ‘We have an opportunity for the city to increase our park space,’ Uranga said during the meeting.”

Cultural Resources

Yes, there will be Potentially Significant Impacts. The Horse Overlay protected zone recognizes culturally significant equestrian lifestyle dating from the 1700s - Spanish and 1800’s Rancho periods in California History. The culture requires low density with access to the river open spaces and regional trail system that is a critical mobility corridor between the communities. Access and trail continuity throughout the length of the River is absolutely critical for this community.

This location is culturally significant and removal of the zone and reduction of its open space, in any manner, will cause negative consequence to the equestrian communities to the south, north and in the region.

Since the LA River was and is a major source of water for early inhabitants there is no doubt that there are areas along the river that may have important historical artifacts, tools, elements, possible early settlements that could require archaeological, that will help us to better understand the life and activities of these people, whether tribal, ranchers, or farmers or even travelers along the River since the river equestrian trail has been in existence and use since the early 1700’s. Doubtless there are remnants of these visitors, travelers, and their purpose and activities that exist in the vicinity that will better inform the cultural and historical record.

We must consider the river would have been a major transportation corridor from the shore to markets in early Los Angeles and other early settlements. Given conflicts in early settlements it possible that human remains could be found along the river trails or along the river itself – where accessible and not concreted over for flood control purposes. There are considerations for naturalizing elements of the river in the future as a part of the LA River Revitalization efforts.

Geology and Soils

Yes, there will be Potentially Significant Impacts. There is likely unstable soils due to extensive oil waste that was dumped into the site over several decades with the likelihood that the consistency of dumped material, even with some evaporation is the consistency of toothpaste in some places as has been confirmed at the sister site used for the same purpose on the north side of Baker Street at 3701 Pacific Place as confirmed in several studies conducted at that site.

Long Beach RiverPark Residential Project

INITIAL STUDY PUBLIC COMMENTS

Greenhouse Gas Emissions

Yes, there will be Potentially Significant Impacts as stated. In the early 2000's a final EIR was rejected by the City Council for a self storage and RV parking site where this housing project is proposed. The rejection was due to traffic impacts which of course contribute to known extensive air quality issues that already exist along the I710. This site also is dangerously close to the SR405. Of course housing will be much more travel intense than a storage facility. The project should not be permitted in this location.

The combination of traffic and air quality impacts caused by multiple mobile and stationary sources (the ports of Long Beach and Los Angeles, several freeways and refineries) make any development a contributor to more severe air quality, traffic and noise causing even greater health risks.

On the west side of Long Beach health risks are heightened, asthma rates are very high and life expectancy is decreased due to these uses. That is specifically why the project should not be permitted to add to it. In conjunction with a planned self-storage and RV parking site for nearly 600 vehicles right across the street from Baker both projects will be major contributors to these issues. Both should never be permitted. Open space is what the city needs for the west side to ameliorate some of these continues. Taking away open space for concrete and buildings will not help these issues. They will exacerbate them.

This project is will only make so many issues so much worse for this area of the city and should never be permitted to advance.

Hazards and hazardous Materials

Yes, there will be Potentially Significant Impacts. This location was a dump site for petroleum products. The soil and site are filled with he decades of petroleum waste dumping in the area from the 1920's to the 1950's. Arsenic and heavy, toxic metals are present as they are in the sister site north of Baker street. The Los Cerritos condominiums just east of the site requires its residents to acknowledge the fact the housing is placed on a site with these issues. The effectiveness may be mitigated, but it is no place to put housing where people live and children play. They are incompatible and a dangerous combination. There have been higher cancer rates and lower life expectancies due to numerous environmental contaminants that are prevalent in the area. Housing should not be allowed at this project site.

There is no guarantee that emissions from the toxic soil and use will be no impact. It is more realistically a Potentially Significant Impact. This matter needs more study and analysis to be conclusive as the issues at this site would be no different than surrounding sites that do have issues from similar historic use.

Long Beach RiverPark Residential Project INITIAL STUDY PUBLIC COMMENTS

Hydrology and Water Quality

Yes, there will be Potentially Significant Impacts. Contaminants and toxins are present in the soil, the water, and in the air we breath, at and near this location and the community is exposed to them. Several studies continue to identify the area along the I710 as some of the worst in the nation. This project cannot be mitigated in that regard. This project must be stopped so that it will not pile on to these issues that have proven to reduce our life expectancy. Putting concrete over the site does not fix all of the literal underlying contamination issues. These sites must be cleaned up for the health of the region. Capped sites may still leak hazardous materials into the water table, river and the bay.

The hydrology of course is altered which affects the health and retention of our water in the region. What we do with our watershed is absolutely critical to the entire Dominguez Watershed. This comment is from “The Greater Los Angeles County Open Space for Habitat and Recreation Plan (Integrated Regional Water Management Plan Update – 2012)”

“If properly preserved, open space will enhance our ability to capture stormwater. Our need for water is increasing as we experience less rain and more urbanization and densification.”

https://dpw.lacounty.gov/wmd/irwmp/docs/Prop84/GLAC_OSHARP_Report_Final.pdf

Table 14. Infiltration and Potential Groundwater Recharge Benefits from Open Space Projects

	Potential Groundwater Recharge Capacity (AF/yr)		
	Habitat	Recreation	Total
North Santa Monica Bay	-	-	-
Upper Los Angeles River	2,000	19,000	21,000
Upper San Gabriel and Rio Hondo	3,000	15,000	18,000
Lower San Gabriel and Los Angeles River	1,000	5,000	6,000
South Santa Monica Bay	-	2,000	2,000
Greater Los Angeles County	6,000	41,000	47,000

Long Beach RiverPark Residential Project INITIAL STUDY PUBLIC COMMENTS

Table 15. Potential Stormwater Quality Benefits from Open Space Projects

	Potential Capture Capacity (AF/yr)		
	Habitat	Recreation	Total
North Santa Monica Bay	200	200	400
Upper Los Angeles River	600	3,900	4,500
Upper San Gabriel and Rio Hondo	900	2,600	3,500
Lower San Gabriel and Los Angeles River	1,100	4,400	5,500
South Santa Monica Bay	800	6,400	7,200
Greater Los Angeles County	3,600	17,000	21,000

The infrastructure to prevent flooding and support additional housing must be addressed as it is historically inadequate near the river. Flooding is common. This is not an ideal use for this location for numerous reasons, that should not be ignored.

Of interest is that a recent Tsunami map of the area indicated there is a risk of adverse impacts from Tsunami. So the event could be considered a Potentially Significant Impact even though the events are rare.

I agree that water management and groundwater replenishment is a major concern with this project.

Land Use and Planning

Yes, there will be Potentially Significant Impacts. This use does conflict with numerous existing plans including:

This project must be weighed against viable and preferred open space and water replenish plans which are critical to our survival and sustainability. A few of these plans are listed below and clearly conclude that the proposed use is not wanted in this location as there are more important land use needs.

1973 Master Plan - LA County

2020 LUE – General Plan- “Wrigley Heights Equestrian Zone will remain”

2020 Lower Los Angeles River Revitalization Plan

2006 LA River Master Plan

2003 Long Beach Riverlink-open space

1996 LA River Master Plan- identified this as open space

Integrated Regional Water Management Plan – Greater Los Angeles Region

Storm Water Best Management Practices

The Greater Los Angeles County Open Space for Habitat and Recreation Plan

(Integrated Regional Water Management Plan Update – 2012)

This property was included in the Countywide Open Space and Recreation Plan completed in 2016, prioritizing the property for acquisition as open space.

Long Beach RiverPark Residential Project INITIAL STUDY PUBLIC COMMENTS

The mayor wrote a letter of support for SB 1374 for a Lower Los Angeles River Recreation and Park District in 2016 – state legislation to support the open space concept.

In the latest General Plan for the city specifically states:

III. The City of Long Beach General Plan Land Use Element Requires Implementation of the Riverlink Plan

Under CEQA, lead agencies must analyze whether a proposed project is inconsistent with applicable land use policies, such as the governing general plan. (Cal. Code Regs, tit. 14 (“CEQA Guidelines”) § 15125, subd. (d).) If substantial evidence supports a fair argument that the proposed project conflicts with the General Plan, then an EIR is required. (*Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 930.) The City of Long Beach General Plan Land Use Element requires implementation of the Long Beach Riverlink Plan. (Exh. G.) Implementation Strategy LU-M-86 requires the City to: “Update and implement the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths and linkages along the east bank of the Los Angeles River, as well as to connect to existing and future parks, open space and beaches along western portions of the City.” (Exh. G, p. 136.) The Project will surely conflict with this implementation measure, as it will foreclose public access and green space on the Project site. Thus, an EIR must be prepared to analyze this significant impact.

Recreation

Yes, there will be Potentially Significant Impacts to eliminate this important site from the continuity of entire river park plan that is to span the entire LA River. Also, is an impact to remove the horse overlay zone that will further remove the recreation and lifestyle opportunities the protective zoning intended to preserve.

It will be a potentially significant impact to disrupt the safe horse trail connectivity and experience for the equestrian community by the reckless addition from this dense development by way of more crossing and merger hazard over and on the historic horse trail, not even mentioned in the IS. The cumulative increase in volumes of added users since 1947 without sufficient signage, education, trail separation and buffers needs to be further evaluated in an EIR – and as suggested in the County Trails Manual, LA River Master Plan, NPS Federal and State recognized guidelines for separation of trail user groups and buffer zones in all cases where the land space allows to maintain SAFE trails and connections. There needs to be a mitigation plan with signage and education to multi-users not aware of or accustomed to the right-of-way horses require, in order to maintain safe recreation and trail connectivity for the horse/bridle trail which serves as the critical mobility corridor for the equestrian community – it needs to be for

Long Beach RiverPark Residential Project INITIAL STUDY PUBLIC COMMENTS

social justice equal to the linear trails available to the bike or walking community of users.

70+ acres is a vast difference than 5 acres here or 11 acres there when looking at the context of the linear continuity of habit, recreation, open space, cultural and historic needs that these lands serve. To develop vast acres of open land, comprised of this and adjacent parcels needs further evaluation and not this project should be the decision

Plus the idea that the County “promise” that they will keep that portion of land outside the channel for parkland when it SHOULD BE KEPT THAT WAY ANYWAY is like dangling a carrot when the whole bunch is what should be preserved and seems pitiful from the agency supposed to be embracing the concept of collaboration when planning in the 1 mile zone along the sensitive river environmental corridor and not a compromise sufficient to mitigate the cumulative loss development of these lands would create and it has the potential to become **an urban forest and that option needs further consideration in an EIR.**

Tribal Cultural Resources

There will be potentially significant impact for the native Tongva who must be allowed to be involved in this process due to the high potential the site will contain burial and artifact finds.

Also the applicant is requesting removed of the horse overlay that was applied to the entire zone which will cause negative impacts to several established communities with a negative impact to cultural resources.

Utilities and Service Systems

This is a potentially significant impact and further analysis of the load capacity for the known undersized storm drains, use of overland “BASINS” in lieu of storm drain pipes as well as other utilities, fresh water needs, police, fire, EMS service the project plans to tie into need to be further evaluated.

This project is wrong for this site. It must be open space and seriously studied for that purpose.

Respectfully Submitted,

Laurie Angel

RiverPark Coalition, Board of Directors

Jane Addams Neighborhood Association, Board member

From: [Amy Harbin](#)
To: [LBDS-EIR-Comments](#)
Subject: FW: Initial Study for Draft EIR for the Long Beach River Park Residential Development Project
Date: Monday, April 12, 2021 5:02:43 PM
Attachments: [712 Baker St Initial Scoping Angel Comments 12 Apr 2021.docx](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)

Hi Laurie,

There was a typo in the LBDS email address, I forwarded your email from mine to that address.

Your comment has been received.

Amy

Amy L. Harbin, AICP
Planner

Long Beach Development Services | Planning

411 W. Ocean Blvd., 3rd Fl. | Long Beach, CA 90802
Office: 562-570-6872



To help balance the City's budget during this economic downturn, some services are closed on alternating Fridays for staff furloughs (unpaid time off). These furloughs affect many operations in all City Departments and help prevent significant service reductions to the community. To see a schedule of impacted service days, visit www.longbeach.gov/furlough. We appreciate your patience and understanding.

From: Laurie C. Angel <lcangel2012@gmail.com>
Sent: Monday, April 12, 2021 4:25 PM
To: LBDS-EIR-Comments@logbeach.gov
Cc: Amy Harbin <Amy.Harbin@longbeach.gov>
Subject: Initial Study for Draft EIR for the Long Beach River Park Residential Development Project

-EXTERNAL-

Dear Ms. Harbin,

Please see my comments in the attached work document.

Respectfully Submitted,

Laurie Angel

From: [Ang C](#)
To: [LBDS-EIR-Comments](#)
Subject: 712 Baker St
Date: Monday, April 12, 2021 12:55:14 PM

-EXTERNAL-

Dear Long Beach Development Services

I am a resident of upper west Long Beach and I am against the proposal of building the gated community for 712 Baker St. Our community is in need of green space and building the River park is what we need. We live in the death corridor because of oil refineries and surrounding freeways. My community of western Long Beach needs access to green space just like the eastern side of Long Beach. We want to have a chance for park equity and clean air. Please honor and safeguard the protected 1977 Horse Overlay District. Also honor the 2007 Long Beach Riverlink Plan that was passed unanimously by the LB city council in 2015. The continued loss of much needed open space must be halted. We are so poor in green space in this side of Long Beach. Please help my community build the River park, not a gated community.

