

CITY OF LONG BEACH

DEPARTMENT OF DEVELOPMENT SERVICES

H-2

333 West Ocean Blvd., 3rd Floor, Long Beach, CA 90802 (562) 570-5237

February 5, 2019

HONORABLE MAYOR AND CITY COUNCIL
City of Long Beach
California

RECOMMENDATION:

Receive the supporting documentation into the record, conclude the public hearing; consider appeals from David P. Denevan, Jeremy Arnold, and Danielle Wilson; accept Categorical Exemption CE-18-152; and,

Uphold the Planning Commission's decision to approve a Site Plan Review (SPR18-033), Conditional Use Permit (CUP18-015), and Local Coastal Development Permit (LCDP18-022), to permit a change of use and renovation of The Breakers Hotel into a 185-room hotel with food and beverage venues (with onsite alcohol), banquet/meeting areas, and amenities, in the Coastal Zone at 210 East Ocean Boulevard in the Downtown Shoreline Planned Development District (PD-6) (Application No. 1806-19). (District 2)

DISCUSSION

On November 15, 2018, the Planning Commission held a public hearing and conditionally approved a Site Plan Review (SPR), Conditional Use Permit (CUP), and Local Coastal Development Permit (LCDP) requests for the change of use and renovation of The Breakers Hotel (The Breakers) into a 185-room hotel with food and beverage venues (with onsite alcohol), banquet/meeting areas, and amenities, in the Coastal Zone at 210 East Ocean Boulevard in the Downtown Shoreline Planned Development District (PD-6) (Attachment A - Planning Commission Staff Report). On August 13, 2018, the Cultural Heritage Commission (CHC) approved a Certificate of Appropriateness request to make exterior building modifications to The Breakers, including restoration work, roof modifications and the addition of an enclosed stairwell, in conjunction with a change of use back to a hotel (Attachment B – Cultural Heritage Commission Staff Report).

The Property

The subject site is located on the south side of Ocean Boulevard between Locust Avenue to the west and Collins Way to the east (Attachment C – Location Map). Victory Park, a public park, abuts the subject property to the north. An existing access easement through the public park allows for vehicular access to the site via an existing circular driveway. The east-west alley (Marine Way) to the rear of the project site was vacated by Resolution No. C-23207 (July 21, 1981), and an easement was reserved along the full length and width of the alley for utility purposes. The site is located within Subarea 7 of the Downtown Shoreline Planned Development District (PD-6), and within General Plan Land Use District Number 7 – Mixed Uses (LUD 7). LUD 7 is intended for combinations of land uses.

Surrounding land uses include the Long Beach Convention Center to the east across Collins Way, office uses to the north across Ocean Boulevard, and office uses to the west across Locust Avenue. To the south across the vacated Marine Way, the site abuts a multi-family residential development (five-stories of apartments over a two-story parking garage) located at 207 Seaside Way, which is currently under construction.

The Breakers was constructed in 1925 as a 13-story hotel with a 14th floor cupola and rooftop area. Two additional levels are located below street level at Ocean Boulevard and the building is approximately 172,000-square-feet in area. The Breakers was designated as a City Historic Landmark in 1989 and this designation recognizes the building's Spanish Renaissance Revival style, elaborate concrete ornamentation around the entry, and bas-relief busts and detailing.

On March 23, 1989, the property was approved for the conversion of The Breakers to a 233-unit congregate care facility (Case No. 8901-29). Prior to the conversion to a congregate care facility, the last use was a hotel. Additional approvals include installation of 12 canopies (1983), hall rental use (with offsite valet) at an existing congregate care facility (1993), an exemption for onsite sale of general alcohol at an existing restaurant with a fixed bar (Sky Room) (1998), installation of signage for the Sky Room Restaurant (1998), and a use permit to reestablish a banquet room/hall rental in association with the Sky Room (1998).

The proposed project will rehabilitate The Breakers building and return the structure to its original historic use. Further, it will establish an economically viable use of the property, which has been vacant since 2016.

The Project

The scope of work subject to the requested approvals (Attachment D – Plans) includes the following:

- Change of use from 233-unit congregate care facility to a 185-room hotel
- Expansion of alcohol service to new food and beverage venues
- Interior floor plan reconfiguration
- Exterior building modifications, including restoration work, roof modifications, and the addition of an enclosed stairwell
- Addition of an outdoor rooftop pool and deck area on the existing 3rd floor roof
- Expansion of the 14th floor rooftop terrace and addition of a new restroom structure on 14th floor terrace
- Conceptual approval of driveway modifications and re-landscaping Victory Park

An addition to the tower portion of the building is proposed to accommodate a new stairwell and service elevator. The addition extends the tower eastward approximately ten feet from its existing facade. The addition of the stairwell and service elevator is a necessary life safety improvement for the building that provides a gurney elevator and

code-compliant stairwell. The CHC placed conditions on the design of the stairwell addition to ensure the new work complies with the Secretary of Interior's (SOI) Standards for Rehabilitation.

The proposed modifications to Victory Park, a City-owned park, are shown on the Conceptual Landscape Plan (Attachment E - Conceptual Victory Park Landscape Plan). The plan includes installation of new park landscaping and amenities. The existing vehicular access to The Breakers will be reconfigured to eliminate one point of vehicle and pedestrian conflict along Ocean Boulevard by relocating the easterly driveway approach to exit onto Collins Way.

Entitlements

The Breakers is built lot line to lot line and there are no onsite parking spaces. The requested change of use to a proposed 185-room hotel falls within non-conforming parking rights, and no additional parking spaces are required for the hotel or other venue uses. However, as a required finding for the CUP for alcohol uses, the operator of the use will provide parking for the hotel equivalent to the parking required for new construction. The parking requirement for the uses serving alcohol under this CUP would be 218 parking spaces. The applicant is proposing to lease 250 non-exclusive offsite parking spaces at the adjacent Long Beach Convention Center parking garage, which The Breakers can use when available. The Convention Center parking is currently expected to have availability on most days of the year but may be limited during special events or certain times of the year. Likewise, parking demand from the hotel may increase during special events. In anticipation of these needs during special events, additional overflow parking of 150 spaces will be leased from the office building at 211 East Ocean Boulevard. All offsite parking will be valet parking only. In addition to providing offsite parking, the property owner/building manager will be required to implement a Transportation Demand Management (TDM) Plan (Attachment F – Transportation Demand Management Plan).

The applicant proposes to transfer the existing Type 47 (on-sale general eating place), Type 58 (Caterers Permit), and Type 68 (Portable Bar) alcohol licenses that cover the existing building. Interior uses related to onsite alcohol would be reconfigured as part of the change of use. No new alcohol licenses are proposed for the site beyond the existing license transfer. Conditions of approval will memorialize and further address operational procedures for all onsite alcohol venues.

Pursuant to PD-6, Site Plan Review is required for projects involving a change of use. In addition, the existing onsite alcohol uses would be a reconfiguration under the project, and would require a CUP (CUP18-015) for the on-premises alcohol. A LCDP is required for any discretionary actions within the Coastal Zone. The Planning Commission found the Project, as conditioned, to meet the SPR, CUP, and LCDP requirements (Attachment G – Findings and Conditions of Approval).

One piece of written correspondence was received prior to the Planning Commission hearing (Attachment H – Public Comment Letters). At a public hearing held on November 15, 2018, the Planning Commission conditionally approved the SPR, CUP, and LCDP requests.

Appeals

Within the ten-day appeal period, three applications for appeal were filed by (1) David P. Denevan, (2) Jeremy Arnold, and (3) Danielle Wilson (Attachment I – Applications for Appeal). The appellants assert that the project conflicts with the standards established under the Victory Park Design Guidelines, PD-6, and the Local Coastal Program (LCP), and that the project introduces environmental impacts.

Supplemental analyses and responses were conducted subsequent to the filing of the applications for appeal (Attachment J – Supplementary Materials). These supplementary materials demonstrate that the proposed project would not result in an effect on the environment and would be consistent with all required findings.

The project will restore the building back to its original use as a hotel. Staff finds that the reuse of a historic landmark building is not likely to cause any negative impacts upon the surrounding areas. The use will include food and beverage venues, banquet/meeting facilities, and amenity uses that would serve both local and hotel patrons. The use will introduce new accommodations to further serve tourists, business visitors, concert and playgoers, and special interest groups in the greater downtown environment. The conceptual changes to Victory Park would provide new landscaping and amenities to the park that are not present under existing conditions.

Staff has analyzed the project in accordance with the required findings for SPR, CUP, and LCDP entitlements, and finds that positive findings can be made. As such, staff recommends the City Council deny the appeals of the Planning Commission's approval of the Project, thus approving the project.

Public hearing notices were distributed on January 15, 2019, in accordance with the requirements of Chapter 21.21 of the Long Beach Municipal Code. Any comments received prior to the City Council hearing of February 5, 2019 will be provided to the City Council at or before the hearing.

In accordance with the Guidelines for Implementation of the California Environmental Quality Act, a Categorical Exemption was prepared for the proposed project (Attachment K – Categorical Exemption CE-18-152), finding that this project qualifies for a Categorical Exemption per Sections 15301, 15303, 15331 and 15332 of the California Environmental Quality Act Guidelines.

One piece of written correspondence was received prior to the City Council Hearing (Attachment L – City Council Correspondence Received).

This matter was reviewed by Assistant City Attorney Michael J. Mais on January 4, 2019 and by Budget Management Officer Geraldine Alejo, on January 17, 2019.

TIMING CONSIDERATIONS

City Council action is requested on February 5, 2019. Section 21.21.504.B of the Zoning Regulations requires a public hearing for an appeal to the City Council to take place within 60 days of receipt of an appeal, the first of which was filed on November 21, 2018.

FISCAL IMPACT

There is no fiscal or local job impact associated with this recommendation.

SUGGESTED ACTION:

Approve recommendation.

Respectfully submitted,



LINDA F. TATUM, FAICP
DIRECTOR OF DEVELOPMENT SERVICES

LFT:CK:AP:mc

P:\Planning\City Council Items (Pending)\Council Letters\2019\2019-02-05\Breakers Hotel\DS - Appeal of 210 E Ocean Blvd.v3.docx

APPROVED:


PATRICK H. WEST
CITY MANAGER

Attachments: Attachment A – Planning Commission Staff Report (November 15, 2018)
Attachment B – Cultural Heritage Commission Staff Report (August 13, 2018)
Attachment C – Location Map
Attachment D – Plans
Attachment E – Conceptual Victory Park Landscape Plan
Attachment F – Transportation Demand Management Plan
Attachment G – Findings and Conditions of Approval
Attachment H – Public Comment Letters
Attachment I – Applications for Appeals
Attachment J – Supplementary Materials
Attachment K – Categorical Exemption CE-18-15
Attachment L – City Council Correspondence Received



CITY OF LONG BEACH

DEPARTMENT OF DEVELOPMENT SERVICES

333 West Ocean Blvd., 5th Floor

Long Beach, CA 90802

(562) 570-6194 FAX (562) 570-6068

November 15, 2018

CHAIR AND PLANNING COMMISSIONERS

City of Long Beach
California

RECOMMENDATION:

Accept Categorical Exemption CE-18-152 and approve a Site Plan Review (SPR18-033), Conditional Use Permit (CUP18-015), and Local Coastal Development Permit (LCDP18-022), to permit a change of use and renovation of The Breakers Hotel (City-Designated Historic Landmark) into a 185-room hotel with food and beverage venues (with on-site alcohol), banquet/meeting areas, and amenities in the Coastal Zone at 210 East Ocean Boulevard in the Downtown Shoreline Planned Development District (PD-6). (District 2)

APPLICANT: Patrick Enrich and Nathan Morries
Arco Construction
900 North Rock Hill Road
Saint Louis, MO 63119
(Application No. 1806-19)

DISCUSSION

The subject property is located on the south side of Ocean Boulevard between Locust Avenue to the west and Collins Way to the east (Exhibit A – Location Map). Victory Park, a public park, abuts the subject property to the north. An existing access easement through the public park allows for vehicular access to the site via a circular driveway. The east-west alley (Marine Way) to the rear of the project site was vacated by Resolution No. C-23207 (July 21, 1981), and an easement was reserved along the full length and width of the alley for utility purposes. The Project site is located within Subarea 7 of the within the Downtown Shoreline Planned Development District (PD-6). The site is located within General Plan Land Use District Number 7 – Mixed Uses (LUD 7). LUD 7 intends for combinations of land uses.

Surrounding land uses include the Long Beach Convention Center to the east across Collins Way, office uses to the north across Ocean Boulevard, and office uses to the west across Locust Avenue. To the south across the vacated Marine Way, the site abuts a multi-family residential development (five-stories of apartments over a two-story parking garage) located at 207 Seaside Way, which is currently under construction.

At present, the property is developed with a thirteen-story building with a 14th floor cupola and rooftop area (Exhibit B – Site Photos). Two additional lower levels are

located below street level at Ocean Boulevard. The building was originally constructed in 1925. The building is approximately 172,000-square-feet in area and is designed in a Spanish Renaissance Revival style with a gable roof with towers. The building consists of a main 13-story tower with a two-story base that extends the entire length of the parcel between Locust Avenue and Collins Way.

The building was designed by the Los Angeles architecture firm of Walker and Eisen which was one of the most prominent firms during the 1920s. The building was designated as a City Historic Landmark in 1989 and this designation recognizes the building's Spanish Renaissance Revival style, elaborate concrete ornamentation around the entry, and bas-relief busts and detailing (Exhibit C – Ordinance No. C-6609). The building's exterior is identified in the landmark ordinance as protected the area as well is the interior lobby. In addition, character defining features include:

- Bas-relief ornamentation at entry,
- Corinthian capitals,
- Octagonal tower
- Window fenestration,
- Exterior finishes, and
- Pill box

Shortly after landmark designation, a seismic strengthening of the building took place. This improvement while significant for the protection of the building, also created significant building alterations. One of the biggest impacts resulting from the project is that it sealed several original window openings.

The last major land use entitlement (Case No. 8901-29) for the property was approved on March 23, 1989 and included the conversion of the landmark building to a 233-unit congregate care facility. Additional entitlement approvals include installation of twelve canopies (1983), hall rental use (with off-site valet) at an existing congregate care facility (1993), an exemption for on-site sale of general alcohol at an existing restaurant with a fixed bar (Sky Room) (1998), installation of signage for the Sky Room Restaurant (1998), and a use permit to re-establish a banquet room/hall rental in association with the Sky Room (1998).

Project Summary

The proposed project at 210 East Ocean Boulevard (Project) would allow for the change of use and renovation of The Breakers Hotel (City-designated Historic Landmark) into a 185-room hotel with food and beverage venues (with on-site alcohol), banquet/meeting areas, and amenity uses. On August 13, 2018, the Cultural Heritage Commission approved a Certificate of Appropriateness request to make exterior building modifications to The Breakers Hotel, including restoration work, roof modifications, and the addition of an enclosed stairwell, in conjunction with a change of use to hotel.

The scope of work subject to Planning Commission approval (Exhibit D – Plans) includes the following:

- Change of use from 233-unit congregate care facility to a 185-room hotel
- Expansion of alcohol service to new food and beverage venues
- Interior floor plan reconfiguration
- Exterior building modifications, including restoration work, roof modifications, and the addition of an enclosed stairwell
- Addition of an outdoor rooftop pool and deck area on the existing 3rd floor roof
- Expansion of the 14th floor rooftop terrace and addition of a new restroom structure on 14th floor terrace
- Conceptual approval of driveway modifications and re-landscaping Victory Park

Change of Use and Off-Site Parking

The 185 hotel rooms would consist of standard rooms and suites. The interior floor plans for the lobby, arcade, and mezzanine levels would be reconfigured to include hotel amenity areas. These areas include food and beverage venues, retail, spa, fitness center, and ballroom/event space. This reconfiguration would result in a loss of 4,250 square feet of ballroom/event space and 670 square feet of retail.

Based on the previous entitlement for the building, a 233-unit congregate care facility with banquet room/hall rental, the property is considered to have 230 parking spaces (without calculating the banquet room/hall rental separately). The previous entitlement included a condition of approval that required not less than 24 off-site parking spaces. Therefore, with the provision of the minimum amount of off-site parking, the building has non-conforming parking rights to 230 parking spaces for hotel uses, without calculating the banquet room/hall rental. The proposed 185 hotel rooms (at a parking rate of 0.75 spaces per hotel room) would fall within the non-conforming parking rights, and no additional spaces are required for the hotel use.

The applicant is however proposing to lease 250 off-site parking spaces at the adjacent Long Beach Convention Center parking garage. In addition to these spaces, additional overflow parking of 150 spaces will be leased from the office building at 211 East Ocean Boulevard, which is directly north of the Breakers Hotel, across Ocean Boulevard. All off-site parking will be valet parking only. New and reconfigured interior uses were calculated separately for the purposes of parking compliance. When considering the loss of ballroom/event space and retail square footage, the existing and proposed uses included in this application would be covered by the leased off-site parking. As conditioned, a minimum of 250 off-site parking spaces shall be leased and secured for use by the Breakers Hotel at all times.

In addition to providing off-site parking, the property owner/building manager shall be required to implement a Transportation Demand Management (TDM) Plan (Exhibit E - Transportation Demand Management Plan). The TDM Plan identifies programs, education, incentives, and facilities that encourage and facilitate vehicle trip reduction for

both employees and guests. These measures include educational materials, facilities to support biking to work, concierge services for transit, and incentives for employee carpooling. The TDM Plan submitted to the Planning Bureau as part of this application would be required to be implemented upon operation of the hotel use.

Exterior Building Modifications

The biggest and most visible alteration on the plans is an addition to the tower portion of the building to accommodate a new stairwell and service elevator. The addition extends the tower eastward approximately 10 feet from its existing facade. The addition of the stairwell and service elevator is a necessary life safety improvement for the building that provides a gurney elevator and code compliant stairwell. The CHC placed conditions on the design of the stairwell addition to ensure that the new work complies with the Secretary of Interior's (SOI) Standards for Rehabilitation.

The existing 2nd floor rear roof would include an open terrace area with a stairwell to access the 3rd floor pool deck. The 3rd floor roof would include a new rooftop pool with a deck and pool bar. The proposed outdoor rooftop pool and deck area on the 3rd floor requires the addition of a 42-inch-high railing. Solid parapet walls would be installed with finishes to complement the building colors and existing parapets.

The existing Cielo Bar is located in the existing 14th floor cupola. The rooftop terrace area would be expanded approximately 1,815 square feet. The open terrace would include a new restroom structure. The rooftop restroom would extend approximately 1-foot above the new 42-inch glass rail proposed to shield patrons from wind.

Additional restoration work includes the restoration of original windows and the replacement of non-period windows. Over the building's history of uses and seismic strengthening, almost all original windows have been replaced. The CHC placed conditions on the restoration and replacement of windows to ensure that the new work complies with the SOI Standards.

The approval of the Certificate of Appropriateness serves as verification that all proposed improvements to the protected exterior and interior character defining features would be completed in compliance with the SOI Standards.

Victory Park

The proposed modifications to Victory Park, a City owned park, are shown on the Conceptual Landscape Plan (Exhibit F – Conceptual Victory Park Landscape Plan). The plan includes the reconfiguration of the existing circular driveway. Vehicles will continue to access the site from a widened driveway at Ocean Boulevard, but the reconfiguration would relocate the vehicle exit onto Collins Way. The widened driveway would feature square pavers for the driving surface. The redesigned Victory Park would also include linear pavers on the walkway areas, new layered drought tolerant landscaping, fixed seating, a drinking fountain, a dog waste post, and public park signage. The overall

Victory Park proposal increases the hardscape in the park, but improves the landscaping and provides new passive park amenities that are not present under existing conditions.

Victory Park is designated as City parkland in the General Plan, PD-6, and the Local Coastal Program (LCP). While no net loss of dedicated parkland will occur, the widened driveway would reduce the active/passive park space for private access. As conditioned, the applicant will replace the displaced parkland at a 2:1 ratio. Existing parkland shall not be permanently displaced until the replacement parkland (excluding roadways and parking) is guaranteed, under construction, or developed elsewhere.

Existing street trees on the site's perimeter on Ocean Boulevard will be protected in place. On site landscaping will consist primarily of California native and drought tolerant species in accordance with the City's provisions for water-efficient landscape design. The conceptual landscape plan notes that new palm trees will be installed in Victory Park and existing palm trees in Victory Park will be replanted where possible.

The proposed Project would enhance the site through the restoration of a City-designated historic landmark and by introducing visitor accommodations, retail, personal service, banquet, and restaurant uses in areas of the Coastal Zone. This project would renovate the building to align with its original use at the time of construction in 1925. In addition, the reconfiguration of Victory Park would represent an improvement to the public park over existing conditions.

The site is located within General Plan Land Use District Number 7 – Mixed Uses (LUD 7). LUD 7 intends for combinations of land uses that vitalize sites and give them more importance in the urban structure of the City. Improving the site with a hotel use and a mix of uses will rejuvenate the site.

Entitlements

The PD-6 Plan requires Site Plan Review for projects involving a change of use. The Project's May 2018 conceptual review was followed by submittal for the subject entitlements in July 2018. Project design has evolved from the initial submittal to achieve a more historically appropriate renovation and a comprehensive landscape treatment in the Victory Park. Conditions of Approval have been incorporated that will ensure that all of the requirements of PD-6 are met. (Exhibit G – Conditions of Approval). As proposed, the project would be consistent with the permitted uses for PD-6, including a hotel use on the Breakers Hotel site, the General Plan, and the LCP (Exhibit H – Findings of Approval).

The proposed hotel, food and beverage venues, banquet/meeting areas, and amenity uses would constitute visitor-serving uses. The LCP and the Coastal Act include policies that relate to coastal tourism, including overnight accommodations and recreation and visitor serving facilities. As noted in the LCP, new development or changes in use in the Downtown Coastal Zone are intended to support the overall economic development of the City and promote efforts aimed at downtown revitalization. The permitted uses in The

Breakers area of the Downtown Shoreline Policy Plan include Victory Park and hotel uses. The proposed hotel's adjacency to the Long Beach Convention and Entertainment Center would provide overnight accommodations to further serve tourists, business visitors, concert and playgoers, and special interest groups. As conditioned, the project would be consistent with the required findings for the Local Coastal Development Permit.

The applicant proposes to transfer the existing Type 47 (on-sale general eating place), Type 58 (Caterers Permit), and Type 68 (Portable Bar) alcohol licenses that cover the existing building. Due to the reconfiguration of the interior uses related to on-site alcohol, all uses in the site are subject to a Conditional Use Permit (CUP18-015) for the on-premises alcohol. No new alcohol licenses are proposed for the site beyond the existing license transfer. As conditioned, the uses subject to the Conditional Use Permit would be consistent with the required findings. Alcohol uses may include room minibars, room service, bars, restaurants, lounges, and pool service. Staff consulted with the Long Beach Police Department (LBPD) on this application and the LBPD expressed no opposition provided security measures such as security cameras and adequate lighting are included in the approval conditions.

Staff recommends that the Planning Commission accept Categorical Exemption CE-18-152 and approve a Site Plan Review (SPR18-033), Conditional Use Permit (CUP18-015), and Local Coastal Development Permit (LCDP18-022), to allow for the change of use and renovation of The Breakers Hotel (City-designated Historic Landmark) into a 185-room hotel with food and beverage venues (with on-site alcohol), banquet/meeting areas, and amenity uses, subject to Conditions of Approval.

PUBLIC HEARING NOTICE

A total of 1,627 Public Hearing notices were distributed on October 29, 2018, to addresses within a 750-foot radius of the site and to the California Coastal Commission, in accordance with the provisions of the Zoning Regulations. As of the preparation of this report no written testimony has been received.

ENVIRONMENTAL REVIEW

Pursuant to the California Environmental Quality Act (CEQA) Section 15301, Class 1-(d)(f), and Section 15332, Class 32, this project is eligible for a CEQA Categorical Exemption for "Existing Facilities" and "In-Fill Development" as it consists of interior alterations and minor exterior alterations to an existing structure and involves negligible or no expansion of an existing use or structure. (Exhibit I - Categorical Exemption) The addition of the stairwell and service elevator is a necessary life safety improvement for the building that provides a gurney elevator and code compliant stairwell. The new stairwell would not provide usable square footage that represents an expansion of the structure.

The project scope of work is eligible for a CEQA Categorical Exemption for "New

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construction or conversion of small structures" pursuant to CEQA Section 15303, Class 3. This exemption covers accessory (appurtenant) structures including patios and swimming pools. The minor additions of terrace and pool decks to the existing building would be consistent with this Categorical Exemption.

Pursuant to Section 15331 - Class 31, this project is eligible for a CEQA Categorical Exemption for "Historical Resource Restoration/Rehabilitation" as the proposed scope of work is consistent with the Secretary of the Interior's Standards for Rehabilitating, Restoring, and Reconstructing Historic Buildings.

Respectfully submitted,



MARYANNE CRONIN
PROJECT PLANNER



ALEJANDRO PLASCENCIA
PRESERVATION PLANNER/PROJECT PLANNER



CHRISTOPHER KOONTZ, AICP
PLANNING BUREAU MANAGER



LINDA F. TATUM, AICP
DIRECTOR OF DEVELOPMENT SERVICES

LFT:CK:AP:mc

Attachments:	Exhibit A - Location Map
	Exhibit B - Site Photos
	Exhibit C - Ordinance No. C-6609
	Exhibit D - Plans
	Exhibit E - Transportation Demand Management Plan
	Exhibit F - Conceptual Victory Park Landscape Plan
	Exhibit G - Conditions of Approval
	Exhibit H - Findings of Approval
	Exhibit I - Categorical Exemption CE-18-152

AGENDA ITEM No. 2**CITY OF LONG BEACH**

DEPARTMENT OF DEVELOPMENT SERVICES

333 West Ocean Boulevard, 5th Floor • Long Beach, CA 90801 • (562) 570-6194 • Fax (562) 570-6068

August 13, 2018

CHAIR AND CULTURAL HERITAGE COMMISSIONERS

City of Long Beach

California

RECOMMENDATION:

Approve a Certificate of Appropriateness request to make exterior building modifications including restoration work, roof modifications, and the addition of an enclosed stairwell, in conjunction with a change of use to hotel. The building is located at 210 E. Ocean Boulevard and is a designated Historic Landmark building known as The Breakers building. (District 2)

APPLICANT: Arco Construction
900 N. Rock Hill Road
Saint Louis, MO 63119
(Application No. HP18-255)

THE REQUEST

The applicant requests approval of exterior building modifications including restoration work, roof modifications, and the addition of an enclosed stairwell, to The Breakers Building in conjunction with a change of use to a hotel. The project includes hotel amenities, including a spa, outdoor pool, patio terrace areas, retail, event space, and food and beverage services. The existing Sky Room restaurant will be maintained as part of this project. The Breakers building is located at 210 E. Ocean Boulevard and is a City-designated Historic Landmark.

BACKGROUND

The subject property is located on the south side of Ocean Boulevard between Locust Avenue to the west and Collins Way to the east (Exhibit A – Location Map) within the PD-6 (Downtown Shoreline Plan Area) District. Victory Park abuts the subject property to the north. An existing access easement through the public park allows for vehicular access to the site via a circular driveway. To the south, the site abuts the mixed-use development located at 207 Seaside Way, which is currently under construction. The east-west alley (Marine Way) adjacent to the project site was vacated by Resolution No. C-23207, and an easement was reserved along the full length and width of the alley for utility purposes.

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The property is developed with a thirteen-story building with a 14th floor cupola and rooftop area. Two additional lower levels are located below street level at Ocean Boulevard. The building was originally constructed in 1925. The building is approximately 172,000-square-feet in area and is designed in a Spanish Renaissance Revival style with a gable roof with towers. The building consists of a main 13-story tower with a two-story base that extends the entire length of the parcel between Locust Avenue and Collins Way. The building was designed by the Los Angeles architecture firm of Walker and Eisen which was one of the most prominent during the 1920s. The firm is known for architecturally significant buildings such as the Oviatt Building, the former Ambassador Hotel, Beverly Wilshire Hotel, and Ace Hotel building. The building was constructed by Jay W. Burgin, a noted Long Beach contractor.

The building is part of a collection of several architecturally significant high-rise buildings in the greater downtown and shoreline areas constructed during the 1920s. The Breakers was one of the largest buildings constructed in Long Beach at the time and captures an early period of development, and popularity in tourism. The building survived the 1933 Long Beach Earthquake.

In 1937, Conrad Hilton of the Hilton Hotel company purchased the building. Under Hilton's ownership, the building underwent an extensive renovation and the Sky Room was added to the rooftop of the building. At the time, it was one of the finest hotels in Long Beach.

The building was designated as a City Historic Landmark in 1989 and this designation recognizes the building's Spanish Renaissance Revival style, elaborate concrete ornamentation around the entry, and bas-relief busts and detailing (Exhibit B – Ordinance No. C-6609). The building's exterior is identified in the landmark ordinance as protected the area as well is the interior lobby. In addition, character defining features include:

- Bas-relief ornamentation at entry,
- Corinthian capitals,
- Octagonal tower
- Window fenestration,
- Exterior finishes, and
- Pill box

Shortly after landmark designation, a seismic strengthening of the building took place. This improvement while significant for the protection of the building, also created significant building alterations. One of the biggest impacts resulting from the project is that it sealed several original window openings.

The last land use entitlement for the property was approved in 1999 and included the conversion of the landmark building to a 233-unit congregate care facility.

ANALYSIS

On April 9, 2018, the Cultural Heritage Commission (CHC) held a Study Session to introduce the CHC to the proposal for The Breakers building. The Study Session was

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beneficial to both the applicant and property owners as it gave the Commission the opportunity to better understand the project and provide valuable project feedback to staff and the development team.

At the CHC Study Session, the applicants requested clarification on very specific questions regarding the proposed alterations before proceeding with further plan development. Questions addressed at the CHC Study Session are summarized below in Table 1. The table provides a description of the originally proposed alterations in the left column, Commission comments and responses in the middle column, and the revisions to the plans based on those comments in the right column.

Based on the Commission's comments, the applicants revised the drawings and returned with a more detailed project and presentation (Exhibit C – Plans & Photographs).

Table 1: Questions Addressed at the April 2018 Cultural Heritage Commission Hearing

	STUDY SESSION– PROPOSED ALTERATIONS	CHC COMMENTS/RESPONSE AT STUDY SESSION	REVISED PLANS
1	Permitting an addition of a stairwell/elevator tower extending from the existing stairwell at east elevation	The Commission generally found the addition acceptable, but also encouraged more contemporary appearance (i.e. glass material) to better comply with SOI Standards.	Alteration Remains – The proposed stairwell still proposed as stucco exterior to match existing building finish.
2	The 14 th floor has varying roof levels, and plans requested raising the roof to a single level thereby enlarging the proposed roof deck and an addition of glass railing	Commission reviewed the visibility and generally found the alteration acceptable	Alteration Remains and Revised – Plans include the raised roof level and glass railing on the 14 th floor. The proposed plans now include a restroom structure on the expanded rooftop terrace.
3	Changes to the third floor including mechanical equipment removal, new pool, glass railing	Commission reviewed the visibility and generally found the alteration acceptable	Revised – The proposed alterations are still included on the third floor, but with one change. The glass rail will now be a solid wall with plaster finish. Only one outdoor pool is proposed in the revised plans.
4	Proposal to replace all windows with period appropriate materials (upper floors)	Steel or wood, based on original materials	Revised – The plans indicate that the proposed windows for upper floors would be of aluminum material.
5	Proposal to replace storefront windows with period appropriate materials	Steel or wood, based on original materials	Revised – The plans indicate that all storefront windows, except one original storefront, would be replaced with aluminum storefront window systems.
6	Review of rear alterations to rear façade	Commission reviewed and generally found the alterations acceptable	Revised - Rear alterations associated with pool area have been removed from project.

CULTURAL HERITAGE COMMISSION

August 13, 2018

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Table 1: Questions Addressed at the April 2018 Cultural Heritage Commission Hearing

	STUDY SESSION– PROPOSED ALTERATIONS	CHC COMMENTS/RESPONSE AT STUDY SESSION	REVISED PLANS
7	Alterations to Sky Room windows	The applicants clarified that plans showed alterations in error, but no longer planned	Revised - No changes to Sky Room windows are proposed.
8	Three (3) options were presented for Victory Park modifications	Commission recommended minimal change to no change at all. Recommendations also included avoiding parking areas in front of building	Revised - The plans only include one option (Option 3) for changes to Victory Park. This option proposes for the widening of the driveway in Victory Park with various planting areas, walkways and berms. Vehicles are proposed to exit onto Collins Way (converted to one way street).
9	Proposal to relocate existing interior historic bar	Commission reviewed and generally found the alterations acceptable	Alteration Remains - No change to plans, as proposed at study session.
10	Proposal to eliminate historical elements at upper level hallways	Commission reviewed and generally found the alterations acceptable	Alteration Remains - No change to plans, as proposed at study session.

SOI = Secretary of the Interior

In addition to the general scope of work presented at the April 2018 CHC Study Session, the revised plans include features not previously presented to the Commission. Table 2, below, includes a summary of changes or new features that were not presented the Commission during the CHC Study Session.

Table 2: Summary of Changes from Plans Presented at the April 2018 Cultural Heritage Commission Hearing

STUDY SESSION PLANS	CHANGE FROM STUDY SESSION PLANS	NEW FEATURE NOT PREVIOUSLY PROPOSED
Two (2) pools proposed – one at second floor (behind tower) and one at third floor	The 2 nd floor pool was removed and replaced with a terrace area.	N/A
3 rd floor pool railing featured a 42-inch-high glass railing	The railing has been revised to be a solid plaster parapet wall at the 3 rd floor.	N/A
N/A	N/A	A new bathroom structure added at 14 th floor roof deck.
Elevator Tower finish to match existing stucco finish	CHC discussion allowed for the building extension to be glass or more contemporary style. The proposed plans indicate that the extension will remain as stucco.	N/A
Victory Park – Three (3) options presented with purpose of widening for two-car width and grasscrete for valet spaces	One option was provided on the revised plans. The driveway is proposed to be widened and reconfigured with exiting onto Collins Way & new landscape plan.	N/A

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Table 2: Summary of Changes from Plans Presented at the April 2018 Cultural Heritage Commission Hearing

STUDY SESSION PLANS	CHANGE FROM STUDY SESSION PLANS	NEW FEATURE NOT PREVIOUSLY PROPOSED
Windows presented as compatible in style and appearance	Materials proposed are aluminum for upper stories. The one (1) original storefront window that dates to the period of significance is proposed to be protected in place. The remaining storefront windows are proposed to be aluminum-framed and in a style to reflect the scale and proportions of the original design. Three (3) windows on the rear elevation (alley) will have new metal panel infill panels to cover the area where the new mezzanine area would overlap the window opening.	N/A
Doors at rear elevation (alley)	N/A	The south elevation would include the infill of seven window/door elements and the replacement/addition of new doors to align with the new basement floor plan.

N/A = Not Applicable

Stairwell/Elevator Addition

The biggest and most visible alteration on the plans is an addition to the tower portion of the building to accommodate a new stairwell and service elevator. The addition extends the tower eastward approximately 10 feet from its existing facade. The addition of the stairwell and service elevator is a necessary life safety improvement for the building that provides a gurney elevator and code compliant stairwell. The applicants proposed to finish the addition/extension in stucco to match the original building. The proposal considers the Secretary of Interior's (SOI) Standard #9 to distinguish the new work from the original building by including separate new rectangular fixed windows and an aluminum reveal along the side of the extension. While these are helpful towards complying with the intent of SOI Standard #9, it's not sufficient to clearly distinguish the addition. As conditioned, the addition shall be painted a different color from the original building and/or include another treatment to more clearly distinguish the addition/extension.

Rooftop Pool Area and Railing

The revised plans indicate that the proposed 2nd floor rooftop pool at the rear of the building has been removed, which causes no impacts to the historic building. The 2nd floor rear roof is now proposed to be used as an open terrace area with a stairwell to access the 3rd floor pool deck.

The proposed outdoor rooftop pool and deck area on the 3rd floor requires the addition of a 42-inch-high railing. The revised plans contrast the glass railing originally proposed in the study session. As currently proposed, a solid parapet wall would be installed with finishes to match the building colors and designed to complement the existing parapets. Staff recommends, as conditioned, to design the parapet walls to complement the building features, but paint the new walls a separate color to further distinguish the new from the original features. The proposed color change would ensure that the railing would not replicate the original building features.

Windows & Storefront Windows

Windows are an important feature to a building. Over the building's history of uses and seismic strengthening, almost all original windows have been replaced (Exhibit D – GPA Memorandum). One historic storefront remains intact under existing conditions. The existing replacement double-hung windows (upper floors) consist of a vinyl sash style and the storefront windows have been replaced with aluminum windows. Both materials (vinyl and aluminum) are not appropriate for a building from this period. The National Park Service (NPS) provides guidance for window replacement projects including historic high-rise buildings such as the subject property (Exhibit E – Replacement Windows That Meet the Standards). It is recommended that all replacement windows on the structure are of original material, size, and style of the original building (wood or steel). In recognition of the number of windows to be restored, staff has reviewed the NPS guidance for replacement windows and applied those standards to the landmark building.

"Replacement windows on the primary, street-facing or any highly visible elevations that are part of the base of high-rise buildings must match the historic windows in all their details and in material (wood for wood and metal for metal). The base may vary in the number of stories, but is generally defined by massing or architectural detailing." – National Parks Service

The lower rectangular base of the building extends is visible from all four sides since the building is built to all property lines and windows. As applied to this landmark building, Staff has determined that the base of the building is the area from ground level up to the higher string course (decorative horizontal band) separating the top of the 4th floor and bottom of the 5th floor. Based on this determination, Staff recommends that this portion of the building comply with the NPS guidance for windows on highly visible elevations. The street-facing north (Ocean Boulevard), west (Locust Avenue), and east (Collins Way) elevations shall be treated as highly visible elevations. Therefore, all windows at the base of the building on these elevations shall be restored to original materials and styles (See Plan Sheet A9.02, Photo 2 Enlarged [1926]). Windows that replicate appearance of the original windows above the 5th floor can be replaced another (non-historic) material, as appropriate. Staff has conditioned that the windows and storefront window systems at the base of the building (ground level to string course separating top of 4th floor and bottom of 5th floor, as shown on front elevation) are restored with windows that match the style and materials of the original building.

The proposed north elevation at the ground floor level features a series of storefronts. As proposed, a poster display case is proposed on the western side of the façade. This proposed element appears to break up the symmetry of this ground floor elevation. The

solid wall will be a structural shear wall. Staff has conditioned that the storefront system is restored to match historic style and materials. This would include removing the blank wall on the north elevation and replacing it with a storefront. Staff would consider a proposal to phase the restoration of this elevation to match historic conditions. If restoration of this storefront is not feasible, the blank wall area shall be painted to look like a storefront and incorporate interpretive signage related to the building's history.

Rooftop Terrace

The revised plans include a new restroom structure on 14th floor on the expanded rooftop terrace. The rooftop restroom would extend approximately 1-foot above the new 42-inch glass rail proposed to shield patrons from wind. The new restroom structure on the rooftop terrace would represent an addition that exceeds the existing roof parapet. The proposed rooftop restroom does not appear to be a modification that staff can support. Staff has recommended that the applicant consider the potential for incorporating the restroom inside the cupola base, if feasible.

Fire Escape

A historic fire escape is located on the south elevation of the tower portion of the landmark building. The plans indicate that this fire escape is proposed for removal from the building. As an original feature of the building, staff has conditioned that the fire escape on the rear elevation is protected in place.

