



ENVIRONMENTAL MANAGEMENT ASSOCIATES

April 15, 2014

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

RE: Comments on the Notice of Preparation/Initial Study for the PCH + 2<sup>nd</sup> Project

Mr. Chalfant:

On behalf of the Los Cerritos Wetlands Land Trust (LCWLT), we respond to the Notice of Preparation (NOP) and Initial Study (IS) prepared for the PCH + 2<sup>nd</sup> Project (Project). The LCWLT concurs that an Environmental Impact Report (EIR) should be prepared. Following are comments on the released IS.

*Project Description*

The Project needs to be better defined so as to accurately be able to determine impact significance. The Project, as described, “would include approximately 216,000 square feet of retail uses, approximately 29,000 square feet of restaurant uses, and 1,172 surface and structured parking spaces.”

The Project Description must identify what types of restaurant uses are associated with this Project. Per City Code (Table 41-1C, Required Number of Parking Spaces for Commercial, Industrial/Manufacturing and All Other Uses), different restaurant types have different parking requirements (i.e. “dinner restaurant” requires 10 spaces per 1,000 GFA of dining areas plus 20 per 1,000 GFA per tavern area and 25 per 1,000 for dance floor; “ready to eat restaurant” requires 4 per 1,000 GFA, etc.). Without knowing what type of restaurants are associated with the “29,000 square feet of restaurant uses” it is not possible to determine if the Project is supplying the required amount of parking.

As it stands presently, the Project is providing 1,172 surface and structured spaces. Given that the parking required for 216,000 square feet of retail uses would be 1,080 spaces (5 spaces for 1,000 SF-GFA), it seems that only 92 spaces are “allotted” for restaurant uses, which, regardless of the type of restaurant use assumed, does not appear to be adequate with regards to parking supply.

The Project must provide sufficient parking consistent with City of Long Beach code requirements. If it does not, the EIR must identify where the “overflow” parking will be provided

(i.e. the Marina lot across the street, etc.). Alternatively, the Project must be downsized to provide adequate parking.

The identification of restaurant type is also important for the Traffic Impact Analysis. Different restaurant uses have different vehicle trip generation factors. Without knowing what types of restaurants will be constructed, it is not possible to accurately determine the trip generation associated with the Project.

The project description should also be revised to more clearly describe the Project's open space. Attachment A (Project Description), Section 3 (Landscaping and Open Space) of the IS identifies that the Project is providing 157,252 square feet of open space and exceeds the 30% open space requirement, yet it is not clear how that determination was made.

Per SEADIP, "A minimum of thirty percent of the site shall be developed and maintained as usable open space (building footprint, streets, parking areas and sidewalks adjacent to streets shall not be considered usable open space). Bicycle and pedestrian trails not induced within the public right of way may be considered usable open space.

Section 3 and the corresponding Figure A-12 of the prepared Project Description identify trees and landscaping throughout the Project site. Are all landscaped areas assumed to be open space? Landscaping within parking areas (or valet drop off areas) should not be utilized when calculating the Project's provided open space.

### *Traffic Impacts*

As identified in the Initial Study, traffic impacts are likely to be significant. The Project must offer traffic mitigation which reduces impacts to below a level of significance. This mitigation must also be feasible.

If the applicant is going to mitigate traffic by constructing a dedicated right turn lane on PCH by "consuming" portions of the Mobil station across the street (as was proposed under the 2<sup>nd</sup> + PCH Project), it must be demonstrated that: 1) the applicant owns the parcel of land he wishes to utilize for traffic mitigation, has the ability to implement the mitigation, and the City has the ability to legally enforce it; and 2) neither the ingress/egress nor the internal circulation of the Mobil station will be adversely impacted. Further, potential impacts related to the construction of the dedicated turn lane would need to be analyzed in the Project EIR.

If the applicant is going to mitigate traffic by offering shuttle service (as was proposed under the 2<sup>nd</sup> + PCH Project), the specifics of the shuttle service (i.e. shuttle route, number of trips, etc), should be identified in the Project EIR. It also should be demonstrated how the shuttle service will successfully mitigate traffic to below a level of significance. Simply offering shuttle service and declaring it successful (as was done in the 2<sup>nd</sup> + PCH Project EIR) will not suffice.

### *Biological Impacts*

The LCWLT is extremely concerned about any Project's impacts on the nearby Los Cerritos Wetlands. The EIR must address the impact of the project and its additional traffic, with its associated noise and light pollution, on the Los Cerritos Wetlands.

### *Appealable Area and Tidelands*

In correspondence between City staff (Craig Chalfant) and the applicant dated July 10, 2012 re. "Final Action for Conceptual Site Plan Review, 6400 E. Pacific Coast Highway," page 2 (of 10) states, "**Coastal Zone Boundaries:** The Long Beach City Attorney's office is currently working with the State Lands Commission to determine the exact boundary of the Coastal Zone Appealable Area in relation to Marina Drive. Staff will inform you of the State's determination, which we anticipate to be confirmed in the next few weeks." What are the results of the findings, and is this Project within the appealable area of the Coastal Zone?

Further, if portions (or all) of the Project site is located within an area identified as tidelands, there are certain requirements and development restrictions associated with development in tidelands areas. These areas, and the related development requirements, should be identified and discussed in the Project EIR.

### *Alternatives to the Proposed Project*

The Project EIR must identify and analyze a reasonable range of alternatives. Given the significant amount of traffic associated with an all retail/restaurant development, reasonable alternatives would include reducing the size of the all commercial development therein reducing the amount of related vehicle trips. Also, as a hotel is an allowable use for this parcel, an alternative should include a "hotel only" option. Additionally, a mixture of hotel/commercial uses should also be considered as this would serve to reduce impacts, particularly traffic related.

### *Cumulative Impact Analysis*

CEQA requires that an EIR analyze cumulative impacts. An elaborate comprehensive master planning exercise to rezone the entire SEADIP area is currently underway. This Project is being processed concurrent with those planning efforts. It is vital to carefully consider the cumulative scenario of this Project in relation to the SEADIP update (and any other projects which are reasonably foreseeable). How are the impacts of this Project going to be identified and evaluated in a cumulative context given a seemingly dynamic and uncertain (future) baseline?

### *Conclusion*

Thank you for consideration of the above comments. The LCWLT requests to be placed on the

Craig Chalfant, Long Beach Development Services  
PCH + 2<sup>nd</sup> Project  
Notice of Preparation/Initial Study

mailing list for any future notices and documents. The LCWLT also looks forward to reviewing and commenting on the Draft EIR.

Sincerely,

Environmental Management Associates, Inc.

/s/

Heather Altman  
Senior Environmental Specialist