Sincerely

Angeline Cancino
3333 Fashion Ave
Long Beach Ca 90810

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

March 26, 2021

Amy L. Harbin, AICP
City of Long Beach Development Services
411 W. Ocean Boulevard
Long Beach, CA 90802

RE: Long Beach RiverPark Residential Project –
Notice of Preparation (NOP)
SCH# 2021020492
GTS# 07-LA-2021-03507
Vic. LA-405 PM 7.302
Vic. LA-710 PM 9.052

Dear Amy Harbin,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project proposes a residential development on 20 acres of vacant land in the neighborhood of Wrigley Heights in the City of Long Beach. The gated residential development will include 226 single-family detached and attached homes, with 11 affordable housing units. The residential project will include a mix of single-family detached homes, carriage townhouses, row townhouses, streets, open space, and 510 parking spaces for both residents and guests. Five acres of the site will be used for open space with recreational facilities. The site will be remediated prior to construction according to a Remediation Action Plan approved by RWQCB.

The nearest State facilities to the proposed project are I-405 and I-710. After reviewing the NOP, Caltrans has the following comments:

Currently the project is designed with a single land-use type (residential) and an excessive amount of car parking, both of which have been shown to induce a higher number of vehicle trips per household. The Lead Agency is encouraged to integrate transportation and land use in a way that reduces Vehicle Miles Travelled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use. Caltrans recommends the following to more effectively address the significant VMT that this project will create as currently proposed:

- 1) Provide for a mixture of land use types within the Project's new zoning area to allow for adaptive reuse in the future. This can allow goods, services, and jobs to be created closer to where the project's residents live.

- 2) Reduce the amount of parking whenever possible, as abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building too much parking.
- 3) Improve connections to existing active transportation and transit infrastructure, such as the LA River Trail to the west and the Metro A (Blue) Line Wardlow station to the east. This can be done with robust signage, wayfinding, safety improvements, and human scale amenities. Additionally, the most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing.
- 4) Gated developments divide communities, limit transportation choices, and increase VMT. For these reasons they should be avoided. If walls are still to be allowed, numerous gates and access points should be provided for people walking or riding bicycles to be able to reach their homes and other destinations.

The five acres of active open space located at the north end of the Project area is abutting Caltrans right-of-way. Please be aware that any work on or adjacent to Caltrans Right-of-Way will require an Encroachment Permit and that transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

Caltrans looks forward to the forthcoming Draft Environmental Impact Report to confirm that the Project will result in a net reduction in Vehicle Miles Traveled.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2021-03507.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

April 9, 2021

To: Amy Harbin, Development Services

Re: Scoping Comments on the Initial Study for the planning gated housing project at 712 Baker Street (River Park Project).

POTENTIAL ENVIRONMENTAL EFFECTS: Potentially significant adverse environmental impacts associated with the proposed Project include Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, and Transportation. These topics will be addressed in the EIR. In addition, the EIR will describe and evaluate project alternatives that may reduce or avoid any identified significant adverse impacts of the project. Unless new information identifying other potential impacts is presented during the scoping process, **the following topics will not be discussed further in the EIR: Aesthetics, Agriculture and Forestry, Energy, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities, and Wildfire.**

I urge you to include Aesthetics, Land Use and Planning, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, and Utilities in the EIR.

AESTHETICS The viewpoint of the neighborhood will be changed by the addition of three story structures where there is now a view of the mountains. Aesthetics should be in the EIR.

LAND USE AND PLANNING I believe the conclusions that there is less than significant impacts on Land Use and Planning are invalid. The Initial Study states:

Land Use and Planning b) *Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Less Than Significant Impact. *Although A waiver for the height limitation is requested by the applicant in exchange for providing 5% affordable housing on-site. The Project would offer 11 affordable housing units out of the proposed 226 units. The waiver is consistent with the California Density Bonus Law, State of California Government Code Section 65915 and the LBMC Chapter 21.63- Incentives for Affordable Housing. The height limitation waiver would allow the Project to include 3-story buildings in an area designated for 2-story buildings under the General Plan.*

The Project Site is currently zoned for Commercial Storage (CS) and Single Family Residential Standard Lot (R-1-N) use, with a Horse Overlay District over the parcels on the east side of the Project Site. A zone change of the Project Site to Residential Planned Unit Development (PUD) is proposed with this Project. Residential PUD is established to achieve greater flexibility and encourage innovative and creative design through good urban planning principals, with efficient use of land, a mixture of densities, and diverse housing opportunities and on-site community facilities. This proposed zoning would be consistent with the General Plan. The Project would have a less than significant impact on project conflict with applicable zoning and other regulations after the height waiver and the implementation of the proposed zone change, no mitigation measure is required.

Please include a study of Land Use and Planning in the EIR and address the need for height variance, zoning change and the elimination of the historic Horse Overlay District.

PUBLIC SERVICES must be included in the EIR. Our police numbers are already below those in other nearby cities. With over 200 units, the count of 100 students seems inadequate. The schools may have room for more students, but with one exit onto Wardlow, it will be very difficult for students to get to them.

RECREATION: Although this is checked as a Potentially Significant Impact, it is stated there needs to be no further discussion in the EIR. I disagree. This site has been planned as open space/park/access to the LA River for the neighborhood, the city and the region.

The Initial Study states: *Residential development is proposed on the portion of the Project Site located south of Baker Street and the area north of Baker Street would be landscaped as an open space and recreation area. **This open space and recreation area would contain trails and a grass area. This grass area would be sufficient in size for use as a soccer field or for other active sports activities.***

At the Scoping Meeting on 4/8/21, it was stated these 5 acres would be park space. Who would be paying for the development and maintenance of the park? Would the public have full time access to the park and to the LA River? Is there available public parking?

Recreation needs to be included in the EIR.

TRIBAL CULTURAL RESOURCES is also checked as a potentially significant impact. The EIR must include information on the prior use of this land by the Tongva. All local tribe representative must be contacted. There must be a native representative present during excavations with instructions as to burial and artifact finds.

UTILITIES AND SERVICE SYSTEMS The Initial Study States:

Potentially Significant Impact. Development of the Project would the extension of existing utility systems to the site. Additional analysis is needed to determine if construction of the utilities needed to serve the Project would result in any significant environmental effects.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Potentially Significant Impact. The proposed Project would increase water demand in the Cit. Additional analysis is needed to determine if the City's water supplies are sufficient to serve the Project and other projected growth.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Potentially Significant Impact. As discussed in Question 19 a), Development of the Project would generate an estimated 624 residents and provide 5-acres of recreational open space. The additional residents to be generated by the Project and nearby multi-family developments would require additional utilities and resources that currently does not exist on the vacant Project Site. Therefore, additional analysis to determine the effect of the Project and other nearby housing projects on existing wastewater treatment facilities is needed.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Potentially Significant Impact. As discussed in Question 19 a), Development of the Project would generate an estimated 624 residents and provide 5-acres of recreational open space. The additional residents to be generated by the Project and nearby multi-family developments would require additional utilities and resources that currently does not exist on the vacant Project Site. Therefore, additional analysis to determine the effect of the Project and other nearby housing projects on existing solid waste infrastructure and solid waste reduction goals is needed.

All issues for water, wastewater treatment, storm water draining, electric power, natural gas and telecommunication facilities are checked as potentially significant and needing further analysis and yet there is no plan to discuss further in the EIR. It is obvious Utilities must be included in the EIR.

In addition to the above issues, I urge the inclusion of Alternative Uses of this property which would include Open Space, Public Parkland and Wetlands as found in the RiverLink Plan, the LA River Master Plan and the Lower LA River Master Plan.

Sincerely,

Ann Cantrell, Board Member Riverpark Coalition, Citizens About Responsible Planning and Sierra Club Los Cerritos Wetlands Task Force

From: anngadfly@aol.com
To: [LBDS-EIR-Comments](#)
Cc: acahni@gmail.com; bmarsocci64@gmail.com; corlisslee@aol.com; csovalle@gmail.com; flight750@gmail.com; hawkmcfadzen@gmail.com; ispatton@yahoo.com; jeovallec@gmail.com; kimwalters@gmail.com; lamiller@pacbell.net; lcangel2012@gmail.com; renee_matt@live.com; rwgutmann@gmail.com; serenasteers.ccv@gmail.com; glennisd@mac.com; hoorae1@aol.com; jweins123@hotmail.com; mbcotton@hotmail.com; achris259@yahoo.com; cmoore@algalita.org; ksharper01@cs.com; rebroles1@gmail.com; vbickf123@aol.com
Subject: Scoping Comments for 712 Baker St.
Date: Monday, April 12, 2021 11:52:34 AM
Attachments: [Scoping Comments 712 Baker.docx](#)

-EXTERNAL-

Dear Amy,
Attached please find my comments for the proposed EIR for the RiverPark housing development.

Sincerely,
Ann Cantrell

From: [Laura Ceia](#)
To: [LBDS-EIR-Comments](#)
Subject: 712 Baker St
Date: Monday, April 12, 2021 3:16:34 PM

-EXTERNAL-

- Do not remove the Horse Overlay.”
- “Preserve this undeveloped land to meet the needs of western Long Beach for green space.”
- “Honor the Riverlink Plan and the LA River Master Plan.

Thank you!

Dr. Laura Ceia
Associate Professor of French and International Studies
Education-abroad Advisor
International Studies Program
<http://www.cla.csulb.edu/departments/ist/>



From: [Melinda Cotton](#)
To: [LBDS-EIR-Comments](#)
Subject: Fw: Preserve the Horse Overlay Zoning - Protect Long Beach History Re: 712 Baker Street, aka: River Park Residentail
Date: Monday, April 12, 2021 12:29:01 PM

-EXTERNAL-

Forwarded as requested...

From: Melinda Cotton <mbcotton@hotmail.com>
Sent: Monday, April 12, 2021 11:54 AM
To: Amy Harbin <Amy.Harbin@longbeach.gov>; Christopher Koontz <Christopher.Koontz@longbeach.gov>
Cc: Mayor <Mayor@longbeach.gov>; Council District 9 <District9@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; CityClerk <CityClerk@longbeach.gov>
Subject: Preserve the Horse Overlay Zoning - Protect Long Beach History Re: 712 Baker Street, aka: River Park Residentail

-EXTERNAL-

I urge preservation of the City's Horse Overlay Zoning, and call your attention to the Importance of protecting Long Beach culturally significant equestrian lifestyle dating from the 1700s - Spanish and 1800's Rancho periods in California History.

"Concrete Cowboy" - the new Netflix film, shows the importance and need for retaining Horse Overlay Zones in urban settings. Long Beach needs to do the same. Philadelphia - the setting for "Concrete Cowboy" - bulldozed stables and riding areas in this historic American City - few remain. Yet they provide a safe and sane and important lifestyle for Blacks in Philadelphia - and for our Hispanic and Anglo and other communities on the West side of Long Beach.

Do not wipe out this important history - and way of life!!!!

Horses and a community of teen age riders in an Oregon County Fairgrounds setting provided a welcome and nurturing environment for me as a young person growing up - recognize and encourage this kind of outdoor activity for young people and adults.

I urge your support, and join Renee Lawler's comments which are attached.

Thank you.
Melinda Cotton

From: Renee Lawler <Renee_Matt@live.com>
Sent: Monday, April 12, 2021 11:01 AM
To: Richard Gutmann <rwgutmann@gmail.com>; regina17@verizon.net <regina17@verizon.net>; Melinda Cotton <mbcotton@hotmail.com>; Joe Weinstein <jweins123@hotmail.com>; SUSAN MILLER <mpshogrl@msn.com>
Cc: Tilly (Good is Better) <tilly@goodisbetter.net>; gggilbertent@aol.com <gggilbertent@aol.com>
Subject: FW: 712 Baker Street, aka: River Park Residentail aka OOI South aka Wrigley Heights Park South; Integral Developers

FYI comments due by 4:30pm for anyone who wishes to weigh in and
Oppose the Horse overlay zoning removal request
Request further storm water run off impact review due to sub-standard and aging infra-
structure and levee integrity risks due to overland run off and downstream pooling of water
next to the levee
Renee Lawler
562-433-0757

From: Renee Lawler
Sent: Monday, April 12, 2021 9:57 AM
To: amy.harbin@longbeach.gov
Subject: 712 Baker Street, aka: River Park Residentail aka OOI South aka Wrigley Heights Park South; Integral Developers

Dear Ms. Harbin and staff:

With respect I submit my comments on the IS for the above-referenced property that is comprised of multiple parcels, but commonly referred to as 712 Baker Street.

I oppose the request to remove the Horse overlay in this zone for cultural and historical reasons and storm water run-off, hydrology and sub-watershed issues and infra-structure deficiencies as well as other issues require as per/CEQA further analysis for remediation, mitigation or no-project or an alternative solution that is more suitable to the needs of the community and wishes of the stakeholders. I also oppose the request for street vacation of Baker street ROW without further analysis.

Thank you.

Renee Lawler
562-433-0757
HETASC
CARP
Riverpark Coalition

From: [Lynette Ferenczy](#)
To: [LBDS-EIR-Comments](#); [Amy Harbin](#)
Subject: EIR Comments on River Park Residential Plan - 225 W Wardlow Rd
Date: Monday, April 12, 2021 4:26:06 PM

-EXTERNAL-

Hi,

Please address these comments on the EIR for the proposed 226 unit residential project.