Lobby

The ground floor lobby is identified in the landmark ordinance as containing historic design elements and decorative features that should be preserved. Ground-floor lobby areas and arcade hallway areas shall be protected in place. In addition, the historic mail chute adjacent to the elevators shall be protected in place.

Victory Park

The proposed modifications to Victory Park, a City owned park, are best illustrated on the Conceptual Landscape Plan. The plan includes a widened driveway with small cobble pavers for the driving surface, linear pavers leading to the hotel entry, new layered drought tolerant landscaping, bermed landscape areas with retaining walls, new artistic pavers in front of the building into more of courtyard area. The proposal increases the hardscape in the park, but improves the landscaping. The driveway access will continue from Ocean Boulevard, but the driveway configuration is realigned to exit to Collins Way.

At the April 2018 CHC Study Session, the Commission expressed concerns about cars parked on the driveway for extended periods of time and a large number of cars in front of the building. The revised plans proposed to widen the driveway. At its narrowest point on the proposed plans, the driveway would maintain a 24-foot-width and widen at the entry to 33 feet in width. Staff recommends that the driveway be narrowed to match existing conditions. The overall width should be between 20 to 22 feet to still maintain a pass lane

and still allow cars to park and unload. The materials need more evaluation from Parks, Recreation and Marine, but guidance on the general direction from the Commission on materials like contemporary pavers would be helpful.

The landmark ordinance identifies the circular driveway as an important feature associated with The Breakers building. The plans still need to be reviewed by the Site Plan Review which includes Public Works among other City Departments that review these cases.

Victory Park is designated a City parkland in the General Plan, PD-6, and the Local Coastal Program. The widened driveway and courtyard area would effectively remove public park space. In addition, the proposed improvements in Victory Park are designed in a manner that a member of the public would not recognize that the area north of The Breakers is public park space. While the enhancement of Victory Park is permissible, the amount and perception of public park space is subject to zoning standards and findings. Staff recommends that the design of Victory Park is revised to align with the current driveway and planting areas.

Paint Colors

A historic paint analysis has been prepared to document the original color of the building (Exhibit F – Color Analysis Study). The applicant proposes to paint the entire building a single color (off-white, Benjamin Moore, 856 Silver Satin). While this color scheme does not directly reflect the original color of the building (pale peach color), staff finds the proposed colors acceptable. As conditioned, staff requires that the parapet wall around the pool and the new stairwell/elevator addition to be painted a different color than the structure to differentiate the new from the original features.

The windows are proposed to be painted two colors: a black color (P2, Black) at the ground floor to the 2nd floor and an off-white color (P3, Bone White) at the 3rd floor and above. This color scheme would match historic photos of the landmark building.

In addition, as per CHC comments, a condition of approval for this project requires the restoration of the bas-relief on the building. This scope of work would include removal of the existing paint and restoration to match the original finishes and color.

Secretary of The Interior's Standards

While the new improvements represent a change from existing conditions, they are compatible with the existing landmark building's architectural style and use of the building. The improvements should not give a false sense of the property's historical development.

Standard No. 2 states "The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." No original street facing windows are proposed to be replaced as part of the project. As conditioned, all interior areas designated as character defining features in the landmark ordinance shall be protected in place.

Standard No. 6 states "Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence." One original storefront window system remains under existing conditions. For windows that have been replaced along street-facing elevations, the applicant shall be required to follow standards established by the National Park Service for replacement windows. As conditioned, any replacement windows at the designated base of the building shall be restored to original style and materials. Replacement windows at the upper floors shall be windows that maintain a similar appearance to the original windows, but may be constructed of non-historic materials.

The Secretary of Interior's Standards for Rehabilitation, Standard No. 9 states that "new work shall be differentiated from the old and shall be compatible with the massing, size, scale and architectural features..." The new work would bring the building into compliance with life and safety standards and restore damaged and missing original features of the building. As proposed and conditioned, the new stairwell/elevator addition would be distinguished from the original building by incorporating finished in stucco painted in a different color, new rectangular fixed windows on the east elevation of the addition, and an aluminum reveal along the side of the extension. In addition, the proposed parapet wall around the 3rd floor rooftop pool would be designed to be compatible, but distinguished from the original building by painting the wall a different color. In addition, the storefront system would be restored to original style and materials. Where appropriate on upper floors, non-historic windows would be replaced with new windows of a compatible style, but feature non-historic materials.

RECOMMENDATION

Staff has analyzed the proposed project and has determined that the project meets the requirements set forth in Title 21 of the City's Zoning Code, Section 2.63.080 (Cultural Heritage Commission) of the Long Beach Municipal Code, the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. With conditions, Staff supports approval of the Certificate of Appropriateness for the project. All the findings can be made in the affirmative for the proposed improvements, as these improvements are compatible in overall scale, massing, proportions, materials and colors to the architectural style of the existing structure on the property and in the context of the landmark ordinance. Staff recommends approval of the Certificate of Appropriateness subject to the conditions of approval (Exhibit G – Findings and Conditions of Approval).

PUBLIC HEARING NOTICE

Public notices were distributed on July 25, 2018. As of this date, no objections have been filed as it relates to the project.

ENVIRONMENTAL REVIEW

Pursuant to Sections 15301 (Existing Facilities) and 15331 (Historical Resource Restoration/Rehabilitation) of the CEQA Guidelines, and no subsequent environmental review is required.

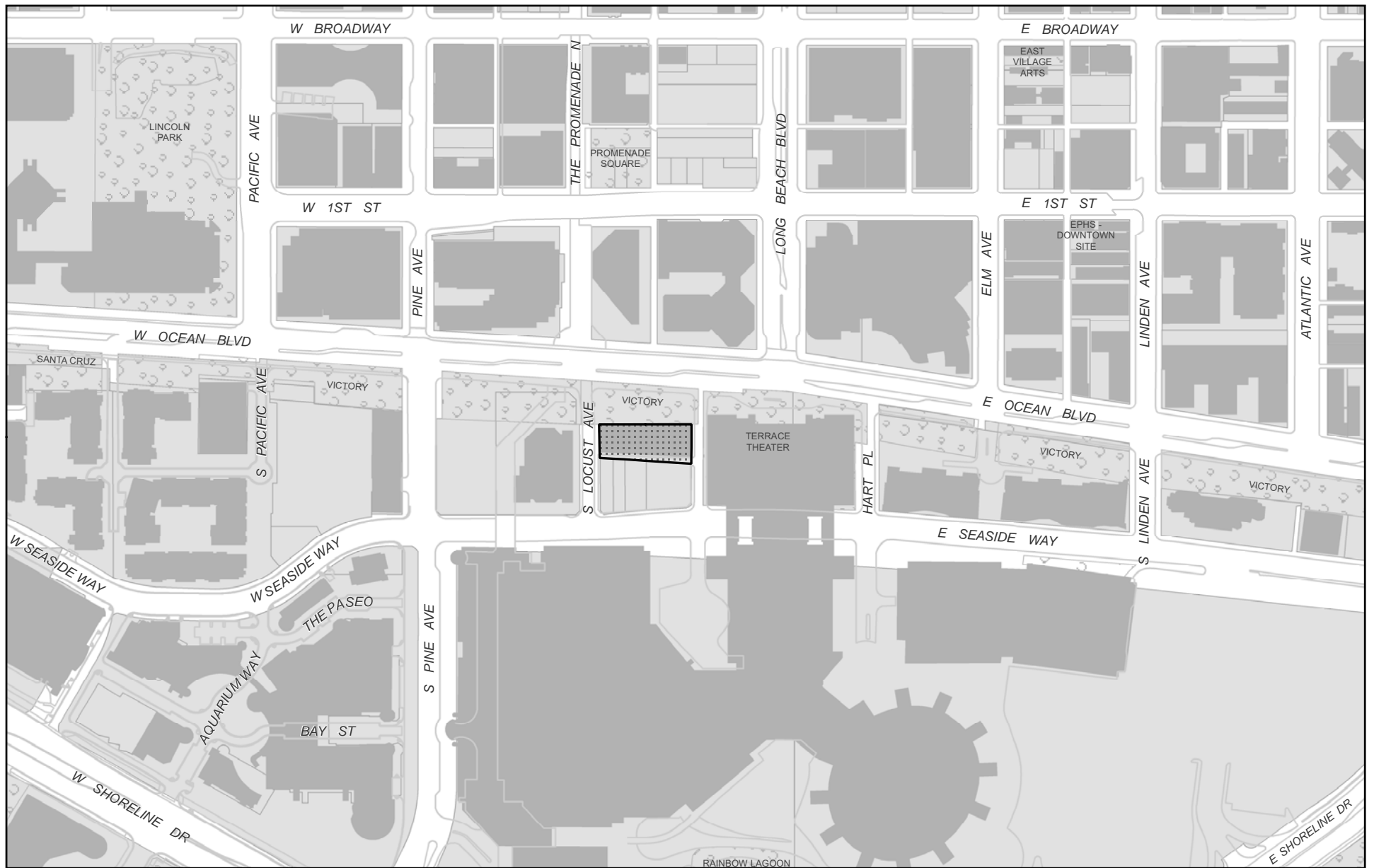
Respectfully submitted,

A handwritten signature in black ink, appearing to read "Christopher Koontz", with a stylized flourish at the end.

CHRISTOPHER KOONTZ, AICP
PLANNING BUREAU MANAGER

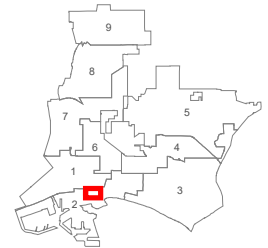
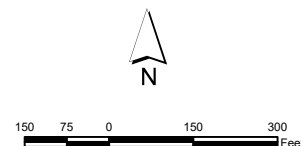
CK:AP:mc

Attachments: Exhibit A – Location Map
 Exhibit B – Ordinance No. C-6609
 Exhibit C – Plans & Photographs
 Exhibit D – GPA Memorandum
 Exhibit E – Replacement Windows That Meet the Standards
 Exhibit F – Color Analysis Study
 Exhibit G – Findings & Conditions of Approval



Subject Property:
210 E Ocean Blvd
Application No. 1806 -19
Council District 2
Zoning Code : PD-6 SubArea 7

Attachment C



Attachment D



NADEL SPECIAL
PROJECTS INC
1990 S. BUNDY DRIVE
SUITE 400
LOS ANGELES, CA 90025
T. 310.826.2100
F. 310.826.0182
WWW.NADELARC.COM

CLIENT:
ARCO
CONSTRUCTION
OWNER:

 pacifico

BREAKERS
HOTEL
RENOVATION

210 E OCEAN BLVD.
LONG BEACH,
CA 90802

REVISIONS:	
ISSUE DESCRIPTION:	ISSUE DATE:
NO.:	
PLANNING APPROVAL	10/30/2018

NADEL PROJECT No: 18016
DRAWING DATE: 08/10/2018
SCALE: 1/16"=1'-0"

COVER SHEET

A0.00

[illegible]

AREA MATRIX					NARRATIVE																			
BREAKERS HOTEL ROOM AND AREA MATRIX																								
AREA PER FLOOR PLATE		PROPOSED AREA, GSF		EXISTING AREA, GSF																				
BASEMENT FLOOR		21,365		21,365																				
ARCADÉ FLOOR		21,365		21,365																				
GROUND FLOOR		19,090		19,090																				
MEZZANINE FLOOR		6,170		1,280																				
2ND FLOOR		17,370		16,720																				
3RD POOL AREA FLOOR		9,590		8,630																				
4TH AND 5TH FLOORS	9,145 X 2 FLOORS	18,290		17,792																				
6- 11TH TYPICAL FLOOR	8,765 X 6 FLOORS	52,590		51,150																				
12TH PENTHOUSE FLOOR		8,925		8,685																				
13TH SKY ROOM FLOOR		8,620		8,620																				
14TH ROOFTOP FLOOR		2,297		2,075																				
TOTAL		186,032		176,762																				
		ADDITIONAL AREA		9,270																				
FOOD AND BEVERAGE		AREAS GSF	SF/ SEAT	COVERS	EXISTING F&B AREA																			
FUTURE VENUE		1,900	15	127																				
ALL DAY DINING		1,480	15	99	5600																			
LOBBY BAR		505	15	34																				
FLEX DINING		630	15	42																				
COFFEE SHOP		645	15	43																				
MUSIC VENUE/ WINE BAR		1355	15	90	1300																			
POOL BAR		275	15	18																				
SKY ROOM BAR & RESTAURANT		4,140	15	276	4140																			
CIELO/ ROOFTOP BAR		990	15	66	990																			
ROOFTOP TERRACE		1,815	15	121																				
TOTAL		13,735		916	12,030																			
		ADDITIONAL AREA		1,705																				
SPA/ FITNESS		AREAS GSF																						
SPA/ FITNESS GROUND CENTER		4,170																						
SPA MEZZANINE		3,615																						
TOTAL		7,785		N/A																				
RETAIL		AREAS GSF		EXISTING RETAIL																				
RETAIL		710																						
GIFT SHOP		220																						
TOTAL		930		1600																				
		REDUCED AREA		-670																				
EVENT SPACE		AREAS GSF		EXISTING EVENT																				
BALL ROOM #1		3,080																						
BALL ROOM #2		3,605																						
BOARD ROOM		710																						
MEETING ROOM A		445																						
MEETING ROOM B		875																						
MEETING ROOM C		295																						
MEETING ROOM D		465																						
MEETING ROOM E		440																						
MEETING ROOM F		450																						
2ND FLOOR MEETING ROOM 1		995																						
2ND FLOOR MEETING ROOM 2		505		11,375																				
		(REMOVED) GROUND FLOOR BALLROOM		4,250																				
TOTAL		11,375		15,625																				
		REDUCED AREA		-4,250																				
TERRACE SPACE		AREAS GSF		EXISTING TERRACE																				
2ND FLOOR		1,770		2,020																				
POOL DECK		4,010																						
ROOF TOP BAR TERRACE		1,815																						
TOTAL		7,595		2,020																				
		ADDITIONAL AREA		5,575																				
GUESTROOMS		AREAS GSF		EXITING GUEST AREA																				
TYPE	AVE. AREA (SF)	NUMBER	%																					
KING	375 SF	124	67%																					
DOUBLE QUEEN	430 SF	37	20%																					
JR SUITE	450 SF	13	7%																					
SUITES	578 SF	11	6%																					
TOTAL GUESTROOMS		185		PREVIOUS GUESTROOMS																				
TYP. GUEST ROOM (7 LEVELS)	8765 GSF			242																				
TOTAL GUEST ROOM FLOORS				105,178																				
		ADDITIONAL AREA		96,965																				
		ADDITIONAL AREA		8,213																				
BREAKERS HOTEL 210 E OCEAN BLVD, LONG BEACH CA 90802 ASSESSORS ID 1278-007-034 TRIM BLOCK 1, OCEAN PIER TR1Y12 VAC ST, ADJ ON S AND LOTS 15 THRU LOT 19					ZONING: PLANNED DEVELOPMENT DISTRICT (PD-6) SUB AREA 7 ALLOWABLE USE: HOTEL/ RESIDENTIAL MAX ALLOWABLE HEIGHT: 250' SETBACKS: • FRONT: (OCEAN BLVD) 80' • SIDE: 0 • BACK: 0 PARKING: REUSE OF EXISTING BUILDINGS SHALL NOT REQUIRE PARKING IN EXCESS OF WHAT CURRENTLY EXIST.					PLANTINGS WILL BORDER THE PUBLIC SIDEWALK AREA. VALET SERVICE FOR HOTEL, SPA, AND RESTAURANT / BAR GUESTS WILL OCCUR NEAR THE EXISTING MAIN ENTRY. THE DRIVEWAY PROPER WILL BE WIDENED TO TWO CURBED LANES AND A SMALL PASSING LANE IN ORDER TO RELIEVE CONGESTION DURING PEAK USAGE. THIS WILL AVOID BACKUPS ONTO OCEAN BOULEVARD AND PROVIDE ACCESS TO EMERGENCY VEHICLES IF NEEDED. ADDITIONALLY, VALET SERVICE ALONG LOCUST AVENUE WILL BE MAINTAINED FOR THE ARCADE LEVEL MEETING ROOM FUNCTIONS. PROPOSED INTERIOR WORK: THE HISTORICAL FEATURES OF THE INTERIOR MAIN LOBBY AND THE EXISTING GROUND LEVEL LOBBY AND THE ARCADE LEVEL HALLWAY MOST PROMINENTLY, THERE ARE ORIGINAL PLASTER COLUMNS, EXTERIOR LIGHTING DETAILS UTILIZING MARITIME AND CLASSICAL THEMES. THESE FEATURES, ALONG WITH ANY OTHER HISTORICAL HISTORICAL ELEMENTS, WILL LARGELY BE RETAINED AND INCORPORATED INTO THE NEW INTERIORS. AT THE ARCADE LEVEL, THE EXISTING HALLWAY WILL BE RETAINED, ALONG WITH ITS CONVEX CEILING AND OTHER HISTORICAL DETAILS. NEW ENTRIES INTO FLANKING MEETING AND CONFERENCE ROOMS WILL BE CREATED. AT THE GROUND FLOOR WE WILL KEEP THE LARGE LOBBY WITH ADJOINING FOOD AND BEVERAGE VENUES. THE LOBBY WILL HAVE STRATEGIC OPENINGS INTO THE STOREFRONT AREAS ALONG THE DRIVE COURT TO CREATE OPENNESS AND FACILITATE CIRCULATION. THE EXISTING STAR CONNECTING THE ARCADE LEVEL WITH THE GROUND FLOOR, WHICH IS NOT ORIGINAL, WILL BE RELOCATED AND REBUILT IN A COMPATIBLE STYLE. THERE WILL BE A NEW SPA AND FITNESS AREA AT THE EAST END OF THE GROUND FLOOR. THE TYPICAL RESIDENTIAL FLOORS WILL BE RECONFIGURED TO ACCOMMODATE APPROPRIATELY SIZED HOTEL ROOMS. THE ROOMS WILL UTILIZE THE EXISTING EXTERIOR WINDOW LOCATIONS AND WILL BE ACCESSED FROM A CENTRAL CORRIDOR THAT LARGELY UTILIZES THE EXISTING CORRIDOR CIRCULATION. THE EXISTING LOCATION OF THE SKY ROOM AT THE THIRTEENTH FLOOR WILL BE RETAINED. THE EXISTING, NON-ORIGINAL INTERIOR WILL BE REVISED TO PROVIDE BETTER FUNCTIONALITY AND IMPROVED VIEWS. THE EXISTING CIELO BAR WILL BE RENOVATED AND PROVIDED WITH IMPROVED ACCESS AND A NEW OUTDOOR TERRACE. VERTICAL CIRCULATION SYSTEM • OCCUPANT LOAD WILL BE DETERMINED BASED ON 2016 CBC TABLE 1004.1.2 • NUMBER OF EXITS WILL BE DETERMINED BASED ON 2016 CBC TABLE 1003.0.21 • LUMINOUS EGRESS PATH MARKING IS REQUIRED PER CBC SECTION 1025 STAIRS • THE STAIR TO THE BASEMENT LEVEL VENUE AND THE ARCADE ENTRY STAIR AT LOCUST AVE WILL BE RETAINED AS AN EXISTING CONDITION. • THE TWO EXISTING TOWER EXIT STAIRS WILL REPLACE WITH NEW STAIRS THAT ARE CODE COMPLIANT AND SERVE THE GROUND LEVEL TO THE 14TH FLOOR. • ALL INTERNAL STAIRS WILL BE REPLACED WITH NEW CODE COMPLIANT STAIRS. • THE EXTERIOR STAIR ALONG COLLINS WAY WILL BE REPLACED WITH A NEW CODE COMPLIANT STAIR ELEVATORS: • THE EXISTING GUEST ELEVATORS WILL BE REPLACED WITH NEW CUSTOM SIZED 2,500, 450 FPM, MODERN ELEVATORS WITHIN THE EXISTING ELEVATOR SHAFTS • THE EXISTING SERVICE ELEVATOR WILL BE REPLACED WITH A NEW CUSTOM SIZED AT 2,000, 500 FPM, GURNEY CAPABLE SERVICE ELEVATOR WITHIN A CUSTOM SIZED SHAFT • THE ELEVATOR ACCESS CONTROL SYSTEM WILL ALLOW CUSTOMIZED ACCESS TO HOTEL, GUEST • THE LOCATION OF THE SERVICE ELEVATOR IS THE LEAST IMPACT-FULL OF ALL POSSIBLE LOCATIONS BECAUSE A PARTIAL HEIGHT SERVICE ELEVATOR SHAFT ALREADY EXISTS IN THIS LOCATION.					CONSTRUCTION TYPE, TYPE 1 B MAX HEIGHT: 181' (UNLIMITED AS LONG AS WITHIN HISTORIC ENVELOPE PER CHBC) MAX FLOORS: 12 (UNLIMITED AS LONG AS WITHIN HISTORIC ENVELOPE PER CHBC) MAX AREA: UNLIMITED PROJECT NARRATIVE: PRELIMINARY PROPOSED PROGRAM: • 4150 KEY BUTIQUE HOTEL, WITH ATTENDANT SUPPORT FUNCTIONS • 113,300 SF OF FOOD AND BEVERAGE VENUES, ACCESSIBLE TO PUBLIC • GROUND FLOOR MAIN DINING • GROUND FLOOR WINE BAR • BASEMENT LEVEL BAR (SPEAK-EASY/ "BROILER ROOM") • PENTHOUSE DINING (SKY ROOM) • ROOFTOP BAR (CIELO BAR) AND ROOF TERRACE • 110,000 SF OF ARCADE LEVEL MEETING / CONFERENCE ROOMS • 14,000 SF SPA AND FITNESS • OUTDOOR POOL PROPOSED EXTERIOR WORK: THE NEW HOTEL WILL RETAIN THE CHARACTER AND CHARM OF THE EXISTING BUILDING BY RETAINING THE EXISTING HISTORIC FEATURES AND COMPLEMENTING THESE FEATURES WITH DISCRETE NEW MODERN ADDITIONS. THE EXISTING FACADES WILL BE CLEANED PER THE SECRETARY OF THE INTERIORS STANDARDS FOR REHABILITATION USING THE GENTLEST MEANS POSSIBLE FOR CLEAN OF SURFACES. DETERIORATED HISTORICAL FEATURES SHALL BE REPAIRED RATHER THAN REPLACED AND THEN ALL SURFACES TO BE PAINTED, WITH THE HISTORIC ELEMENTS BEING RETAINED AND REPAIRED AS REQUIRED. MOST OF THE EXISTING WINDOWS HAVE BEEN REPLACED WITH INEXPENSIVE AND INAPPROPRIATELY DESIGNED WINDOWS. THESE WILL ALL BE REPLACED WITH NEW ENERGY EFFICIENT ALUM AND GLASS WINDOWS UTILIZING PROFILE AND COLOR OF THE ORIGINAL 1926 WINDOWS. AT THE GROUND LEVEL, ALONG OCEAN BLVD THERE IS ONLY ONE REMAINING STOREFRONT SYSTEM FROM THE TIME OF SIGNIFICANCE. IT WILL BE RETAINED, CLEANED AND REPAIRED AS REQUIRED. ALL NEW COPINGS AND BELT COURSES THAT ARE CONTINUATIONS OF EXISTING SHALL BE PRECAST, MADE FROM A RUBBER CASTING OF THE ORIGINAL COPING/BELT COURSEING. ALL EXISTING CANOPIES ARE NOT FROM THE HISTORICAL PERIOD OF SIGNIFICANCE AND WILL BE REMOVED. NO CANOPIES ARE BEING PROPOSED. THE REMAINING, NON-HISTORIC STOREFRONTS WILL BE REPLACED WITH NEW STOREFRONTS THAT WILL REFLECT THE SIMPLICITY, SCALE AND PROPORTION OF THE ORIGINAL 1926 STOREFRONTS AND ENTRIES. THE FACADE HAS A FEW REMAINING EXISTING WINDOWS THAT ARE DATING BACK TO WITHIN THE HISTORIC DESIGNATION RANGE 1925-1947. THESE WINDOWS WILL BE RETAINED AND REPAIRED AS REQUIRED. • GROUND FLOOR WOOD, STEEL AND GLASS STOREFRONT WINDOW SYSTEM BELOW THE NEW TRANSOM • GROUND FLOOR HAS 4 STEEL AND GLASS "ARCH" WINDOWS LOCATED AT THE EAST AND WEST FACADES. • SECOND FLOOR THERE ARE A MULTIPLE STEEL AND GLASS FIXED WINDOWS FLANKED BY CASSEMENT WINDOWS • THIRTEENTH FLOOR THERE ARE A MULTIPLE STEEL AND GLASS FIXED WINDOWS FLANKED BY CASSEMENT WINDOWS. • THIRTEENTH FLOOR ADDITION TO THE SKY ROOM THE ROOF IS SUPPORTED BY A STRUCTURAL MILLION THAT IS INTEGRATED INTO THE WINDOW DESIGN. THE EXISTING STAIR TOWER AT THE NORTH END OF THE BUILDING WILL BE SLIGHTLY EXPANDED TO THE NORTH IN A HISTORICALLY COMPLEMENTARY STYLE, IN ORDER TO ACCOMMODATE CODE-REQUIRED NEW STAIRS AND SERVICE ELEVATOR EXTENSION. THIS NEW ADDITION WILL BE SEPARATED BY A REVEAL FROM THE ORIGINAL CONSTRUCTION AND IS THE LEAST DISRUPTIVE ALTERNATIVE TO PROVIDE THE REQUIRED FIRE AND LIFE SAFETY ELEMENTS. THERE WILL BE A NEW EXTERIOR POOL DECK ABOVE THE EXISTING SECOND FLOOR DINING ROOM, LOOKING OUT OVER THE TERRACE, THEATER, CENTER TO THE NORTH. THIS POOL DECK WILL HAVE A SOLID RAIL, SET BACK FROM OCEAN BOULEVARD, COLLINS WAY AND THE ALLEY, FROM COLLINS WAY AND THE ALLEY, IT WILL BE MINIMALLY VISIBLE. ADDITIONALLY, THERE WILL BE A SMALL SECOND FLOOR TERRACE, FACING SOUTH, WHICH WILL BE INVISIBLE FROM GROUND LEVEL. THERE WILL BE A NEW ROOF TOP TERRACE ABOVE THE PENTHOUSE RESTAURANT, ACCESSIBLE FROM, AND AT THE SAME LEVEL AS, THE EXISTING CIELO BAR (CUPOLA BAR). IN ORDER TO MINIMIZE THE IMPACT FROM AT-GRADE SIGHTLINES, THE NEW TERRACE WILL BE SET BACK FROM THE BUILDING FACE ALONG THE OCEAN BOULEVARD SIDE. AT THE BACK EDGE OF THE EXISTING SLOPED TILE ROOF THAT WILL BE RETAINED, AT THE LOCUST AVENUE SIDE, THE TERRACE WILL BE SIGNIFICANTLY SET BACK FROM THE BUILDING FACE. THE STEPPED TERRACE WILL BE ENCLOSED WITH A 3'-6" HIGH GLASS RAIL ATOP A 2'-0" HIGH STEM WALL, AND WILL STEP DOWN 2'-0" AND PROVIDE A 3'-6" HIGH GLASS RAIL ATOP A 4'-0" HIGH STEM, TO PROTECT PATRONS FROM WIND. PROPOSED GROUND-LEVEL WORK: THE ENTIRE EXISTING FRONTAGE, FROM PUBLIC RIGHT OF WAY TO THE BUILDING FACE, WILL BE UPGRADED WITH NEW PAVING, PLANTINGS, AND A POSSIBLE SCULPTURE IN A WAY THAT IS AN ENHANCEMENT TO VICTORY PARK. NEW					GLASS WINDOW SYSTEM INSTALLED DIRECTLY BEHIND, THE MILLION SIZE WILL BE SIZED TO MATCH THE EXISTING WINDOWS • STEEL AND GLASS FIXED/CASSEMENT WINDOWS AT THE THIRTEENTH FLOOR, WINDOWS WILL BE CLEANED AND REPAIRED AS REQUIRED. • SKY ROOM ROOF STRUCTURE/WINDOW SYSTEM, WILL BE CLEANED AND REPAIRED AS REQUIRED. THE INTEGRITY OF THE ROOF STRUCTURE WILL BE VERIFIED DURING CONSTRUCTION. ALL GLASS AND MILLIONS WILL BE REPAIRED AS REQUIRED ALUMINUM AND GLASS STOREFRONT SYSTEM: • THIS STOREFRONT AND CLEARSTORY SYSTEM IS INTENDED TO REFLECT THE SIMPLICITY, SCALE AND PROPORTION THE HISTORIC WINDOWS SYSTEMS INSTALLED IN 1926. THE SYSTEM WILL BE AN ALUMINUM FRAMED STOREFRONT SYSTEM WITH 4X 4'-1/2" CENTER GLAZED, BY WINCO, WAUSAU OR SIM. ALUMINUM AND GLASS WINDOWS SYSTEM: DESIGNED TO APPEAR ABOVE HUNG PER THE ORIGINAL WINDOWS • 1450 HR SERIES BY WINCO OR SIM. STEEL REPLICA WINDOWS: • 1200 SERIES BY WINCO OR SIM. ALL GLASS WINDOW SYSTEM: • CRL US ALUMINUM- GLASS DOOR PATCH SYSTEM GLASS RAIL SYSTEMS: • 42" HIGH GUARD RAIL SYSTEM: CRL US ALUMINUM- GR5 TAPER LOC DRY GLAZE GLASS RAILING SYSTEM PEDESTAL PAVER SYSTEMS: PEDESTAL PAVING SYSTEM- THE TECH STANDARD PEDESTAL PAVER SYSTEM PORCELAIN PAVERS- TILE TECH 24X24 FINISH T80 WITH THE HEX TRAY WIND UPLIFT SYSTEM				

REVISIONS:

ISSUE DESCRIPTION	ISSUE DATE
NO. 1	
PLANNING APPROVAL	10/30/2018



Date: March 23, 2018
Project: The Breakers Hotel, Long Beach
For: Pacificá Enterprises
From: Laura O'Neill, Senior Architectural Historian & Emily Rinaldi, Associate Architectural Historian
Subject: Breakers Hotel Building History & Changes Over Time

This memorandum was prepared at the request of Pacificá Enterprises. GPA Consulting conducted research into the history of the Breakers Hotel at 200 E. Ocean Boulevard in Long Beach. GPA reviewed building plans and permits obtained from the Long Beach Department of Building & Safety, as well as historic photographs and newspaper articles. GPA also conducted field inspections on March 20-21, 2018 to document the building's existing conditions and to determine to what extent original features, finishes, and materials remained intact beneath subsequent alterations.

Below is a summary of notable alterations to the building's exterior and interior spaces. Notable original features, finishes, and materials that date from the building's construction in 1925-1926 or from when Conrad Hilton renovated the building in 1938-1939 are also noted below. Please note that this summary of notable original features and alterations is not a complete list and is based upon information known as of the date of this memo.

Exterior: Basement and Arcade

- Windows have been infilled or were replaced with new windows in 1990.
- Garage opening was constructed sometime before 1946. Roll-up metal door is a modern replacement.
- Entrance to Arcade is likely not original, although the door frame could possibly date from 1939.

Exterior: Ground-Floor

- Glass-and-bronze infill at the main entrance is not original and possibly dates from 1962. The glass doors at the main entrance are also not original and likely date from the 1980s or 1990s. The original main entrance was a single wood revolving door with metal multi-light sidelights and transom.
- Light fixtures at the main entrance are likely original, although they have been moved. These light fixtures were originally located on the paired pilasters to either side of the main entrance rather than within the reveal of the main entrance.
- Storefronts to the east and west of the main entrance have almost all been entirely altered from their original configuration and replaced with modern storefront infill. However, one

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storefront, the second storefront to the west of the main entrance, likely retains features/finishes/materials from 1926 and 1939. This storefront likely retains the original door frame and transom above the entry door from the original 1926 storefront. It also retains the 1939 storefront windows and bulkheads. It no longer retains the 1939 transom windows historically located above the storefront. It also no longer retains the original 1926 entry door.

- Majority of windows on the ground floor have been infilled or replaced with new windows in 1990. The only original windows that possibly remain intact are the two arched metal windows on the east elevation. Two of the arched metal windows on the west elevation appear partially intact, although the original multi-light central window sash has been replaced with a single-light window sash.

- Terra cotta tile cladding on the north elevation was installed in 1939 and has since been painted. The ground-floor was originally entirely clad in stone or masonry made to appear like stone.

Exterior: Second through Thirteenth Floors

- Majority of window sash and frames were replaced in 1990 with new window sash and frames. While no original windows remain on these upper floors, windows on the second floor of the four-story wing likely date from 1939. Some of the windows on the thirteenth floor also likely date from 1939. The Sky Room addition was constructed in 1946-1947; however, the existing windows on the addition appear to have been altered somewhat from historic photographs and were likely replaced at an unknown date.
- Historic photographs of the east elevation show that the windows on the projecting bay where an opening is half the height of the other is the original configuration. The smaller opening has likely not been resealed. The larger opening was originally an open balcony with a metal railing. This balcony has since been enclosed with a fixed window. The existing railing is not original, though it possibly dates from 1939.
- Fire escape on the south elevation likely dates from 1926 or 1939.
- Gun turret on the south elevation of the tower dates from World War II.

Interior: Arcade Floor

- Paired pilasters and arches in the Arcade entrance vestibule and corridor are likely original.
- Light fixtures in the Arcade entrance vestibule and corridor are likely modern replacements and not original.
- Portions of the wood and plaster trim, moldings, and base in the corridor are possibly original or date from 1939. A portion of these features were also replaced during the 1990 rehabilitation.

Memorandum – The Breakers Hotel, Long Beach, CA

2



Interior: Lobby

- Configuration of partitions has been altered over time, most notably along the north wall. Historic photographs of the original 1926 lobby show that there was originally an opening between the storefront immediately west of the main entrance and the lobby. During the 1939 Hilton renovation, the interior partitions between the three storefronts to the west of the main entrance and the lobby were modified with new openings, which were infilled with glass display cases.
- Original features that remain from 1926 are located on the ceiling or border the ceiling. These features include: column capitals, ceiling panels, cornices, and ornamental moldings. The wood paneling on the reception desk also likely dates from 1926.
- Original walls and columns were finished to look like rusticated stone. These features also had a plaster or masonry chair rail and a plaster or masonry base. This original finish was replaced with a smooth plaster finish in 1939. The original chair rails were removed, and the base was replaced with wood baseboards.
- Window moldings were likely installed in 1939 during the Hilton renovation.
- Baseboards were likely installed in 1939 during the Hilton renovation.
- Light fixtures are modern replacements and are not original.
- Applied plaster wall trim is not original and was likely added sometime during the 1980s.

Interior: Ground-Floor Elevator Lobby

- Elevator door frames and baseboard on south wall likely date from 1939.
- Ceiling paneling likely dates from 1926 or was replicated to match original ceiling paneling.
- Light fixture is a modern replacement and not original.
- Letter box and mail chute likely dates from 1939. It is not seen in a historic photograph of the original 1926 elevator lobby.
- Stair to second floor was constructed in 1939.
- Flooring is not original nor does it likely date from the Hilton renovation. It likely was installed sometime after 1947.

Memorandum – The Breakers Hotel, Long Beach, CA

3



Interior: First-Floor Bar

- First-floor bar was originally constructed in 1939 during the Hilton renovation.
- Configuration of the partitions has been altered over time. The entrance on the west wall was originally located to the south of the current entrance. The entrance on the south wall is likely in its 1939 location, although there was previously a partition immediately to the north of this entrance that enclosed a short corridor to the bar. A portion of the west wall was relocated further east, likely during the 1980s seismic upgrades or possibly when the mail room was first constructed.
- Ceiling and light fixtures are modern replacements and do not date from 1939.
- Drawings from the 1990 rehabilitation indicate that the bar and bar back were salvaged from another location and installed in this space at this time.
- Portions of wall paneling possibly date from 1939, other portions were salvaged from another location and installed during the 1990 rehabilitation according to a note on the 1990 drawings.
- Flooring possibly dates from 1939; however, it was altered at an unknown date to mirror the new location of the west wall.

Interior: First-Floor Ballroom

- Historic photographs show that there originally was a formal dining room located in the approximate location of the first-floor ballroom. This formal dining room was subsequently partitioned into multiple spaces in 1939.
- Original features/finishes/materials were removed from the spaces that were converted into a kitchen, cocktail room, and service corridor, but 1926 features/finishes/materials likely remained in the space noted as the "Grille Room" on the 1939 plans.
- First-floor ballroom was restored in 1986, and features/finishes/materials thought to date from 1926 were retained and replicated throughout the space. It is likely that original features/finishes/materials remain in the southwest portion of this space where the 1939 "Grille Room" was located.
- Features/finishes/materials original to this space possibly include: portions of the moldings on the ceiling, moldings along the ceiling beams, and the column capitals.
- Features/finishes/materials not original to this space include: mirrored panels on the columns; applied plaster trim on the walls; flooring; light fixtures; baseboard; and door surround on west wall.

Memorandum – The Breakers Hotel, Long Beach, CA

4



Interior: Mezzanine

- Portion of the mezzanine was demolished in 1939, and the remainder of the mezzanine was enclosed. Historic photographs from 1926 show that mezzanine was originally open to the lobby with a low metal railing along the perimeter.
- Metal and wood railing at the mezzanine stair is original and pictured in historic photographs of the original 1926 lobby.

Interior: Second-Floor Dining Room

- None of the existing features/finishes/materials date from 1926. It is unknown whether the trim on the columns or the baseboards possibly date from 1939.

Interior: Upper-Floor Elevator Lobbies

- No original features/finishes/materials likely remain from 1926.
- Baseboards and elevator door frames possibly date from 1939.
- Mail chute likely dates from 1939.

Interior: Upper-Floor Corridors

- Corridor configuration has been altered by the enclosure of the original staircase on floors 2-12 and the reconfiguration of openings at the northwest corner of the corridor on several floors.
- Some original door frames and transoms from 1926 remain in the upper-floor corridors.
- Ceiling is likely not original. It was likely lowered in part and the soffit added to conceal sprinkler system sometime after 1926.

Interior: Upper-Floor Hotel Rooms

- Original baseboard and wall trim remain in some hotel rooms.
- Original door frames, paneled doors, and hardware remain in some hotel rooms.
- Original window moldings likely remain in the majority of the hotel rooms.
- Original marble thresholds at openings in the bathroom remain in some hotel rooms.

Interior: Sky Room

- Majority of the features/finishes/materials in the lobby, restrooms, main dining room, and 1947 Sky Room addition date from the 1984 renovation of the Sky Room.
- Coved ceiling over platform at the west end of the main dining room and in the Sky Room addition date from the 1957 renovation of the Sky Room.
- Curved wall at the west end of the main dining room also dates from 1957.

Memorandum – The Breakers Hotel, Long Beach, CA

5



Interior: Circulation

- Configuration of the main staircase was altered when this staircase was enclosed in 1970. This included the relocation of landings and treads at floors 2-12. It also included the demolition of the stair at the first floor and the construction of a new stair that connects to the original 1926 stair at the mezzanine level. The metal stair railing is also not original; however, portions of the metal railing possibly date from 1939.
- Elevator doors, cabs, call buttons, and indicator lights are all modern replacements and not original.