1. Aesthetics- The proposed project will have a negative impact on the aesthetics of the community. The density of this project and layout crates an almost continuous row of buildings approximately 1,000 feet long along the east and west property lines that will block views to the LA River and into the development. The homes on the east and west perimeter of the property are placed approximately 6 feet apart and creating a nearly continuous building wall. Landscape setbacks at least 30-50' wide every 150-200' feet shall be provided to avoid monotony in the site plan and provide views corridors through the project and to the river. The project also backs to the river and does not provide residents pedestrian access to the bike trails or walking path. The previous plan dated June 6, 2019, has breaks in the layout with clusters of six homes and then a landscape area. Additionally, the proposed homes are much larger than those found in the Wrigley and Wrigley Heights where the original homes are closer to 1,000 - 1,400 square foot in area. The new homes are not compatible in size to the existing neighborhood. With the exception of about 40 homes built in 1987 on 2,400 square foot lots to the east, the rest of the neighborhood to the south and east and west across the 710 are all R-1-N lots 6,000 square feet in area or more and are all 1-2 stories in height. Three story condominiums along Wardlow are not consistent with the neighborhood development pattern, aesthetically undesirable and will have a negative impact. The density and extremely small lot size proposed are out of character with the scale and layout of the predominately R-1-N neighborhood. This development is way to dense and there is almost no landscaping between the three story condos and Wardlow Road. Gated communities

are not consistent with the Wrigley community. The only pedestrian access to the river is from Golden Avenue to Baker Street. Provide a pedestrian access or stairs to the bike path from this development.

The pool and recreation area look to small for a project of this size.

2. Air Quality- this part of Long Beach next to the 405 and 7210 has some of the worst air quality in the City. This is a fact that can not be mitigated. The construction of this project and vehicle traffic from 226 homes will only worsen air quality. Thus, a no project option is the only way to avoid increasing air pollution. This issue is a very significant impact.

3. Biological Resources- The site is adjacent to the LA River and one of the last open spaces left in the Wrigley area, especially of this size 15 acres. The development of this site will eliminate the last opportunity for open space and is inconsistent with the LA Riverlink Plan and LA River Master Plan. The site plan proposes a wall of homes adjacent to the river that is approximately 900-1,000 feet long with each home only 6 feet apart creating a monotonous barrier. No opening or access to the river or landscape buffer is provided adjacent to the horse trail.

4. Geology and Soils- this site has been used for oil waste storage and is not appropriate for residential development. Will all containment soils be removed?

5. Greenhouse Gases- the construction of the project and additional traffic construction is a significant impact that is unavoidable.

6. Water quality- runoff from this site which is almost entirely paved or covered by building below baker street will increase runoff downstream to the south.

7. Land Use the proposed zone change from R-1-N and CS to a PUD will allow greater flexibility which means anything goes. The property can be developed under the R-1-N zone. There is no need for a PUD other than to allow the developer to use a zone that allows for maximum density and minimum setbacks and development standards. This

density and development pattern of attached condos and is inconsistent with the neighborhood and the setbacks are extremely small. Some of the town houses facing Wardlow Road have a setback of less than 10 feet with no landscaping. The standard setback in the R-1-N zone is 20. The density proposed is way to high for a lot of this size. There is almost no landscaped areas of significant size south of Baker Street. Why is the required open space on another lot? In some cases residents will have to walk over 1,000 feet to reach open space. The open space should be integrated into the development and not accessible through a locked gate so far from their homes. The historic horse overlay district should also be maintained. Why is it being removed, other than the developers wishes? There are many horse stables along the LA river south of this site.

Please number the 59 guest parking spaces on the site plan. Where are they located?

The applicant shall be required to dedicate public park space adjacent to the LA river for landscaping and public use.

8. Transportation. Wardlow Road has been reduced in size from three to two travel lanes so that a bike path could be added a few years ago. Traffic already backs up substantially during rush hour. To add a left turn lane at that Wardlow Road for 226 homes is going to create a very dangerous situation as cars are picking up speed going downhill from the overpass. These homes are also much larger with more bedrooms than the existing neighborhood meaning more people and vehicles per household. In addition, there will be hundreds of cars through the Wrigley neighborhood daily as Magnolia Ave and Pacific Avenue are the main roads directly to the south. During rush hours more cars are cutting through the neighborhood down to Spring St. to avoid waiting 2-3 signal changes to get through the intersection at Wardlow and Pacific and now hundreds more cars will be added to that traffic. As this community suffers from terrible air quality this significant impact can not be avoided. Hundreds of units have been added in the Wrigley/Central area and the cumulative impact of the air pollution can not be mitigated. The density should be spread through the City and this project should have a density similar to the existing neighborhood.

Please clarify if a traffic light will be installed at the entrance on Wardlow Road.

I request that the EIR not be certified as proposed. This area should be maintained to be open space and comply with the LA Riverlink Plan and LA River Master Plan. If developed, the density should be greatly reduced and the lot size similar to the existing Wrigley neighborhood.

Lynette Ferenczy
lferenczy62@verizon.net



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



March 26, 2021

Amy Harbin
City of Long Beach
411 W. Ocean Blvd., 3rd Floor
Long Beach, CA 90802
Amy.Harbin@longbeach.gov

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Long Beach RiverPark Residential Project, SCH #2021020492, City of Long Beach, Los Angeles County

Dear Ms. Harbin:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the City of Long Beach (City; Lead Agency) for the Long Beach RiverPark Residential Project (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Conserving California's Wildlife Since 1870

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Project Description and Summary

Objective: The City proposes a residential development on 21 acres of vacant land, which was formerly a facility used to treat production water from oil wells. Plans for the site include a mix of single-family detached homes, multifamily homes, streets, parking, and open space with built in trails. Approximately 15 acres of the site will be used for residential development and 5 acres of open space with recreational facilities. Project-related activities include grading, vegetation clearing, road construction, home construction, and installation of public utility infrastructure.

Location: The Project site is located on an approximately 21-acre site at roughly 701 W Baker Street in the neighborhood of Wrigley Heights in the City of Long Beach, within Los Angeles County. The Project site borders the Los Angeles River to the west, Interstate 405 (I-405) to the north, Golden Avenue to the east, and Wardlow Road to the south. Los Angeles County Assessor Parcel Numbers (APNs) associated with the site are 7203-002-001, -005, -007, -008, -009, and -010.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW looks forward to commenting on the DEIR when it is released. CDFW may have additional comments to the DEIR not addressed in this letter.

Specific Comments

- 1) Burrowing Owl. Burrowing owls (*Athene cuniculara*), a California Species of Special Concern (SSC), have been observed as recently as 2015 in empty lots about 1 mile north of the Project site along the Los Angeles River (LSA 2016). The same studies identified multiple potential burrows on a vacant lot adjacent to the Project site. Page IS-7 of the IS indicates that "some old foundations, roads, and pipes are still present on the site." Burrowing owls are known to use artificial sources for burrows, such as debris piles or exposed pipes.
 - a) CDFW recommends the City perform a protocol-level survey for burrowing owls adhering to survey methods described in CDFW's March 7, 2012, [Staff Report on Burrowing Owl Mitigation](#) (CDFW 2012). All survey efforts should be conducted by a qualified biologist. Survey protocol for breeding season owl surveys states to conduct four survey visits: 1) at least one site visit between February 15 and April 15, and 2) a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15. Full disclosure of the presence/absence of burrowing owls is necessary to help the City's determination of whether the Project would impact burrowing owls, thus requiring mitigation. The Project and environmental document should be conditioned to avoid and/or mitigate for potential impacts to burrowing owl and habitat.
- 2) Tree Replacement. Appendix A: Biological Resources Constraints Analysis (BRCA) of the Initial Study (IS) indicates that there are a mix of eucalyptus (*Eucalyptus sp.*), Peruvian pepper (*Schinus molle*), California fan palm (*Washingtonia filifera*), Canary Island palm

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(*Phoenix canaryensis*), and Brazilian pepper (*Schinus teribenthifolia*) trees that will be removed from the Project site. In urban environments such as this Project site, small pockets of green space and trees are vital habitat to local wildlife. Bats have been shown to utilize palm trees as habitat for roosting throughout the Los Angeles region. Tree trimming activities (e.g., palm skinning) can impact bats that attempt to roost in landscape plantings (Miner and Stokes 2005). Tree trimming and removal are also likely to impact bird species found to be nesting or foraging among street trees. Habitat loss is one of the leading causes of native biodiversity loss.

- a) To compensate for any loss of trees, CDFW recommends replacing all non-native trees removed as a result of the proposed work activities with at least a 1:1 ratio with native trees. CDFW recommends replacing native trees with at least a 3:1 ratio with a combination of native trees and/or appropriate understory and lower canopy plantings.
- 3) Nesting Birds. As stated in the IS, multiple on-site trees and shrubs will be removed as part of the proposed Project. This vegetation may provide potential nesting habitat where Project activities may impact nesting birds. Project activities occurring during the breeding season of nesting birds could result in the incidental loss of fertile eggs, or nestlings, or otherwise lead to nest abandonment in trees directly adjacent to the Project boundary. The Project could also lead to the loss of foraging habitat for sensitive bird species.
- a) Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.
 - b) CDFW recommends that measures be taken to fully avoid Project impacts to nesting birds and raptors. Proposed Project-related ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs.
 - c) If impacts to nesting birds and raptors cannot be avoided, CDFW recommends the DEIR include measures to mitigate for impacts. CDFW recommends surveys by a qualified biologist with experience conducting breeding bird and raptor surveys. Surveys are needed to detect protected native birds and raptors occurring in suitable nesting habitat that may be disturbed and any other such habitat within 300 feet of the Project disturbance area, to the extent allowable and accessible. For raptors, this radius should be expanded to 500 feet and 0.5 mile for special status species. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
 - d) CDFW recommends the DEIR provide an analysis of the expected increase in human presence and any subsequent change in traffic, noise level and frequency, and artificial lighting relative to a no build alternative. Using these expected elevated levels of human-

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driven disturbances, further consideration should be given to potential impacts to birds and raptors nesting within and adjacent to the Project site.

- 4) Bat Species. The IS for the proposed Project states that several palm and eucalyptus trees will be removed as part of Project activities. At least 24 bat species occur in the south coast ecoregion of the State, indicating the importance of the region to bat diversity (Miner and Stokes 2005). Despite the high diversity and sensitivity of bats in Southern California, numerous bat species are known to roost in trees and structures throughout Los Angeles County. Project activities may have the potential to adversely impact bat populations within the vicinity.
 - a) Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). Project construction and activities, including (but not limited to) vegetation removal, increased noise, and ground disturbing activities, may have direct and/or indirect impacts on bats and roosts.
 - b) CDFW recommends the DEIR provide a thorough discussion and adequate disclosure of potential impacts to bats and roosts from Project construction including (but not limited to) disturbances to vegetation, trees, and structures; demolition; grading; and excavating. If necessary, to reduce impacts to less than significant, the DEIR should provide bat-specific avoidance and/or mitigation measures [CEQA Guidelines, § 15126.4(a)(1)].
- 5) Non-Native Plants and Landscaping. The Project may involve significant landscaping for aesthetic purposes. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and create monocultures. CDFW recommends using native, locally appropriate plant species for landscaping on the Project site, similar to species found in adjacent natural habitats.
 - a) If the Project may involve landscaping, CDFW recommends the Draft Environmental Impact Report (DEIR) provide the landscaping plant palette and restrict use of species listed as 'Moderate' or 'High' by the [California Invasive Plant Council](#) (Cal-IPC 2020). These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.
 - b) If non-native invasive plants are on site, CDFW recommends the DEIR provide measures to reduce the spread of non-natives during Project construction and activities. Spreading non-native plants during Project activities may have the potential to impact areas not currently exposed to non-native plants. This could result in expediting the loss of natural habitats in and adjacent to the Project site and should be prevented.

General Comments

- 1) Disclosure. A DEIR should provide an adequate, complete, and detailed disclosure about the effect which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation

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measures, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).

- 2) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental impact report should describe feasible measures which could mitigate for impacts below a significant level under CEQA.
 - a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, §§ 15126.4, 15041). A public agency should provide the measures that are fully enforceable through permit conditions, agreements, or other measures (Pub. Resources Code, § 21081.6). CDFW recommends that the City prepare mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). Adequate disclosure is necessary so CDFW may provide comments on the adequacy and feasibility of proposed mitigation measures.
 - b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the Project as proposed, the environmental document should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the environmental document should provide an adequate, complete, and detailed disclosure about a project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.
- 3) Biological Baseline Assessment. In preparation of the DEIR, CDFW recommends providing a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. The DEIR should include the following information:
 - a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. Project implementation may result in impacts to rare or endangered plants or plant communities that have been recorded adjacent to the Project vicinity. CDFW considers these

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communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a State-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFW 2021a).

- b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where Project construction and activities could lead to direct or indirect impacts off site.
- c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the neighboring vicinity. The [Manual of California Vegetation](#) (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2009). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts off-site. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
- d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the Project. CDFW's [California Natural Diversity Database](#) (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat (CDFW 2021b). The DEIR should include a nine-quadrangle search of the CNDDDB to determine a list of species potentially present at the Project site. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur in the Project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)].
- e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including SSC, and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#) for established survey protocol for select species (CDFW 2018). Acceptable species-specific survey procedures may be developed in consultation with CDFW and the USFWS.
- f) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame or in phases.

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- 4) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2021c). The City should ensure the data has been properly submitted, with all data fields applicable filled out. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred.
- 5) Biological Direct, Indirect, and Cumulative Impacts. CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The DEIR should address the following:
 - a) A discussion regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish & G. Code, § 2800 et. seq.)]. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
 - b) A discussion of both the short-term and long-term effects to species population distribution and concentration and alterations of the ecosystem supporting the species impacted [CEQA Guidelines, § 15126.2(a)].
 - c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species and identification of any mitigation measures.
 - d) A discussion on Project-related changes on drainage patterns; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project sites. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included.
 - e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR.
 - f) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant and wildlife species, habitat, and vegetation communities. If the City determines that the Project would not have a cumulative impact, the environmental document should indicate why the cumulative impact is not significant. The City's conclusion should be supported by facts and

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analyses [CEQA Guidelines, § 15130(a)(2)].

- 6) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
- a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas.
 - b) CEQA Guidelines section 15126.6(a) states that an environmental document should describe a reasonable range of potentially feasible alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. CEQA Guidelines section 15126.6(f)(2) states if the Lead Agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include reasons in the environmental document.
 - c) A range of feasible alternatives to Project component location and design features to avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas. CDFW recommends the City consider configuring Project construction and activities, as well as the development footprint, in such a way as to fully avoid impacts to sensitive and special status plants and wildlife species, habitat, and sensitive vegetation communities. CDFW also recommends the City consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes for the duration of the Project and from any future development. As a general rule, CDFW recommends reducing or clustering the development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.

Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6).
 - d) Where the Project may impact aquatic and riparian resources, CDFW recommends the City consider alternatives that would fully avoid impacts to such resources. CDFW also recommends alternatives that would allow not impede, alter, or otherwise modify existing surface flow; watercourse and meander; and water-dependent ecosystems and vegetation communities. Project-related designs should consider elevated crossings to avoid channelizing or narrowing of streams. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level and cause the stream to alter its course of flow.
- 7) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from a project site and permanently moving it to a new location. CDFW generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the

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outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.

- 8) Moving out of Harm's Way. To avoid direct mortality, we recommend that a qualified biological monitor, approved by CDFW, be on-site prior to and during ground and habitat disturbing activities. The biological monitor may need to move any special status species or other wildlife of low mobility out of harm's way that would likely be injured or killed by Project-related construction activities, such as grubbing or grading. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. If the Project requires species to be removed, disturbed, or otherwise handled, we recommend that the DEIR clearly identify that the designated entity should obtain all appropriate state and federal permits.

CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's [Scientific Collection Permits webpage](#) for information (CDFW 2021d).

- 9) Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies. The [Wetlands Resources](#) policy the Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California (CFGC 2020). Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."
- a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, the Project must include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions for the benefit to on-site and off-site wildlife populations. CDFW recommends mitigation measures to

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compensate for unavoidable impacts be included in the DEIR and these measures should compensate for the loss of function and value.

- b) The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).

Conclusion

We appreciate the opportunity to comment on the NOP for the Long Beach RiverPark Residential Project to assist the City of Long Beach in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Andrew Valand, Environmental Scientist, at Andrew.Valand@wildlife.ca.gov.

Sincerely,

DocuSigned by:

5991E19EF8094C3...
Victoria Tang

Signing for Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW

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From: [David flores](#)
To: [LBDS-EIR-Comments](#)
Subject: Riverpark
Date: Monday, April 12, 2021 2:08:38 PM

-EXTERNAL-

You are absolutely destroying Long Beach with all of this overbuilding.

We DO NOT NEED more storage/RV parking. We need more open areas and greenspace for the citizens of Long Beach.

From: [onyx4455 \(null\)](#)
To: [LBDS-EIR-Comments](#)
Subject: 712 Baker St
Date: Monday, April 12, 2021 11:34:21 AM

-EXTERNAL-

To whom it may concern,

As a passionate resident of Long Beach I must be vocal about the looming destruction of everything that makes our beautiful city unique, valuable and a bright spot in Southern California. Please do not pave over our beautiful parks. Please do not remove the horse overlay, and I ask you to honor the riverlink plan and the LA river master plan.

In honoring the wishes of the citizens and the community you are restoring the democratic process in a time that it desperately needs restoration. You are also putting people and environment over profit and can only draw more tourists and opportunity to our great city by preserving it's natural essence/beauty by preserving its undeveloped land to meet the needs of western Long Beach for green space. Which at the same time will keep Long Beach a top tier spot instead of paving paradise to put up a parking lot.

I appreciate your time. Thank you for listening and leading with integrity and grace when considering the impact of your decision on future generations and ultimately the fate of our great city.

God bless,
Stephanie Fugleberg

From: [Leslie Garretson](#)
To: [LBDS-EIR-Comments](#)
Cc: [Mayor](#); [Council District 1](#); [Council District 2](#); [district3@lb.gov](#); [district4@lb.gov](#); [district5@lb.gov](#); [district6@lb.gov](#); [Council District 7](#); [Councilmember Roberto Uranga](#); [Council District 8](#)
Subject: Riverpark Residential Project/712 Baker Street
Date: Monday, April 12, 2021 12:58:03 PM

-EXTERNAL-

Amy Harbin
Planner, Development Services Department
City of Long Beach
LBDS-EIR-Comments@longbeach.gov

Dear Ms. Harbin,

712 Baker Street Initial Study for CEQA Process

I am writing to comment on the Initial study for CEQA on the 712 Baker Street parcel, also known as the Long Beach RiverPark Residential Project. I make the following comments on the Initial Study. I look forward to seeing them addressed in the forthcoming Draft EIR.

Adverse effect on habitat

Considering the substantially altered state of the Los Angeles River and the commitments made at city, regional, county, and national levels regarding its revitalization, it is clear that the EIR will have to robustly consider how the proposed development will 'have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species' (p. 23) and also the dire impact of eliminating any possibility that the 20 acre site could immediately or in the future become public open space. There are at least 124 sensitive species on the site and in the immediate area, 23 of those threatened or endangered (p. 26). Safe habitat is essential for these threatened, endangered and otherwise at-risk species. To say that 'the Project Site consists of disturbed vacant land surrounded by existing residential development and urban infrastructure' (p. 27) hides the ecologically significant impact on the entire watershed of protecting this site from development. The Letter from the Department of Fish and Wildlife has particular points which I look forward to seeing addressed in the EIR, including a recommendation that replanting be at a 3:1 ratio for removed native trees. It would be a mistake to conceptualize empty lots as devoid of ecological values or habitat, as evidenced by the finding of Burrowing Owls (*Athene cuniculara*) – a California Species of Special Concern – in empty lots a mile north and immediately adjacent to the Project site. The removal of 'some old foundations, roads, and pipes [that] are still present on the site' could well destroy habitat for owls.^[2]

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The proposed removal of the Horse Overlay District (p. 13) – a distinctive and essential element of Long Beach's urban fabric – needs extensive attention in the draft EIR. My strong opinion is that the Horse Overlay must not be removed. My request is that the draft EIR fully address the following:

- the history of Horse Overlays in Long Beach, including the EIR that was part of the overlay establishment in the 1970s, and also any relevant legal proceedings
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- the density allowed under a Horse Overlay compared to the density of the proposed project [5]
- effects of the removal of the Overlay, and the construction of the housing development on both the immediate equestrian community with open space and the trail, as well as linear connectivity for horses and their riders between Long Beach equestrian districts, and indeed into the San Gabriel River, the Rio Hondo and north to Atwater and Burbank equestrian neighborhoods

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Given the open space deficits that exist in West Long Beach, the addition of 624 residents and the provision of 5+ acres of recreational open space (p. 66) is insufficient.

The EIR needs to systematically document past promises made in planning documents and elsewhere about this land parcel and others in terms of creating public open nature space.

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The planting list for the condominium area does not indicate any intention of the developer to use a native plant palette. Instead it specifies Tipu Tree, Purple Orchid Tree, Magnolia, Marina Arbutus, Australian Woultow, Brisbane Box, New Zealand Christmas Tree, Chanticleer Pear, Crape Myrtle, and Majestic Beauty (p. 13). The developer needs to design with a commitment to native plants, at a minimum adhering to the standards in the Draft Los Angeles River Master Plan of at least 85% being native to the LA River watershed and no more than 15% being non-native, non-invasive plants.

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This project would by definition 'induce substantial unplanned population growth in an area, directly (for example, by proposing new homes and businesses)' and yet this is ascribed a 'Less Than Significant Impact' rating (p. 60). It will not meet the City's own Founding and Contemporary Neighborhood (FCN) General Plan Land Use designation per the City's recent 2040 General Plan.

It is too blunt, some may even say disingenuous, to use a city-wide thirty-year growth projection (p. 60) to make the magnitude of this development look smaller than it really is.

Ascribing this point a 'Less Than Significant Impact' appears to be in error and needs to be corrected.

Public Engagement

I ask the City and the consultants to all they can to facilitate engagement of the general public with the EIR process, accommodating linguistic diversity, socioeconomic status, education, as well as cultural and social capital. Environmental injustices disproportionately impact disadvantaged, minority, and marginalized communities and the City has a responsibility to address this in the current CEQA process, and in general. Outreach initiatives should be documented in the EIR.

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I disagree with the assertion that the development will have a less than significant impact on a scenic vista (p. 15). The River is designated as 'a scenic route as it provides a viewshed that is worthy of protection and enhancement' (p. 16) and no convincing argument is made that the addition of 227 buildings in a jumble of high-density Spanish Colonial, Italianate, and Santa Barbara architectural styles 'would not substantially alter the existing views along the Los Angeles River' (p. 16). The Los Angeles River is internationally and locally iconic, and the viewshed needs not only to be protected but also enhanced.

Traffic

I note that the Department of Transportation has stated several strong concerns about the development in terms of adverse traffic outcomes.^[4] I share these concerns and look forward to seeing them addressed in the EIR. The addition of at least 511 vehicles (p. 9) to the neighborhood needs to be addressed and mitigated.

Urban Heat Island

The density and character of the development looks as if it will contribute substantially to urban warming, an increasing problem in the face of climate change. This needs to be addressed in the EIR and mitigated in the site design.

In conclusion, the highly developed/degraded nature of a site is often used by EIR preparers to craft an illusion of the development being unproblematic because it is proposed on land already substantially altered, a brownfield not worthy of environmental protections. This is a paradigm that is philosophically and practically unviable, particularly in hyper urban landscapes such as those along the Los Angeles River. The character, scale, and function of the proposed development is vastly unsuitable for the site, particularly in light of the draft Los Angeles River Master Plan, the Lower LA River Revitalization Plan, and RiverLink.

When the EIR proposes alternatives, as per CEQA Guidelines, I hope that an environmentally superior alternative to the project or its location will include the possibility of the land parcel being protected as public green space, and that the developer may be encouraged to build in a more suitable manner on a more suitable site. The protection of this land parcel as open green space would be game-changing for Long Beach, and the entire river. I trust the City and the CEQA process to protect the river, the 712 Baker Street parcel, and the adjacent community.

Best regards,

Leslie Garretson

Cc. Mayor of Long Beach
Long Beach Councilmembers

[1] <https://www.instagram.com/lariverx>

[2] <https://files.ceqanet.opr.ca.gov/267919-1/attachment/HuhVqMY0sv-44efzmlNS4ZldpnZaKIZTWvNmPlsKSoFlfnvsgqWhh89jsXpnQT4Y4uBoPeSsdvZhaUJbSo>

[3] <https://www.lbreport.com/lue/staffily.pdf>, accessed 9 April 2021.

[4] https://files.ceqanet.opr.ca.gov/267919-1/attachment/4QOQSHrPrjnVcJJSROwxKc6L0pQiyOfxD6wbwqoGvt8kxNPO6fgezcNHe6vT1my_BU7HMbiSKRgcnzjOo

[5] [CHAPTER 21.38 - HORSE OVERTLAY DISTRICT | Municipal Code | Long Beach, CA | Municode Library](#)

From: [DOROTHY GOLZ](#)
To: [LBDS-EIR-Comments](#)
Subject: 712 Baker St.
Date: Monday, April 12, 2021 12:46:16 PM

-EXTERNAL-

[712 Baker Street.](#)

This undeveloped land should be preserved as open space to meet the needs of residents on the western side of the city where there is a shortage of parkland and an increase in health risks due to proximity to the freeway, port and industry.

The horse overlay should be retained.

The previously developed Riverlink Plan and LA River Master Plan should be honored.

The river should be revitalized and restored. Cities need to preserve more open space that if developed will be lost for the health and enjoyment of future generations.

Respectfully submitted,

Dorothy Golz
Helmut Golz
[7147 E. Killdee St.](#)
[Long Beach, CA 90808](#)

Sent from my iPad

From: [Elizabeth Henderson](#)
To: [LBDS-EIR-Comments](#)
Subject: 712 Baker St
Date: Monday, April 12, 2021 12:28:53 PM

-EXTERNAL-

Dear Sir or Madam,

I am writing in regard to the proposed RV Park at the abovementioned address in Long Beach, California. I am writing to object to this proposal. As a Long Beach resident, home owner, and tax payer I would much rather see this plot of undeveloped land preserved and used to meet the needs of western Long Beach for much needed green space. I also ask that the council Honor the Riverlink Plan and the LA River Master Plan by keeping this space green and open to the public.

Sincerely,

M. Elizabeth Henderson
323.640.6702
liz_henderson@msn.com

Tilly Hinton, PhD
Independent Scholar and Curator
229 S Westlake Ave Apt 206
Los Angeles CA 90057
tilly@godisbetter.net

Amy Harbin
Planner, Development Services Department
City of Long Beach
LBDS-EIR-Comments@longbeach.gov

12 April 2021

Dear Ms Harbin,

712 Baker Street Initial Study for CEQA Process

I am writing to comment on the Initial study for CEQA on the 712 Baker Street parcel, also known as the Long Beach RiverPark Residential Project.