Memorandum – The Breakers Hotel, Long Beach, CA

6

REVISIONS:	ISSUE:
ISSUE DESCRIPTION:	DATE:
NO.:	
PLANNING APPROVAL	10/30/2018

NADEL PROJECT No: 18016
DRAWING DATE: 08/10/2018

SCALE
1/16"=1'-0"

GPA HISTORICAL MEMORANDUM

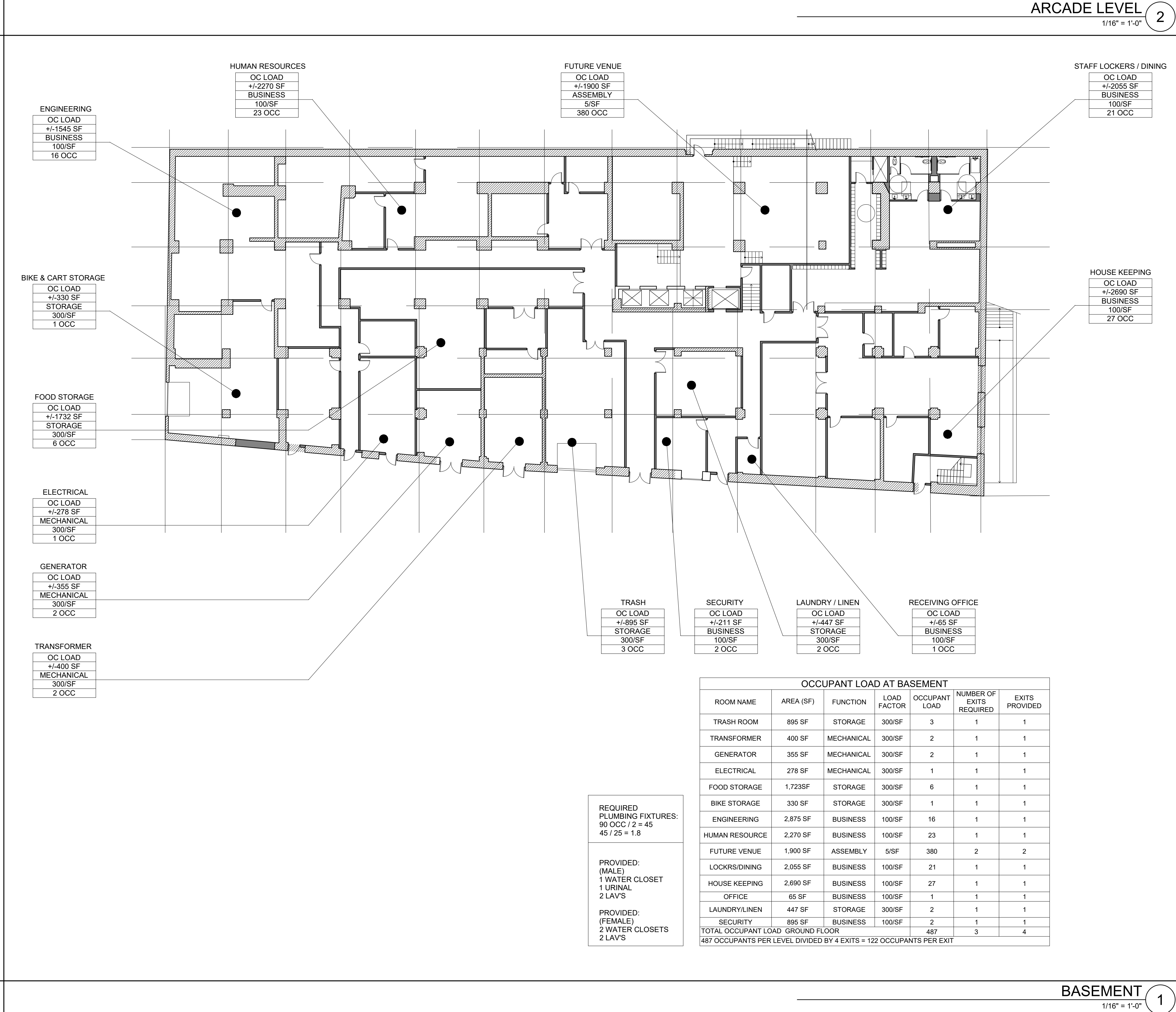
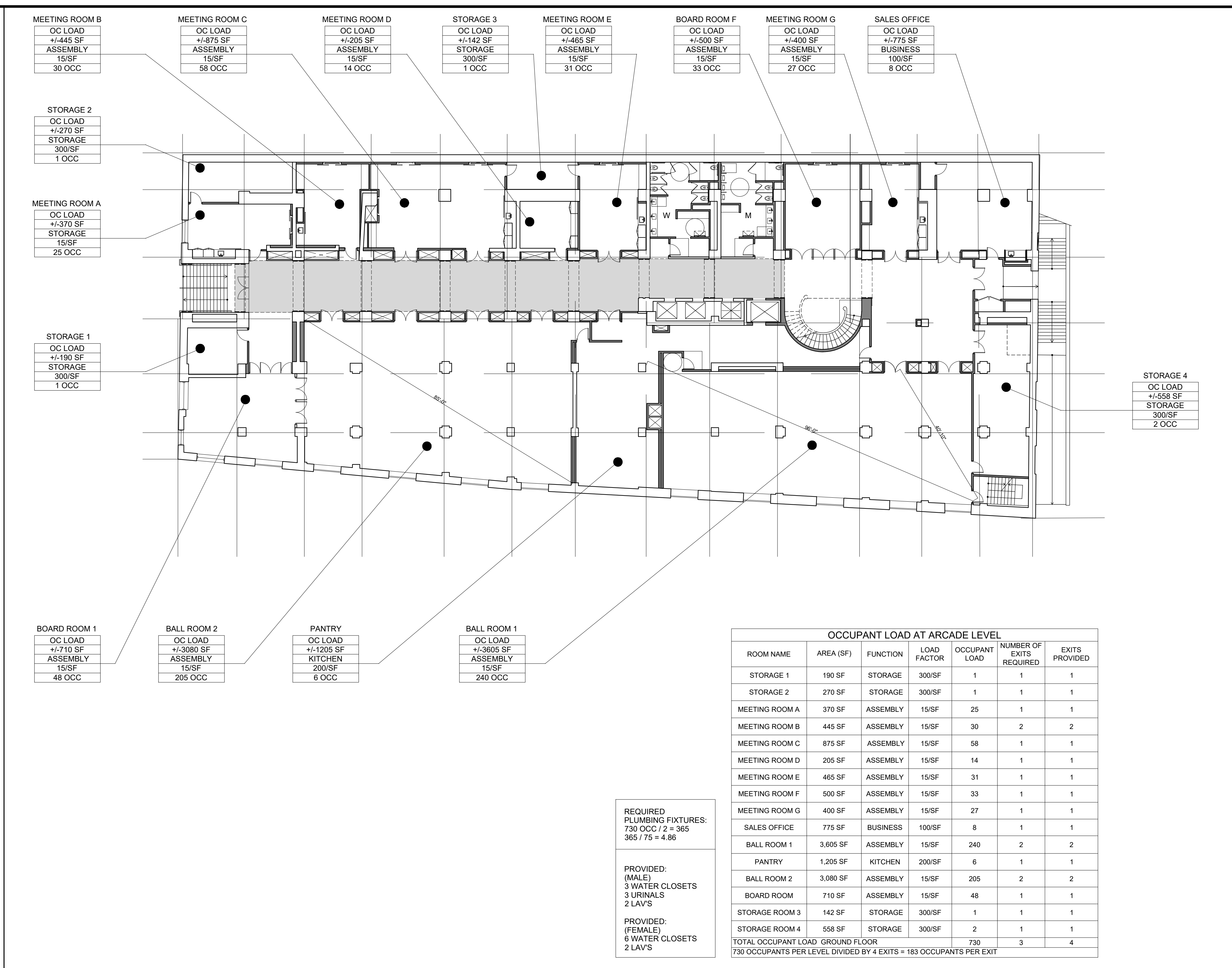
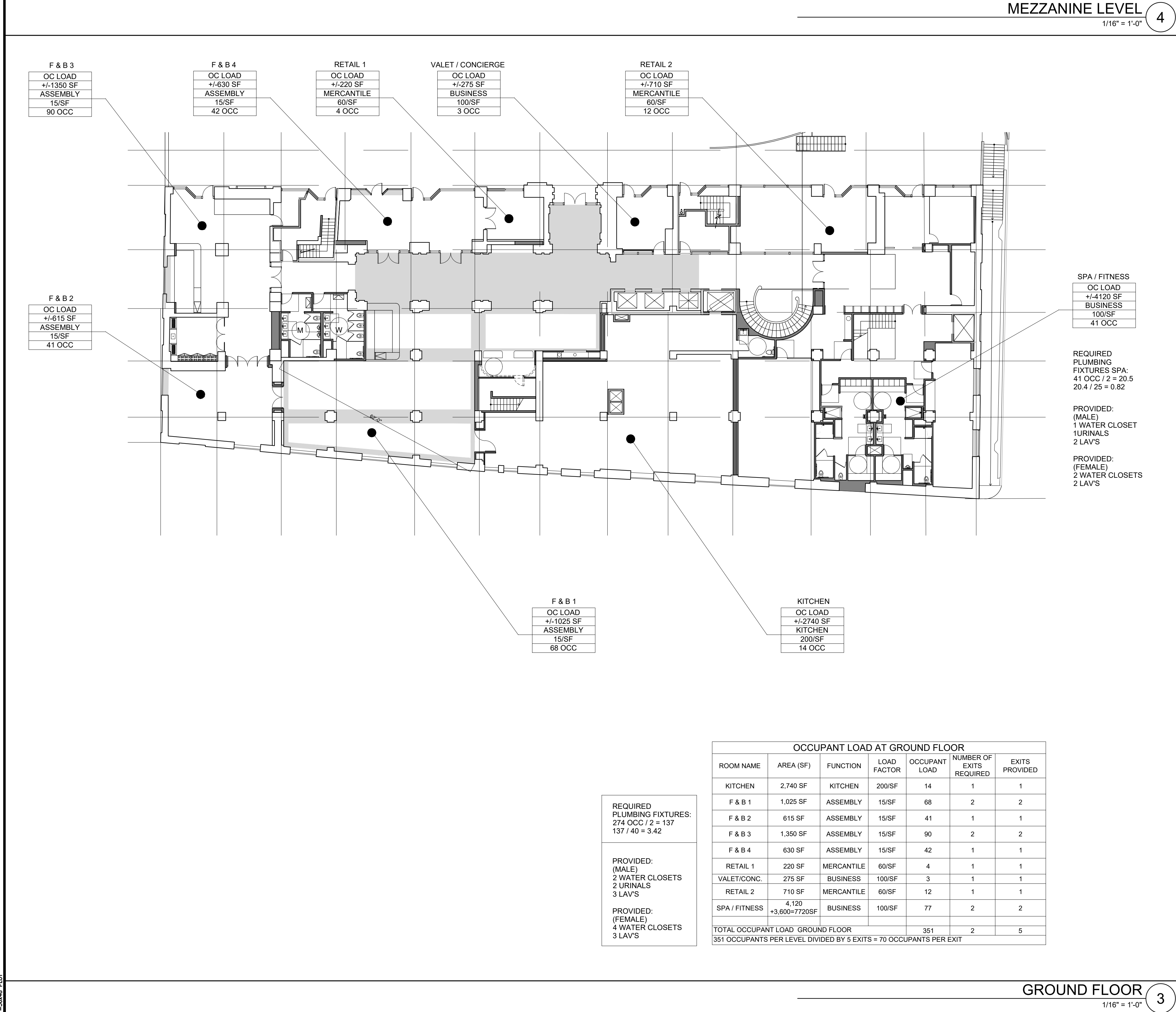
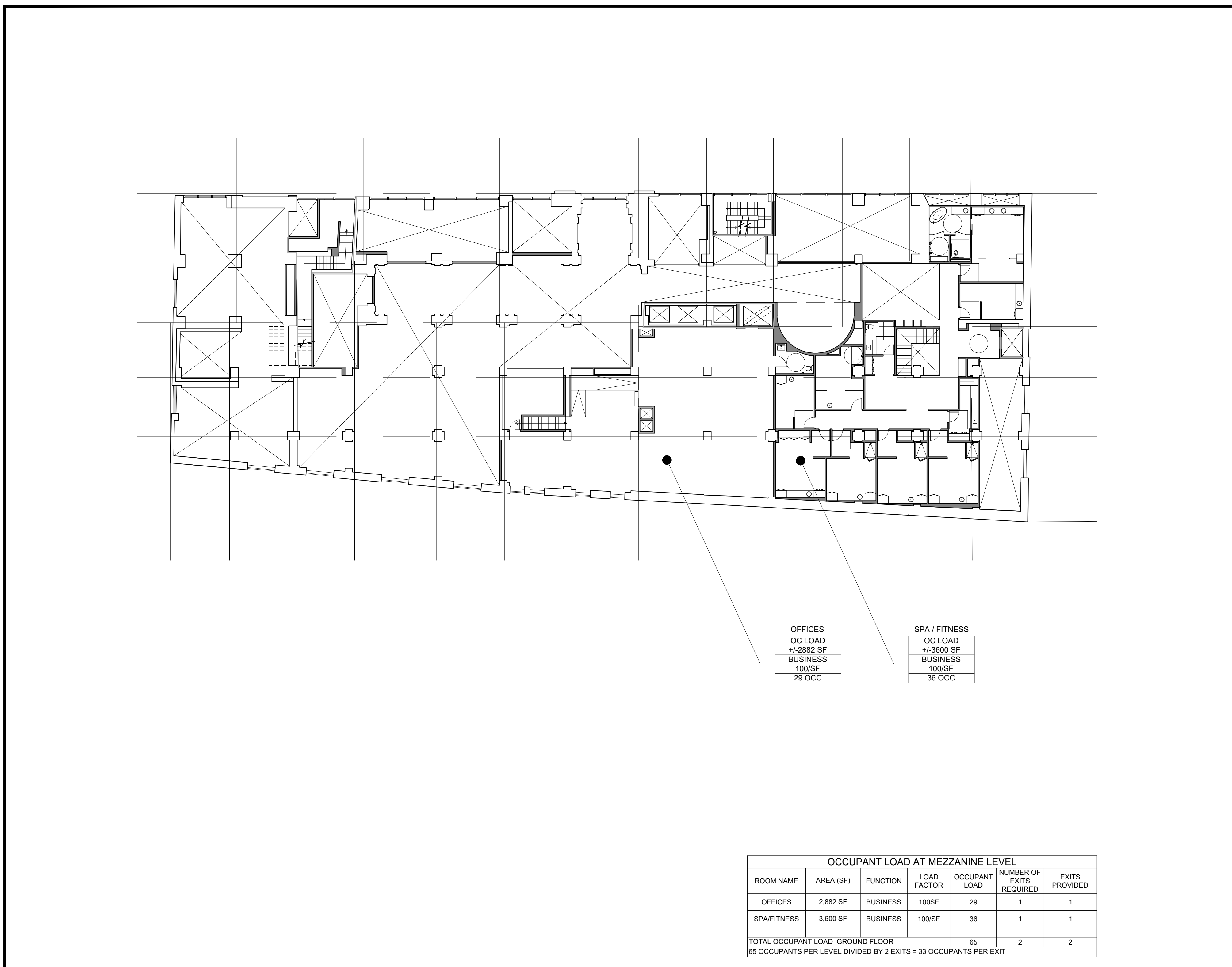
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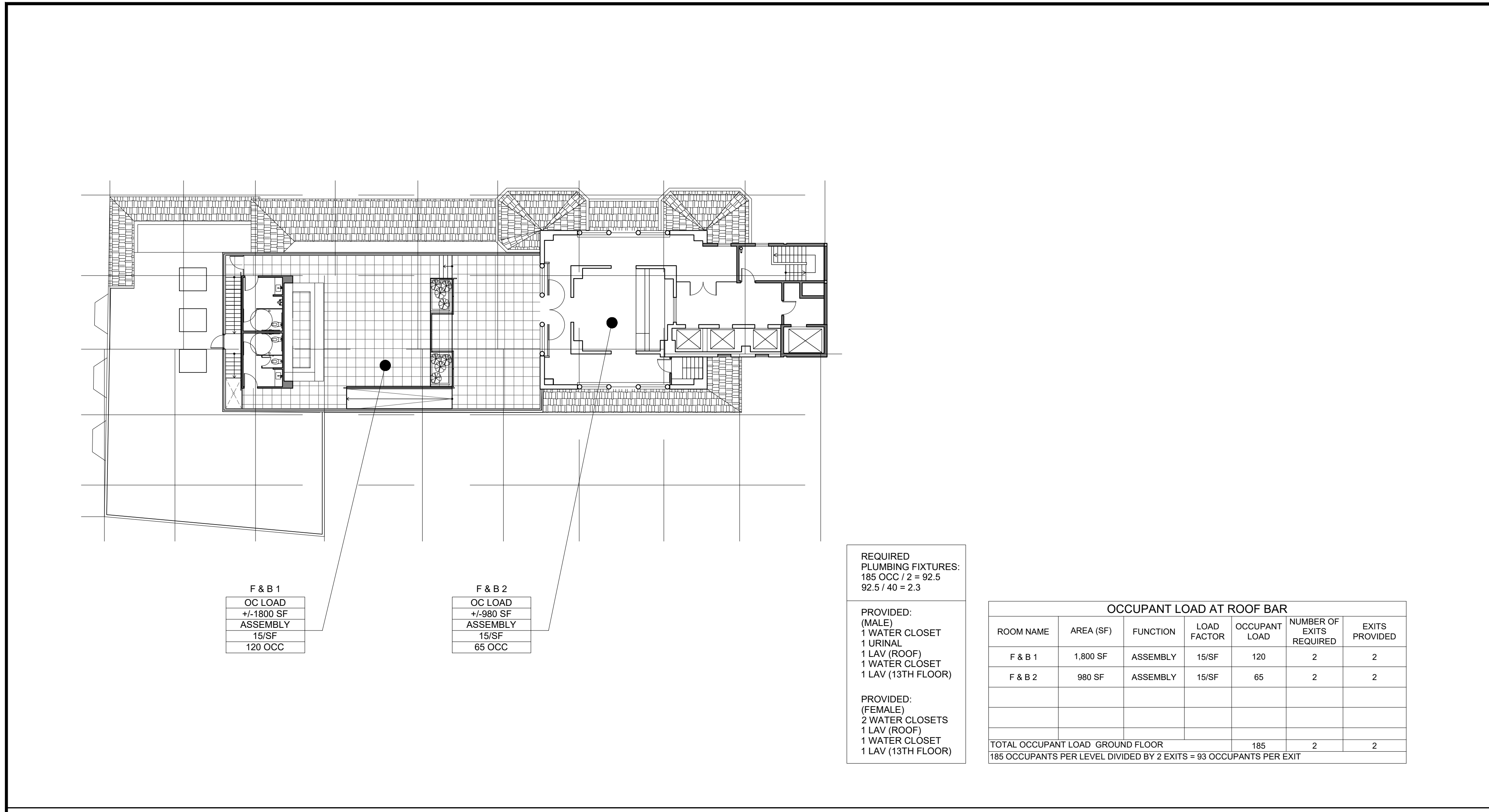
NADEL PROJECT NO: 18016
DRAWING DATE: 08/10/2018

SCALE
1/16"=1'-0"

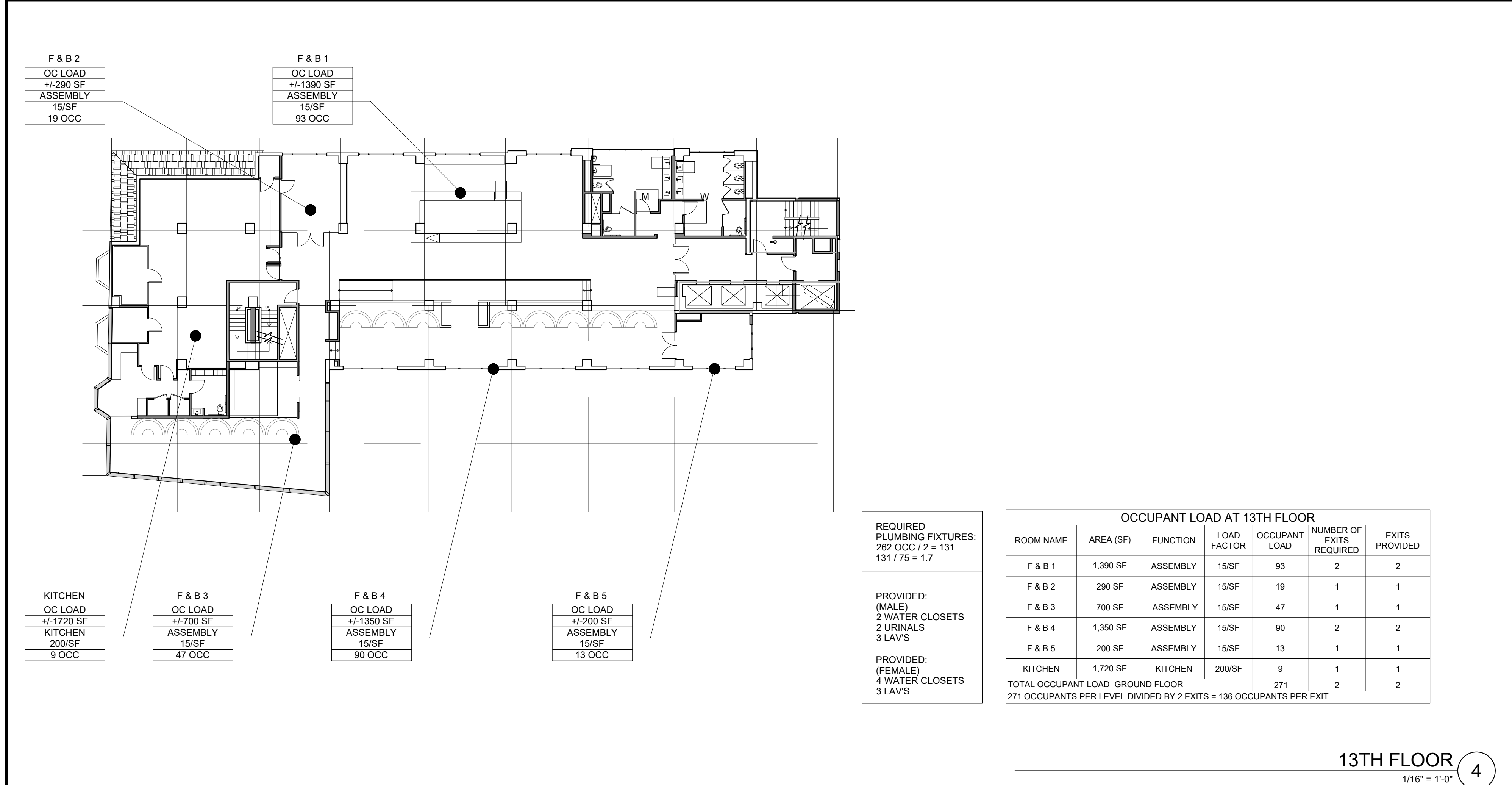
EXITING
ANALYSIS

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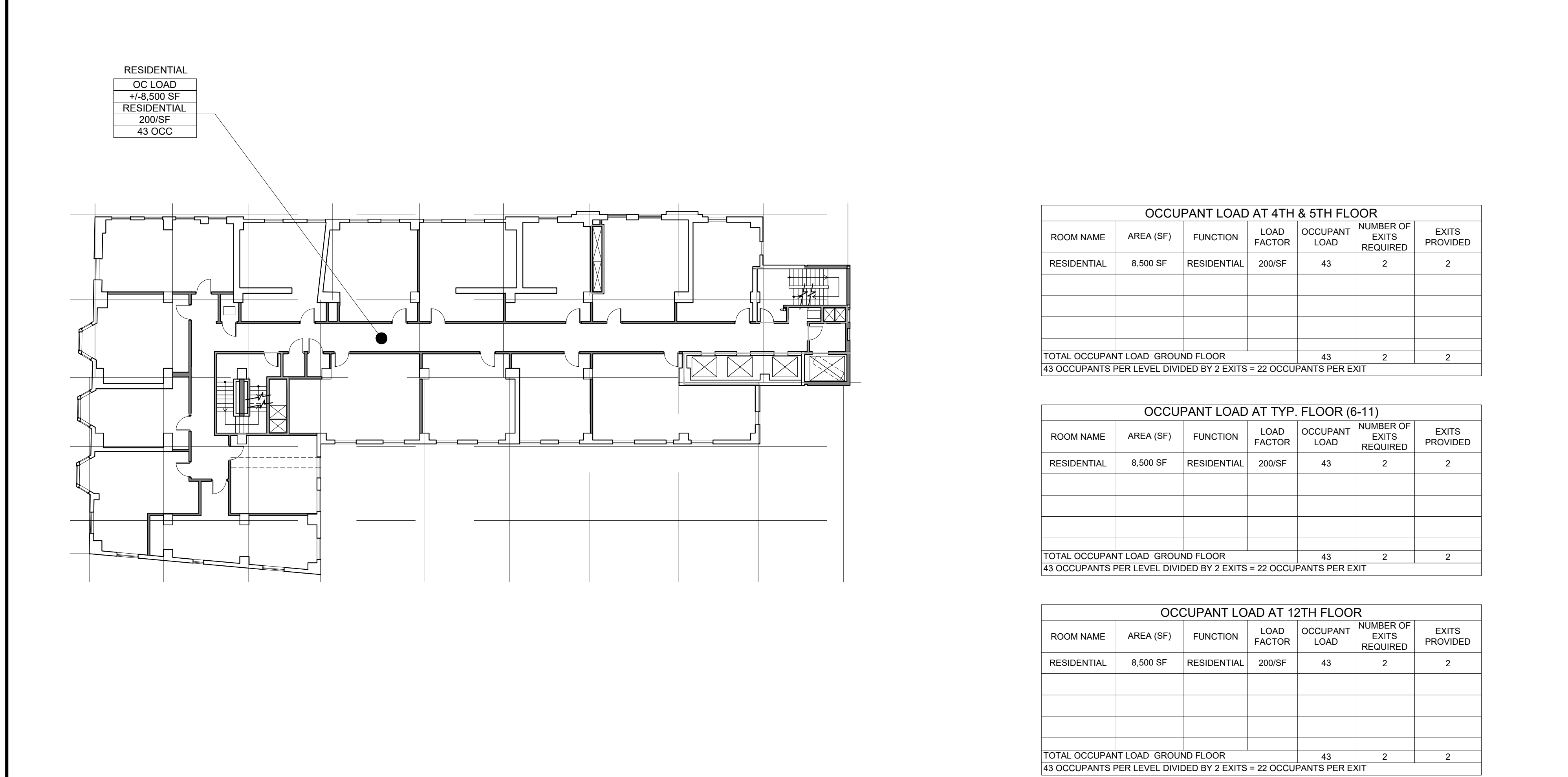




ROOF BAR 5
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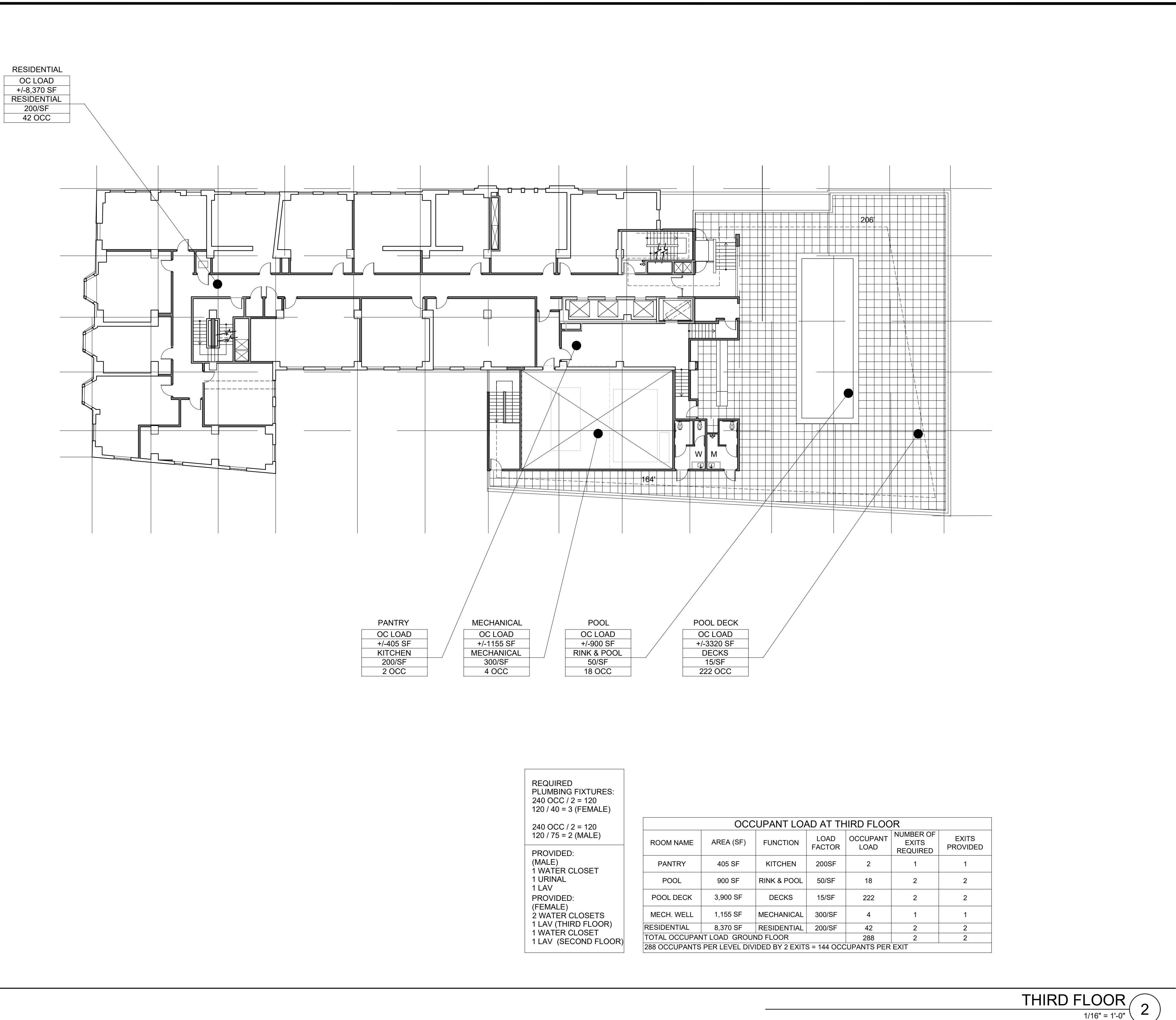


13TH FLOOR 4
1/16" = 1'-0"

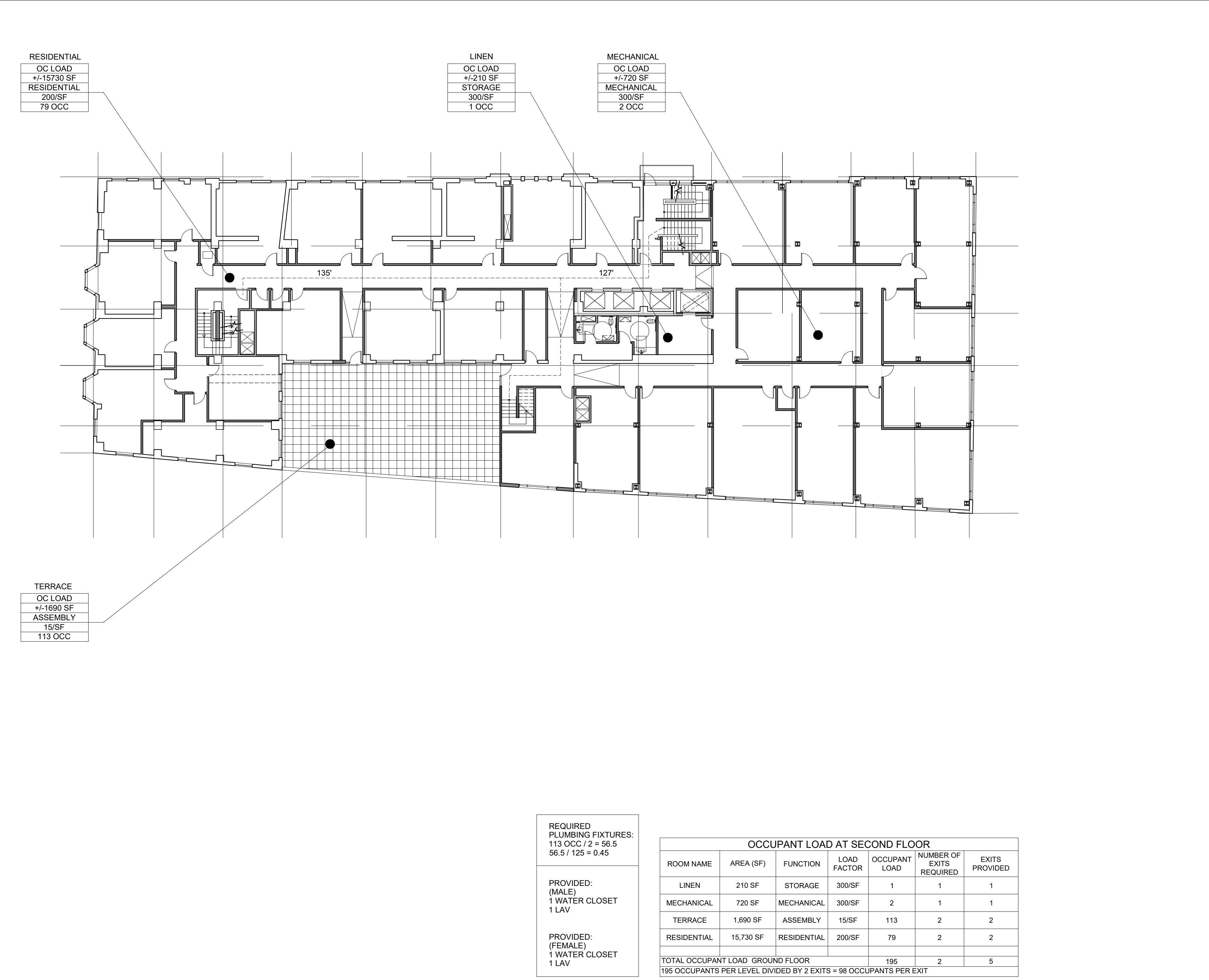


TYPICAL FLOOR 3
1/16" = 1'-0"

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THIRD FLOOR 2
1/16" = 1'-0"



SECOND FLOOR 1
1/16" = 1'-0"

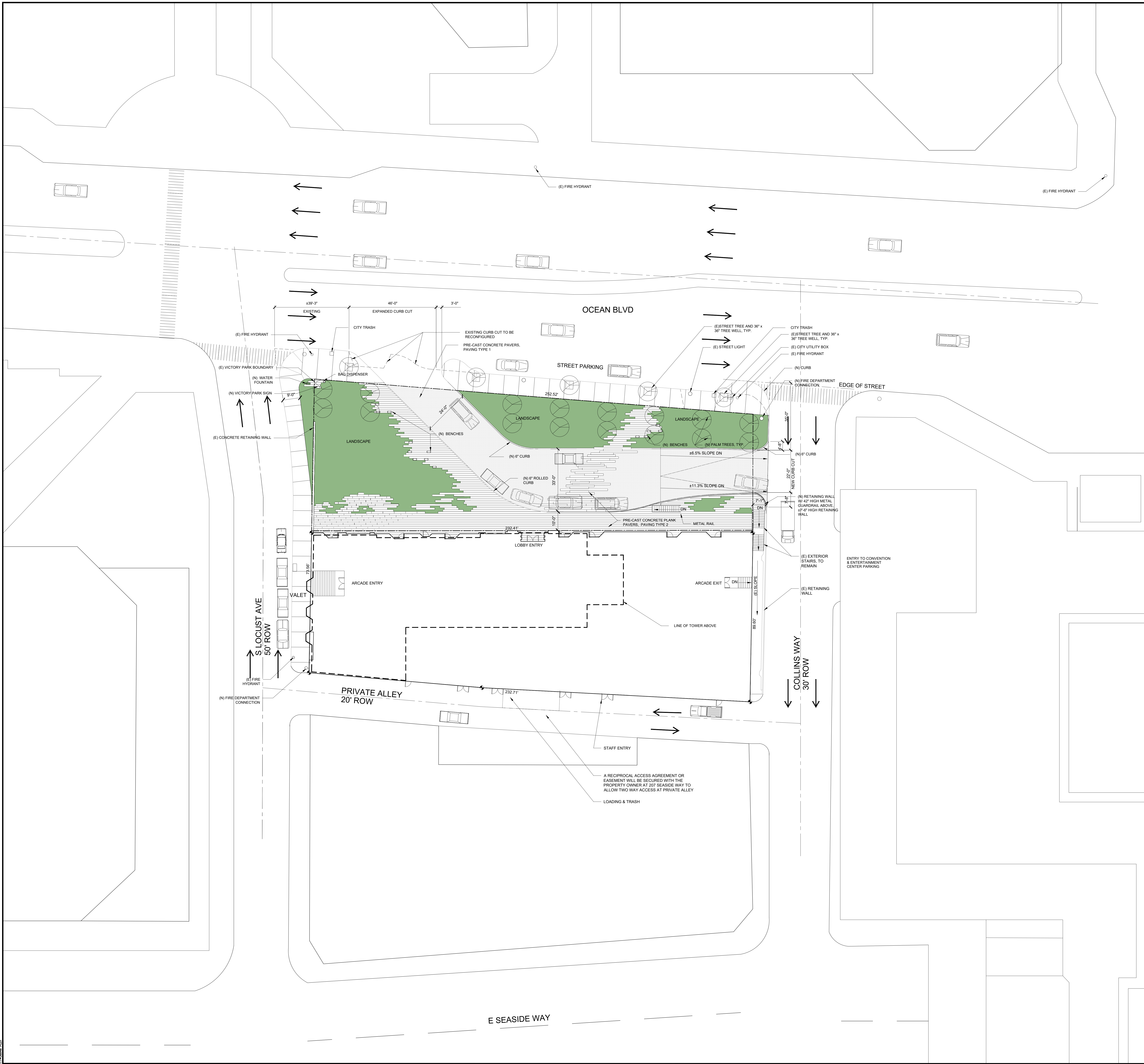
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ARCO
CONSTRUCTION
OWNER:
pacific6

BREAKERS
HOTEL
RENOVATION
210 E OCEAN BLVD.
LONG BEACH,
CA 90802

REVISIONS:
ISSUE DESCRIPTION: NO.1
ISSUE DATE: 10/30/2018
PLANNING APPROVAL: 10/30/2018
NADEL PROJECT No: 18016
DRAWING DATE: 08/10/2018
SCALE: 1/16"=1'-0"

EXITING
ANALYSIS
A0.05



FROM SURVEY DATED 7/3/2018:	
EXISTING PARK AREA:	16,398 sf
EXISTING LANDSCAPE (LA):	8,747 sf (53.4% COVERAGE)
EXISTING DRIVE WAY (DW):	3,921 sf (23.9% COVERAGE)
EXISTING HARDSCAPE (HS):	3,730 sf (22.7% COVERAGE)
PROPOSED LANDSCAPE: 7,100 sf (43.3% COVERAGE)	
PROPOSED DRIVE WAY:	5,319 sf (32.4% COVERAGE)
PROPOSED HARDSCAPE:	3,979 sf (24.3% COVERAGE)
DELTA AT LANDSCAPE:	-1,374 sf
DELTA AT DRIVEWAY:	1,398 sf
DELTA AT HARDSCAPE:	249 sf
APN: 7278-007-034	
LOT SIZE:	119,184 sf
LOT COVERAGE:	100%
GROSS BUILDING AREA:	186,417 sf
(BY FLOOR):	
BASEMENT:	± 21,315 sf
ARCAD:	± 21,315 sf
GROUND:	± 19,090 sf
MEZZANINE:	± 5,875 sf
2ND FLOOR:	± 17,300 sf
3RD FLOOR:	± 5,740 sf
4TH & 5TH FLOOR:	± 18,290 sf (15,145 sf x 2 FLOORS)
6TH & 11TH FLOOR:	± 53,550 sf (10,925 sf x 6 FLOORS)
12TH FLOOR:	± 8,925 sf
13TH FLOOR:	± 6,620 sf
12TH FLOOR:	± 2,297 sf