I am an independent scholar and the founder/curator of Los Angeles River X.¹ I have over a decade of international research and community engagement expertise in river landscapes and their complex interrelationships with surrounding communities, particularly the Los Angeles River. On that basis, I make the following comments on the Initial Study. I look forward to seeing them addressed in the forthcoming Draft EIR.

Adverse effect on habitat

Considering the substantially altered state of the Los Angeles River and the commitments made at city, regional, county, and national levels regarding its revitalization, it is clear that the EIR will have to robustly consider how the proposed development will ‘have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species’ (p. 23) and also the dire impact of eliminating any possibility that the 20 acre site could immediately or in the future become public open space. There are at least 124 sensitive species on the site and in the immediate area, 23 of those threatened or endangered (p. 26). Safe habitat is essential for these threatened, endangered and otherwise at-risk species. To say that ‘the Project Site consists of disturbed vacant land surrounded by existing residential development and urban infrastructure’ (p. 27) hides the ecologically significant impact on the entire watershed of protecting this site from development. The Letter from the Department of Fish and Wildlife has particular points which I look forward to seeing addressed in the EIR, including a recommendation that replanting be at a 3:1 ratio for removed native trees. It would be a mistake to conceptualize empty lots as devoid of ecological values or habitat, as evidenced by the finding of Burrowing Owls (*Athene cuniculara*) – a California Species of Special Concern – in empty lots a mile north and immediately adjacent to the Project site. The removal of ‘some old foundations, roads, and pipes [that] are still present on the site’ could well destroy habitat for owls.²

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Best regards,



Tilly Hinton, PhD

Cc. Mayor of Long Beach
Long Beach Councilmembers

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From: [Tilly \(Good is Better\)](#)
To: [LBDS-EIR-Comments](#)
Subject: Submission on 712 Baker Street Initial Study
Date: Monday, April 12, 2021 11:08:01 AM
Attachments: [Hinton-712-Baker-Street-Letter.pdf](#)

-EXTERNAL-

Dear Ms Harbin,

Thank you so much for the information your provided over the weekend. Much appreciated!

Please find attached my comment letter.

Warmest,
Tilly

photo



Dr Tilly Hinton

Writer | Research Scholar | Floral Designer | Facilitator |
Grants and Awards Wrangler | Cultural Producer | Impact
Consultant

E tilly@goodisbetter.net **W** linktr.ee/tillyhinton

Us phone +1 323-536-7998

Au phone +61 7 5660 6759





South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

March 16, 2021

LBDS-EIR-Comments@longbeach.gov

Amy L. Harbin, AICP, Planner
City of Long Beach, Development Services Department
411 West Ocean Boulevard, Third Floor
Long Beach, California 90802

Notice of Preparation of a Draft Environmental Impact Report for the Long Beach RiverPark Residential Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants and include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. The Proposed Project will include, among others, 227 residential units and is located in close proximity to Interstate 405 and Interstate 710, and to facilitate the purpose of an EIR as an informational document, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵ to disclose the potential health risks⁶.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*⁷ is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory⁸.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook¹, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan⁹, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy¹⁰.

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ *Ibid.*

⁷ CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

⁸ CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

⁹ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

¹⁰ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

Health Risk Reduction Strategies

Many strategies are available to reduce exposures, including, but are not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters¹¹, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumption that the Lead Agency should evaluate in the EIR. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the EIR. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC210225-01
Control Number

¹¹ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>.

712 BAKER

To: Amy Harbin, Development Services

Re: Scoping Comments on the Initial Study for the planning gated housing project at 712 Baker Street (River Park Project).

Dear Ms Harbin:

I submit my comments on the Initial Study (IS) in effort to see them addressed in the Draft EIR being prepared for the 712 Baker Street (River Park Residential Project) aka: OOI south, Wrigley Heights Park South.

The proposed project will have significant adverse environmental impact on Cultural, Historic resources, Habitat & Biological Resources, Hydrology and Water Quality, Mobility & Transportation, Social Equity & Land Use and Planning, Recreation & Open Space , Aesthetics & Scenic vistas, Tribal, Public Services, Utilities, Air Quality, Geology and Soils.

Cultural Resources

Horse Overlay protected zone recognizes culturally significant equestrian lifestyle dating from the 1700s - Spanish and 1800's Rancho periods in California History. The culture requires low density with access to the river open spaces and regional trail system that is a critical mobility corridor between the communities. This location is a culturally significant location and removal of the zone and reduction of it's open space in any manner will cause negative consequence to the equestrian communities to the south, north and in the region.

In the 1900s Gregorio Encinas purchased the land that is now the site of Baker Street Park from the Bixby family. The Encinas family was one of California's early pioneering families and used the land to create a large ranch and farm. Several generations of the Encinas family worked on this land, operating a dairy and riding academy, and growing alfalfa, beets and other crops.

Sara Bixby Smith often spoke of how the rancho horses were kept by the river and horses live still live and travel these lands to this day.

Despite centuries of equestrian history at this specific site and vicinity, the City of Long Beach continues to methodically whittle away at those critical zones reducing the habitat necessary for the local resident stake-holder horses who have no voice in this process but who are living, breathing and touchable in the area – animals who have needs that the Horse overlay zoning intended to protect by recognizing the

need to maintain consistency of lot size with a proper balance of low density minimum 8000 square foot lots sizes, with set backs, construction restrictions, open space buffers, private and public trails easements and open space with space trail separations that these animals require for their habitat and needs that CEQA law mandates be evaluated – there is no distinction between “wild or domesticated” animals.

Long Beach with this zoning removal request is not making good on it’s promise in 1977 to protect and preserve equestrian lifestyle through the establishment of the 6 historic equestrian zones and again the LUE in 2020 stating that the “Wrigley Heights Equestrian zone is to remain”.

Biological Resources

Will the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?

YES - Potentially Significant Impact – but the “IS” erroneously indicates there is a “less than significant impact on plant and animals communities and so it needs further evaluation in reference to the loss of open space habitat.

This site has been allowed to go fallow, back to a natural vegetative state longer than it was “oil commercial operations” and to remove the additional restorative habitat opportunity has a cumulative impact on all species who depend on the corridor for foraging, nesting, shelter, and hunting. It has a cumulative impact on the survival of the eco-system on this property, adjoining river lands and within the Dominguez Gap, Wrigley Greenbelt and south past the Willow Street Bridge. Audubon has logged 216 known species of birds in the vicinity through recent years, including endangered and watched species such as Bells Vireo, and Burrowing owls.

Have a substantial adverse effect on any riparian habitat or other sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?

YES - THIS WILL HAVE AN IMPACT – This land is part of a larger vision to restore linear greenbelts and open spaces along the river corridor that provide for hunting, foraging, nesting grounds, home to species of rodents and small mammals, rest stops for migratory, coastal and protected birds such as Eagles observed during migration from Catalina to Big Bear for nesting. This parcel is part of a linear biological corridor with multi-use recreation and cultural significance that must be reviewed in an “in-the-whole” manner as it relates to the larger larger resource and other projects in the vicinity as per vision of AB530 Lower Los Angeles River Master

Plan, and further by the Department of Fish and Wildlife, and in respect to any sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Department of Fish and Wildlife.

Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

YES - This will have Potentially Significant Impact. It is a major migratory bird and wildlife corridor that has been dramatically impacted by man-made encroachments such as this project and the levees and channelization and needs further EIR review.

Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved State, regional, or local habitat conservation plan? –

YES - The idea that it is not considered as habitat by the City of Long Beach is disturbing given the history of this as habitat for many migratory bird species, sea birds, watched and endangered species – further EIR review is needed.

Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?

Potentially Significant Impact. CEQA Guidelines Section 15064.5 defines a historic resource – and this location and it's proximity to the historic trail, rancho land uses should be further reviewed for determination to be eligible for listing in the California Register of Historical Resources; anysite, area, place,to be historically significant or significant in the ...economic, agricultural, educational, social, cultural annals of California may be considered an historical resource,....supported by substantial evidence in light of the whole record. Generally, a resource shall be considered “historically significant” by the lead agency if the resource meets the criteria for listing on the California Register of Historical Resources. Additional analysis is required to determine if the site contains any features with historic significance.

Hydrology and Water Quality

This location is part of a sub-watershed has been part of a receiving basin for overland run-off that is not diverted into storm drain pipes as well as a contributor to overland run-off downstream. The topography, due to the natural slope toward the lower elevation of the river land to the west directs run-off and combines with the natural swales that flow north to south along the trail and lands adjacent to the east levee of the LA River. In addition it is documented that there is a north to south flow that runs along the greenbelt lands contributing to known flooding conditions documented downstream. These existing conditions and any proposed alterations to the site and infra-structure lacking or sub-standard requires further evaluation by multiple agencies responsible for NPDES and MS4 permits, and for this EIR. There are substantial changes in elevation, grade and slope on the property that will affect the adjacent and downstream lands which CEQA requires further review.

These low lands do not have substantial or in most cases any storm drain pipes existing and are not sufficient to tie into from the blue line crossing to the north, south to the Wrigley Greenbelt SD6 pump station on the east side of the east levee of the LA River.

The practice to allow run off to divert overland was fine when there was no levee and a large alluvial plain to absorb and when there was lower overall density when the storm drain pipes and infra-structures were built in the 1930s,40s and 50s – but that is no longer the case. There has been increased density since the 1930s that the same storm drains are serving and this project will cause cumulative negative impact to an already over-burdened and known sub-standard storm drain infrastructure that no amount of “bio-swale” system on site will be able to mediate. (See Carollo Engineering Report 2016 – City of Long Beach for details on sub-standard storm drain systems in the vicinity).

There are either no pipes or undersized pipes in the vicinity and adding this type of density or any development that will reduce permeable space and without significantly upgrading the system the project will tie into all the way to SD6 at Willow will contribute to significant potential for downstream flood impacts including overland run-off and allows for Title 22, VOCs and toxins to travel to other lands and into the waterway with possible CWA 1972 violations.

A recent report produced by Hromadka indicates – “Records indicate that the City of Long Beach has been subject to historic flooding, even before 1981. A report titled “A History of Significant Weather Events in Southern California” by the National Weather Service indicates that large areas of Long Beach were inundated in February 1927. Additionally, a USGS Report, Water Supply Paper 426, titled “Southern California Floods of January, 1916” by H. D. McGlashan and F. C. Ebert states “There were heavy floods on Los Angeles and San Gabriel river in 1825, 1833, 1862, 1867, 1884, 1886, 1889, 1890, 1911, and 1914, and it is said that serious floods occurred also in 1842, 1852, and 1874.” Specifically, an

article by Beachcomber states “The Long Beach area was constantly hit by hard storms and flooding particularly in 1862, 1867, 1873, 1884, 1891, 1911, 1913 and 1914.” and that “In 1938, the heavy rain storms... again took their toll on Long Beach.”

Long Beach had significant storm events in the 1980s, 1995, 2000. There is continual evidence of overland un-controlled run off in this sub-watershed that includes this parcel and downstream therefore necessary for further review in an EIR is required before any development within the corridor should proceed - in 2014, 2016, 2017, see *Lawler v LACFCD* and *City of Long Beach* and *Grayley v LACFCD* and continued in 2018, 2019 and 2020

This EIR will require the further assessment that may include a “response plan” by DTSC and by any all agencies such as LA Regional Water Quality Board, City of Long Beach Storm Drain Division, LACFCD, USACE for any alternation along this reach of the LA River sub-watershed from the blue line to Willow between the east levee of the LA River to the first up-land points of connection for City and County flood control pipes and pump systems upstream and within this sub-watershed to determine capacities, load, and for BMP’s with respect to mitigation for existing and future flooding impacts within the entire sub-watershed and downstream. That will include a permit from the USACE in advance of any grading or earth-moving activities as per the 1999 Maintenance and use agreement with LACFCD and Title 33 requirements for Flood Control Management.

In the Notice of Incomplete Application, Application No. 1906-07 (CSPR19-004) 8/1/2019, Page 2 of 3 Item 3.
Open Space – Staff Stated “*Staff wishes to clarify that bioswales, biofiltration areas, and detention basins cannot be counted toward usable project open space.*”

The Baker Street proposed park cannot be counted toward useable open space for this project as per Staff Notice of Incomplete Application. This entire location has a *history of being a “detention basin” for overland storm water run-off in this sub-watershed.*

In a recent report by expert hydrologist “HORODIMKA” he indicated – “Records indicate that the City of Long Beach has been subject to historic flooding, even before 1981. A report titled “A History of Significant Weather Events in Southern California” by the National Weather Service indicates that large areas of Long Beach were inundated in February 1927. Additionally, a USGS Report, Water Supply Paper 426, titled “Southern California Floods of January, 1916” by H. D. McGlashan and F. C. Ebert states “There were heavy floods on Los Angeles and San Gabriel river in 1825, 1833, 1862, 1867, 1884, 1886, 1889, 1890, 1911, and 1914, and it is said that serious floods occurred also in 1842, 1852, and 1874.” Specifically, an article by Beachcomber states “The Long Beach area was constantly hit by hard storms and flooding particularly in 1862, 1867, 1873, 1884, 1891, 1911, 1913 and 1914.” and that “In 1938, the heavy rain storms... again took their toll on Long Beach.”

Urbanization of the City of Long Beach Decreased Flood Risk: Natural and Historic Topography - Review of the USGS 1896 Topographic Map for the Downey Quadrangle shows that the land.....is located in a historic flow path through which runoff from the surrounding area would drain

Lawler v LACFCD and City of Long Beach and Grayley v LACFCD and City of Long Beach case history further emphasizes the need for evaluation of storm water run-off, flood control, water quality, hydrology, erosion, soils and toxin transfer from overland flow in this sub-watershed before any alteration, project or construction commences thereby further EIR review on this subject is required.

Aesthetics

Encroachment of construction right up to the river parcels is not protecting the scenic and natural features within this one mile zone of the river and not in line with the vision of AB530 and linear river revitalization and respecting “established” communities.

The IS states: “On a local scale, the Long Beach General Plan Urban Design Element designates the Los Angeles River as a scenic route as it provides a viewshed that is worthy of protection and enhancement, and also serves as a non-motorized trail.s

This development does have potential to be visible from the Los Angeles River trail, and views of the proposed residential development **WILL NOT BE similar to current views** of residences available from this trail along the Los Angeles River, **IT WILL substantially alter the existing and scenic opportunity for enhanced natural views** along the Los Angeles River Historic Equestrian bridle/hiking trail that was dedicated in 1947. The Long Beach General Plan fails to sufficiently recognize in the Plan Historic Preservation Element, that the project DOES contain historic resources by the very nature of the “H” overlay zone and adjacent historic bridle/hiking trail that are a historic district and feature recognized in 1947 and 1977 and again in the LUE in 2020 and many local, regional state and federal documents and therefore should be eligible or designated as a historic resource under the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register). As such, those feature require further analysis.

There will be additional glare and light impact to the river environmental habitat and 1 mile zone as identified in the LA River Master plan and needs further analysis with respect to the impact on wildlife in the EIR.

Air Quality

The higher density, more traffic, more congestion will contribute significantly to reduced air quality in this “diesel death zone” and the “significant impact” needs further analysis.

Expose sensitive receptors to substantial pollutant concentrations – potential significant impact that needs further analysis.

**Geology and Soils - Directly or indirectly cause potential substantial
iii) Seismic-related ground failure, including
liquefaction and lateral spreading?**

This site is in a liquefaction zone, see attached map and further analysis is required.

b) Result in substantial soil erosion or the loss of topsoil? The IS states Less Than Significant Impact. THAT IS NOT THE CASE, there is plenty of evidence to show that soil erosion, loss of top soil and impacts from construction would be SIGNIFICANT IMPACT and mitigation measure and further review in the EIR is required. “The existing soils and exposed soils subject to rainfall and wind, thereby potentially resulting in soil erosion and as part of the plan check requirements, the Project would be required to have a stormwater management program, including a Storm Water Pollution Prevention Plan (SWPPP)”.

That review must take into consideration the overland run-off and flood history in the sub-watershed, recent case history and documentation of the sub-standard piping and aging infrastructure known within this sub-watershed.

It also the EIR needs to evaluate in comparison to the Long Beach RiverPark Residential Project **IS-36** City of Long Beach Initial Study February 2021 and pursuant to NPDES permit requirements. As part of the SWPPP, BMPs would be implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible.

THIS IS NOT CORRECT – “Based on compliance with regulatory requirements, including the implementation of BMPs, impacts from construction would be less than significant, and no mitigation measures are required.”

“According to the *Preliminary Drainage Study (Appendix B)*, the stormwater from the Project would be collected by an on-site drainage system that would connect into a proposed City of Long Beach maintained storm drain system that discharges into the Los Angeles River. Since the stormwater would eventually discharge into a tidally influenced portion of the Los Angeles River, no erosion or negative downstream impacts are projected. Based on the analysis provided, impacts from operation would be less than significant, and no mitigation measures are required.” THIS IS NOT A CORRECT STATEMENT AND FURTHER EIR REVIEW IS REQUIRED TO

MITIGATE FOR THE POTENTIAL IMPACTS THAT INCLUDE Title 22, 1972 Clean Water Act and 1999 Maintenance and Use Agreement obligations by City of Long Beach and LACFCD as local and district operators and USACE permits prior to construction.

c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, and drainages) or waters of the United States or California, as defined by § 404 of the federal Clean Water Act or California Fish & Wildlife code § 1600, et seq. through direct removal, filling, hydrological

This is within the boundaries of a navigable waterway as determined by the USEPA and is known to be historic marsh and wetland habitat that should be evaluated for restoration opportunities or mitigation and impact through an EIR.

Land Use and Planning

Staff response indicated: **"Minimum Unit Size and Minimum Lot Size** - Although all development standards specified for a PUD will apply to this project, staff wishes to draw particular attention to the minimum unit size standard of 1,200 sq. ft. and 16 feet in width, and the minimum lot size of 2,400 sq. ft. Your site plan will need to be substantially redesigned to comply."

THE DESIGN AND EVEN THIS RE-DESIGN is NOT COMPLIANT with the existing LOW-DENSITY Land Use, the Horse Historic protective zone that came with extensive pre-CEQA EIR review. It was establish the OVERLAY ZONE DISTRICT for continuity of low-density for the health and safety of the animals and to protect and preserve the lifestyle that cannot be achieved with high-density variances such as what is proposed with this project. The zone established was not specific to just a few parcels as staff and the developers wishes you to believe. The Horse Overlay, is consistent with the adjacent open space uses and the lower density single family adjacent neighborhoods of Wrigley Heights, Los Cerritos or Wrigley North and it is also compatible with any low density commercial equestrian use such as public arenas and stables also compatible and in keeping with the theme of multi-use recreation opportunities identified in each of the past and present master plans. Staff has been less than transparent about the existence of the "H" overlay, by excluding it from the LUE maps, despite clearly being advised about its' presence and the historic cultural value it represents.

The applicant is requesting removal of the horse overlay that was applied to the entire zone – increased density in any more of this zone as was the case within this and several "H" overlay protected zones will contribute further to cumulative negative impact to an already

at risk, endangered minority community due to this type of zone encroachment that removes important living historic cultural resources.

The applicant references parcels #'s 7203-002-007, 008, and 010: CS, Horse Overlay – **and Meredian describes the zoning at the site but fails to accurately describe that development code requires that when an OVERLAY DISTRICT, is present, regardless of commercial or residential underlying zone, the “overlay” takes precedent, the more stringent, lower density applies and so this project density is non-complaint with the Overlay**

Oppose the *Necessary Approvals – that will cause negative impact* required for Project development

1. Zone Change to remove the Horse (H) Overlay District
- 2 change to residential Planned Unit Development (RP)
3. Waiver of height standard for providing 5% Very Low Income Housing
5. Street Vacation for General Plan conformity – THIS STREET VACATION SHOULD BE OPPOSED – it is a critical easement for public access to the river greenbelt to the west and to vacate this easement ROW to this developer for profit exhibits preferential judgement at the expense of the equestrian and stakeholder communities and should be further evaluated for the negative impacts.

This project has not complied with: Public Works Development Guidelines: July 18, 2019

“PW reviews a project for conformance with numerous factors encompassing nearly all aspects of a project outside of the property line and within public right-of-way. This includes, but is not limited to:

City Master Plans, Public right-of-way standards, subdivision requirements, drainage, water quality, traffic control, traffic circulation, safety, accessibility, mobility, easements or land use concerns, existing conditions, and constructability”

A sample of the MASTER PLANS THIS PROJECT IS NON-CONFORMING WITH:

1973 Master Plan - LA County

2020 LUE – General Plan- “Wrigley Heights Equestrian Zone will remain”

2020 Lower Los Angeles River Revitalization Plan

2006 LA River Master Plan

2003 Long Beach Riverlink - open space

1996 LA River Master Plan - identified this as open space

Integrated Regional Water Management Plan – Greater Los Angeles Region

Storm Water Best Management Practices

This project is non-compliant with Development Services Process as outlined 4/23/2019:

”1.2 Development Process Overview Development projects start with the City’s Development Services (DV) Department.to ensure compliance with zoning, environmental and land planning laws and codes and compatibility with the community and surrounding neighborhoods. PW works closely with DV to ensure compatibility with existing public infrastructure by issuing conditions during the entitlement process “

It is not compatible with the surrounding neighborhoods, not compatible with the horse overlay zoning, it does not recognize or address any impact to the added users crossing the historic equestrian trail at that location, removal of some of the trail easements at that location and the encroachment of the habitat and trails and river open spaces high density uses will create and will contribute to traffic congestion in the vicinity of Wardlow and Long Beach Blvd at the blue line.

NOTE Development Services Process: 2.2.3 PW

THE FOLLOWING CONFORMANCE REVIEWS NEED TO STILL BE COMPLETED:

- Conformance with City records
- Consistency with adjacent City/ Private project
 - Conformance with Street Master Plans as defined by the mobility element http://www.lbds.info/mobility_element/default.asp EQUITY NEEDS TO BE REVIEWED FOR SOCIAL JUSTICE EQUITY FOR THE CONNECTIVITY BETWEEN THESE HORSE ZONES ON THE HORSE TRAIL
- Conformance with existing easements and agreements that effect the property
- Conformance with Subdivision Map Act requirements <http://californiasurveyors.org/members/1980%20SMA.pdf>

TRAFFIC REVIEW TEAM • Review traffic capacity of adjacent streets

- Conformance with mitigation measures called for within the traffic study
- Conformance of ingress from and egress to the adjacent ROW
- Review on site traffic circulation
- Conformance with bicycle master plan http://www.lbds.info/bicycle_master_plan.asp
- Conformance with traffic signal, and striping standards <http://www.longbeach.gov/pw/resources/engineering/standard-plans/>
- Conformance with mobility standards <http://www.lbds.info/civica/filebank/blobload.asp?BlobID=4112>
- Coordination with Long Beach Transit as applicable

Development Services guidelines needs to be included in the study:

6.3 Traffic Impact Analysis (TIA) Guidelines TRIP GENERATION: For any development, new passenger vehicle trips, pass-by trips and internal capture (if any) should be estimated using the rates and methodologies outlined in ITE Trip Generation Manual, latest edition. Land-Use code and rates should be confirmed with Traffic Engineering.

CIVIL REVIEW TEAM need to ensure:

- Conformance with City standard plans <http://www.longbeach.gov/pw/resources/engineering/standard-plans/>
- Conformance with street moratoriums <http://www.longbeach.gov/pw/resources/engineering/utility-coordinationcorner/>
- Conformance with Pedestrian Accessibility Guidelines <http://www.longbeach.gov/pw/resources/>
- Compliance with storm drain master plan <http://www.longbeach.gov/PW/Resources/Stormwater-Management/LB-Stormwater-Plan/> AND <http://www.longbeach.gov/pw/resources/stormwatermanagement/best-practices/>
- Protection and compatibility of existing public facilities.
- Conformance with Street Tree standards <http://www.longbeach.gov/pw/services/street-trees/>
- Coordination with Long Beach Water and Energy Resources departments as applicable
- Assist with coordination with interested agencies or utility companies* (e.g. Caltrans, MTA, LA Flood Control, SCE, or City Light and Power)

There are other public agencies that will require further coordination as per City of Long Beach Development Services Guidelines: "Applicant is responsible for coordination with other utilities and public agencies. Each reviewer shall prepare draft conditions of approval which shall be compiled by PW staff, reviewed by a manager, any concerns addressed, and delivered back to the Planner for inclusion

with the other stakeholder conditions. The entire process from receipt of application to delivery of draft conditions should take approximately 15 days.”

Recreation

It is a potentially significant impact to remove the horse overlay zone that will further remove the recreation and lifestyle opportunities the protective zoning intended to preserve.

It will be a potentially significant impact to disrupt the safe horse trail connectivity and experience for the equestrian community by the reckless addition from this dense development by way of more crossing and merger hazard over and on the historic horse trail, not even mentioned in the IS. The cumulative increase in volumes of added users since 1947 without sufficient signage, education, trail separation and buffers needs to be further evaluated in an EIR – and as suggested in the County Trails Manual, LA River Master Plan, NPS Federal and State recognized guidelines for separation of trail user groups and buffer zones in all cases where the land space allows to maintain SAFE trails and connections. There needs to be a mitigation plan with signage and education to multi-users not aware of or accustomed to the right-of-way horses require, in order to maintain safe recreation and trail connectivity for the horse/bridle trail which serves as the critical mobility corridor for the equestrian community – it needs to be for social justice equal to the linear trails available to the bike or walking community of users.

70+ acres is a vast difference than 5 acres here or 11 acres there when looking at the context of the linear continuity of habit, recreation, open space, cultural and historic needs that these lands serve. To develop vast acres of open land, comprised of this and adjacent parcels needs further evaluation and not this project should be the decision

Plus the idea that the County “promise” that they will keep that portion of land outside the channel for parkland when it SHOULD BE KEPT THAT WAY ANYWAY is like dangling a carrot when the whole bunch is what should be preserved and seems pitiful from the agency supposed to be embracing the concept of collaboration when planning in the 1 mile zone along the sensitive river environmental corridor and not a compromise sufficient to mitigate the cumulative loss development of these lands would create and it has the

potential to become **an urban forest and that option needs further consideration in an EIR.**

Tribal Cultural Resources

There will be potentially significant impact for the native Tongva who must be allowed to be involved in this process due to the high potential the site will contain burial and artifact finds.

Also the applicant is requesting removed of the horse overlay that was applied to the entire zone which will cause negative impacts to several established communities with a negative impact to cultural resources.

Utilities and Service Systems

This is a potentially significant impact and further analysis of the load capacity for the known undersized storm drains, use of overland "BASINS" in lieu of storm drain pipes as well as other utilities, fresh water needs, police, fire, EMS service the project plans to tie into need to be further evaluated.