LEGEND:

(E) WALL TO REMAIN

(N) WALL/STRUCTURE

(E) HISTORIC ELEMENT TO REMAIN (1926-1977)

0

8

16

32

NORTH

SCALE 1/16"= 1'-0"

1

SITE PLAN

1/16"= 1'-0"

FLOOR PLATE GROSS AREA= 21,355 GSF

NADEL SPECIAL PROJECTS INC

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1	PLANNING APPROVAL	10/30/2018

NADEL PROJECT NO: 18016
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SCALE 1/16"=1'-0"

BREAKERS HOTEL RENOVATION

210 E OCEAN BLVD,
LONG BEACH,
CA 90802

10-30-2018

ISSUE PLANNING APPROVAL

SITE PLAN

A1.01

BREAKERS HOTEL RENOVATION

210 E OCEAN BLVD.
LONG BEACH,
CA 90802

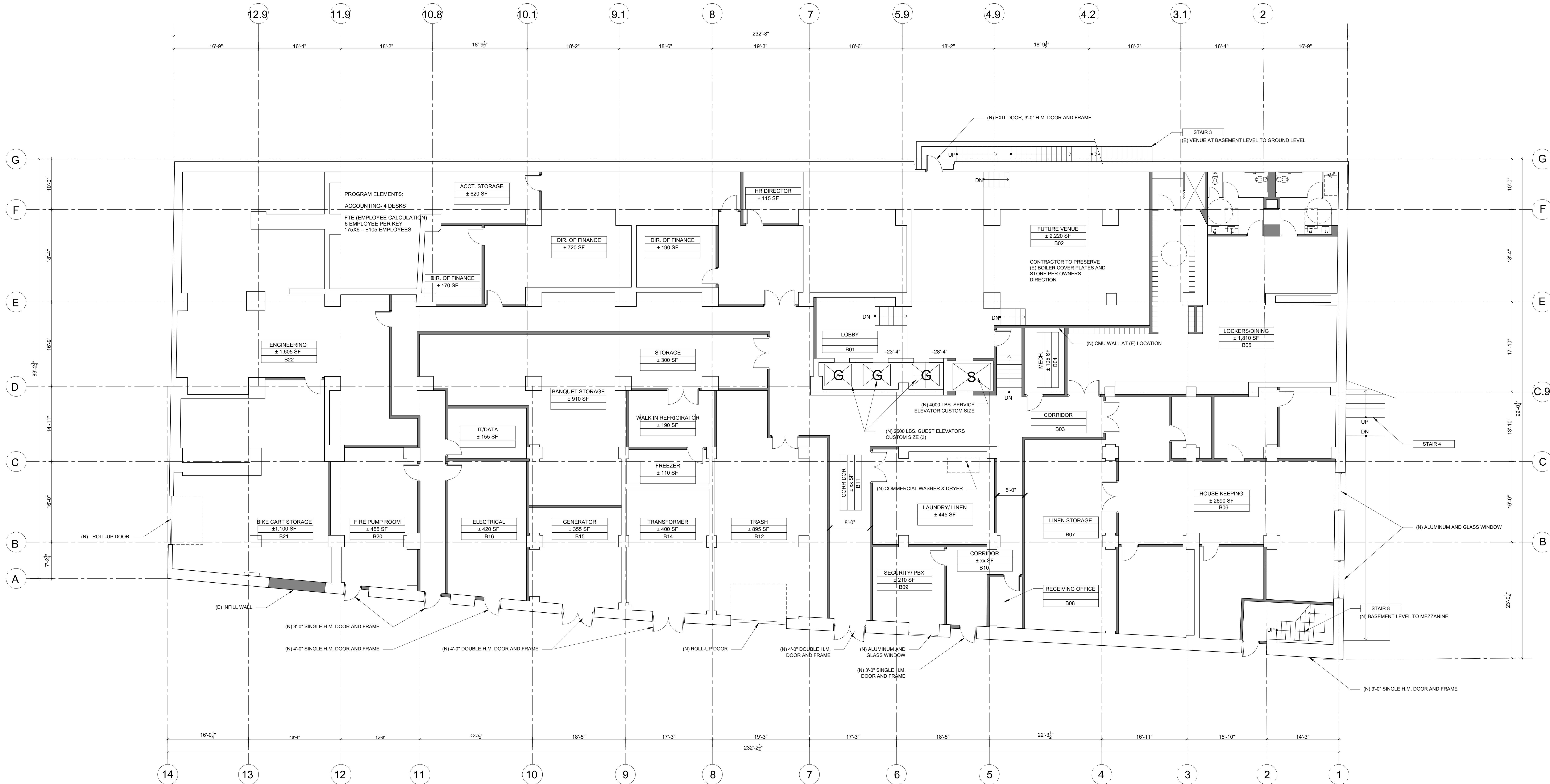
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NO.			
PLANNING APPROVAL			10/30/2018

NADEL PROJECT No: 18016
DRAWING DATE: 08/10/2018

SCALE
1/8"=1'-0"

**BASEMENT
PLAN**

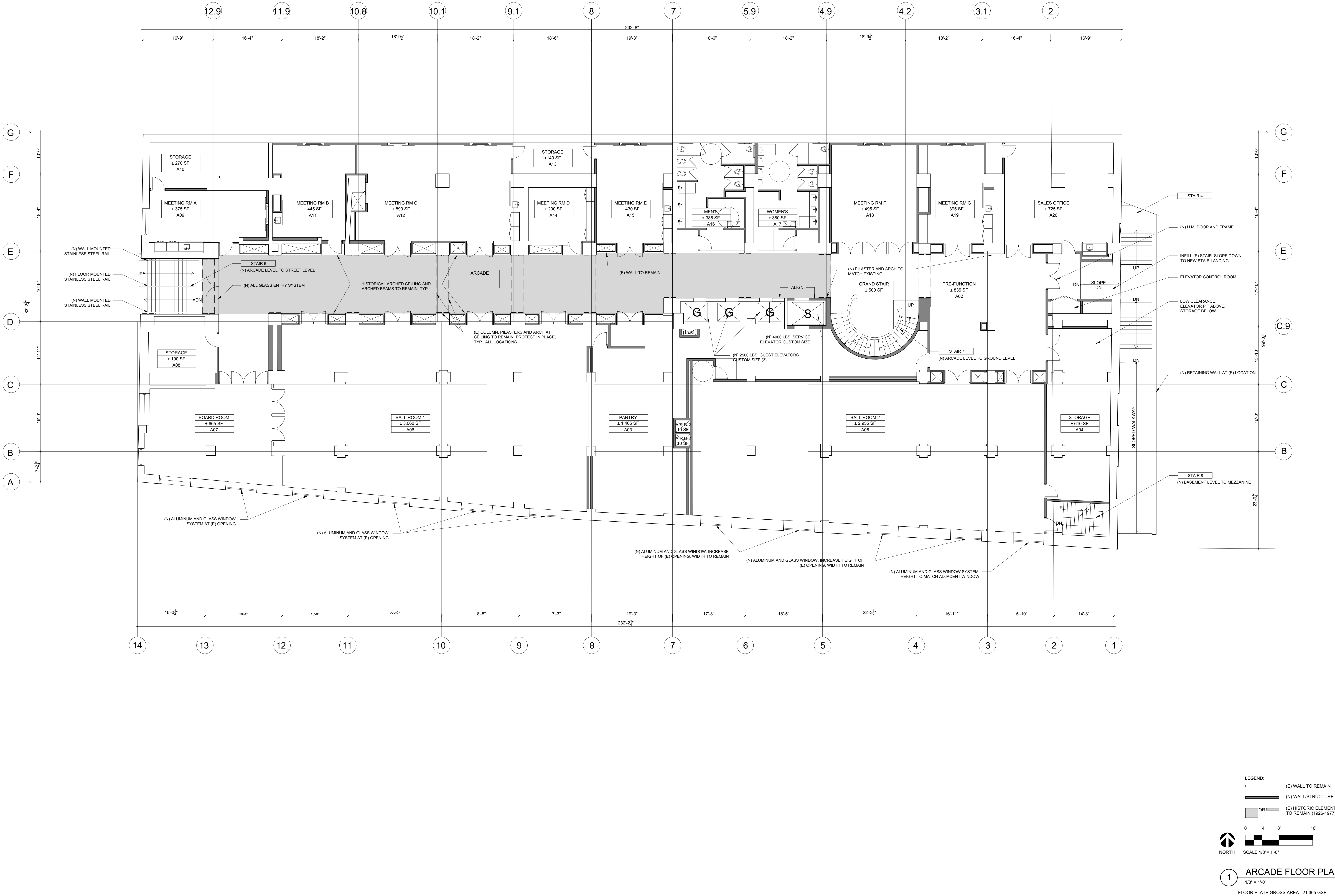
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LEGEND:
(E) WALL TO REMAIN
(N) WALL/STRUCTURE
OR
(E) HISTORIC ELEMENT
TO REMAIN (1926-1977)

0 4' 8' 16'
SCALE 1/8"=1'-0"

1 BASEMENT PLAN
1/8" = 1'-0"
FLOOR PLATE GROSS AREA= 21,365 GSF



BREAKERS
HOTEL
RENOVATION

210 E OCEAN BLVD,
LONG BEACH,
CA 90802

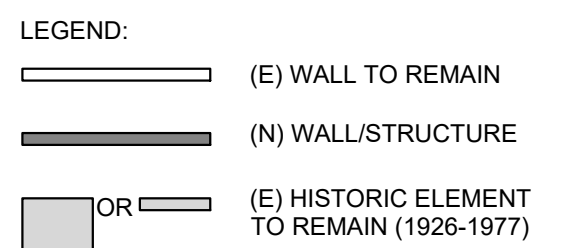
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PLANNING APPROVAL 10/30/2018
ISSUE PLANNING APPROVAL 10-30-2018

NADEL PROJECT No: 18016
DRAWING DATE: 08/10/2018

SCALE
1/8"=1'-0"

ARCADIE FLOOR PLAN

A2.02



1 GROUND FLOOR
1/8" = 1'-0"
FLOOR PLATE GROSS AREA= 19,090

0 E OCEAN BLVD,
LONG BEACH,
CA 90802

ISSUES:	ISSUE DATE:
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DRAWING DATE:	08/10/2018

ISSUE: PLANNING APPROVAL:
10-30-2018

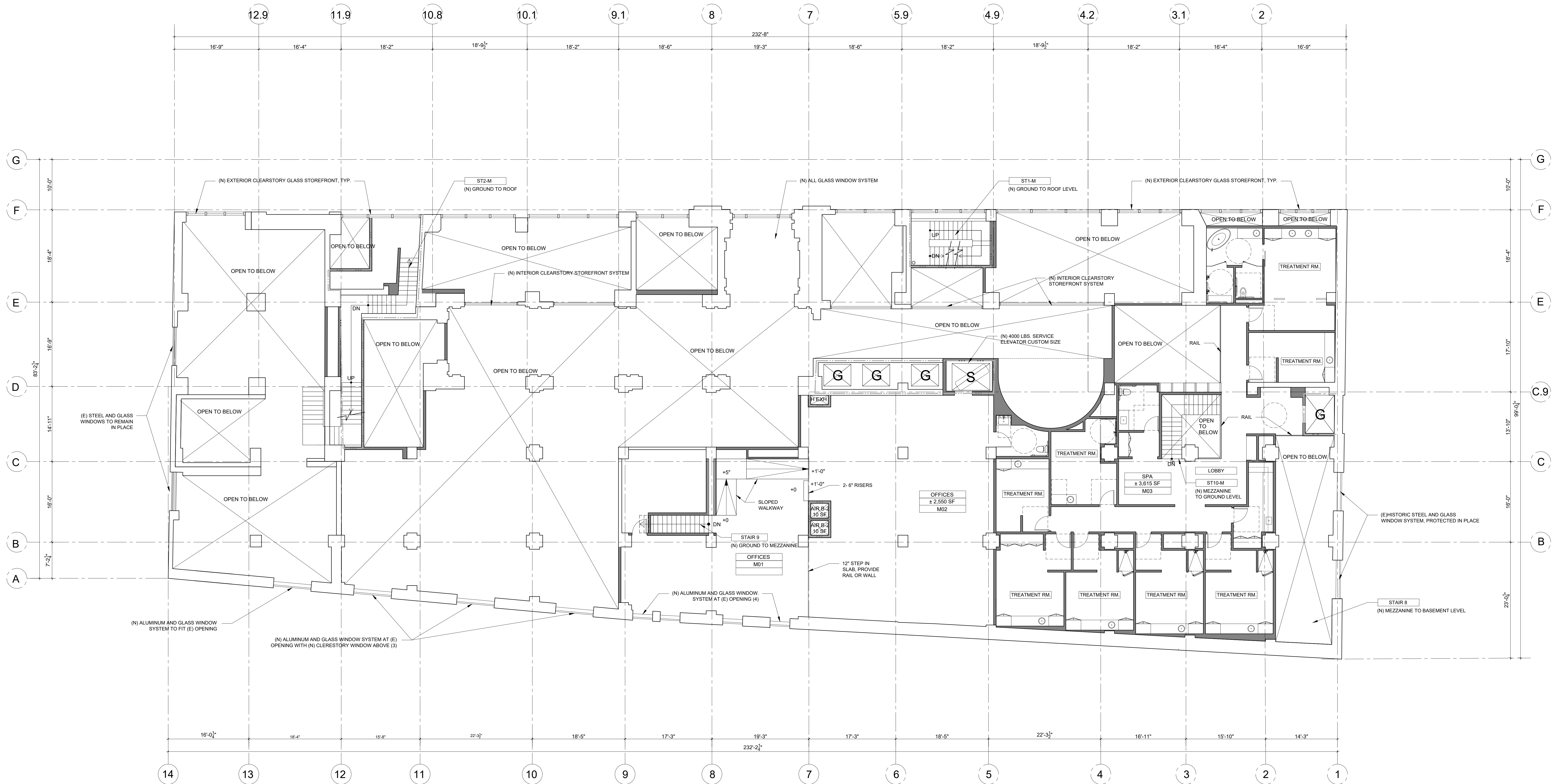
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$1/8'' = 1'-0''$

GROUND FLOOR PLAN

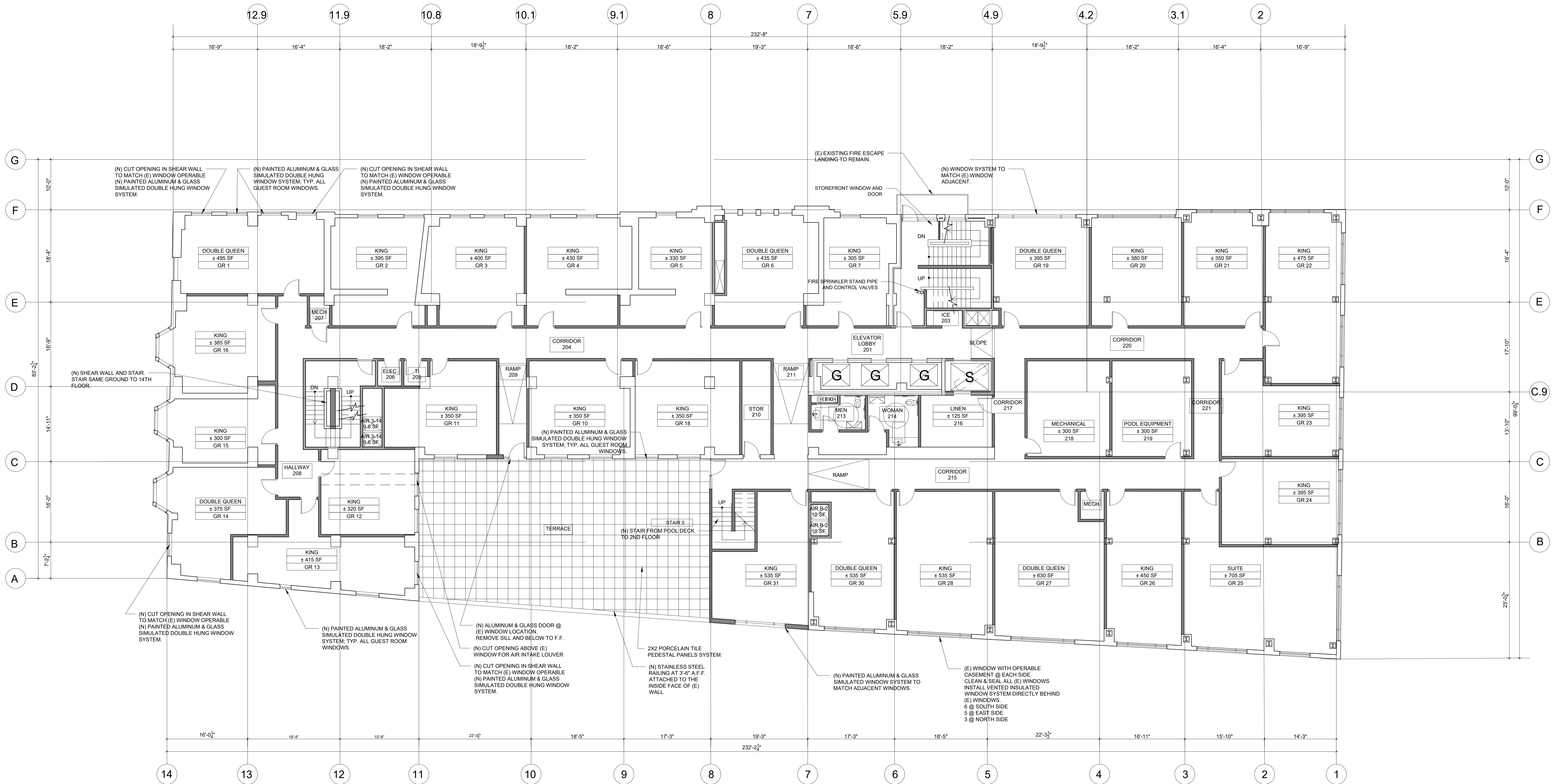
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LEGEND:
(E) WALL TO REMAIN
(N) WALL/STRUCTURE
(E) HISTORIC ELEMENT TO REMAIN (1926-1977)

0 4' 8' 16'
SCALE 1/8"= 1'-0"

1 MEZZANINE FLOOR PLAN
1/8" = 1'-0"
FLOOR PLATE GROSS AREA= 5,675 GSF



LEGEND:
— (E) WALL TO REMAIN
— (N) WALL/STRUCTURE
— (E) HISTORIC ELEMENT TO REMAIN (1928-1977)



2ND FLOOR FLOOR
1/8" = 1'-0"
FLOOR PLATE GROSS AREA= 16,880 GSF

BREAKERS HOTEL RENOVATION

210 E OCEAN BLVD.
LONG BEACH,
CA 90802

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PLANNING APPROVAL	10/30/2018	

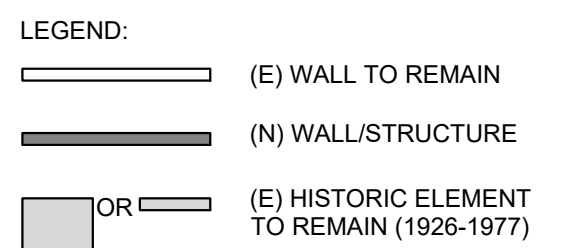
NADEL PROJECT No: 18016
DRAWING DATE: 08/10/2018
SCALE: 1/8"=1'-0"

**2ND
FLOOR PLAN**

A2.05

10-30-2018

ISSUE PLANNING APPROVAL



1 3RD FLOOR FLOOR
1/8" = 1'-0"
FLOOR PLATE GROSS AREA= 9,740 GSF

A2.06

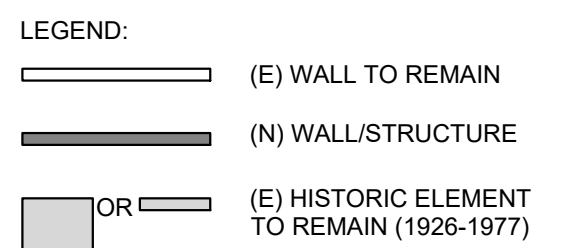
0 E OCEAN BLVD,
LONG BEACH,
CA 90802

[illegible]

ISSUING DATE:	08/10/2018	ISSU
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TH & 5TH
LOOR PLAN

A2.07



0 4' 8' 16'

 NORTH  SCALE 1/8" = 1'-0"

1 4TH & 5TH FLOORS
1/8" = 1'-0"

FLOOR PLATE GROSS AREA= 9,145 GSF

BREAKERS HOTEL RENOVATION

210 E OCEAN BLVD,
LONG BEACH,
CA 90802

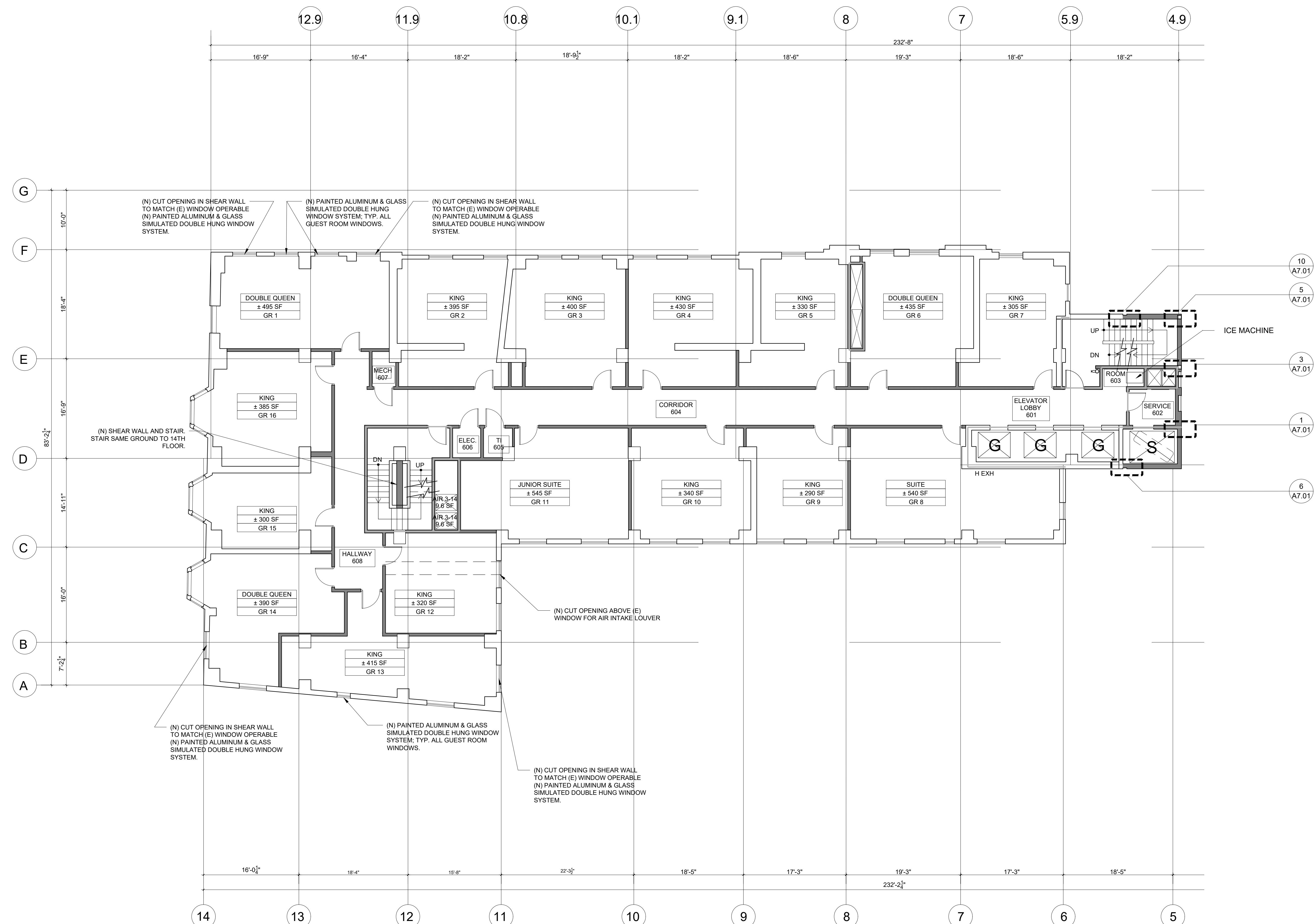
REVISIONS:	KEY COUNT PER FLOOR
ISSUE DESCRIPTION:	KINGS: 11
NO.:	DBL QUEENS: 3
	JR SUITE: 1
	SUITE: 1
	TOTAL KEYS: 16

NADEL PROJECT No: 18016
DRAWING DATE: 08/10/2018

SCALE
1/8"=1'-0"

6TH - 11TH
FLOOR PLAN

A2.08



LEGEND:

- (E) WALL TO REMAIN
- (N) WALL/STRUCTURE
- (E) HISTORIC ELEMENT TO REMAIN (1926-1977)

0 4' 8' 16'

NORTH

SCALE 1/8"= 1'-0"

1 6TH - 11TH FLOOR

1/8" = 1'-0"

FLOOR PLATE GROSS AREA= 8,925 GSF

BREAKERS HOTEL RENOVATION

210 E OCEAN BLVD,
LONG BEACH,
CA 90802

REVISIONS:	ISSUE DESCRIPTION:	ISSUE DATE:
NO.:		

PLANNING APPROVAL	10/30/2018

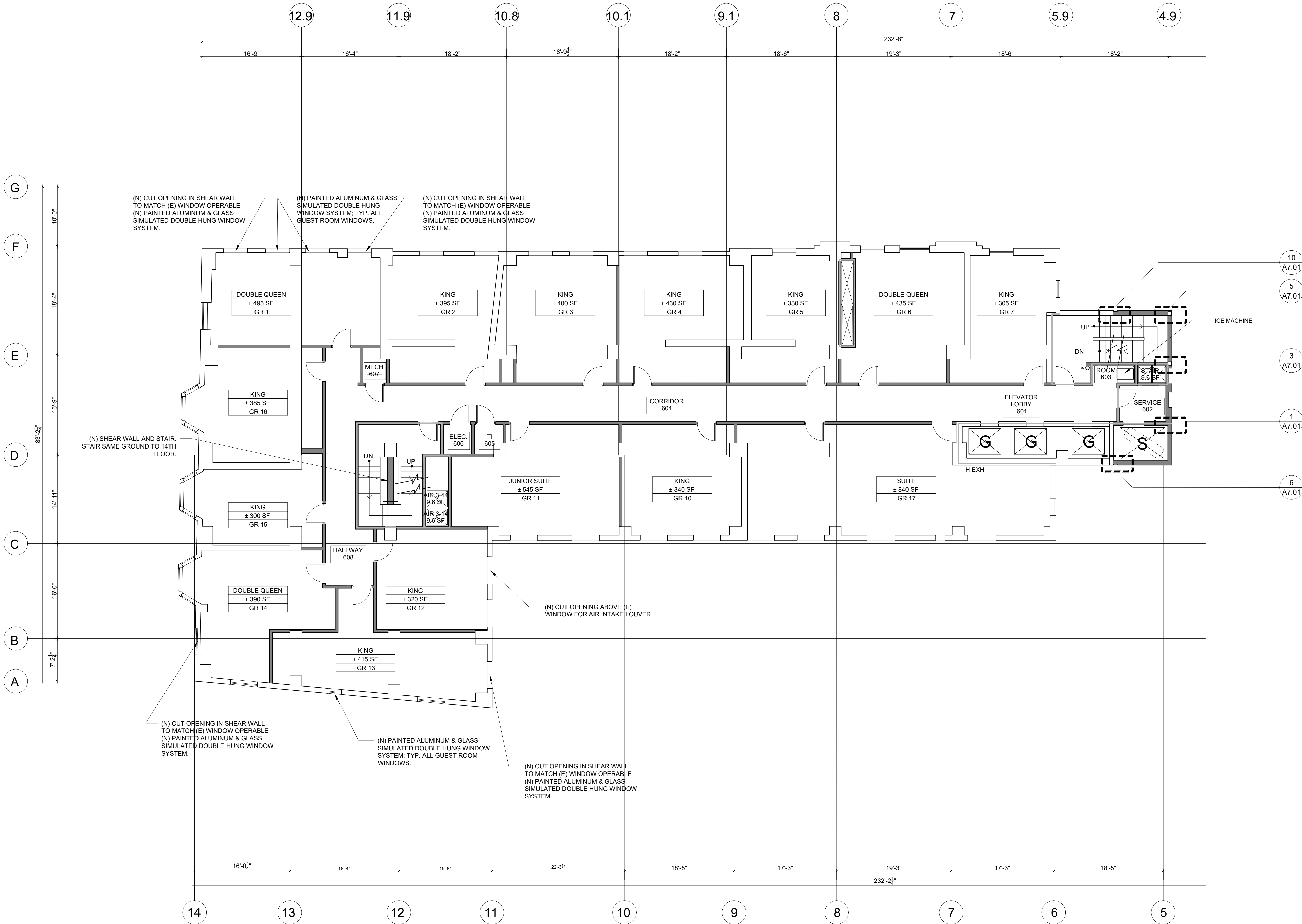
NADEL PROJECT NO: 18016

DRAWING DATE: 08/10/2018

SCALE
1/8"=1'-0"

12TH PENTHOUSE
FLOOR PLAN

A2.09



KEY COUNT PER FLOOR
KINGS: 10
DBL QUEENS: 3
JR SUITE: 1
SUITE: 1
TOTAL KEYS: 15

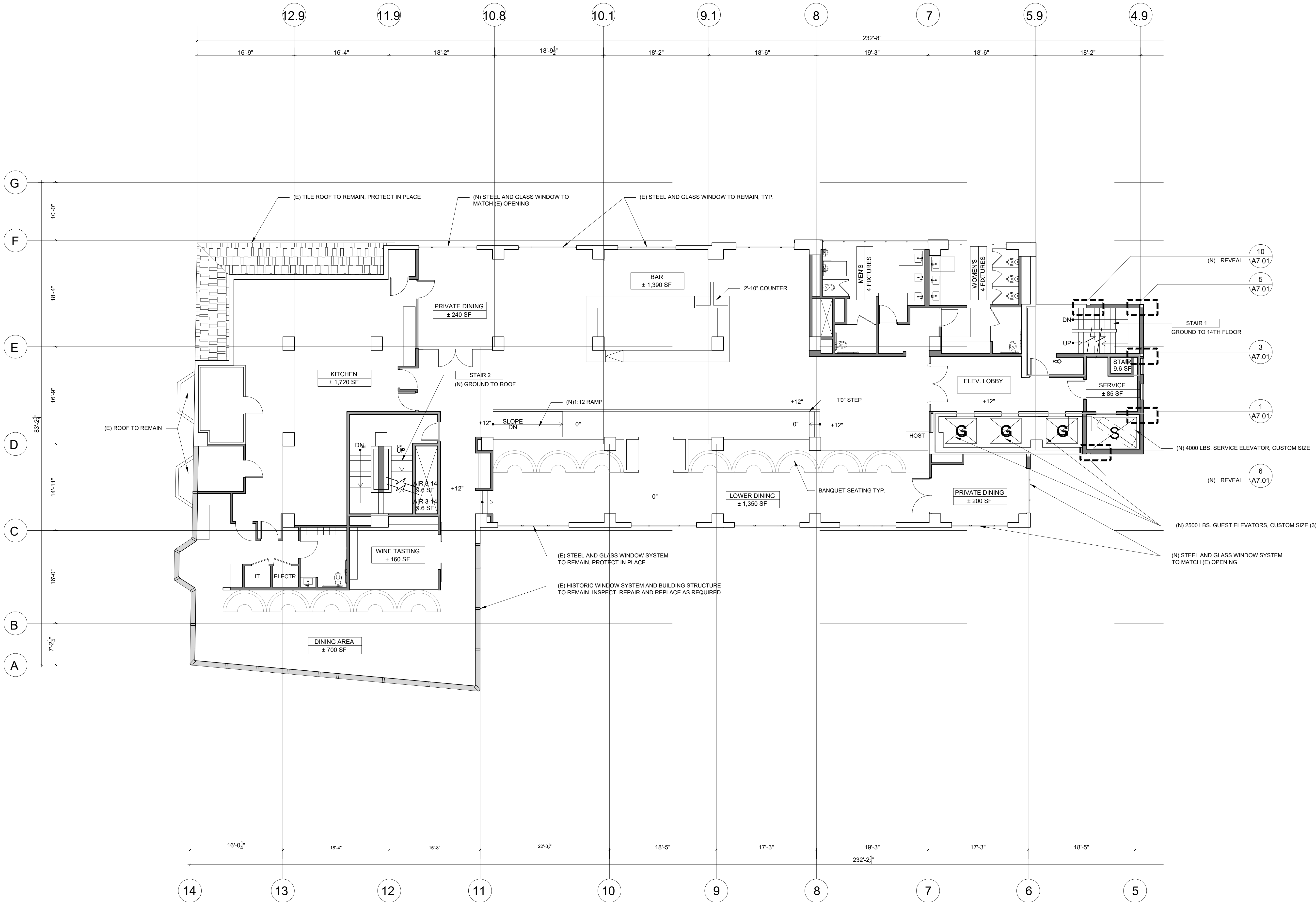
LEGEND:
(E) WALL TO REMAIN
(N) WALL/STRUCTURE
(E) HISTORIC ELEMENT TO REMAIN (1928-1977)

0 4' 8' 16'
SCALE 1/8"=1'-0"

12TH FLOOR

1/8"=1'-0"

FLOOR PLATE GROSS AREA= 8,925 GSF



LEGEND:
(E) WALL TO REMAIN
(N) WALL/STRUCTURE
(E) HISTORIC ELEMENT TO REMAIN (1928-1977)



1 13TH FLOOR
1/8" = 1'-0"
FLOOR PLATE GROSS AREA= 8,620 GSF

**BREAKERS
HOTEL
RENOVATION**

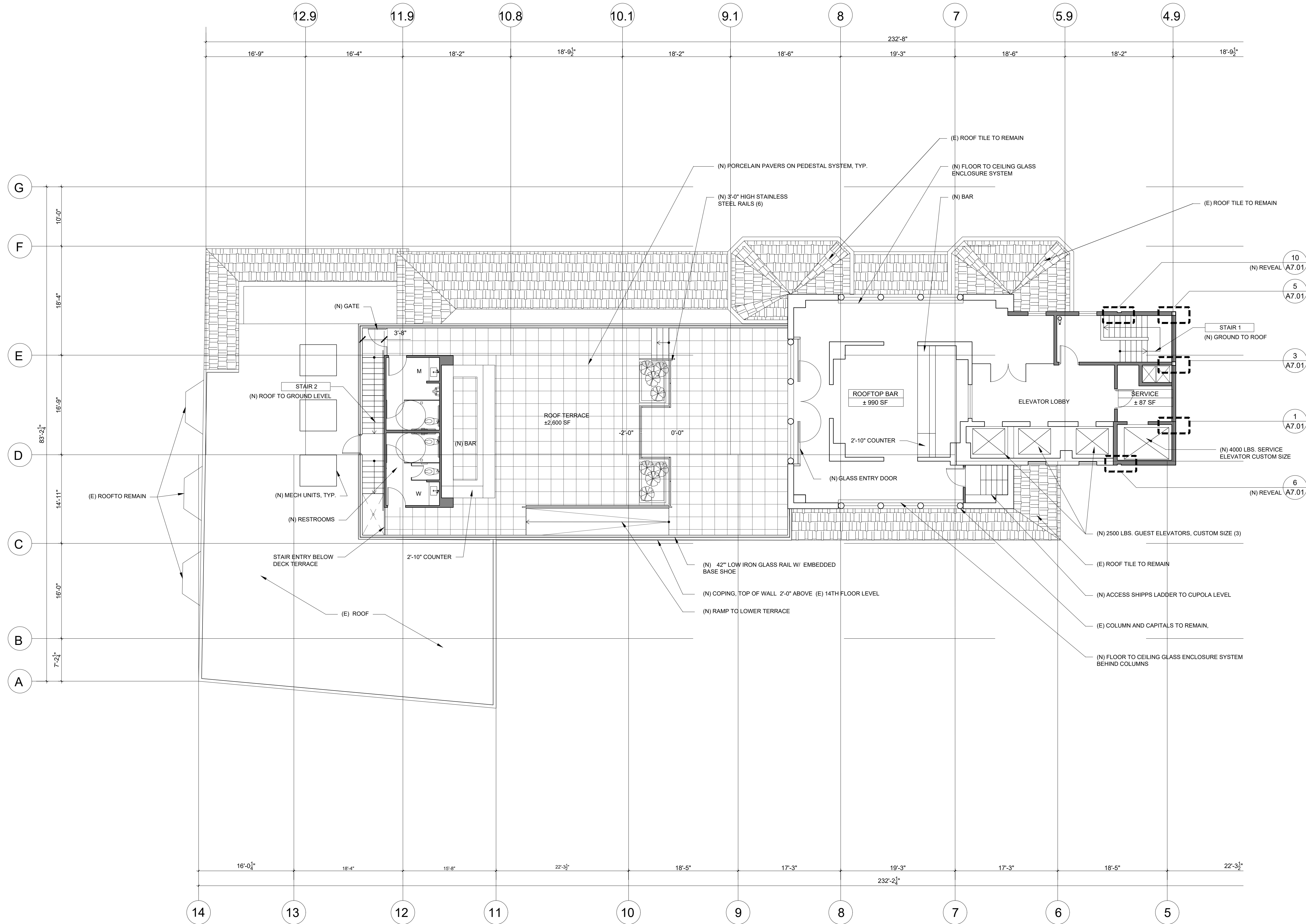
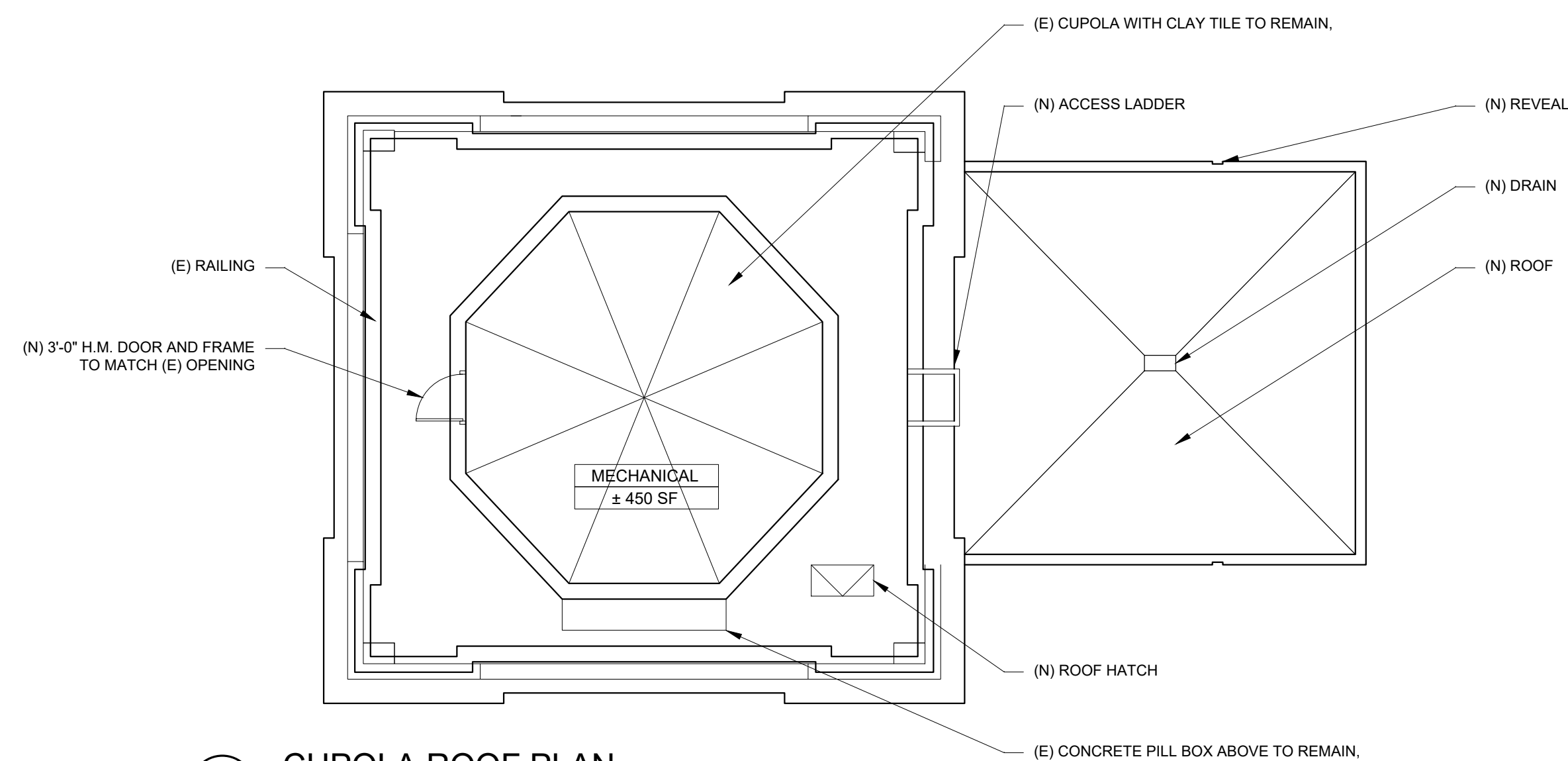
210 E OCEAN BLVD,
LONG BEACH,
CA 90802