From: [Renee Lawler](#)
To: [Amy Harbin](#)
Subject: 712 Baker Street, aka: River Park Residentail aka OOI South aka Wrigley Heights Park South; Integral Developers
Date: Monday, April 12, 2021 9:57:48 AM
Attachments: [712 Baker Street Scoping comments 04 12 2021.docx](#)

-EXTERNAL-

Dear Ms. Harbin and staff:

With respect I submit my comments on the IS for the above-referenced property that is comprised of multiple parcels, but commonly referred to as 712 Baker Street.

I oppose the request to remove the Horse overlay in this zone for cultural and historical reasons and storm water run-off, hydrology and sub-watershed issues and infra-structure deficiencies as well as other issues require as per/CEQA further analysis for remediation, mitigation or no-project or an alternative solution that is more suitable to the needs of the community and wishes of the stakeholders. I also oppose the request for street vacation of Baker street ROW without further analysis.

Thank you.

Renee Lawler
562-433-0757
HETASC
CARP
Riverpark Coalition

From: [diana lejins](#)
To: [LBDS-EIR-Comments](#)
Subject: Parkland west side
Date: Monday, April 12, 2021 11:19:28 AM

-EXTERNAL-

Quit talking about equity and doing nothing about it. There are two Prime pieces of property that can be turned into Parkland that need to be.

[Sent from Yahoo Mail on Android](#)

From: [Mary Ann Melford](#)
To: [LBDS-EIR-Comments](#)
Subject: 712 Baker Street
Date: Monday, April 12, 2021 4:20:33 PM

-EXTERNAL-

Please develop this land into a park that all in Long Beach can use. We need more recreational spaces in this part of Long Beach.

Thank you.

Mary Ann Melford.

Sent from my iPhone



NATIVE AMERICAN HERITAGE COMMISSION

March 1, 2021

Amy Harbin
City of Long Beach
411 W. Ocean Blvd., 3rd Fl.
Long Beach, CA 90802

CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Merrí Lopez-Keifer
Luiseño

PARLIAMENTARIAN
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Karuk

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Apache

COMMISSIONER
**Julie Tumamait-
Stenslie**
Chumash

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Re: 2021020492, Long Beach RiverPark Residential Project, Los Angeles County

Dear Ms. Harbin:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. ~~A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18).~~ (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

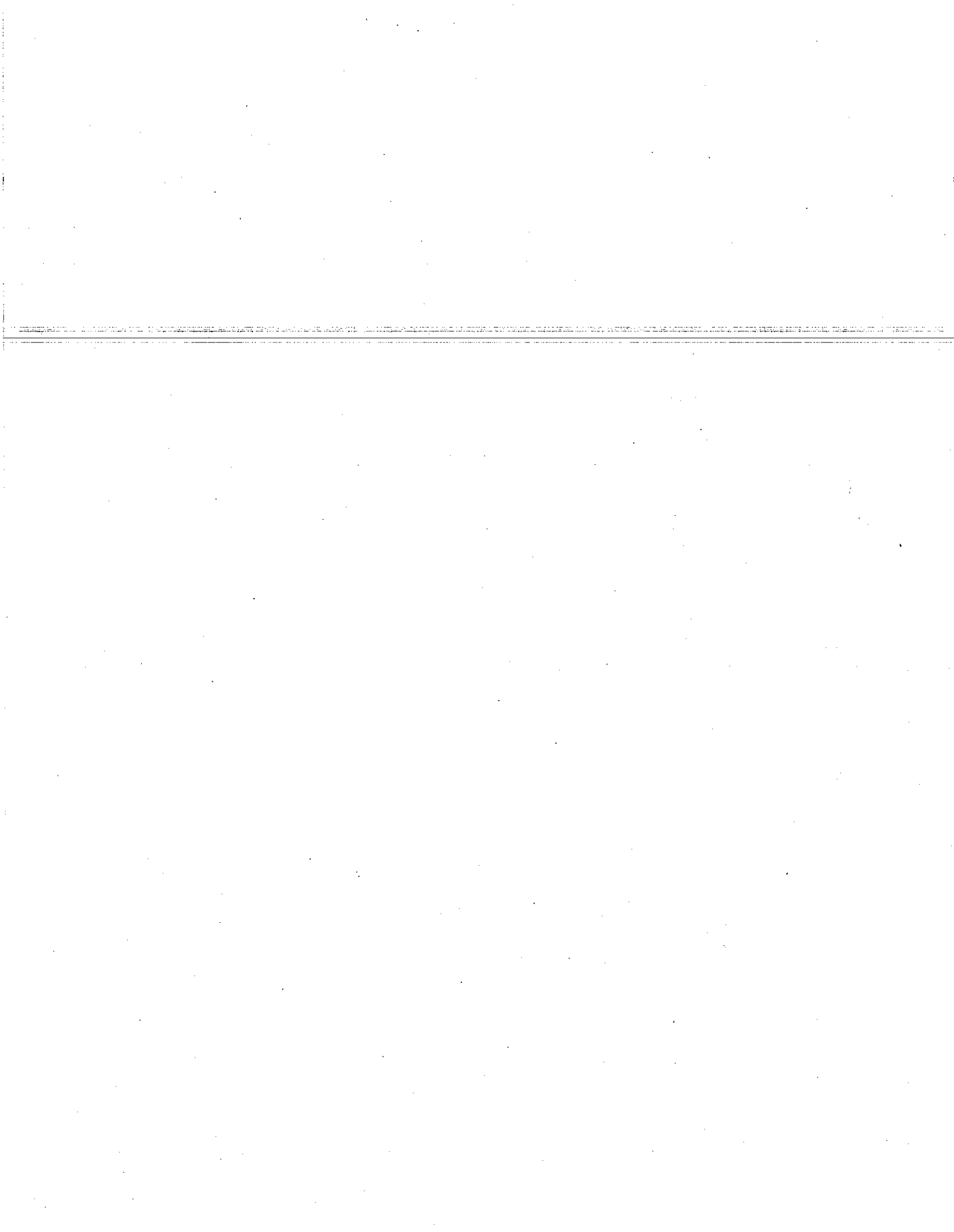
If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse



From: [Anne Proffit](#)
To: [LBDS-EIR-Comments](#)
Subject: 712 Baker Street
Date: Monday, April 12, 2021 2:50:19 PM

-EXTERNAL-

The PEOPLE of Long Beach are not asking for another gated community on the west side. We need a park, a big park that will complement the LA River Master Plan.

The greater needs of the people of Long Beach for green space on the west side will help stop encroaching pollution from the port and the 710 Freeway.

Do not remove the Horse Overlay and preserve this precious undeveloped land. For once, keep your promises got honor the Rivdrlink Plan and the LA River Master Plan that the mayor has stated, over and over again, that he will honor. This negates that promise.

Anne Proffit
213.675.0836
140 Linden Avenue 661
90802

Christine Lan

From: LBDS-EIR-Comments <LBDS-EIR-Comments@longbeach.gov>
Sent: Tuesday, March 23, 2021 3:43 PM
To: Christine Lan; Tony Locacciato
Cc: Scott Kinsey; Jonathan Iniesta
Subject: FW: 712 Baker St

Follow Up Flag: Follow up
Flag Status: Completed

Good Afternoon,

I'm going to take this email as a scoping letter comment.

Thank you,
Amy

Amy L. Harbin, AICP
Planner

Long Beach Development Services | Planning
411 W. Ocean Blvd., 3rd Fl. | Long Beach, CA 90802
Office: 562-570-6872



To help balance the City's budget during this economic downturn, some services are closed on alternating Fridays for staff furloughs (unpaid time off). These furloughs affect many operations in all City Departments and help prevent significant service reductions to the community. To see a schedule of impacted service days, visit www.longbeach.gov/furlough. We appreciate your patience and understanding.

From: David Walker <walkerdgdec@gmail.com>
Sent: Monday, March 22, 2021 3:45 PM
To: LBDS-EIR-Comments <LBDS-EIR-Comments@longbeach.gov>
Cc: Robert Garcia <Robert.Garcia@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; Council District 9 <District9@longbeach.gov>
Subject: 712 Baker St

-EXTERNAL-

I am writing to oppose the removal of the “H” zone for the proposed high-density residential project at 712 Baker St. The Development threatens the culturally significant Horse zone(s) & open space in the south LA River region.

Please do all you can to respect the final “Jewel of the LA River” (Assemblyman Rendon) and work towards open space/park a reality while restoring historic preservation and addressing park inequity and a healthier community.

Thank you,

David & Kathy Walker

From: [Laura Isabel Serna](#)
To: [LBDS-EIR-Comments](#)
Subject: Proposed 712 Baker Street (RiverPark Residential Project)
Date: Monday, April 12, 2021 12:27:41 PM

-EXTERNAL-

To Whom It May Concern,

I'm writing to express my opposition to the development of 712 Baker Street as a gated community. First, I acknowledge that Long Beach and all Southern California cities are in need of affordable housing. This development will not meet that need. Rather, it will cram more market rate homes onto a strip of land that undeveloped and should be preserved to meet west Long Beach's grossly unmet need for open green space. This parcel was identified in both the Riverlink Plan and the LA River Master Plan as ideally suited for expanding the green space along the LA river. So many people access and use the river trail but there is limited greenspace along its route. Residents of west Long Beach deserve to have green spaces to enjoy and to help mitigate the effects of traffic on the 710 freeway. We absolutely do not need more traffic and more buildings in that particular zone.

Thank you,
Laura Isabel Serna, PhD

From: [Regina Taylor](#)
To: [LBDS-EIR-Comments](#)
Subject: 712 Baker Street
Date: Monday, April 12, 2021 2:46:57 PM

-EXTERNAL-

I do not want to see the subject development for many reasons but specifically request consideration of the following:

This area needs to be preserved as it represents the limited land available for the open space needs of West Long Beach (I include in "West" the usually forgotten area on the other side of the L.A. River which is heavily populated and regularly overlooked.)

This land has been considered for permanent open space through multiple plans over the years: Riverlink, L.A. River Master Plan, and most recently the Lower L.A. River Master Plan which considered this property for one of its Signature Projects which has tremendous potential for open space/park use. This land and its location cannot be duplicated!

Do not remove the Horse Overlay with the intended purpose to supersede its use by coupling it with an unrelated commercial storage underlying district. The Horse Overlay always takes precedence! It is culturally significant zoning which supports the history & continuity of the equestrian community which still exists today along the L. A. River.

Regina Taylor
3206 Oregon Ave
Long Beach, CA 90806
562-477-5361

From: [Laura Vena](#)
To: [LBDS-EIR-Comments](#)
Cc: [Mayor](#); [Council District 8](#)
Subject: 712 Baker Street Initial Study for CEQA Process
Date: Sunday, April 11, 2021 6:46:52 PM

-EXTERNAL-

Dear Ms Harbin,

I am writing to comment on the Initial study for CEQA on the 712 Baker Street parcel, also known as the Long Beach RiverPark Residential Project.

I am a Long Beach resident, artist and professor who writes about and studies the culture and flora of the Los Angeles River. My award-winning book, *x/she: stardraped*, is an eco-poetics of the LA River that honors and celebrates the integral role the river has played in our city—it is the reason this area was founded and established as a city. In many ways, as controlled and paved in as it is, it is the heart of our cities. It sustained Native American cultures who lived off of its bounty. And it appealed to the Spaniards who claimed it later and the citizens of Mexico who were its first inhabitants. Beyond that, our city longs for natural space. People who live in park poor communities around the River use it for recreation: bicycle riding and walking. It is tremendous disservice to our city to not restore this parcel to a more natural form, for which we are so desperate.

Because of my research on and promotion of native plants and open space the community so desperately needs, I make the following comments on the Initial Study. I look forward to seeing them addressed in the forthcoming Draft EIR.

Adverse effect on habitat

Considering the substantially altered state of the Los Angeles River and the commitments made at city, regional, county, and national levels regarding its revitalization, it is clear that the EIR will have to robustly consider how the proposed development will 'have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species' (p. 23) and also the dire impact of eliminating any possibility that the 20 acre site could immediately or in the future become public open space. There are at least 124 sensitive species on the site and in the immediate area, 23 of those threatened or endangered (p. 26). Safe habitat is essential for these threatened, endangered and otherwise at-risk species. To say that 'the Project Site consists of disturbed vacant land surrounded by existing residential development and urban infrastructure' (p. 27) hides the ecologically significant impact on the entire watershed of protecting this site from development. The Letter from the Department of Fish and Wildlife has particular points which I look forward to seeing addressed in the EIR, including a recommendation that replanting be at a 3:1 ratio for removed native trees. It would be a mistake to conceptualize empty lots as devoid of ecological values or habitat, as evidenced by the finding of Burrowing Owls (*Athene cuniculara*) – a California Species of Special Concern – in empty lots a mile north and immediately adjacent to the Project site. The removal of 'some old foundations, roads, and pipes [that] are still present on the site' could well destroy habitat for owls.[2]

I note an error on p. 75 in relation to habitat and impacts on plant and animal communities. It is marked as both 'Less Than Significant Impact with Mitigation Incorporated' and 'Potentially Significant Impact'. I trust the EIR will treat this as the latter.

Air quality

As well as considering the air quality impacts of the proposed development (p. 20), the EIR process must adequately consider the ethical and public health implications of knowingly moving several hundred new residents into an area known to have catastrophically poor air quality already. Locating a large and dense residential development in the Diesel Death Zone, with residents at high risk of adverse health outcomes including cancer, asthma, and diabetes, needs rigorous environmental and ethical appraisal.

Cumulative Impacts

When the EIR considers 'impacts that are individually limited, but cumulatively considerable' (p. 75) please ensure that the following themes are fully elucidated: equestrian culture, public open space, environmental injustice, housing affordability, air quality, and traffic.

Density

The Initial Study cites the proposed density of 14.6 dwelling units/acre (p. 9) but does not compare this to the existing density in the immediate neighborhood, or of West Long Beach. For the Draft EIR to adequately scope the impact, these comparisons will need to be included.

Flooding

The Initial Study indicates that the project site is not within a risk zone for a 100-year or a 500-year flood (p. 50). I understand that FEMA have been remapping stretches of the LA River to upwardly revise the flood risks. The EIR will need to investigate whether there have been or are likely to be forthcoming changes to the thirteen-year-old mapping that is currently published by FEMA for the area.

The channelization of the Los Angeles River was made necessary by developers building carelessly in the flood plain, and it seems unfortunate to repeat this behavior some 90 years on, as this development seeks to do. Surely we have learned something since 1938? As a historian, I can't help but think of how history has an ominous way of repeating itself, and I trust that the City of Long Beach won't put people in harm's way, as in the first decades of the twentieth century when the river raged in flood destroying residential, commercial, and industrial sites that had been the wrong developments in the wrong places.

Further, I understand there has been litigation in recent years relating to flooding in the area, and this should be investigated and referenced in the EIR.

Groundwater recharge

The assertion that there will be a Less Than Significant Impact in terms of 'groundwater supplies or interfere[n]ce with groundwater recharge' (p. 48) is questionable and needs attention in the

draft EIR. Likewise the document asserts that the creation or contribution of runoff water would be 'less than significant' (p. 52).

Is it true that in such a densely built development that the site is '38 percent pervious' (p. 48), even though it is entirely dominated by streets and buildings?

The movement of water, and its biofiltration, appears not to be for aquifer recharge but rather expulsion from the site via the stormwater system into the LA River and out to the ocean. This wastage of water is not sensible nor justifiable in our drought-prone climate.

The possibility of designing homes and the clubhouse area to have rainwater capture and/or greywater reuse was not mentioned anywhere in the Initial Study. It must be considered in the EIR and in the City's deliberations. In light of water scarcity in the region, which is only increasing with climate change, urban and architectural design can and must do their part to lessen our water footprint.

I am glad to see sufficiency of 'water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years' categorized as a potentially significant impact (p. 71) and I trust that groundwater recharge, rainwater capture and/or greywater reuse will be adequately incorporated into the project design.

Historic significance

The Initial Study comments that 'according to the Long Beach General Plan Historic Preservation Element, the Project Site does not contain historic resources and is not in a historic district' (p. 16, also p. 29) and yet it has a rich and materially documented equestrian history that spans back to the Spanish and the Rancho periods in our history, and remains as living history every day in Long Beach. Also, as noted, Native American historical significance must be robustly investigated and protected, through the EIR process.

Horse Overlay District

The proposed removal of the Horse Overlay District (p. 13) – a distinctive and essential element of Long Beach's urban fabric – needs extensive attention in the draft EIR. My strong opinion is that the Horse Overlay must not be removed. My request is that the draft EIR fully address the following:

- the history of Horse Overlays in Long Beach, including the EIR that was part of the overlay establishment in the 1970s, and also any relevant legal proceedings
- how many of the original six overlays/equestrian communities remain intact and what the cumulative impacts would be to removing this one, in terms of the land use character of Long Beach, and the protection of Long Beach's living equestrian history
- the density allowed under a Horse Overlay compared to the density of the proposed project (I understand it is approximately 4 homes per acre, but I have not seen documentation of this)
- effects of the removal of the Overlay, and the construction of the housing development on both the immediate equestrian community with open space and the trail, as well as linear connectivity for horses and their riders between Long Beach equestrian districts, and indeed into the San Gabriel River, the Rio Hondo and north to Atwater and Burbank equestrian neighborhoods

Land Use

It's not just the Horse Overlay District under threat. As recently as late 2019 in the City's 2040 General Plan, the area was affirmed by the City as Founding and Contemporary Neighborhood (FCN) and Open Space (OS) (p. 4). The current zoning from Commercial Storage (CS) and Single-Family Residential Standard Lot (R-1-N) would be changed to residential Planned Unit Development (RP) and Council would waive height restrictions. Other approvals forecast in the Initial Study include Vesting Tentative Tract Map and a Street Vacation – meaning the complete or partial abandonment or termination of the public right to use a street, highway, or public service easement – to enable the development to proceed.

Given all of this, I challenge the appropriateness of the Less Than Significant Impact rating given regarding any 'conflict with any land use plan' (p. 55). I would also ask that the consultants ensure plain English language explanations of technical terms such as Vesting Tentative Tract Map and Street Vacation so that lay readers like me can be fully aware of the meaning and implications.

The City made a promise in an undated recent document that FCN constitutes 'more than 34 percent of the City's land area and will not be changed' [emphasis added][3]. The Initial Study suggests the City intends to break that promise and this needs addressing in the EIR.

Park Space

Detailed analysis about access to parkland open space will be important in the EIR, and I ask the preparers to ensure that analysis is more nuanced than at a whole-of-City level. West Long Beach is substantially underserved in terms of open space, and overserved in terms of environmental injustices. For this reason, please ensure that the EIR analysis addresses West Long Beach in particular as well as referencing city wide statistics. Can the EIR please calculate the impact of 624 new residents on West Long Beach's current park ratio, which I believe is 1 acre per thousand residents?

Given the open space deficits that exist in West Long Beach, the addition of 624 residents and the provision of 5-acres of recreational open space (p. 66) is insufficient.

The EIR needs to systematically document past promises made in planning documents and elsewhere about this land parcel and others in terms of creating public open nature space .

Plant palette

The planting list for the condominium area does not indicate any intention of the developer to use a native plant palette. Instead it specifies Tipu Tree, Purple Orchid Tree, Magnolia, Marina Arbutus, Australian Wouldow, Brisbane Box, New Zealand Christmas Tree, Chanticleer Pear, Crape Myrtle, and Majestic Beauty (p. 13). The developer needs to design with a commitment to native plants, at a minimum adhering to the standards in the Draft Los Angeles River Master Plan of at least 85% being native to the LA River watershed and no more than 15% being non-native, non-invasive plants.

Population growth

This project would by definition 'induce substantial unplanned population growth in an area, directly (for example, by proposing new homes and businesses)' and yet this is ascribed a 'Less Than Significant Impact' rating (p. 60). It will not meet the City's own Founding and Contemporary Neighborhood (FCN) General Plan Land Use designation per the City's recent 2040 General Plan.

It is too blunt, some may even say disingenuous, to use a city-wide thirty-year growth projection (p. 60) to make the magnitude of this development look smaller than it really is.

Ascribing this point a 'Less Than Significant Impact' appears to be in error and needs to be corrected.

Public Engagement

I ask the City and the consultants to all they can to facilitate engagement of the general public with the EIR process, accommodating linguistic diversity, socioeconomic status, education, as well as cultural and social capital. Environmental injustices disproportionately impact disadvantaged, minority, and marginalized communities and the City has a responsibility to address this in the current CEQA process, and in general. Outreach initiatives should be documented in the EIR.

Scenic vista

I disagree with the assertion that the development will have a less than significant impact on a scenic vista (p. 15). The River is designated as 'a scenic route as it provides a viewshed that is worthy of protection and enhancement' (p. 16) and no convincing argument is made that the addition of 227 buildings in a jumble of high-density Spanish Colonial, Italianate, and Santa Barbara architectural styles 'would not substantially alter the existing views along the Los Angeles River' (p. 16). The Los Angeles River is internationally and locally iconic, and the viewshed needs not only to be protected but also enhanced.

Traffic

I note that the Department of Transportation has stated several strong concerns about the development in terms of adverse traffic outcomes.^[4] I share these concerns and look forward to seeing them addressed in the EIR. The addition of at least 511 vehicles (p. 9) to the neighborhood needs to be addressed and mitigated.

Urban Heat Island

The density and character of the development looks as if it will contribute substantially to urban warming, an increasing problem in the face of climate change. This needs to be addressed in the EIR and mitigated in the site design.

In conclusion, the highly developed/degraded nature of a site is often used by EIR preparers to craft an illusion of the development being unproblematic because it is proposed on land already substantially altered, a brownfield not worthy of environmental protections. This is a paradigm that is philosophically and practically unviable, particularly in hyper urban landscapes such as those along the Los Angeles River. The character, scale, and function of the proposed development is vastly unsuitable for the site, particularly in light of the draft Los Angeles River

Master Plan, the Lower LA River Revitalization Plan, and RiverLink.

When the EIR proposes alternatives, as per CEQA Guidelines, I hope that an environmentally superior alternative to the project or its location will include the possibility of the land parcel being protected as public green space, and that the developer may be encouraged to build in a more suitable manner on a more suitable site. The protection of this land parcel as open green space would be game-changing for Long Beach, and the entire river. I trust the City and the CEQA process to protect the river, the 712 Baker Street parcel, and the adjacent community.

Best regards,

Laura Vena

CC: Mayor of Long Beach, Long Beach Council Members

Laura Vena

Founder & Creative Director, Blockhead Brigade

1913 Press First Book Award for *x/she: stardraped* by John Keene

Pushcart Prize Nominee for *x/she: stardraped* by Debra di Blasi

Co-Founder & Managing Editor, Two If By Sea Press

Fiction Editor, *Entropy Magazine*

www.lauravena.com

www.twoifbyseapress.org

www.blockheadbrigade.org

From: [Alisha McCullough](#)
To: [LBDS-EIR-Comments](#)
Subject: 712 Baker street
Date: Monday, April 12, 2021 4:07:56 PM

-EXTERNAL-

I strongly oppose the planned development for this site.

I believe and urge you that this site should be preserved for open green space for West Beach, which is green space deficient.

Thank you,
-Alisha Walker

From: [LBDS-EIR-Comments](#)
To: [Christine Lan](#); [Tony Locacciatto](#)
Cc: [Scott Kinsey](#); [Jonathan Iniesta](#)
Subject: FW: 712 Baker St
Date: Tuesday, March 23, 2021 3:43:00 PM
Attachments: [image004.png](#)
[image005.png](#)
[image006.png](#)

Good Afternoon,

I'm going to take this email as a scoping letter comment.

Thank you,
Amy

Amy L. Harbin, AICP
Planner

Long Beach Development Services | Planning

411 W. Ocean Blvd., 3rd Fl. | Long Beach, CA 90802
Office: 562-570-6872



To help balance the City's budget during this economic downturn, some services are closed on alternating Fridays for staff furloughs (unpaid time off). These furloughs affect many operations in all City Departments and help prevent significant service reductions to the community. To see a schedule of impacted service days, visit www.longbeach.gov/furlough. We appreciate your patience and understanding.

From: David Walker <walkerdgdec@gmail.com>
Sent: Monday, March 22, 2021 3:45 PM
To: LBDS-EIR-Comments <LBDS-EIR-Comments@longbeach.gov>
Cc: Robert Garcia <Robert.Garcia@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; Council District 9 <District9@longbeach.gov>
Subject: 712 Baker St

-EXTERNAL-

I am writing to oppose the removal of the "H" zone for the proposed high-density residential

project at 712 Baker St. The Development threatens the culturally significant Horse zone(s) & open space in the south LA River region.

Please do all you can to respect the final “Jewel of the LA River” (Assemblyman Rendon) and work towards open space/park a reality while restoring historic preservation and addressing park inequity and a healthier community.

Thank you,

David & Kathy Walker

From: [David and Kathy Walker](#)
To: [LBDS-EIR-Comments](#)
Subject: 712 Baker
Date: Sunday, April 11, 2021 9:20:57 PM

-EXTERNAL-

I am writing to encourage the city to not approve development of 712 Baker for housing! Let's use this land for Park Space for the Westside

David Walker

Sent from my iPhone

From: [Scott Kinsey](#)
To: [Amy Harbin](#)
Subject: FW: Request for clarification
Date: Monday, April 12, 2021 3:40:43 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Scott Kinsey, AICP
Planner V

Department of Development Services | Planning Bureau
[411 W. Ocean Blvd., 3rd Floor | Long Beach, CA 90802](#)
Office: (562) 570-6461



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From: Kimberly Walters <kimwalters@gmail.com>
Sent: Saturday, April 10, 2021 9:15 PM
To: Scott Kinsey <Scott.Kinsey@longbeach.gov>
Subject: Request for clarification

-EXTERNAL-

Dear Mr. Kinsey,

Thanks very much for the time you and your team took to talk with the community last Thursday regarding 712 Baker St. It's great that you're taking every effort to see that due diligence is done on this site.

I'm writing to you for clarification on a point that you made in that meeting. Mr. Koontz mentioned that it is unconstitutional for the City to interfere with the rights of private property owners to build on their own land. You followed up Mr. Koontz's comment stating that there would be no legal grounds upon which the City of Long Beach could deny these property owners' requests. I believe you meant the zoning changes and all subsequent entitlements and permits.

Could you clarify this legal point for me? My understanding is that the City Council has the legal

obligation to plan the city's developments in accordance with the greater needs of the community. This is, of course, why zoning laws, entitlements, and permits, etc. exist in the first place. Could you help me understand your comment? Why would it be that the City of Long Beach would be unable to deny zoning changes and entitlements to developments that it perceives to go against the needs of the broader public?

Thanks very much for your help in understanding your point.

Kind regards,
Kimberly

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Kimberly Walters
[Assistant Professor](#), International Studies, CSULB
Secretary, [Riverpark Coalition](#)

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