REVISIONS:	ISSUE:
ISSUE DESCRIPTION:	ISSUE DATE:
NO.:	DATE:
PLANNING APPROVAL	10/30/2018

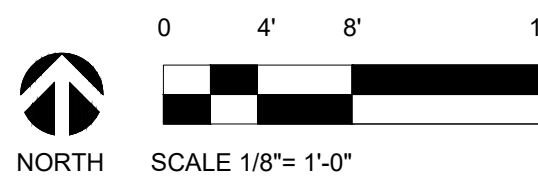
NADEL PROJECT No: 18016
DRAWING DATE: 08/10/2018
SCALE: 1/8"=1'-0"

**14TH FLOOR &
CUPOLA PLAN**

A2.11



LEGEND:
(E) WALL TO REMAIN
(N) WALL/STRUCTURE
(E) HISTORIC ELEMENT TO REMAIN (1928-1977)

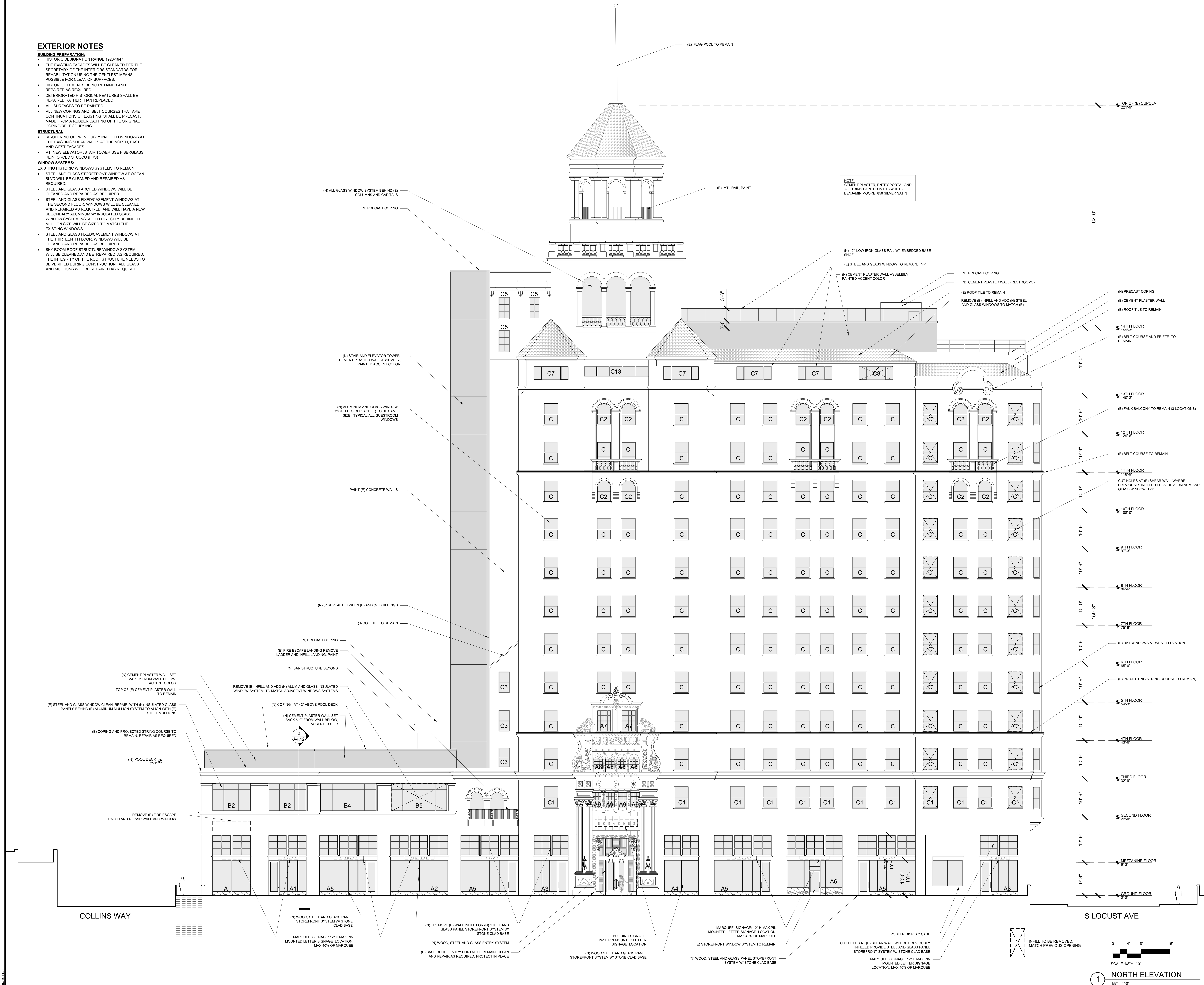


1 14TH FLOOR
1/8" = 1'-0"

FLOOR PLATE GROSS AREA= 2,075 GSF

EXTERIOR NOTES

- BUILDING PREPARATION:**
- HISTORIC DESIGNATION RANGE 1926-1947
 - THE EXISTING FACADES WILL BE CLEANED PER THE SECRETARY OF THE INTERIORS STANDARDS FOR REHABILITATION USING THE GENTLEST MEANS POSSIBLE FOR CLEAN OF SURFACES
 - HISTORIC ELEMENTS BEING RETAINED AND REPAIRED AS REQUIRED
 - DETERIORATED HISTORICAL FEATURES SHALL BE REPAIRED RATHER THAN REPLACED
 - ALL SURFACES TO BE PAINTED
 - ALL NEW COPINGS AND BELT COURSES THAT ARE CONTINUATIONS OF EXISTING SHALL BE PRECAST, MADE FROM A RUBBER CASTING OF THE ORIGINAL COPING/BELT COURSEING
- STRUCTURAL**
- RE-OPENING OF PREVIOUSLY IN-FILLED WINDOWS AT THE EXISTING SHEAR WALLS AT THE NORTH, EAST AND WEST FACADES
 - AT NEW ELEVATOR STAIR TOWER USE FIBERGLASS REINFORCED STUCCO (FRS)
- WINDOW SYSTEMS:**
- EXISTING HISTORIC WINDOWS SYSTEMS TO REMAIN:
- STEEL AND GLASS STOREFRONT WINDOW AT OCEAN BLVD WILL BE CLEANED AND REPAIRED AS REQUIRED
 - STEEL AND GLASS ARCHED WINDOWS WILL BE CLEANED AND REPAIRED AS REQUIRED
 - STEEL AND GLASS FIXED/CASEMENT WINDOWS AT THE SECOND FLOOR. WINDOWS WILL BE CLEANED AND REPAIRED AS REQUIRED. AND WILL HAVE A NEW SECONDARY ALUMINUM W/ INSULATED GLASS WINDOW SYSTEM INSTALLED DIRECTLY BEHIND THE MULLION SIZE WILL BE SIZED TO MATCH THE EXISTING WINDOWS
 - STEEL AND GLASS FIXED/CASEMENT WINDOWS AT THE THIRTEENTH FLOOR. WINDOWS WILL BE CLEANED AND REPAIRED AS REQUIRED
 - SKY ROOM ROOF STRUCTURE/WINDOW SYSTEM WILL BE CLEANED AND BE REPAIRED AS REQUIRED. THE INTEGRITY OF THE ROOF STRUCTURE NEEDS TO BE VERIFIED DURING CONSTRUCTION. ALL GLASS AND MULLIONS WILL BE REPAIRED AS REQUIRED



BREAKERS
HOTEL
RENOVATION

210 E OCEAN BLVD.
LONG BEACH,
CA 90802

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PLANNING APPROVAL	10/30/2018

NADEL PROJECT No: 18016
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SCALE
1/8"=1'-0"

NORTH
ELEVATION

A3.01

**BREAKERS
HOTEL
RENOVATION**

210 E OCEAN BLVD,
LONG BEACH,
CA 90802

REVISIONS:	ISSUE DESCRIPTION:	ISSUE DATE:
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NADEL PROJECT No: 18016
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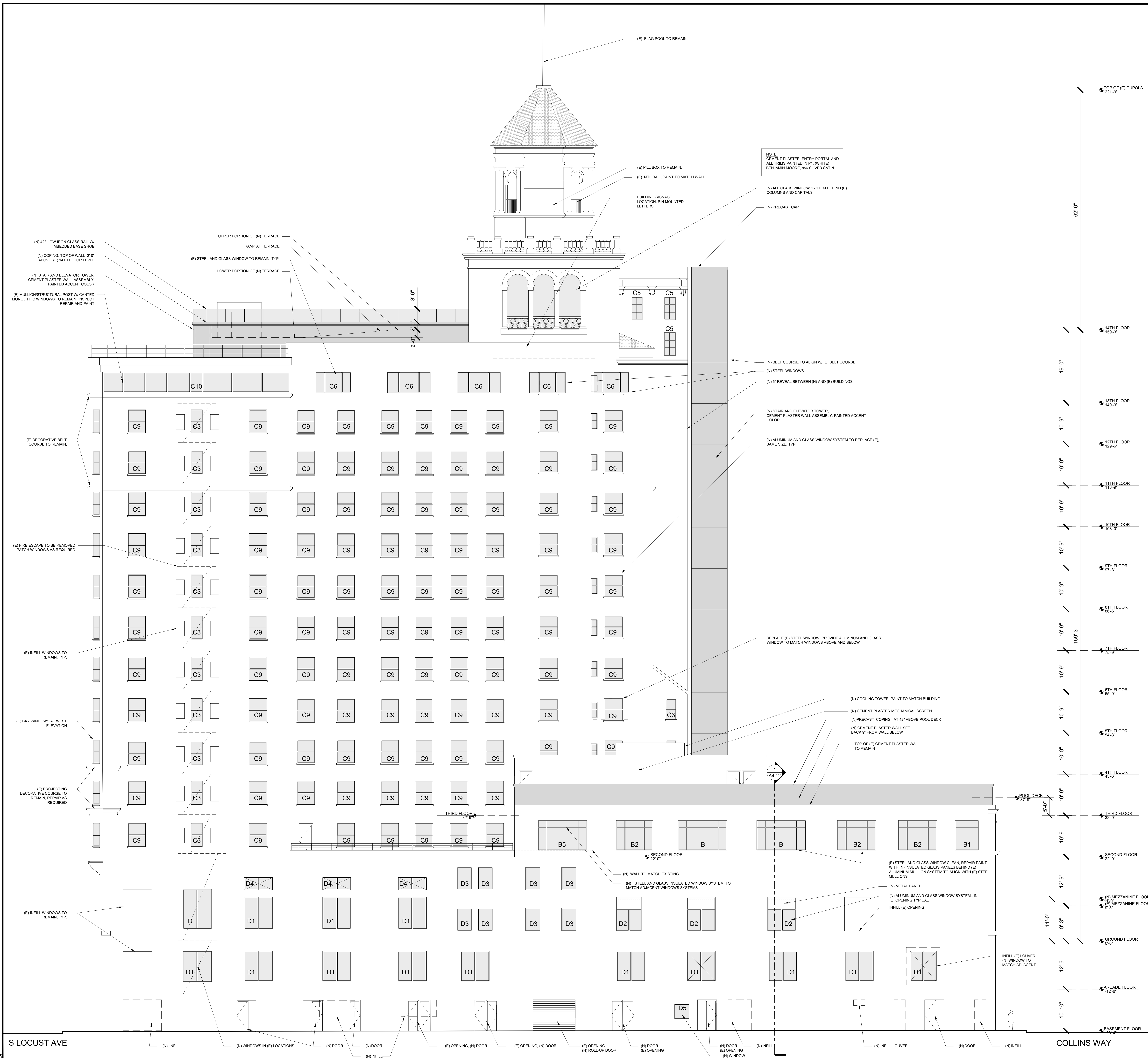
SCALE
1/8"=1'-0"

**SOUTH
ELEVATION**

A3.02

EXTERIOR NOTES

- BUILDING PREPARATION:**
- HISTORIC DESIGNATION RANGE 1926-1947.
 - THE EXISTING FACADES WILL BE CLEANED PER THE SECRETARY OF THE INTERIORS STANDARDS FOR REHABILITATION USING THE GENTLEST MEANS POSSIBLE FOR CLEAN OF SURFACES.
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- RE-OPENING OF PREVIOUSLY INFILLED WINDOWS AT THE EXISTING SHEAR WALLS AT THE NORTH, EAST AND WEST FACADES
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 - STEEL AND GLASS FIXED/CASEMENT WINDOWS AT THE THIRTEENTH FLOOR. WINDOWS WILL BE CLEANED AND REPAIRED AS REQUIRED.
 - SKY ROOM ROOF STRUCTURE/WINDOW SYSTEM. WILL BE CLEANED AND BE REPAIRED AS REQUIRED. THE INTEGRITY OF THE ROOF STRUCTURE NEEDS TO BE VERIFIED DURING CONSTRUCTION. ALL GLASS AND MULLIONS WILL BE REPAIRED AS REQUIRED.



1 SOUTH ELEVATION

EXTERIOR NOTES

BUILDING PREPARATION:

- HISTORIC DESIGNATION RANGE 1926-1947
- THE EXISTING FACADES WILL BE CLEANED PER THE SECRETARY OF THE INTERIORS STANDARDS FOR REHABILITATION USING THE GENTLEST MEANS POSSIBLE FOR CLEAN OF SURFACES
- HISTORIC ELEMENTS BEING RETAINED AND REPAIRED AS REQUIRED
- DETERIORATED HISTORICAL FEATURES SHALL BE REPAIRED RATHER THAN REPLACED
- ALL SURFACES TO BE PAINTED.
- ALL NEW COPINGS AND BELT COURSES THAT ARE CONTINUATIONS OF EXISTING SHALL BE PRECAST, MADE FROM A RUBBER CASTING OF THE ORIGINAL COPING/BELT COURSEING.

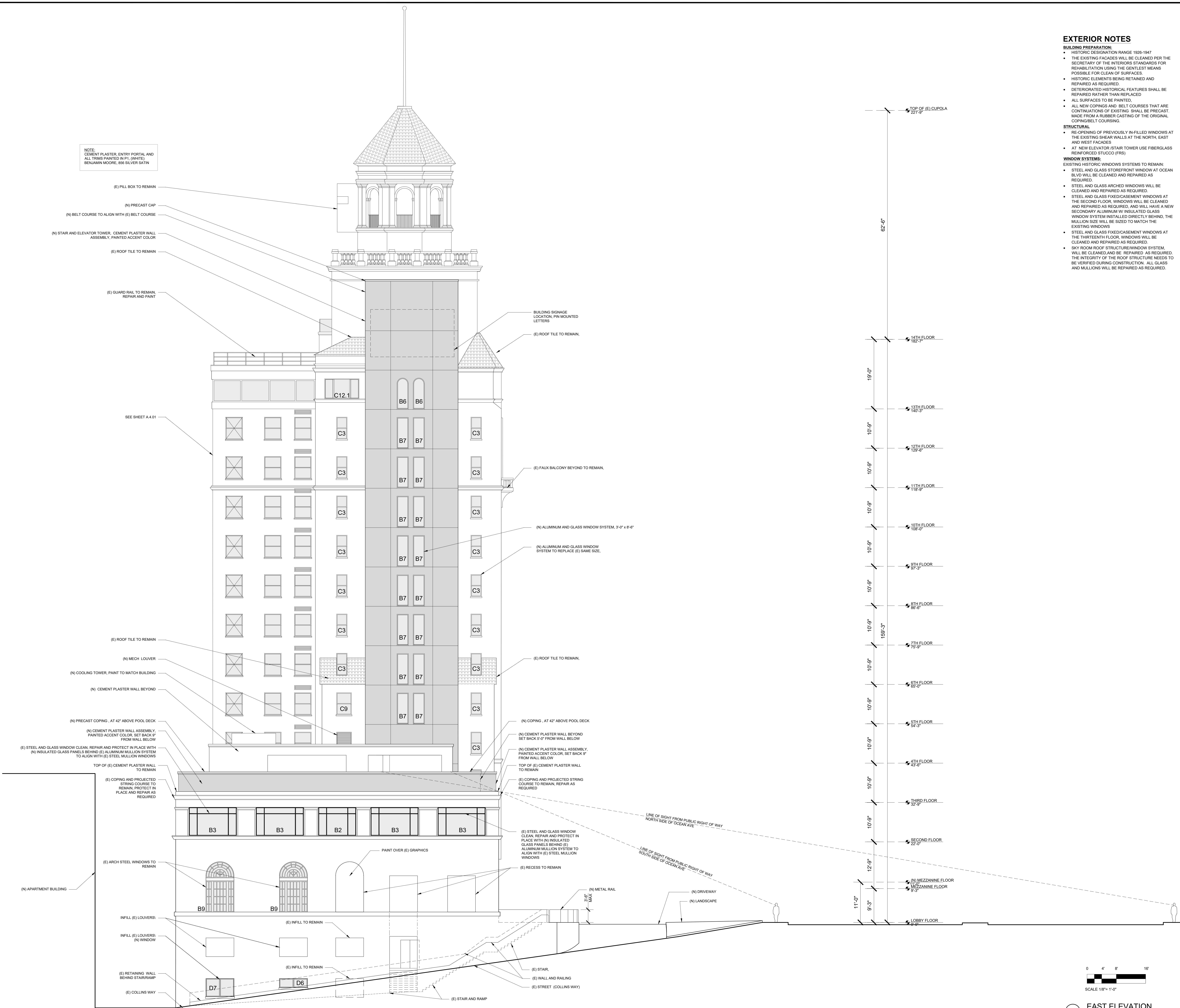
STRUCTURAL

- RE-OPENING OF PREVIOUSLY IN-FILLED WINDOWS AT THE EXISTING SHEAR WALLS AT THE NORTH, EAST AND WEST FACADES
- AT NEW ELEVATOR STAIR TOWER USE FIBERGLASS REINFORCED STUCCO (FRS)

WINDOW SYSTEMS:

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EXTERIOR NOTES

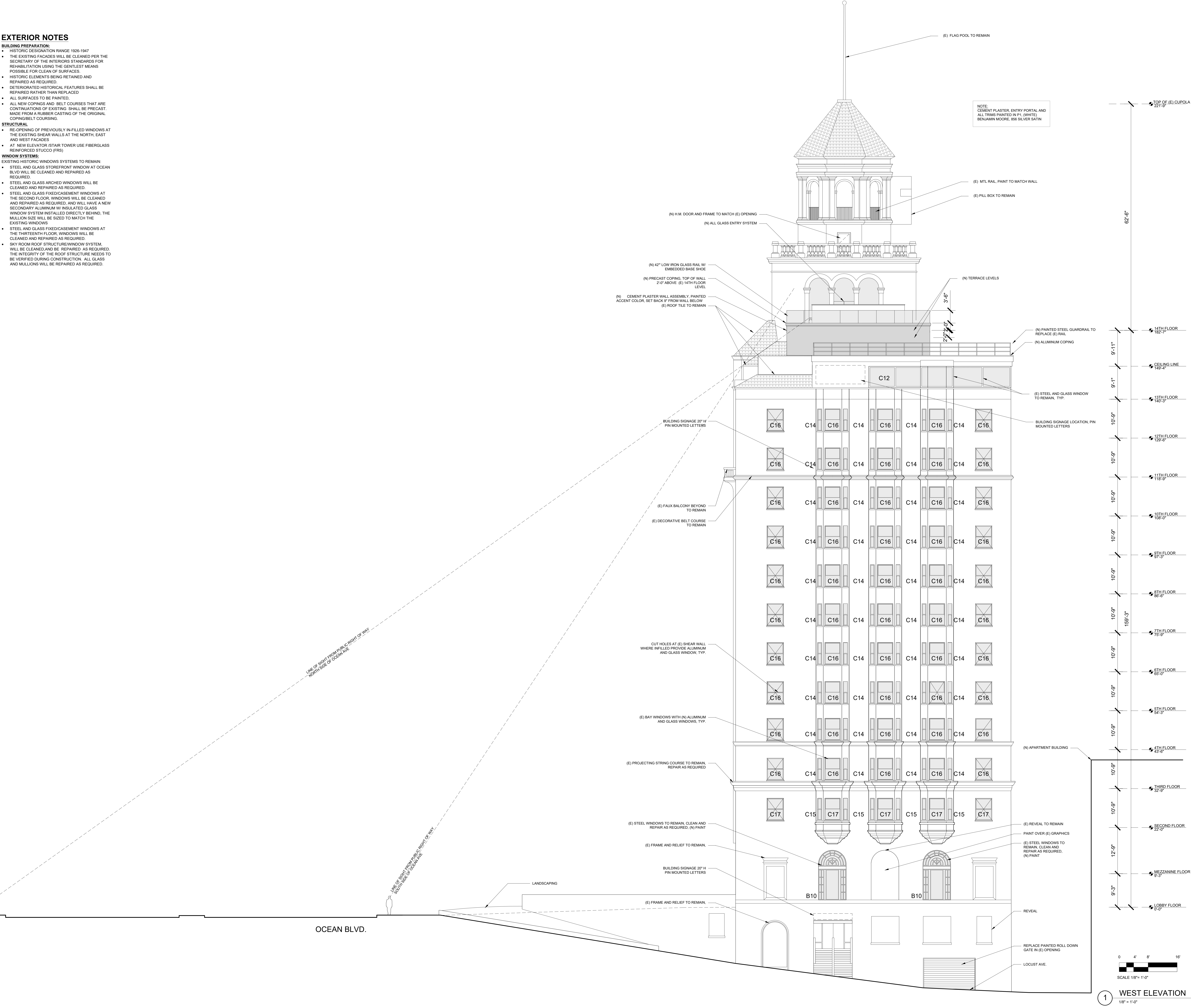
- BUILDING PREPARATION:**
- HISTORIC DESIGNATION RANGE 1920-1947
 - THE EXISTING FACADES WILL BE CLEANED PER THE SECRETARY OF THE INTERIORS STANDARDS FOR REHABILITATION USING THE GENTLEST MEANS POSSIBLE FOR CLEAN OF SURFACES.
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STRUCTURAL

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NADEL SPECIAL PROJECTS INC

1990 S. BUNDY DRIVE
SUITE 400
LOS ANGELES, CA 90025
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F. 310.826.0182
WWW.NADELARC.COM

CLIENT:
ARCO
CONSTRUCTION
OWNER:

pacific6
ARCHITECTS

BREAKERS HOTEL RENOVATION

210 E OCEAN BLVD,
LONG BEACH,
CA 90802

REVISIONS:	ISSUE DATE:
ISSUE DESCRIPTION:	ISSUE DATE:
NO.	NO.
PLANNING APPROVAL	10/30/2018

NADEL PROJECT No: 18016
DRAWING DATE: 08/10/2018
SCALE 1/8"=1'-0"

WEST ELEVATION

A3.04

210 E OCEAN BLVD,
LONG BEACH,
CA 90802

ISSUES:		ISSUE PLANNING APPROVAL: 10-30-2018
THE DESCRIPTION:	ISSUE DATE:	
PLANNING APPROVAL	10/30/2018	
EL PROJECT Nr:	18016	
DRAWING DATE:	08/10/2018	
SCALE		
"=1'-0"		

A4.01



0 E OCEAN BLVD,
LONG BEACH,
CA 90802

EL PROJECT No:	18016	ISSUE 1
WING DATE:	08/10/2018	
SALE *1'-0"		

A4.02



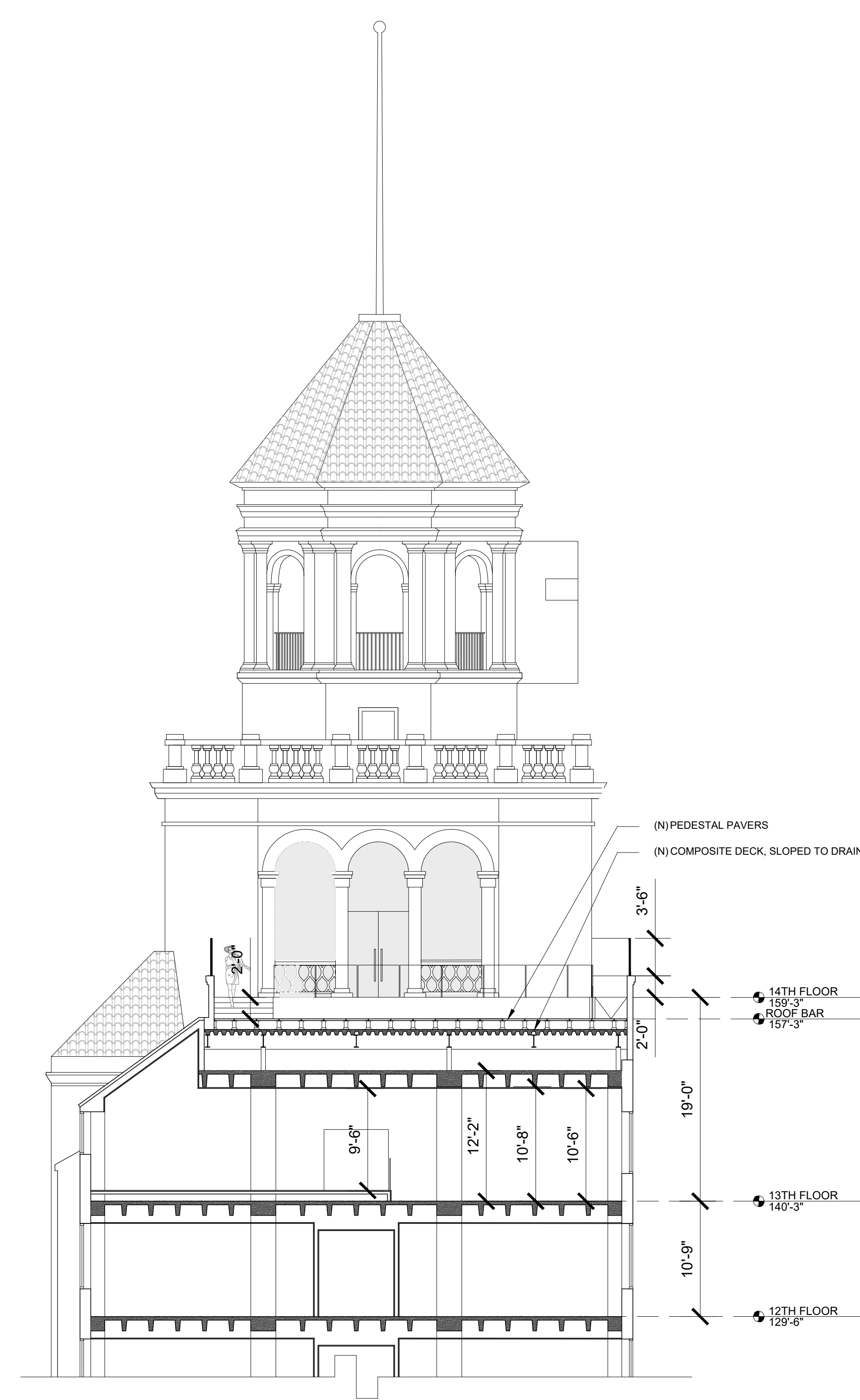
SECTION B - THROUGH
PROPOSED ROOF DECK

BREAKERS
HOTEL
RENOVATION

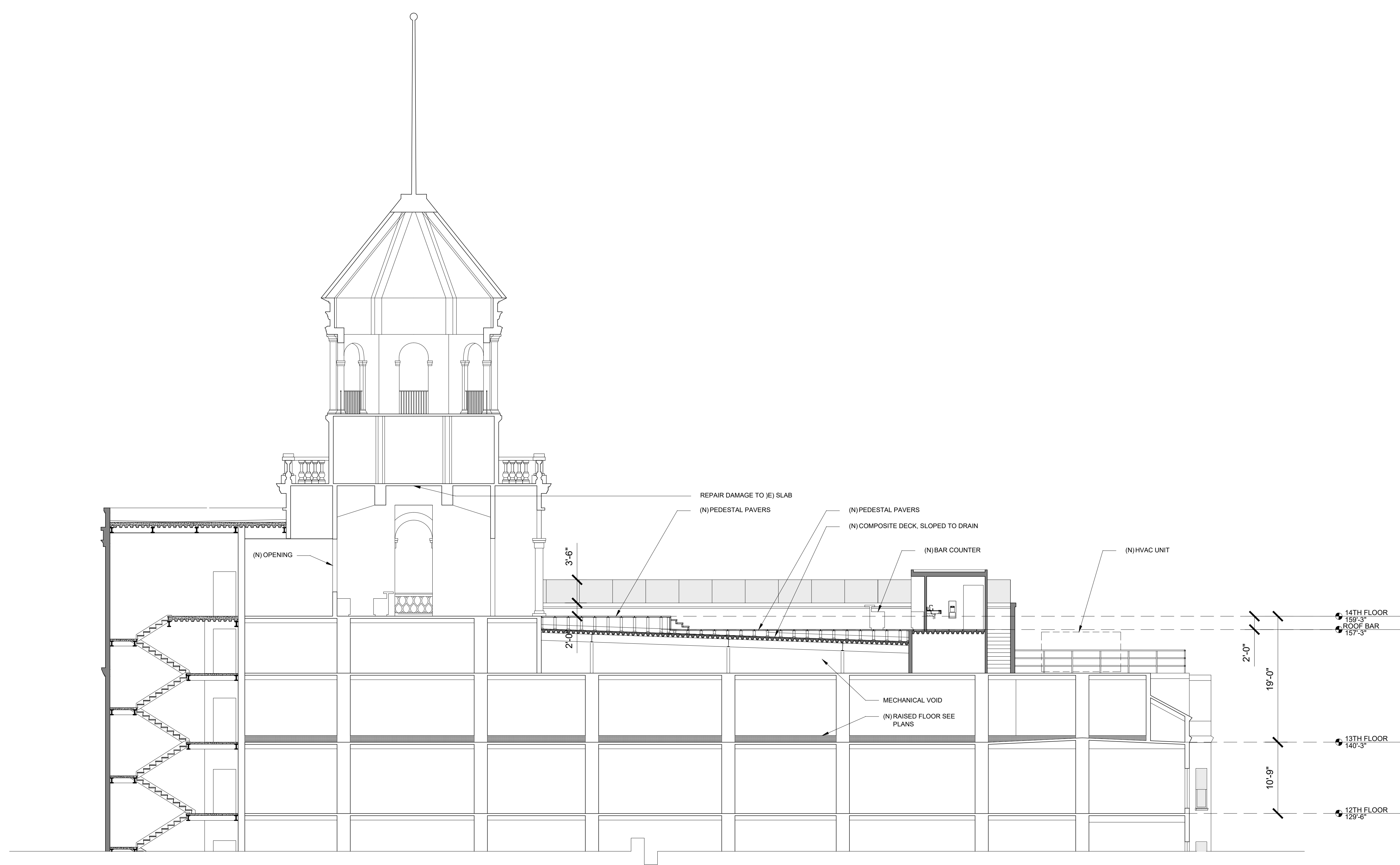
210 E OCEAN BLVD, LONG BEACH, CA 90802	
REVISIONS: ISSUE DESCRIPTION: NO.:	ISSUE DATE:
PLANNING APPROVAL	10/30/2018
NADEL PROJECT NO:	18016
DRAWING DATE:	08/10/2018
SCALE	1/8"=1'-0"

ENLARGED BUILDING
SECTIONS

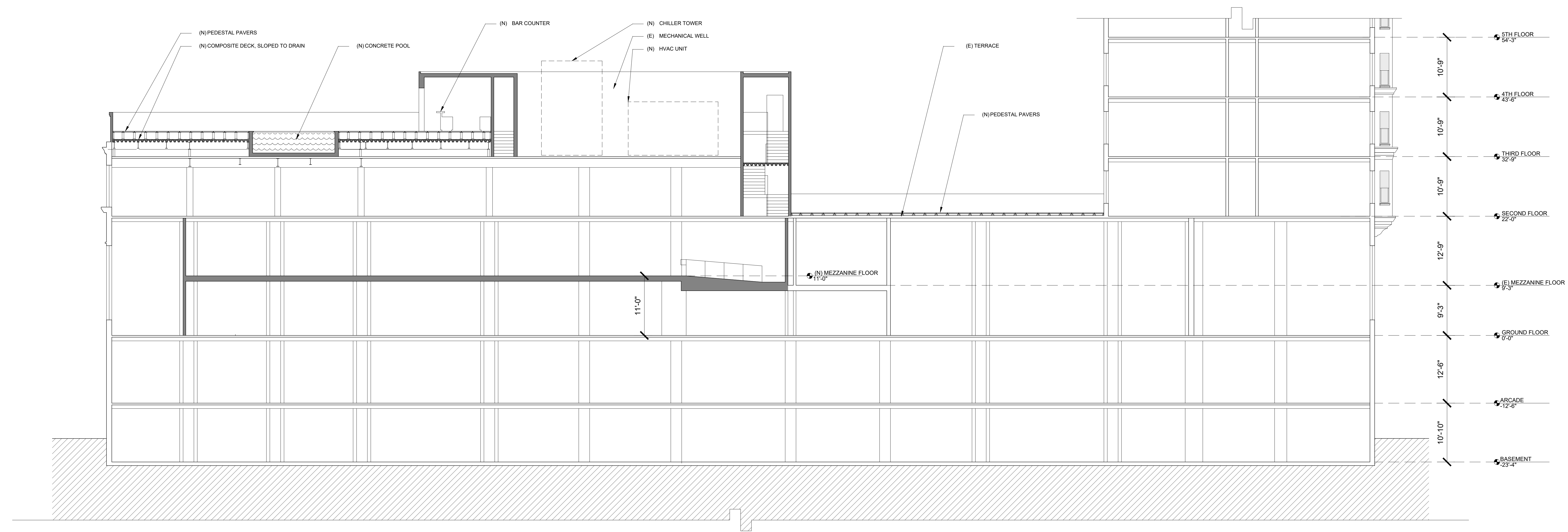
A4.11



3 SECTION E - THROUGH
SKY ROOM
1/8" = 1'-0"



2 SECTION C - THROUGH
PROPOSED ROOF BAR
1/8" = 1'-0"



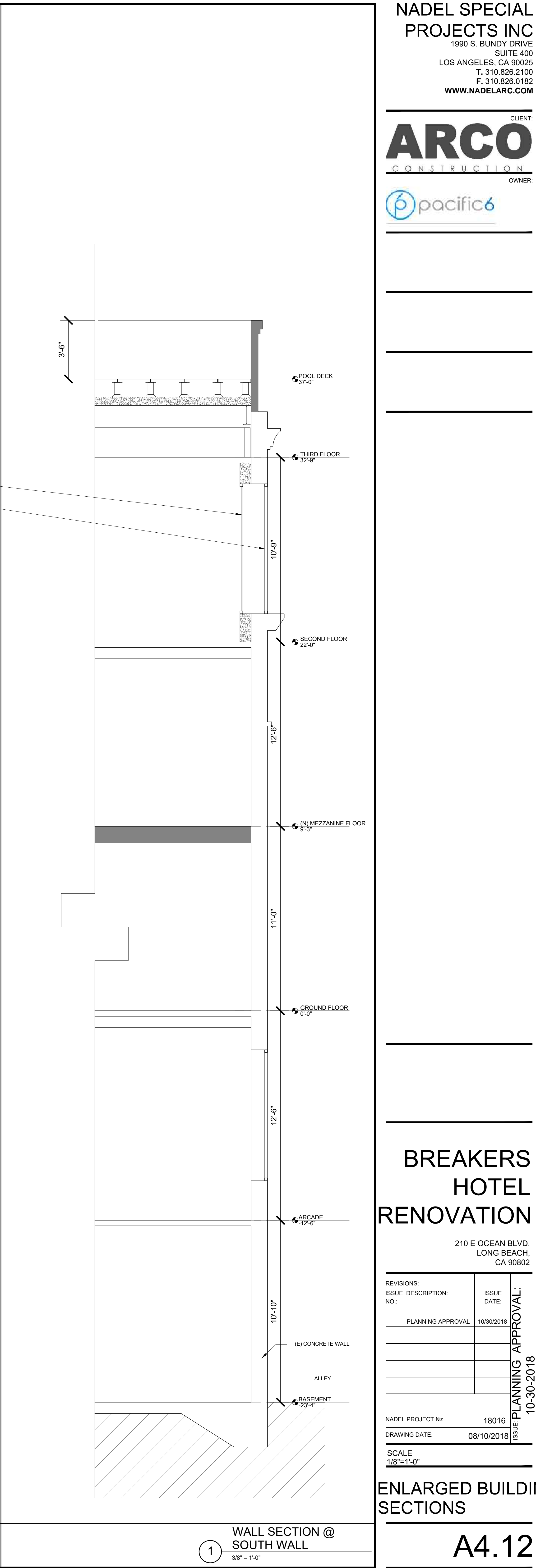
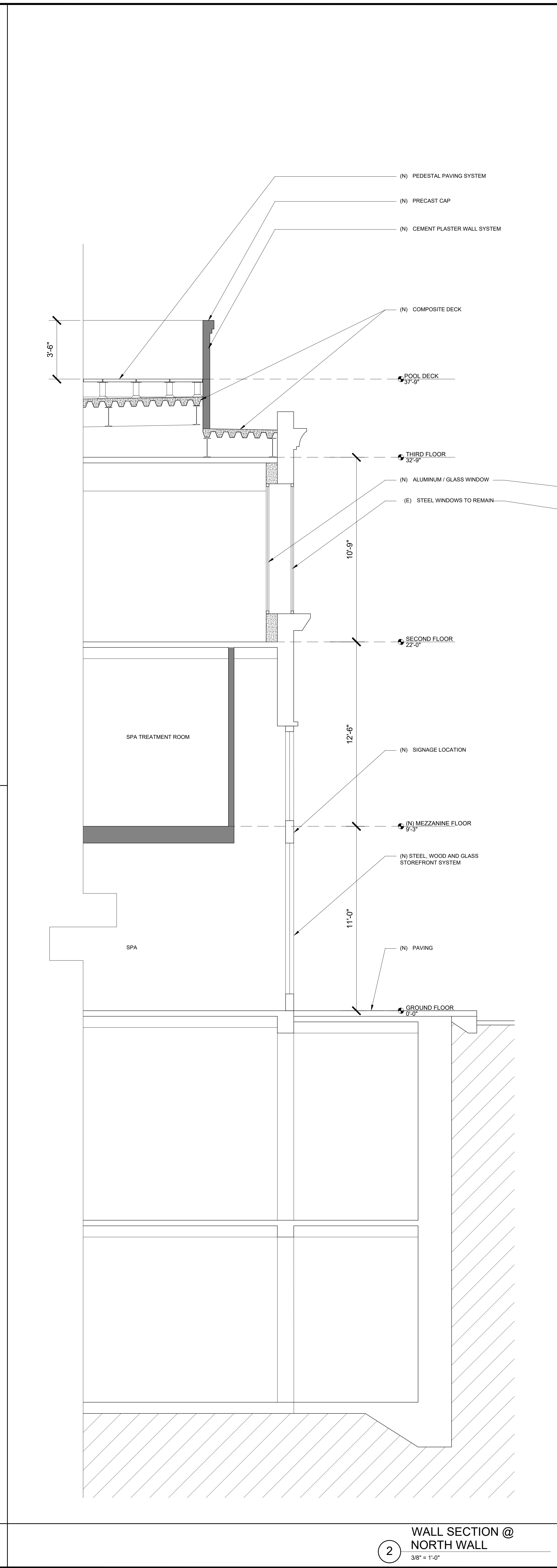
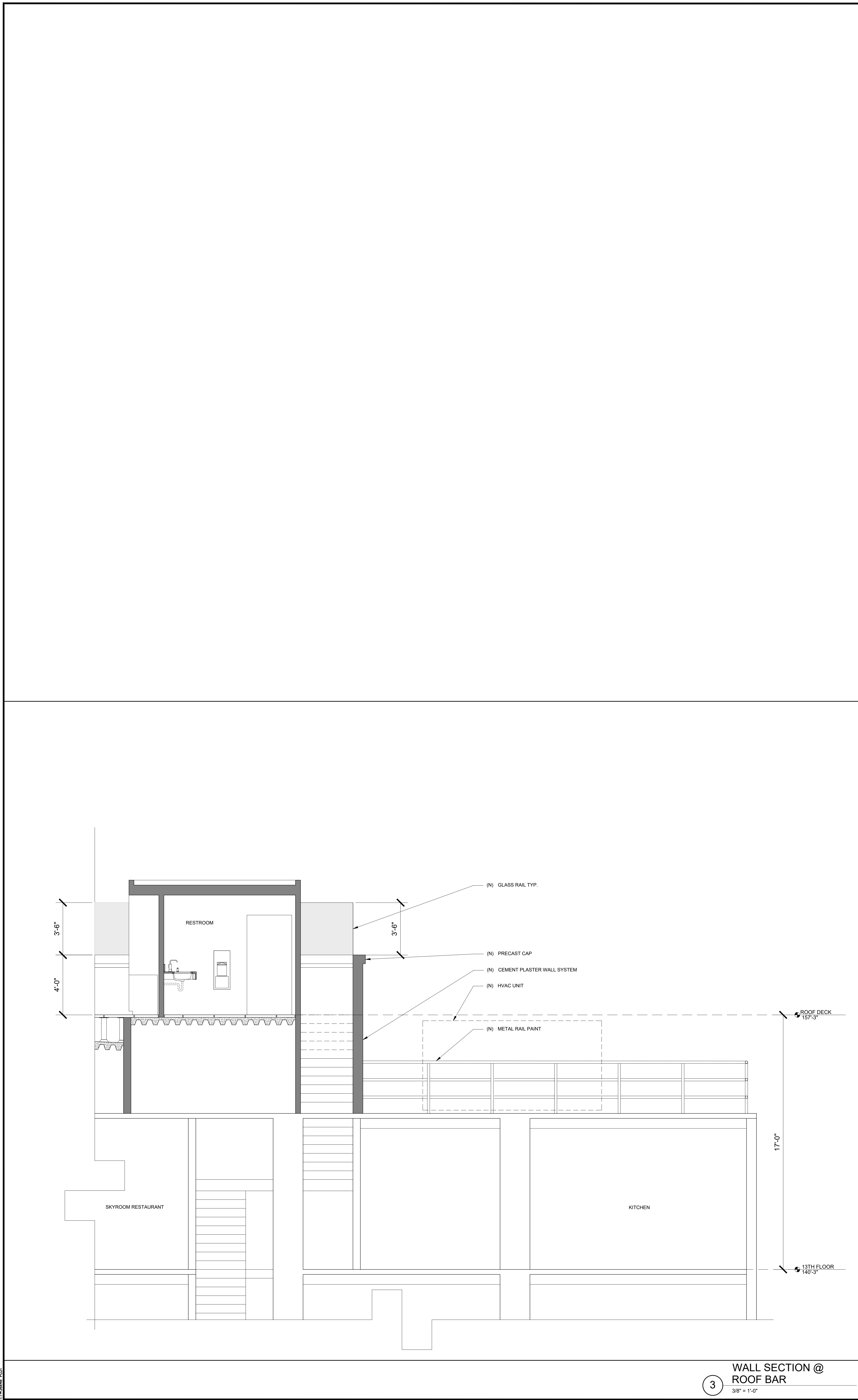
1 SECTION D - THROUGH
PROPOSED POOL DECK
1/8" = 1'-0"

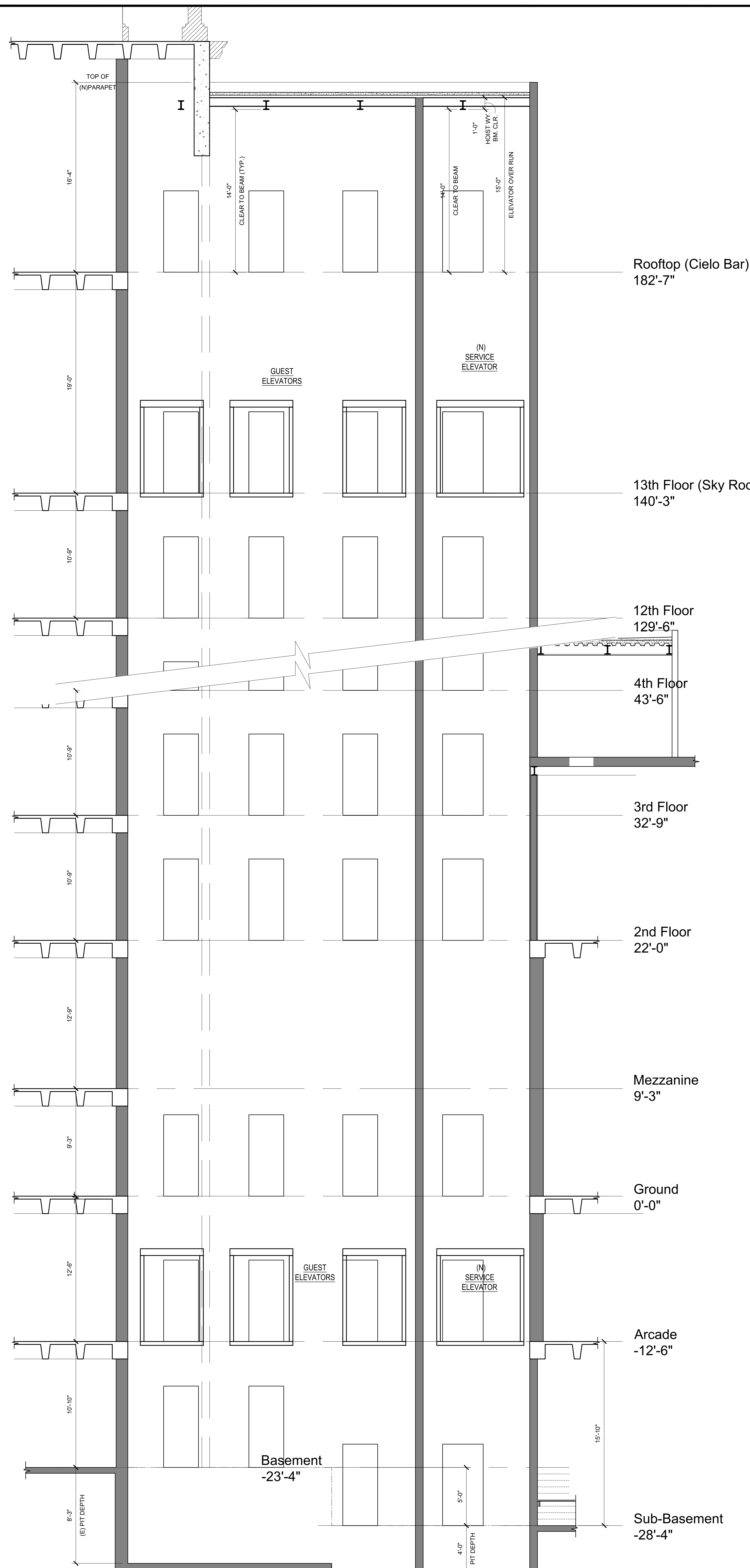
**BREAKERS
HOTEL
RENOVATION**

210 E OCEAN BLVD, LONG BEACH, CA 90802	
REVISIONS: ISSUE NO.: ISSUE DESCRIPTION: DATE:	ISSUE NO.: ISSUE DESCRIPTION: DATE:
PLANNING APPROVAL	10/30/2018
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SCALE	1/8"=1'-0"

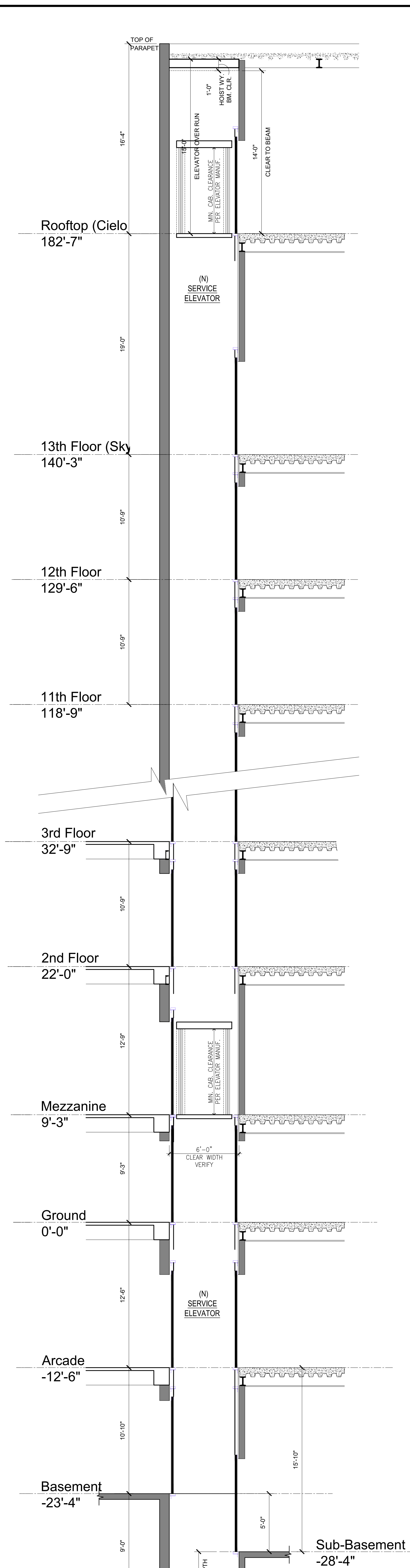
ENLARGED BUILDING
SECTIONS

A4.12

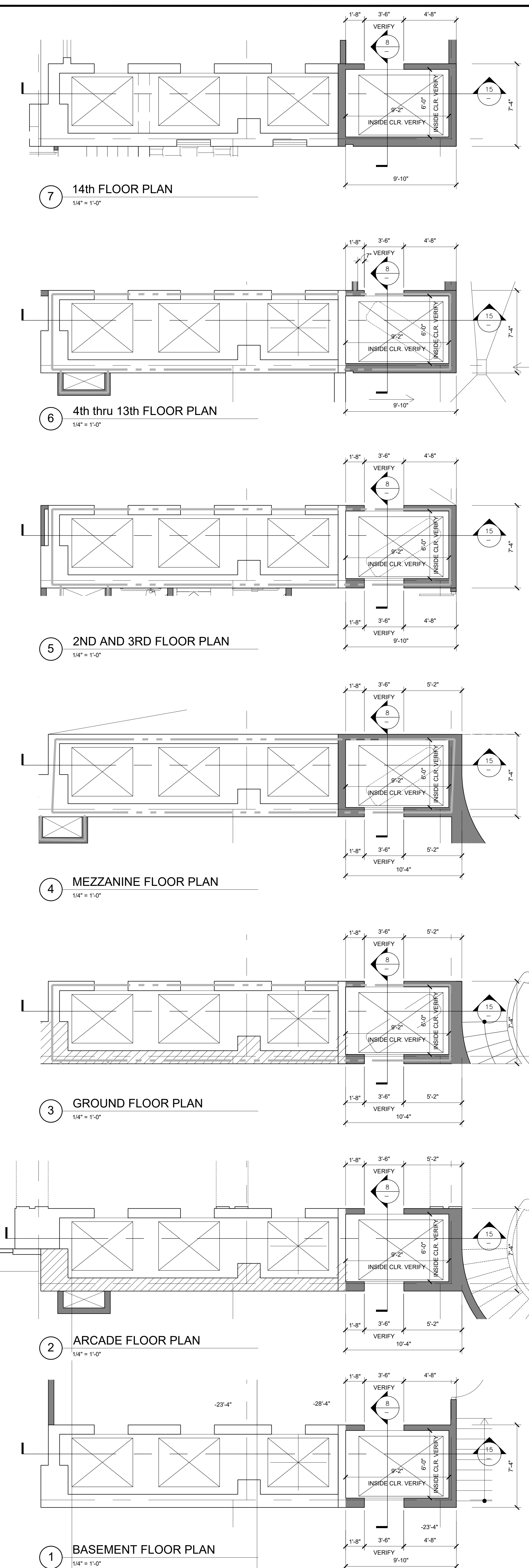




15 ELEVATOR SECTION
1/4" = 1'-0"



8 (N) ELEVATOR SECTION
1/4" = 1'-0"



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BREAKERS
HOTEL
RENOVATION

210 E OCEAN BLVD.
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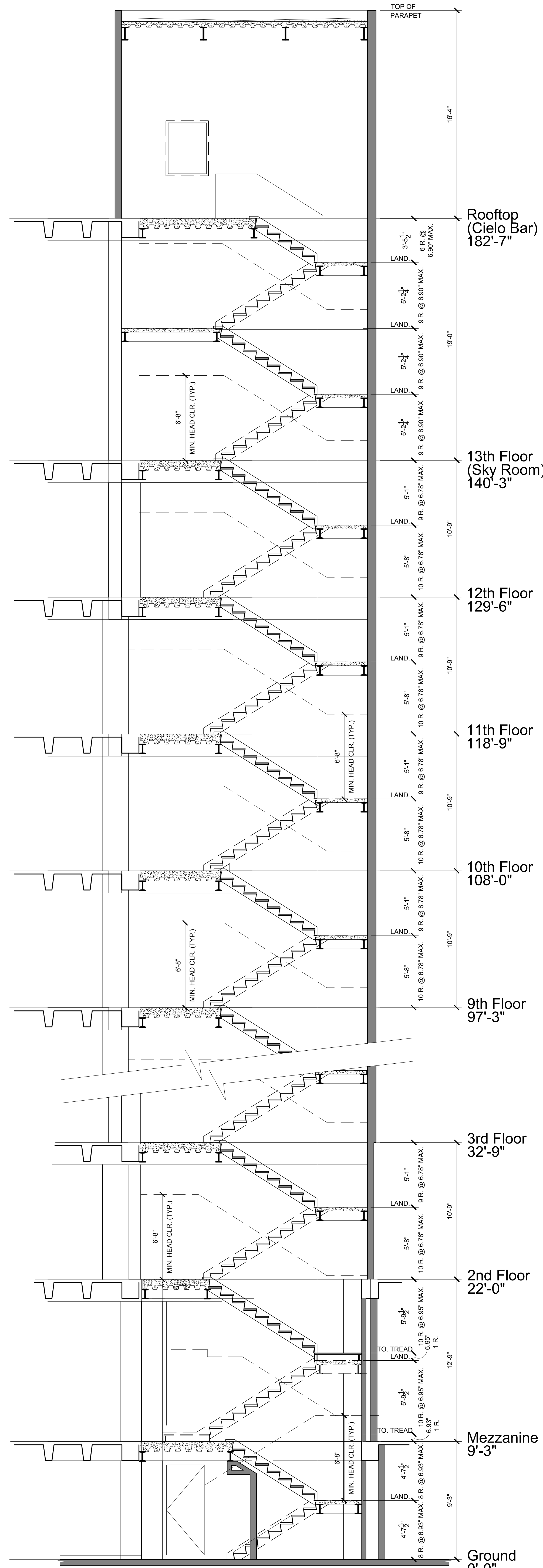
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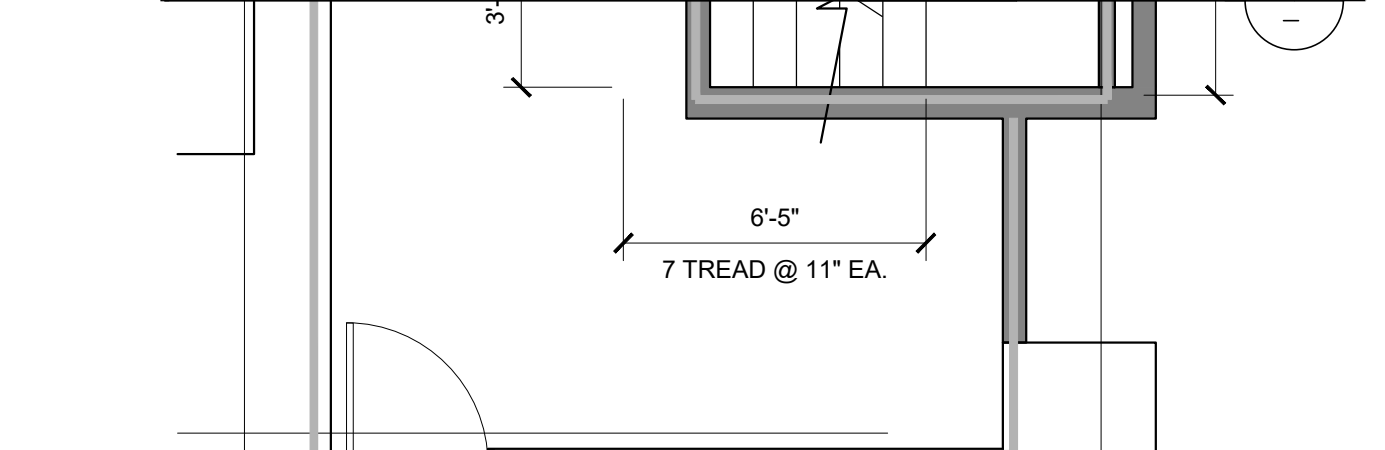
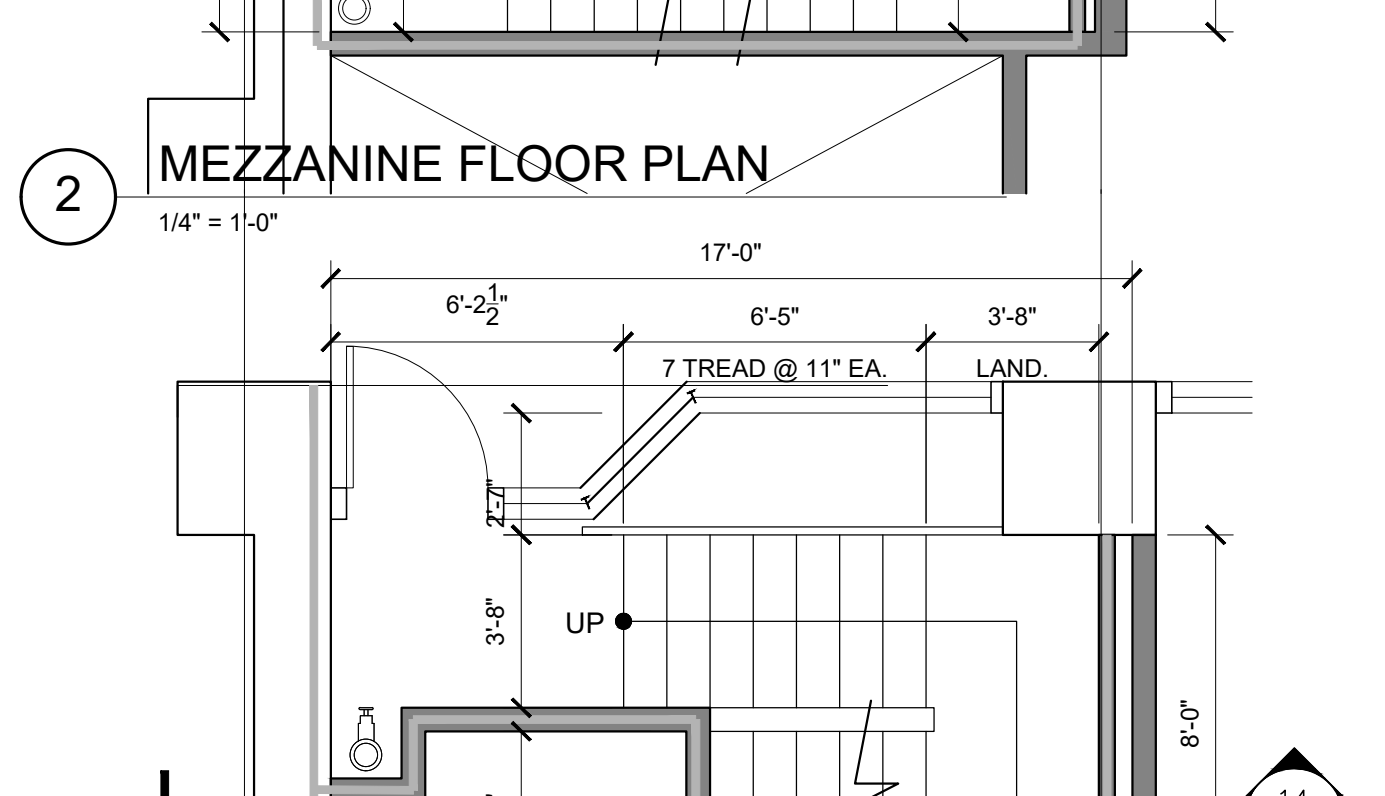
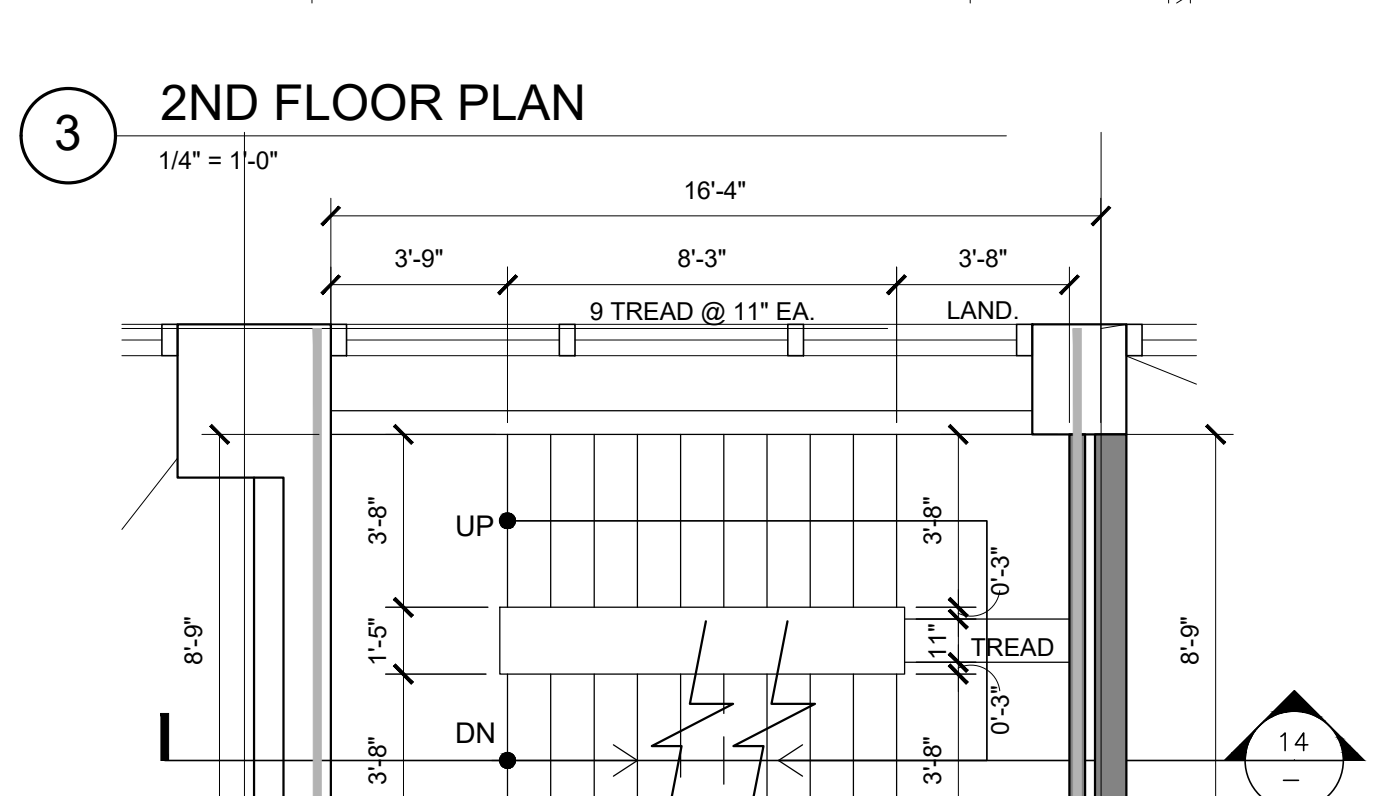
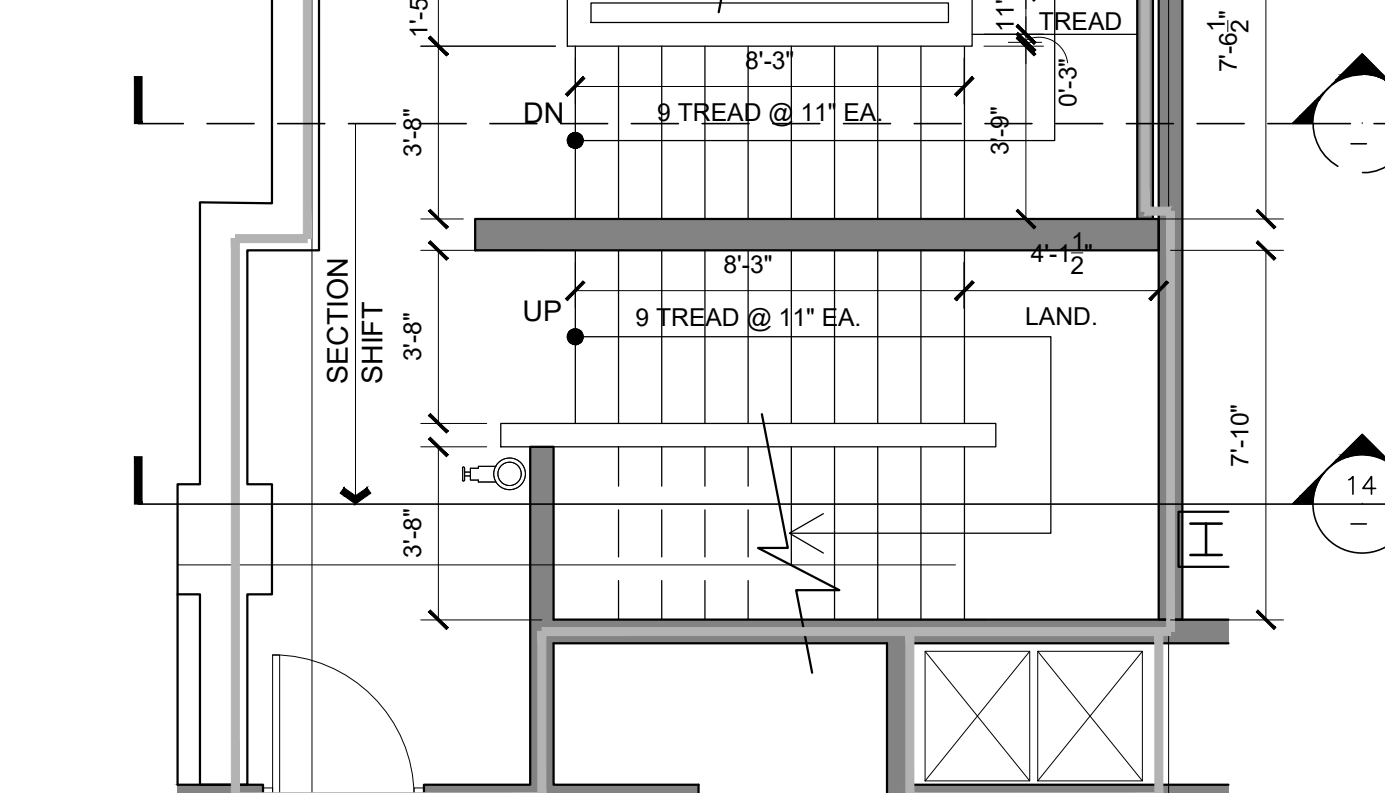
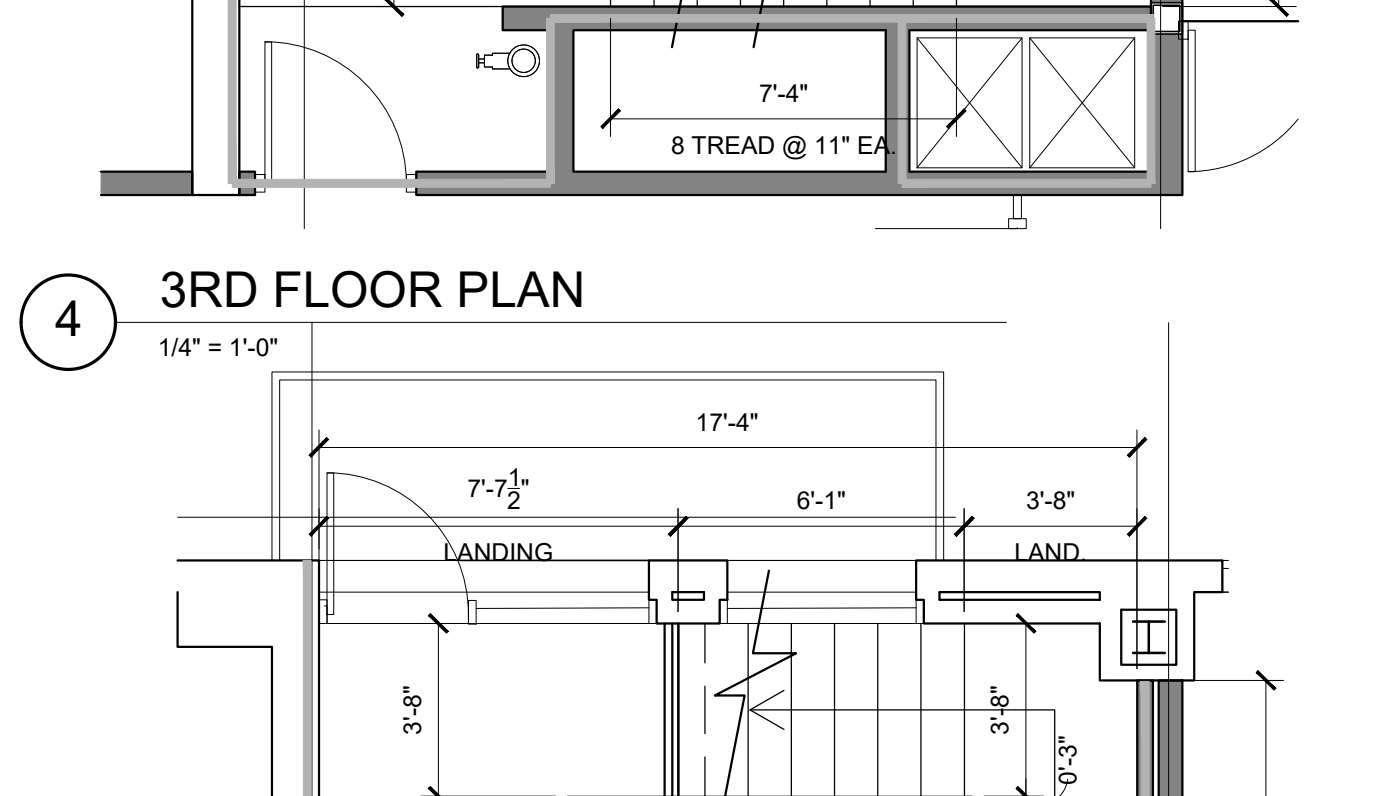
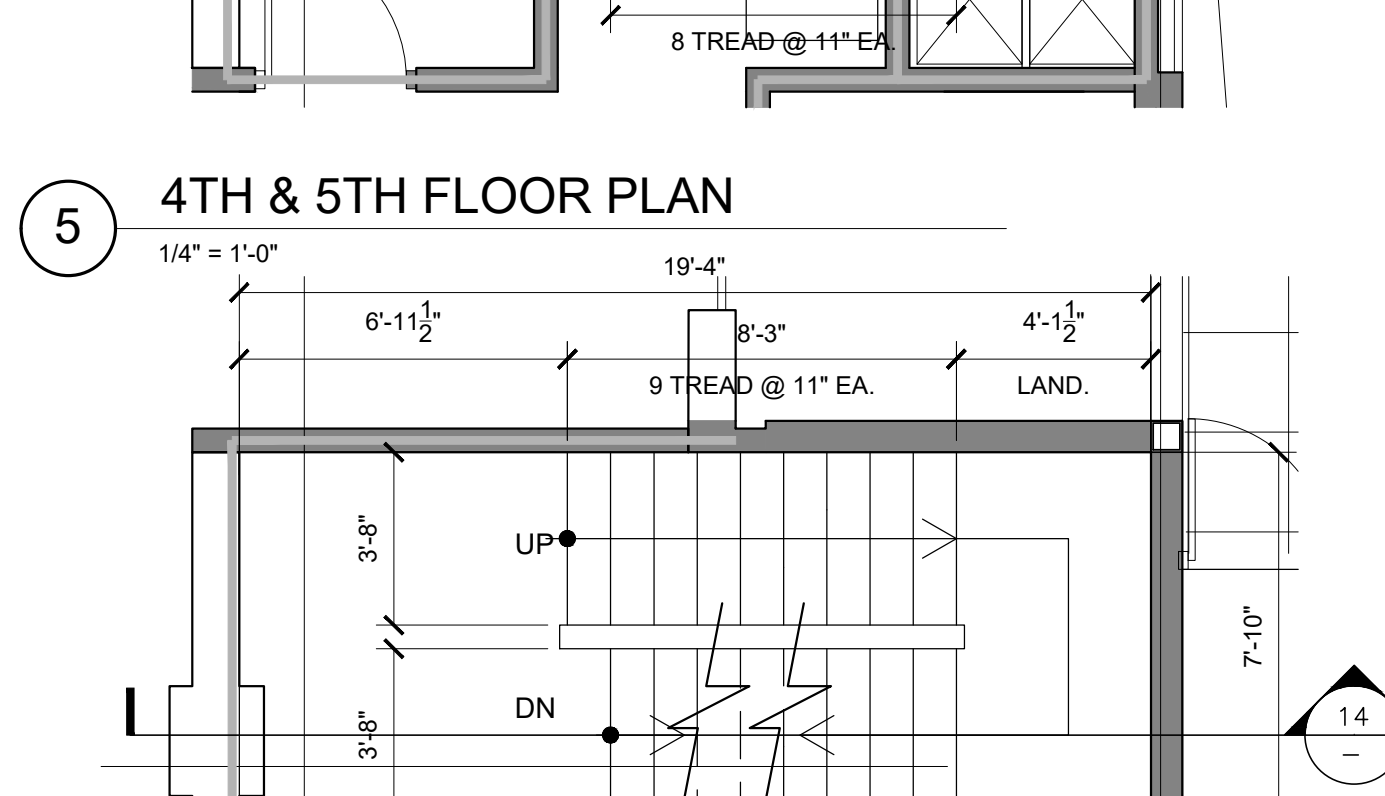
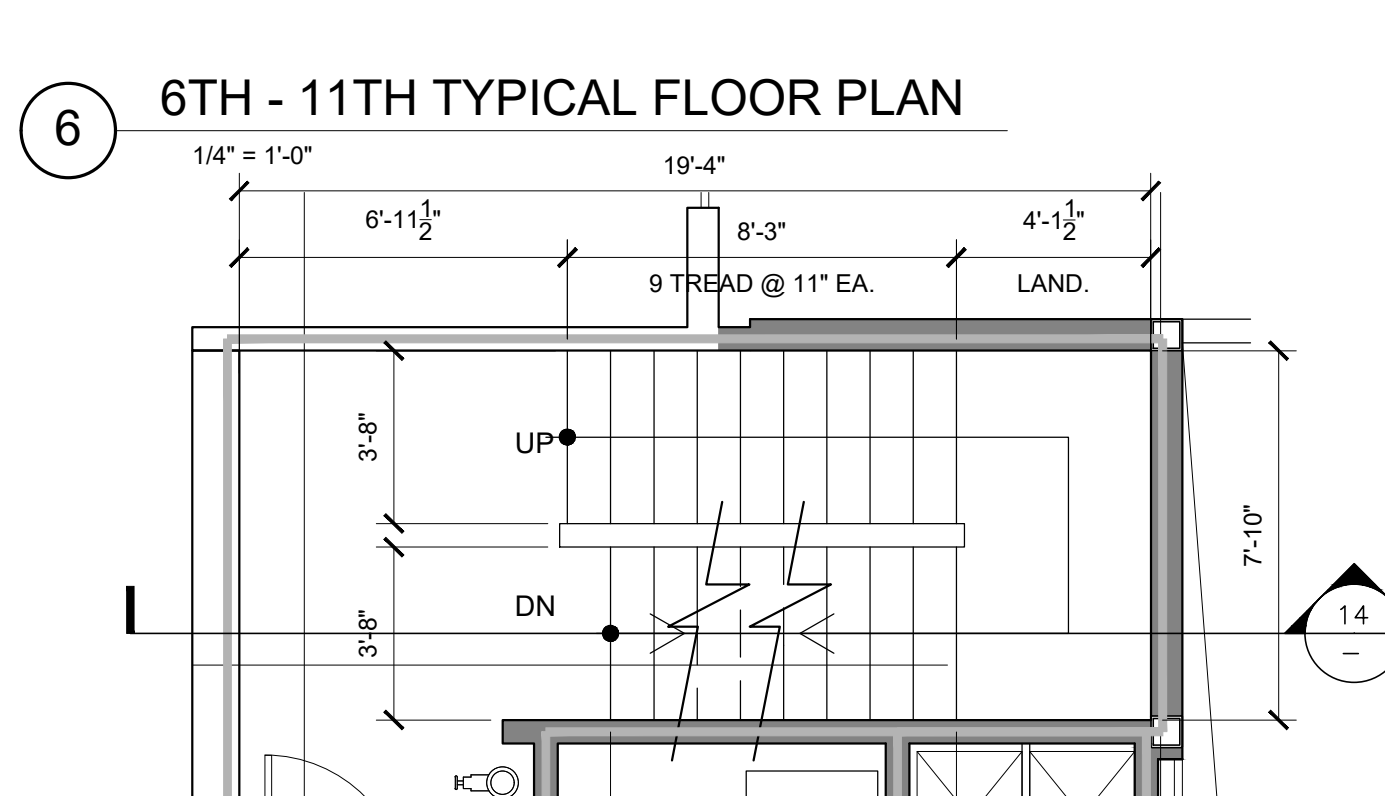
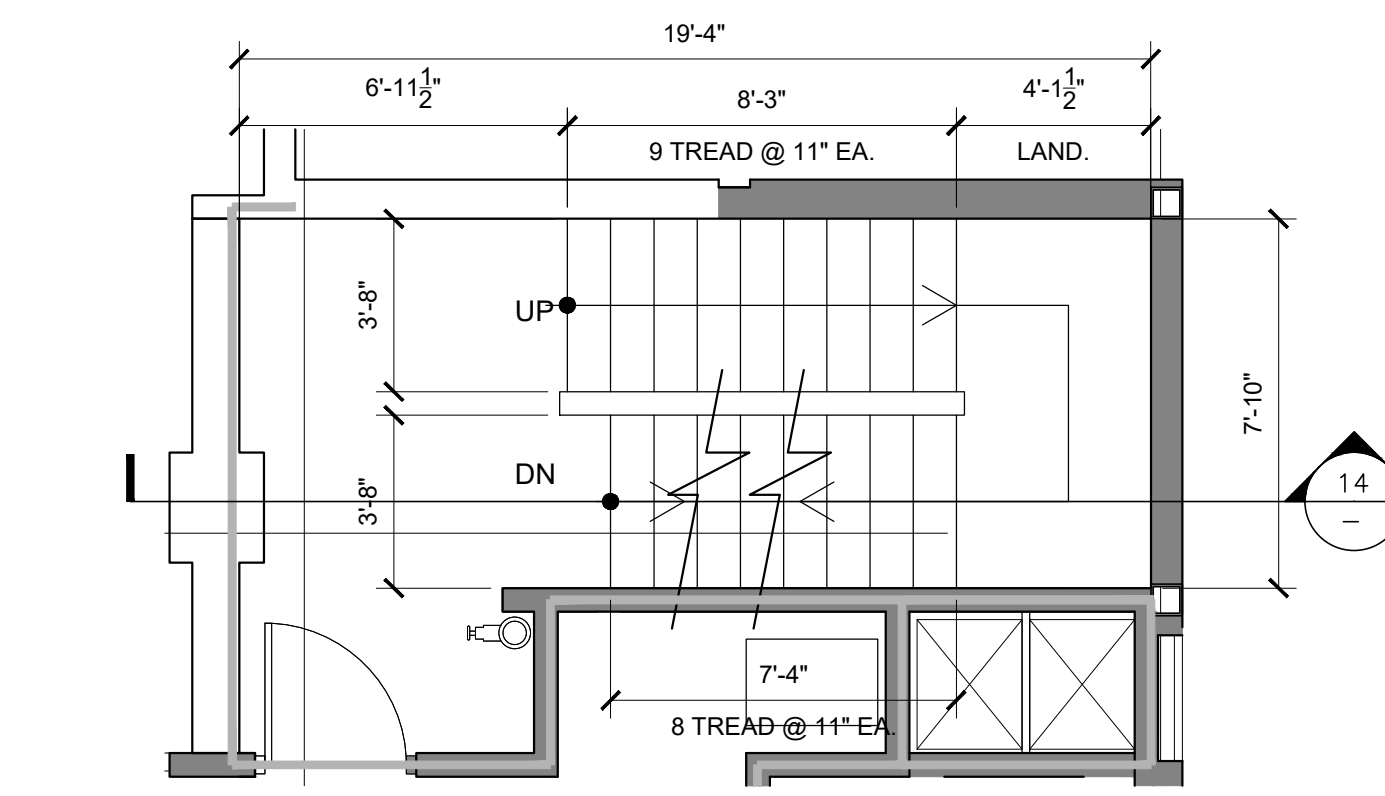
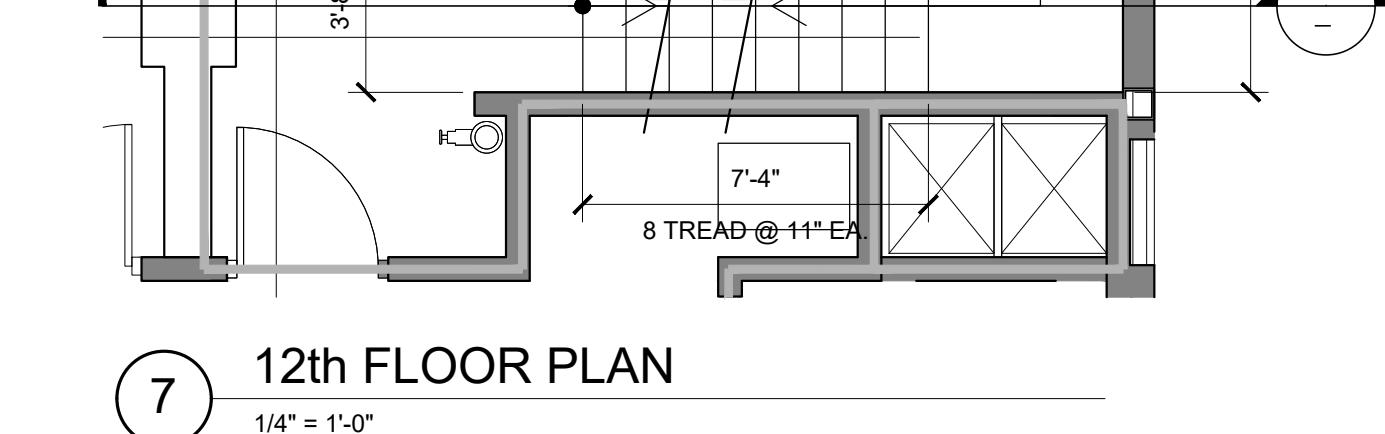
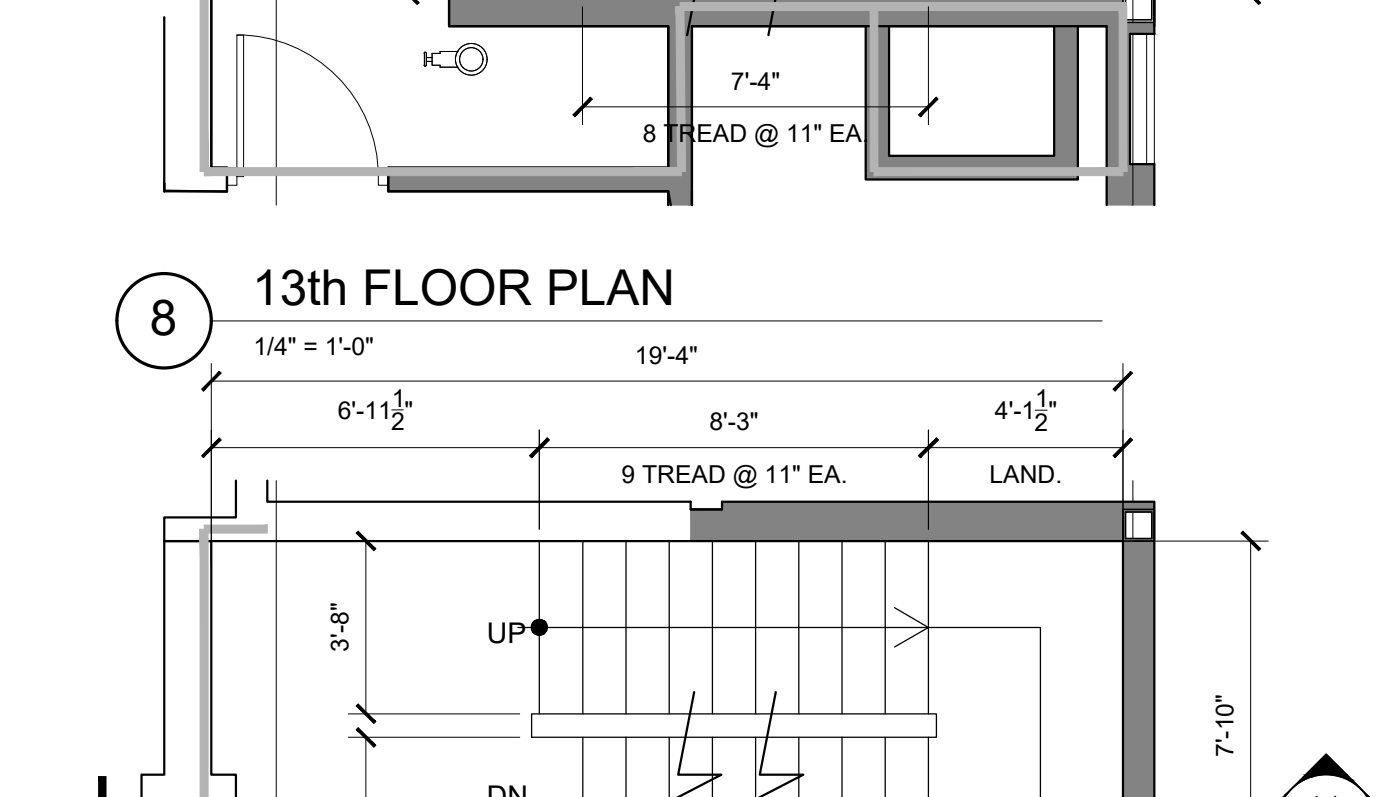
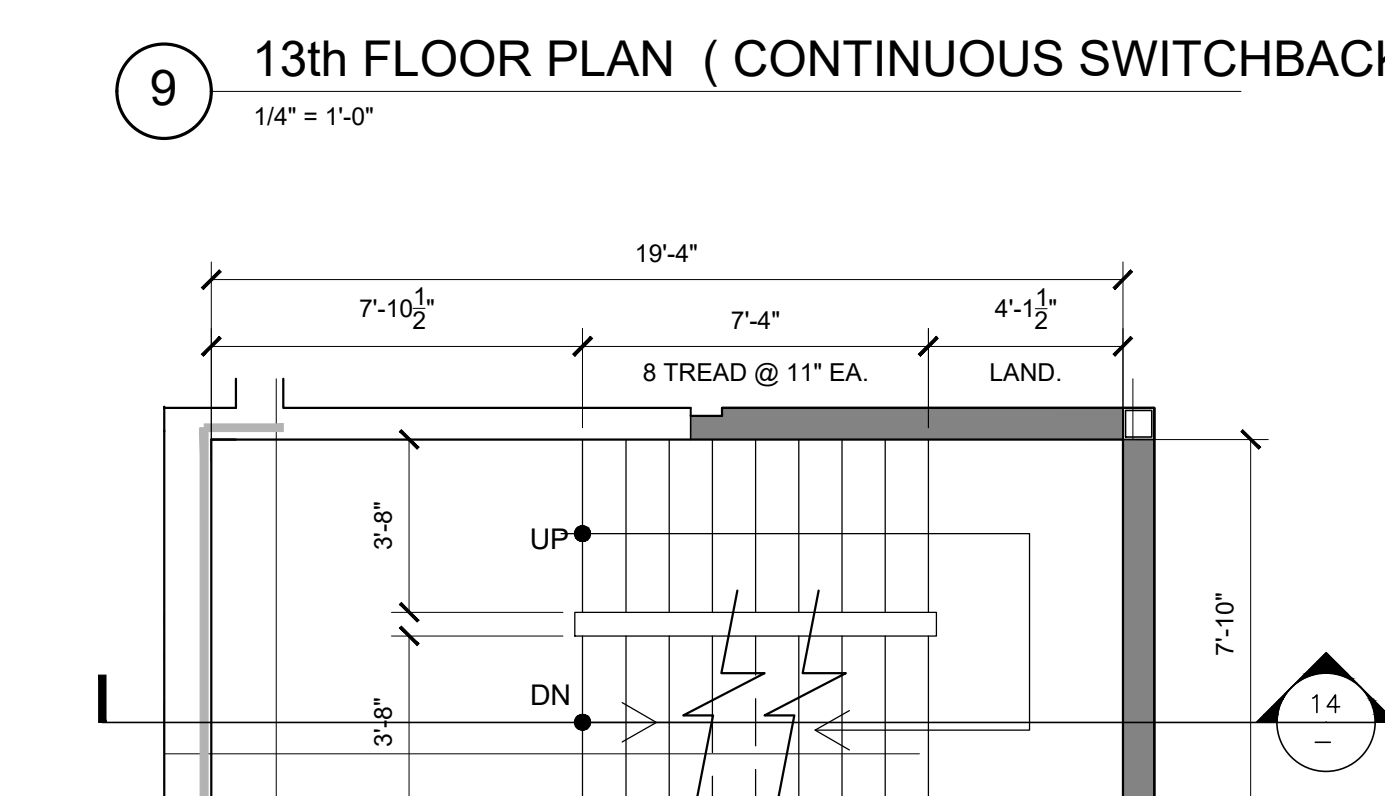
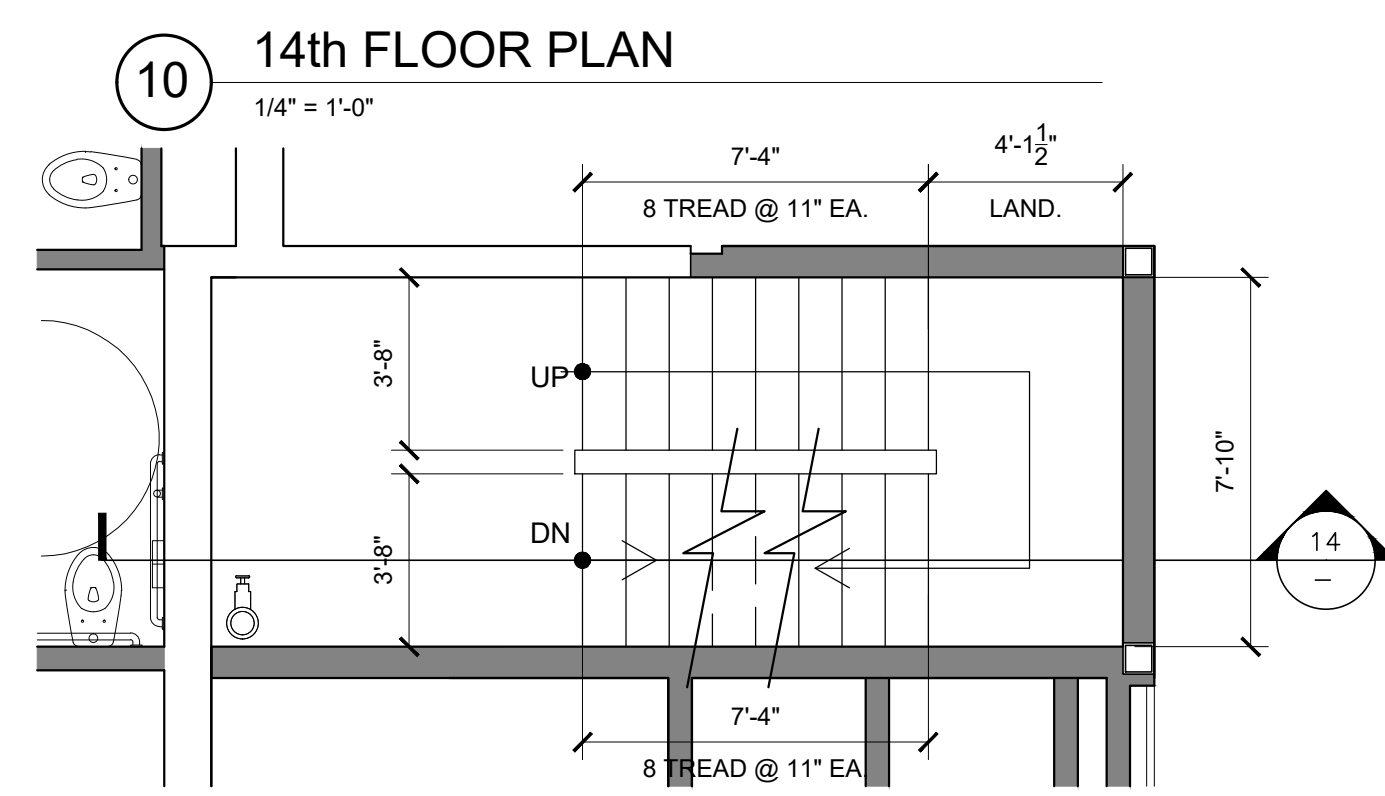
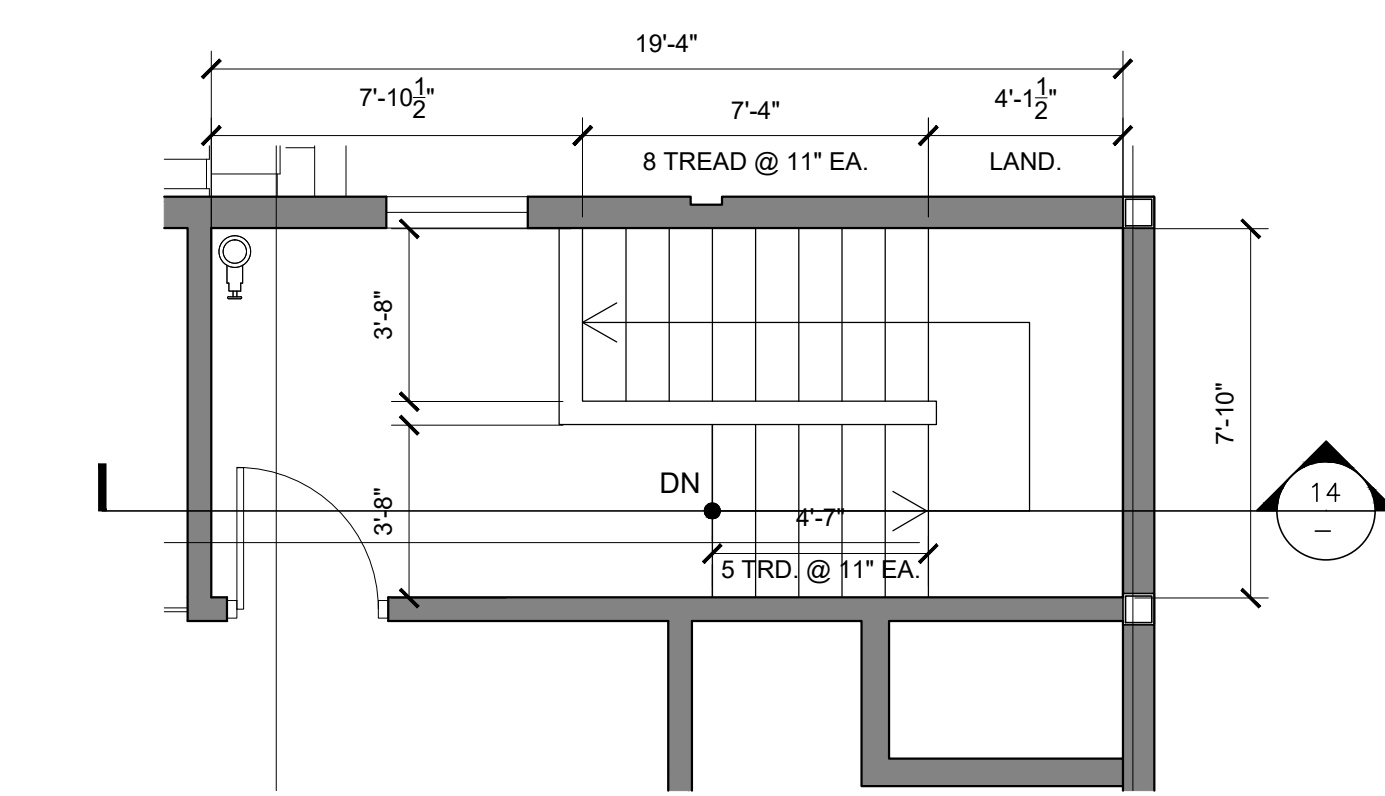
PLANNING APPROVAL:
10-30-2018

ELEVATOR PLANS
AND SECTIONS
A5.01

10/30/2018



14 STAIR 1 SECTION
1/4" = 1'-0"



BREAKERS HOTEL RENOVATION

210 E OCEAN BLVD.
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1	PLANNING APPROVAL	10/30/2018
2		
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NADEL PROJECT No: 18016
DRAWING DATE: 08/10/2018
SCALE: 1/8"=1'-0"

STAIR #1 PLANS
AND SECTIONS

A5.02

13'-10"

6'-1 1/2"

3'-8"

3'-6"

3'-8"

3'-0"

1'-1 1/2"

2'-1"

5'-8"

6 TR @ 11" EA

4'-7"

6'-5"

1 TR @ 11" EA

3'-8"

4'-0 1/2"

2'-9"

4'-0 1/2"

3 TR @ 11" EA

12

3

2ND - 12TH FLOOR PLAN

1/4" = 1'-0"

SECTION SHIFT

6'-4 1/2"

3'-8"

7'-4"

8'-0"

6 TR @ 11" EA.

3'-5"

4'-6"

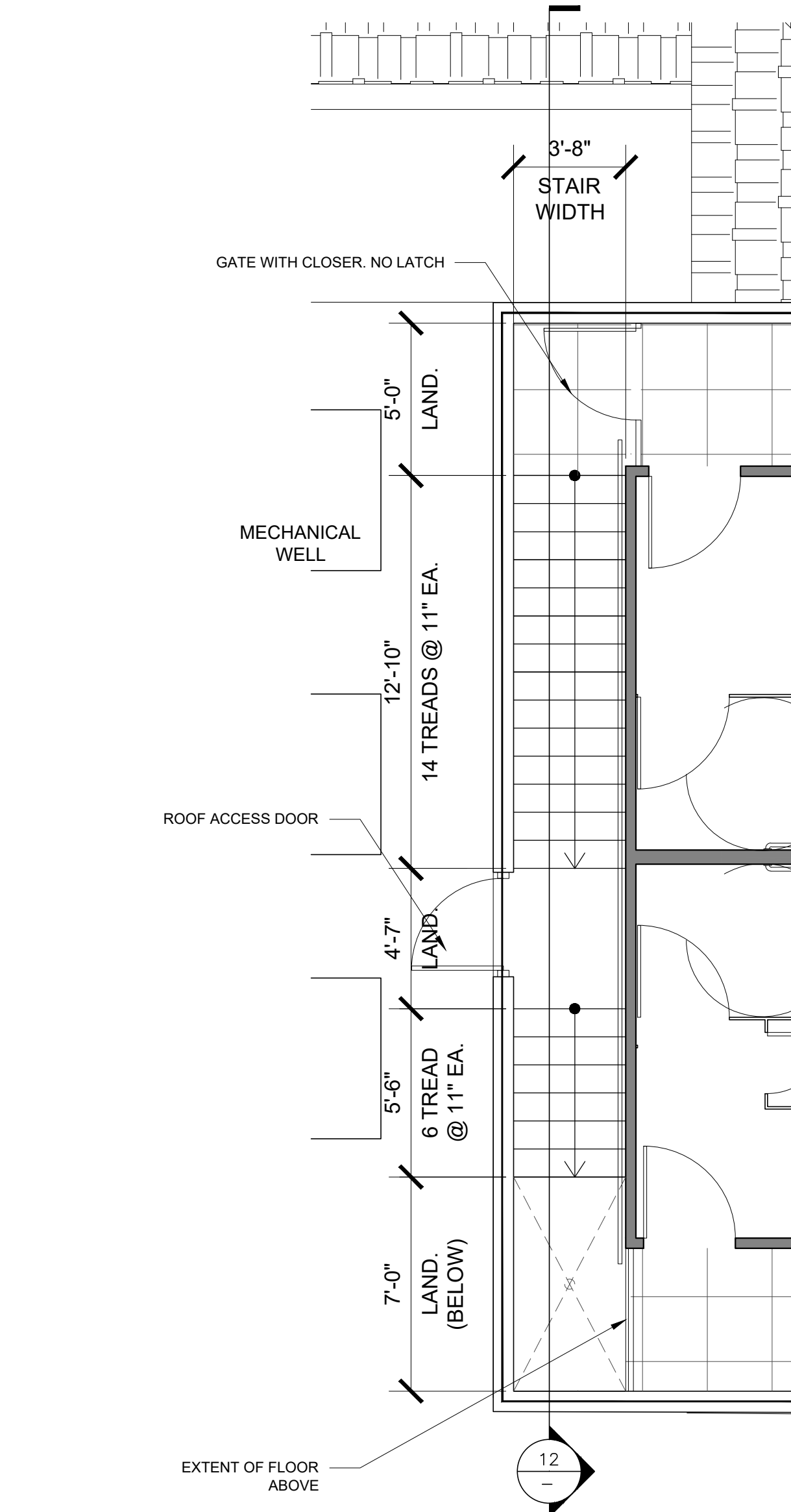
9'-10 1/2"

12'-0"

12'-0"

1

1/4" = 1'-0"



Roof top plan showing the layout of the roof, including the roof access stair, roof access door, and roof access stairs. The plan includes dimensions for the roof deck, roof access stair, and roof access door. The roof deck is 14'-0" wide and 14'-0" deep. The roof access stair is 14'-0" wide and 14'-0" deep. The roof access door is 14'-0" wide and 14'-0" deep. The roof access stairs are 14'-0" wide and 14'-0" deep.

13TH FLOOR PLAN

1/4" = 1'-0"

Architectural section drawing of Stair 2, showing floors from Ground to Rooftop. The drawing includes floor levels, stair flights, landings, and structural details. Key features include:

- Rooftop (Cielo Bar)** 182'-7"
- 13th Floor (Sky Room)** 140'-3"
- 12th Floor** 129'-6"
- 11th Floor** 118'-9"
- 10th Floor** 108'-0"
- 9th Floor** 97'-3"
- 4th Floor** 43'-6"
- 3rd Floor** 32'-9"
- 2nd Floor** 22'-0"
- Mezzanine** 9'-3"
- Ground** 0'-0"

Stair flights are shown with risers and treads, and landings are labeled "LAND.". Structural details like "MIN. HEAD CLR. (TYP.)" and "15 RISERS @ 7" MAX." are indicated. A scale of 1/4" = 1'-0" is provided at the bottom.

A5.04

9 (E) STAIR # 4 SECTION
1/4" = 1'-0"

6 (E) STAIR #4 BASEMENT FLOOR PLAN
1/4" = 1'-0"

3 (E) STAIR # 3 SECTION
1/4" = 1'-0"

2 (E) STAIR # 3 GROUND FLOOR PLAN
1/4" = 1'-0"

1 (E) STAIR #3 BASEMENT FLOOR PLAN
1/4" = 1'-0"

BREAKERS
HOTEL
RENOVATION

210 E OCEAN BLVD,
LONG BEACH,
CA 90802

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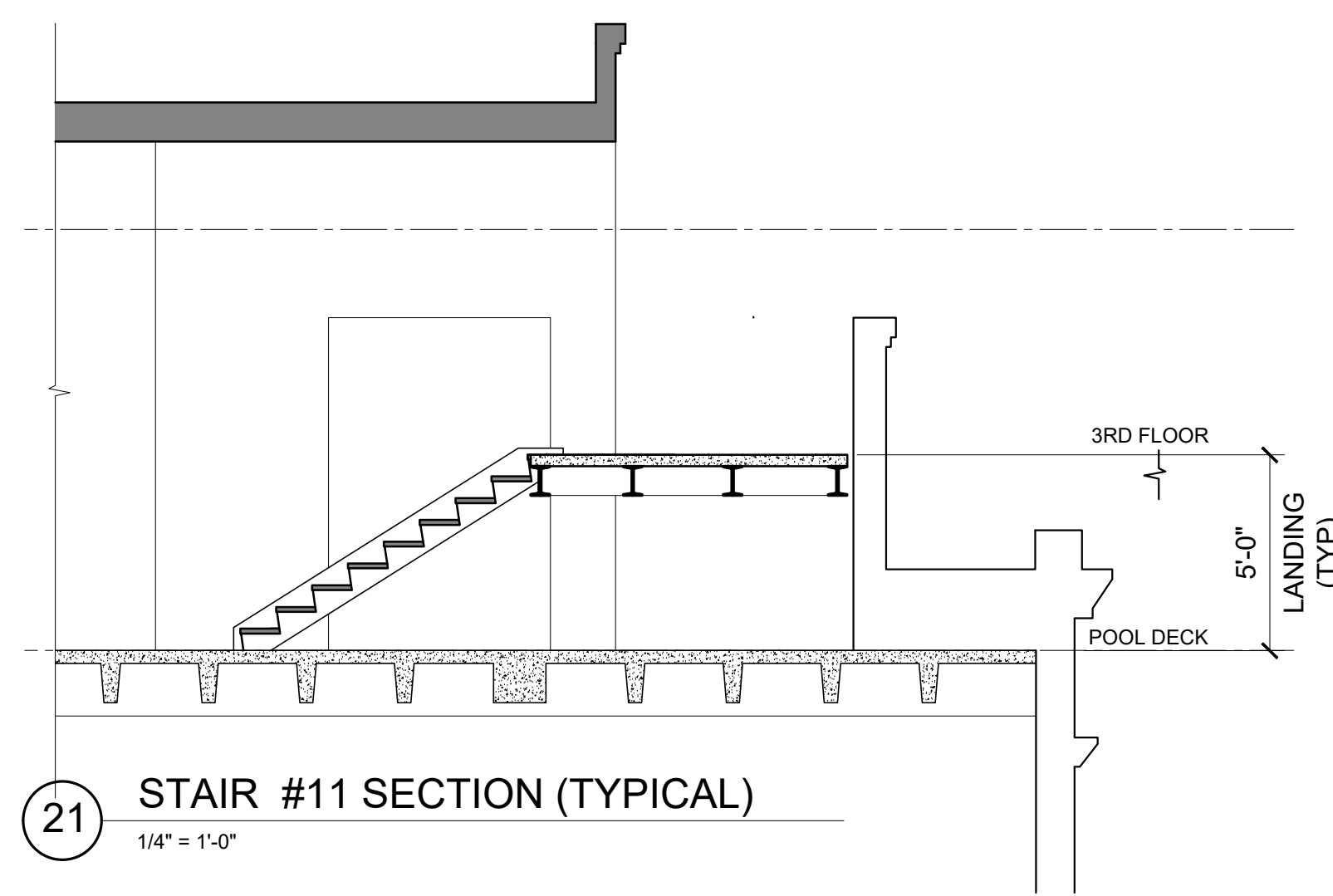
PLANNING APPROVAL 10/30/2018

NADEL PROJECT No: 18016
DRAWING DATE: 08/10/2018

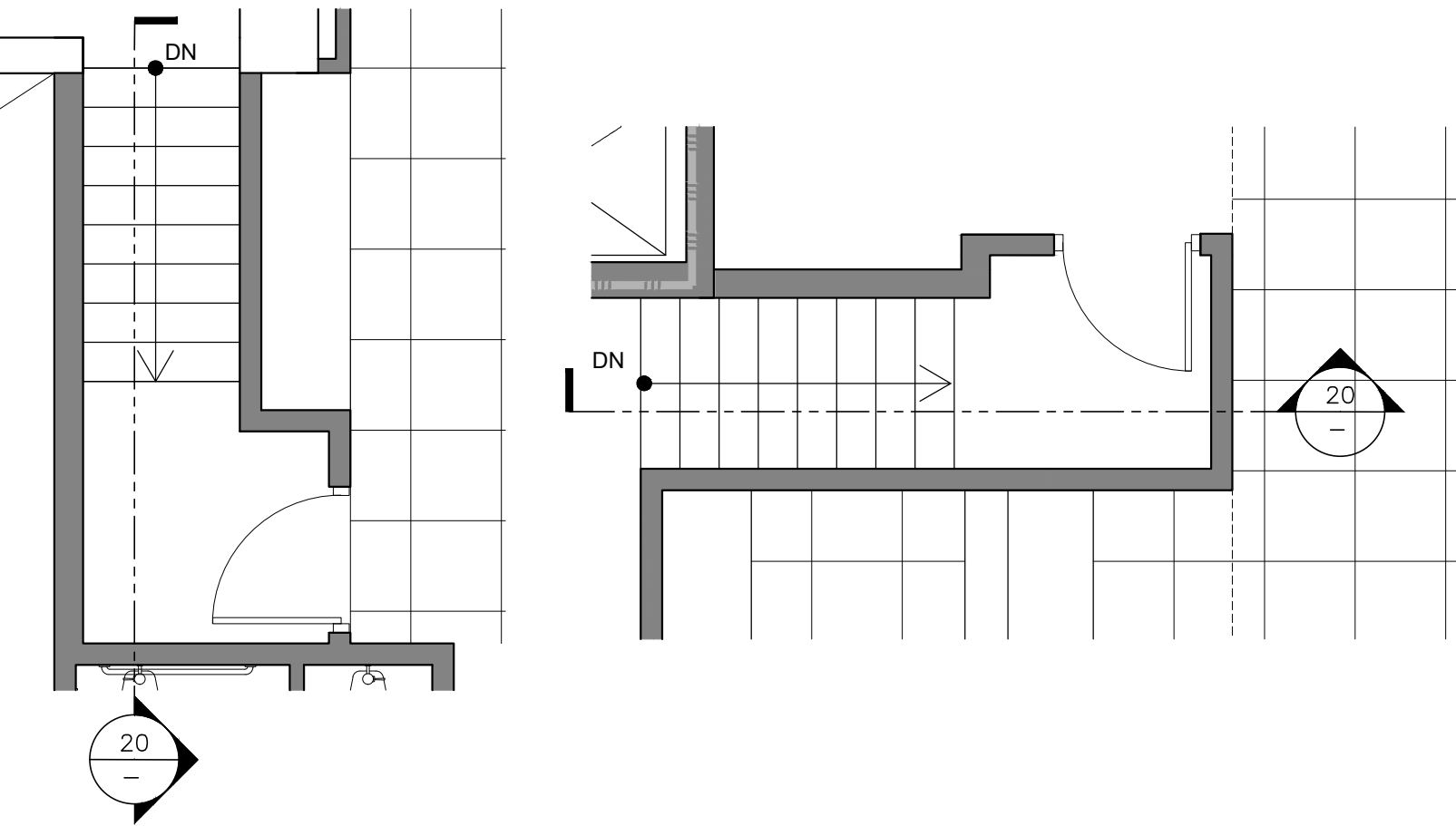
SCALE
1/8"=1'-0"

STAIRS #5 - #11
PLANS AND
SECTIONS

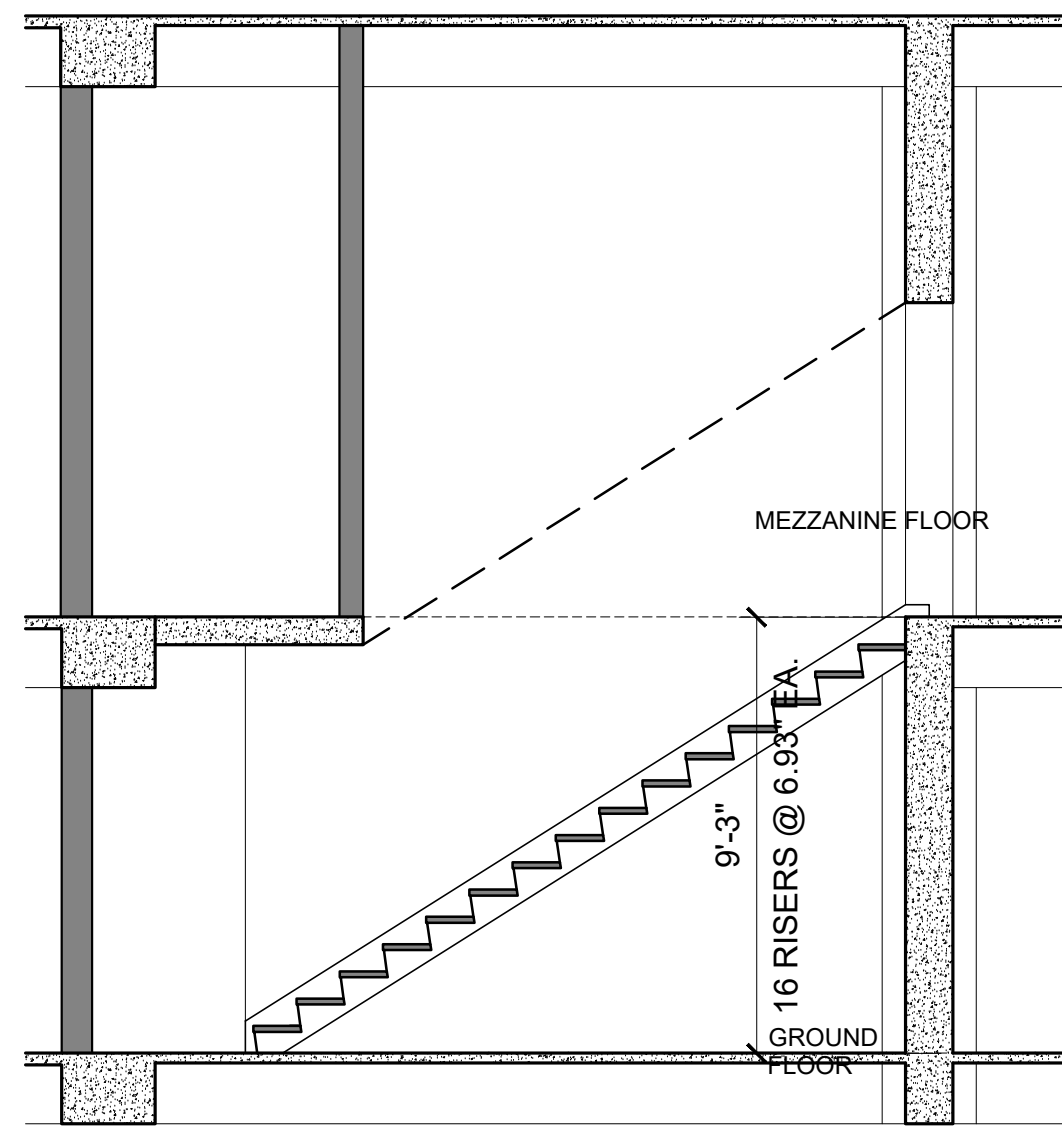
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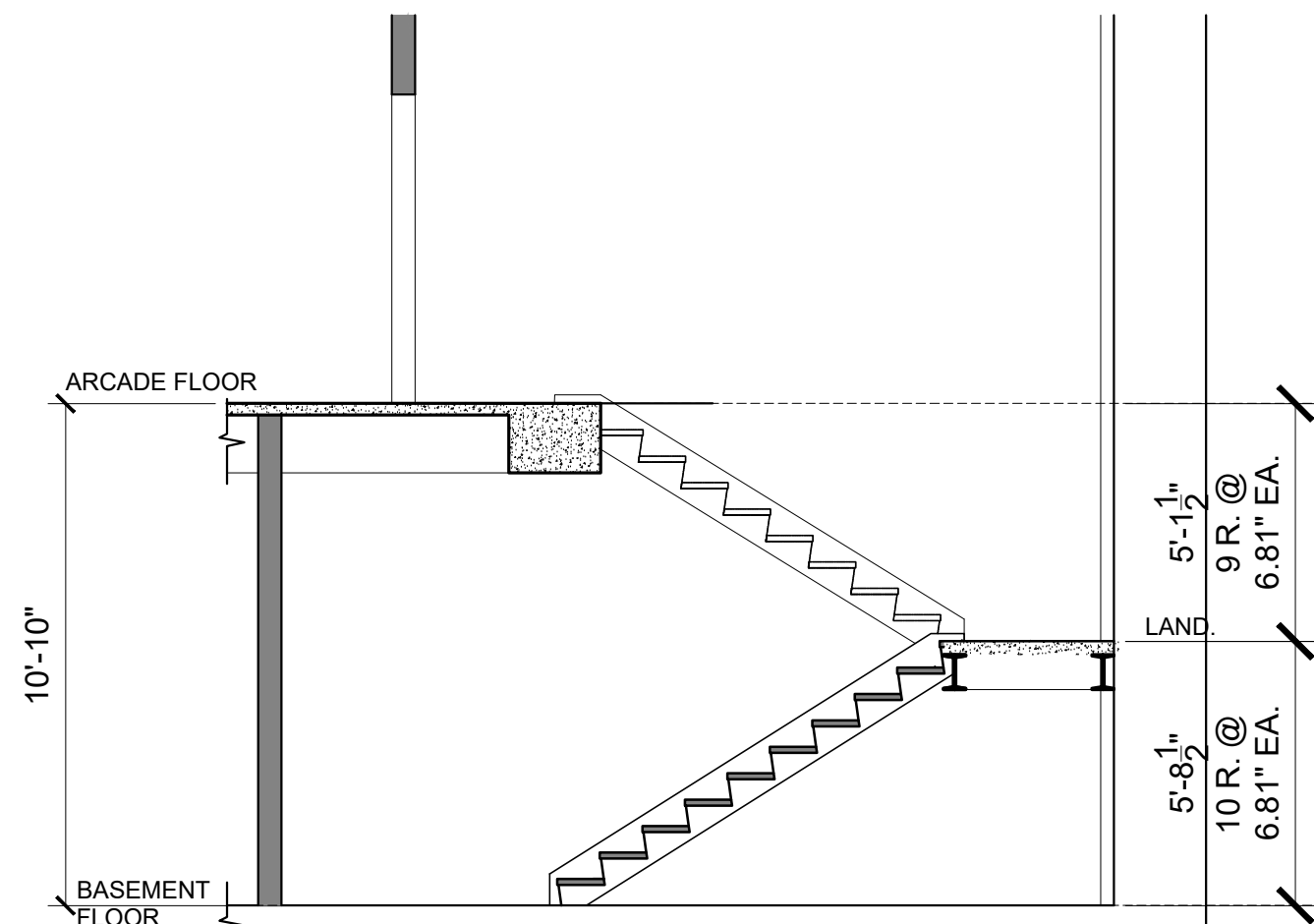
21 STAIR #11 SECTION (TYPICAL)
1/4" = 1'-0"



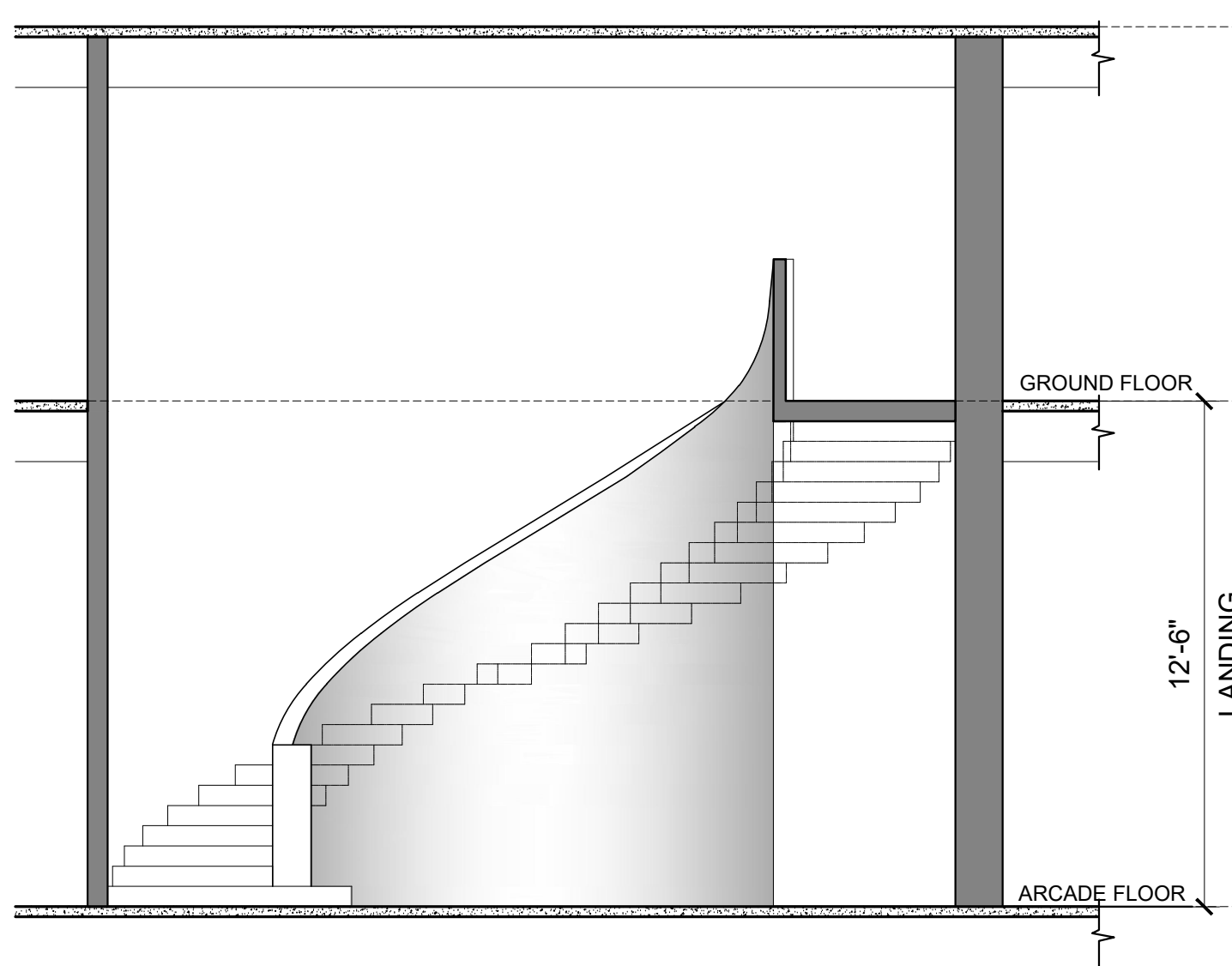
20 STAIR #11 3RD FLOOR PLAN (TYPICAL)
1/4" = 1'-0"



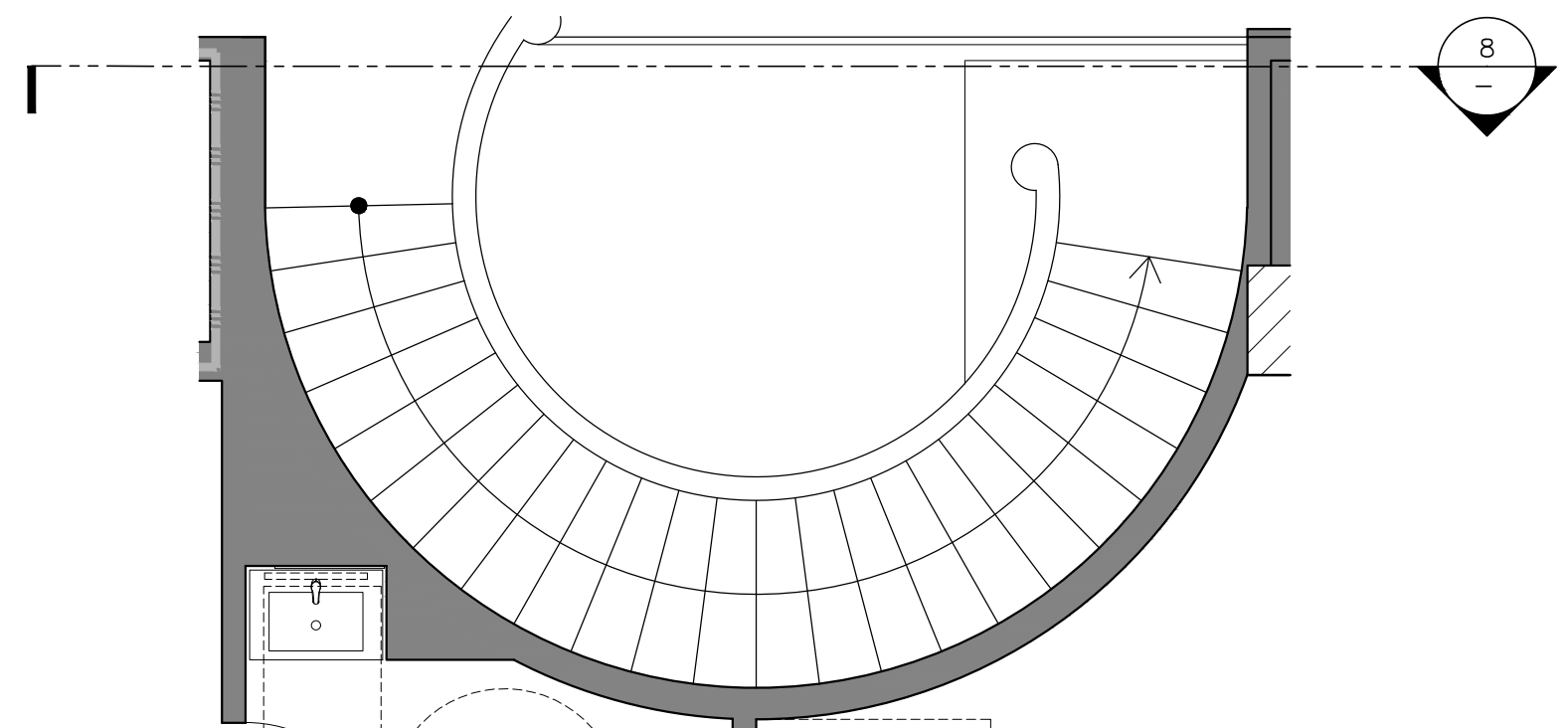
15 STAIR #9 SECTION
1/4" = 1'-0"



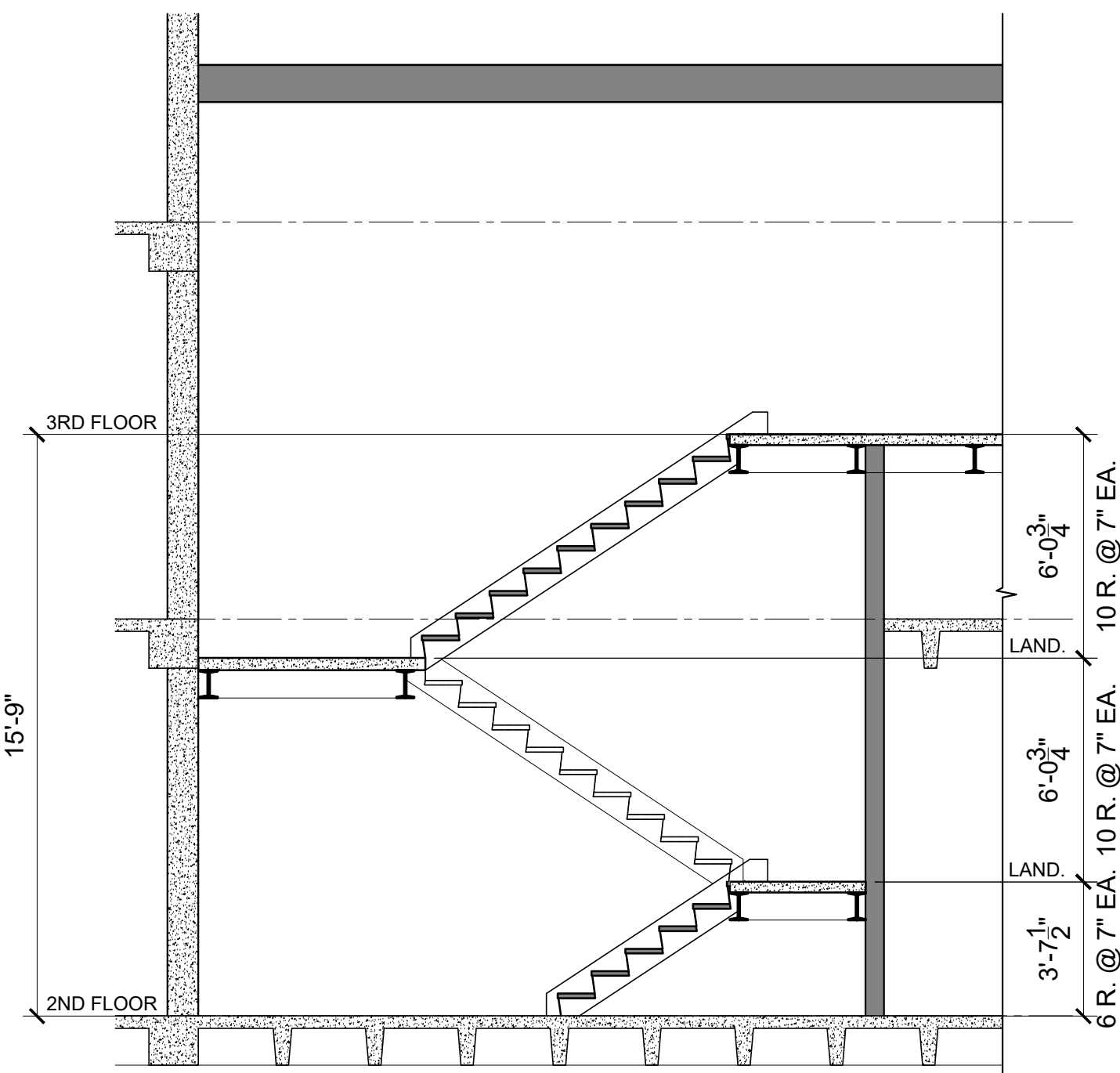
11 STAIR #8 SECTION
1/4" = 1'-0"



8 STAIR #7 SECTION
1/4" = 1'-0"

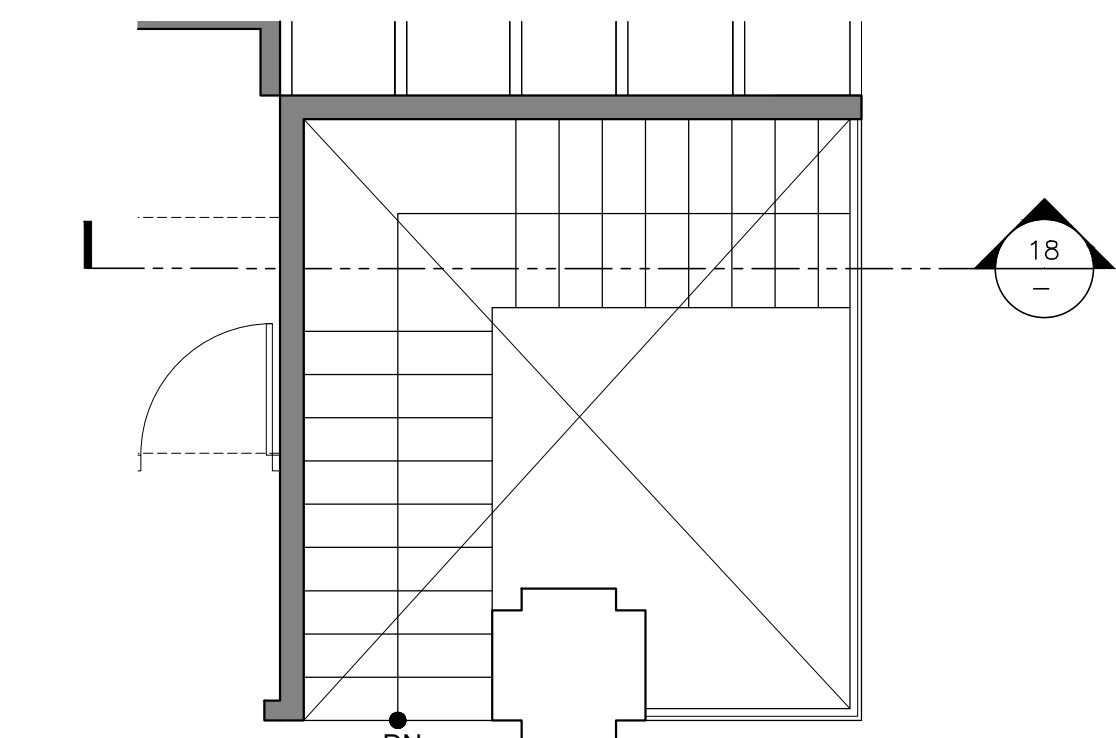


8 STAIR #7 GROUND FLOOR PLAN
1/4" = 1'-0"

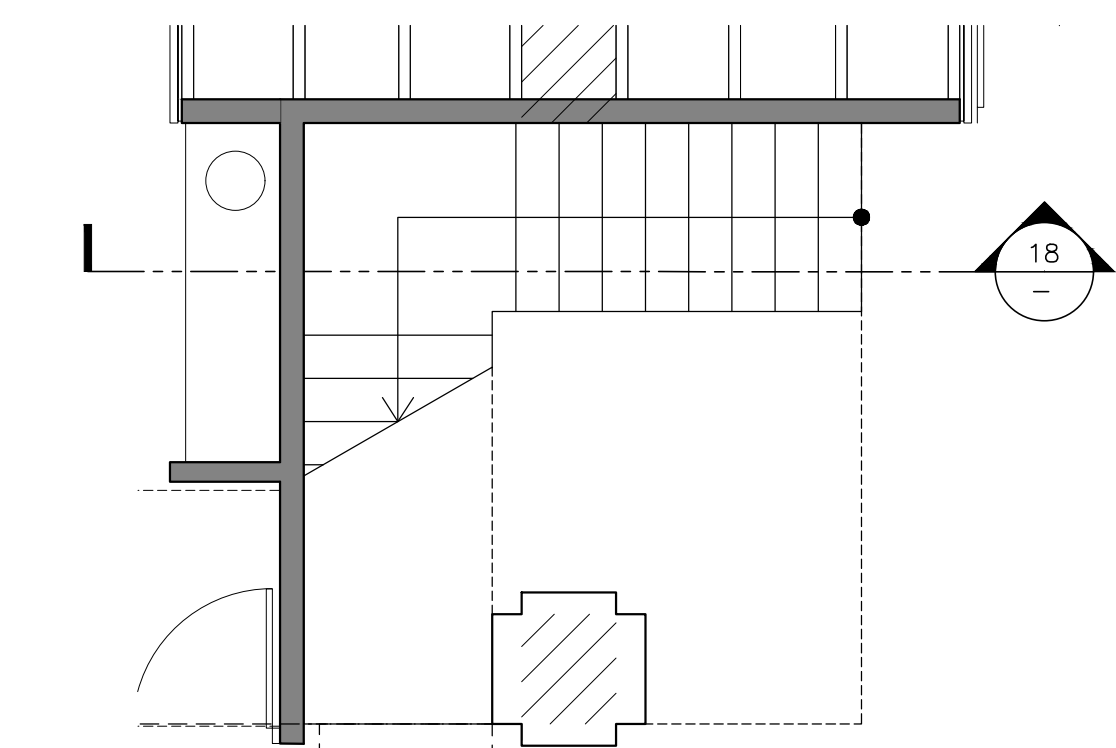


3 STAIR #5 SECTION
1/4" = 1'-0"

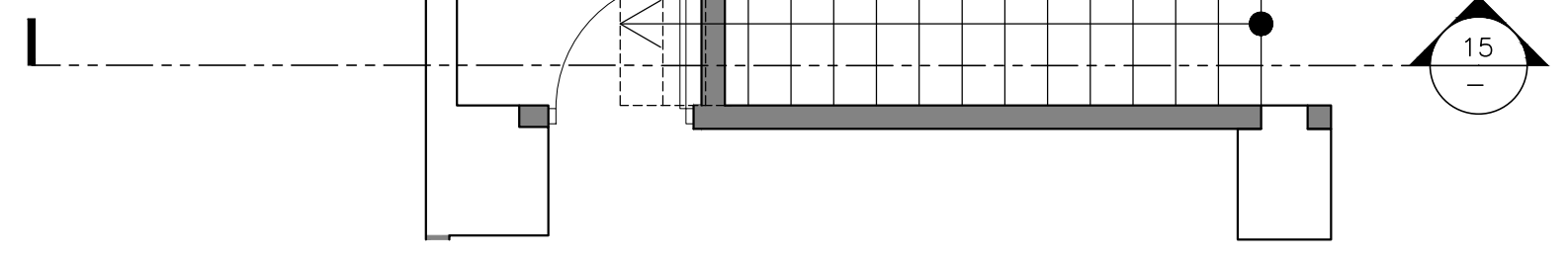
19 STAIR #10 SECTION
1/4" = 1'-0"



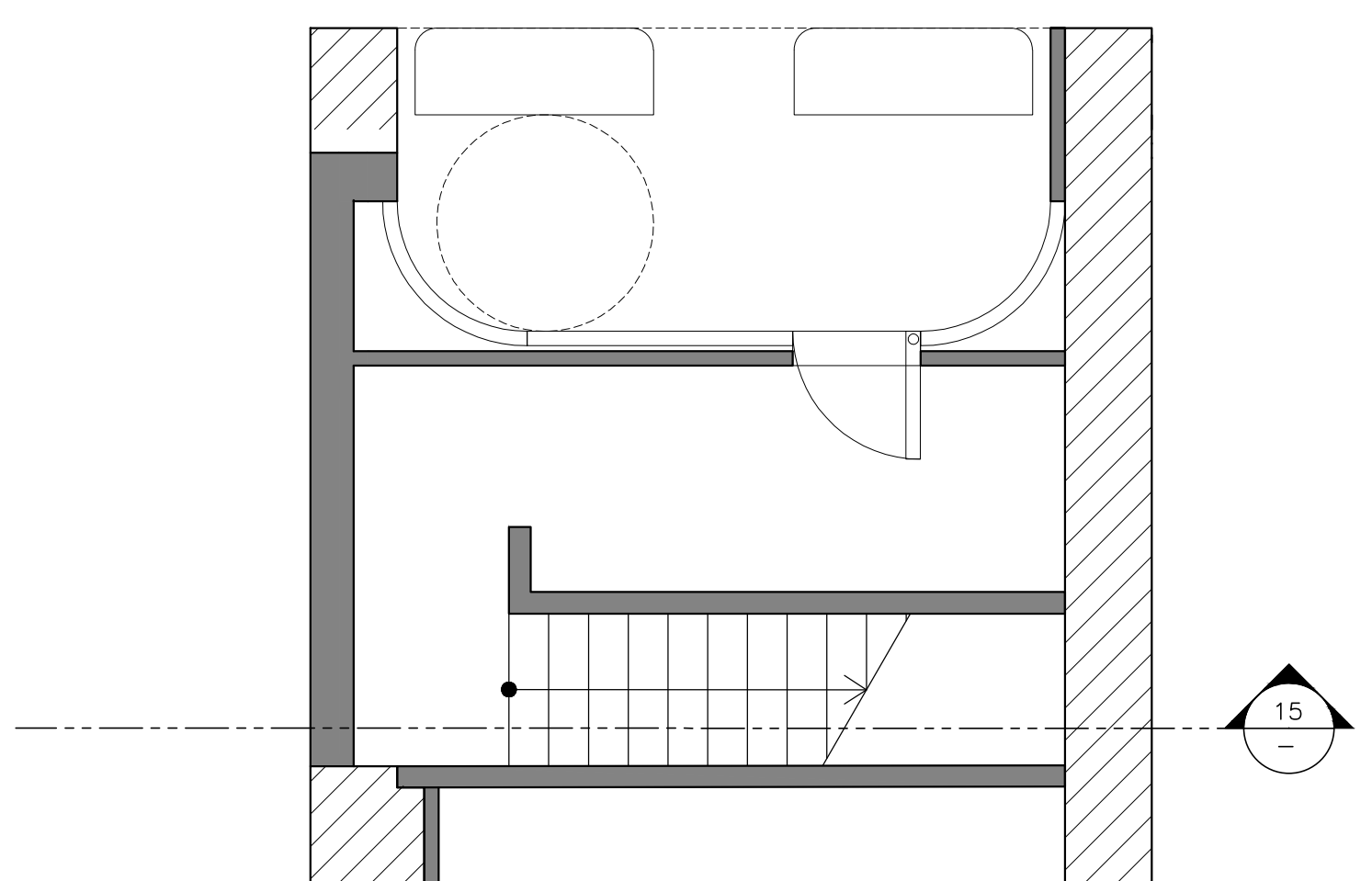
18 STAIR #10 MEZZANINE FLOOR PLAN
1/4" = 1'-0"



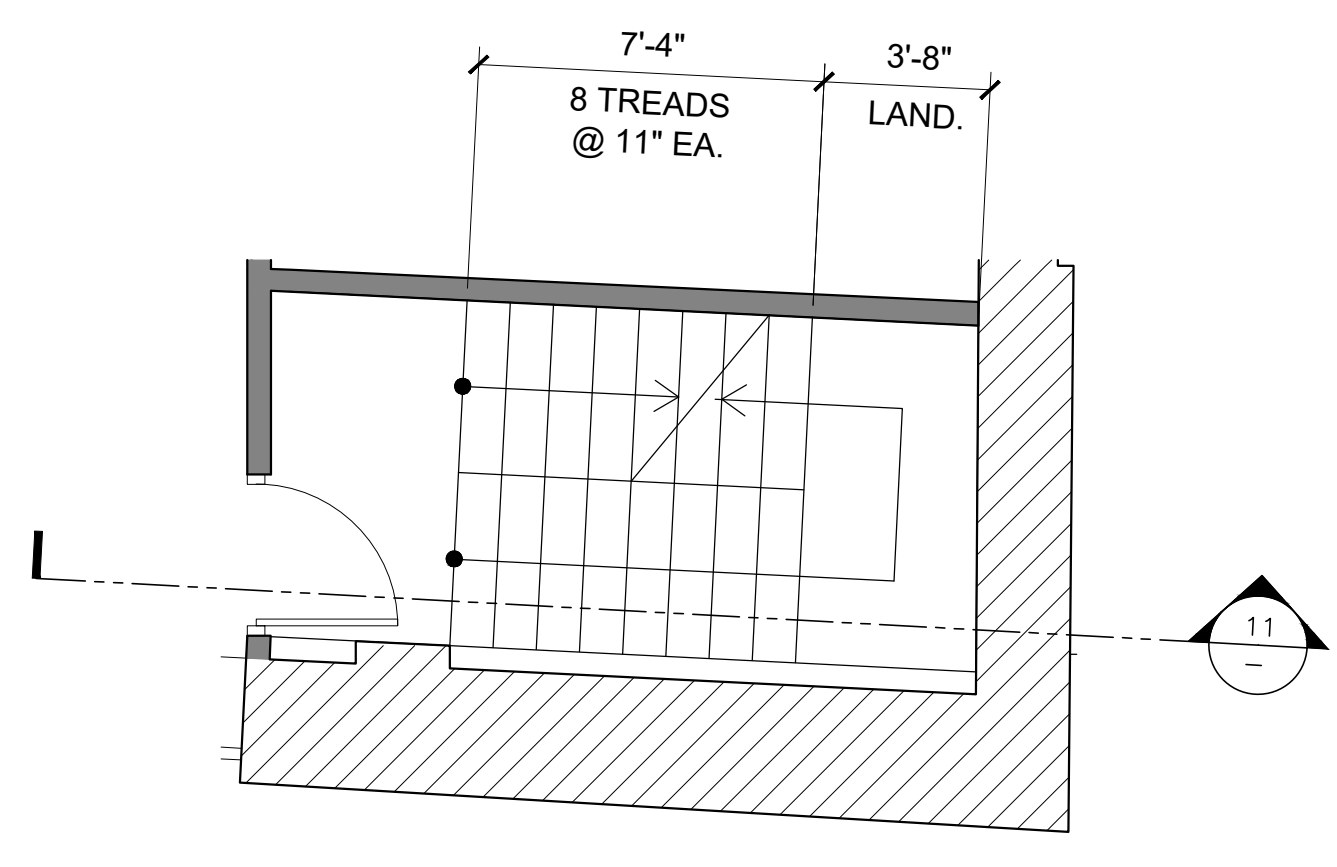
17 STAIR #10 GROUND FLOOR PLAN
1/4" = 1'-0"



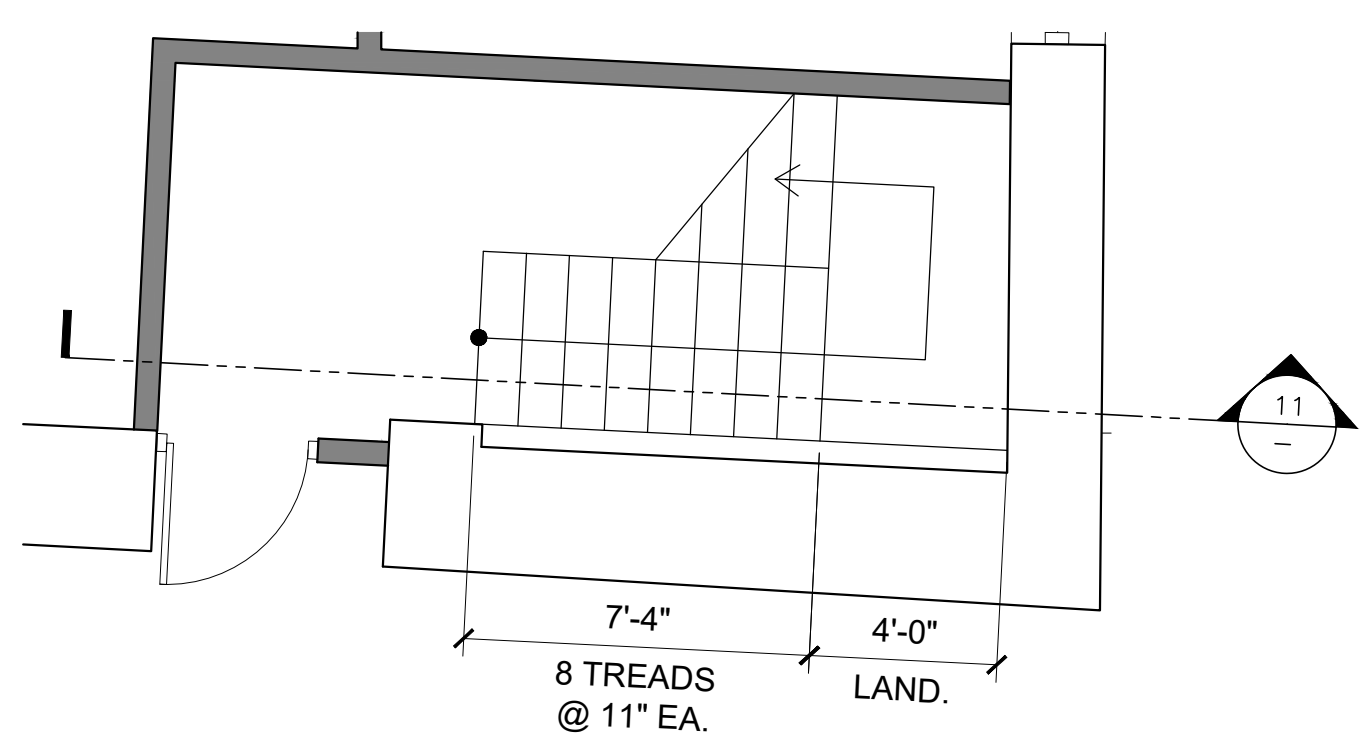
14 STAIR #9 MEZZANINE FLOOR PLAN
1/4" = 1'-0"



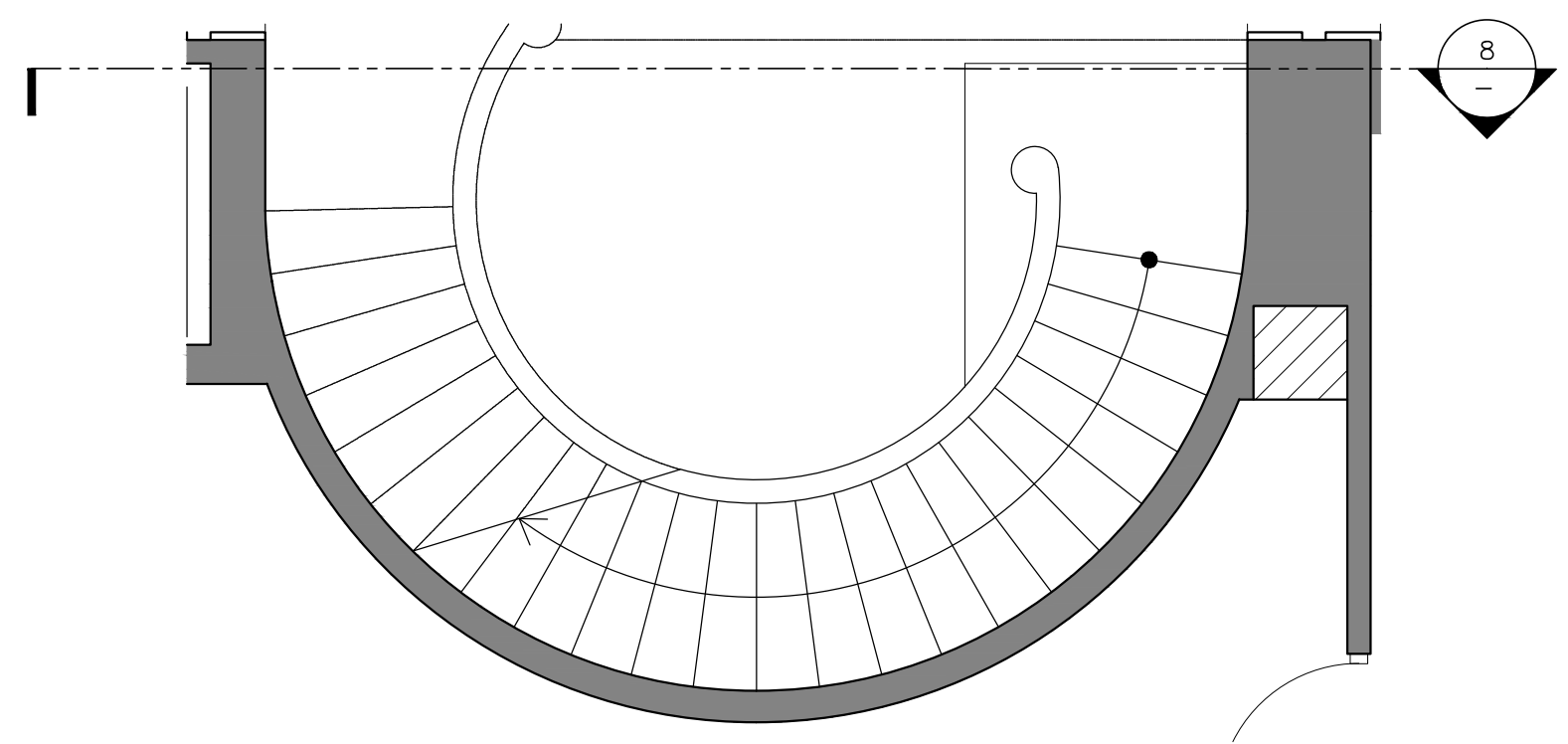
13 STAIR #9 GROUND FLOOR PLAN
1/4" = 1'-0"



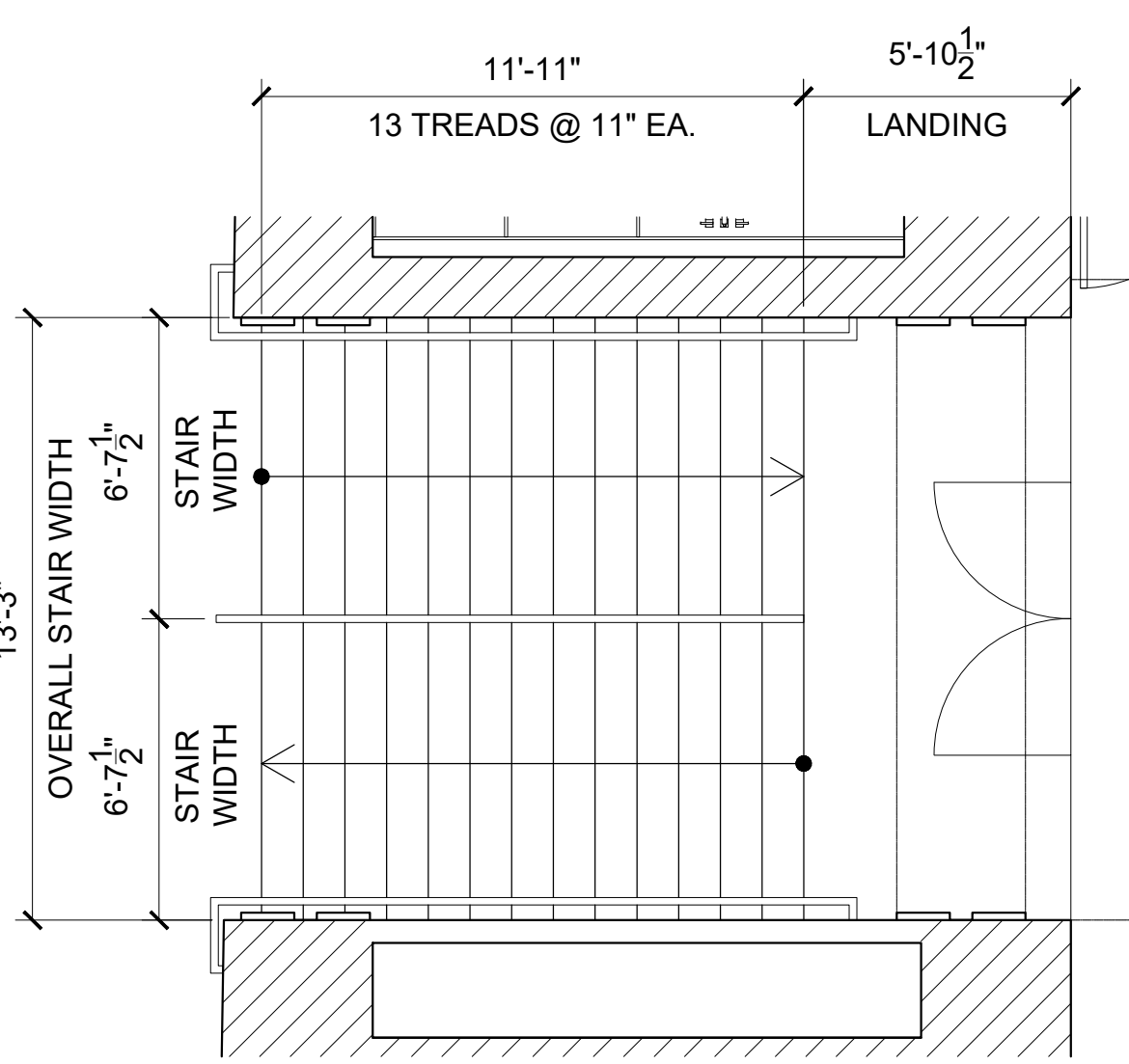
10 STAIR #8 ARCADE FLOOR PLAN
1/4" = 1'-0"



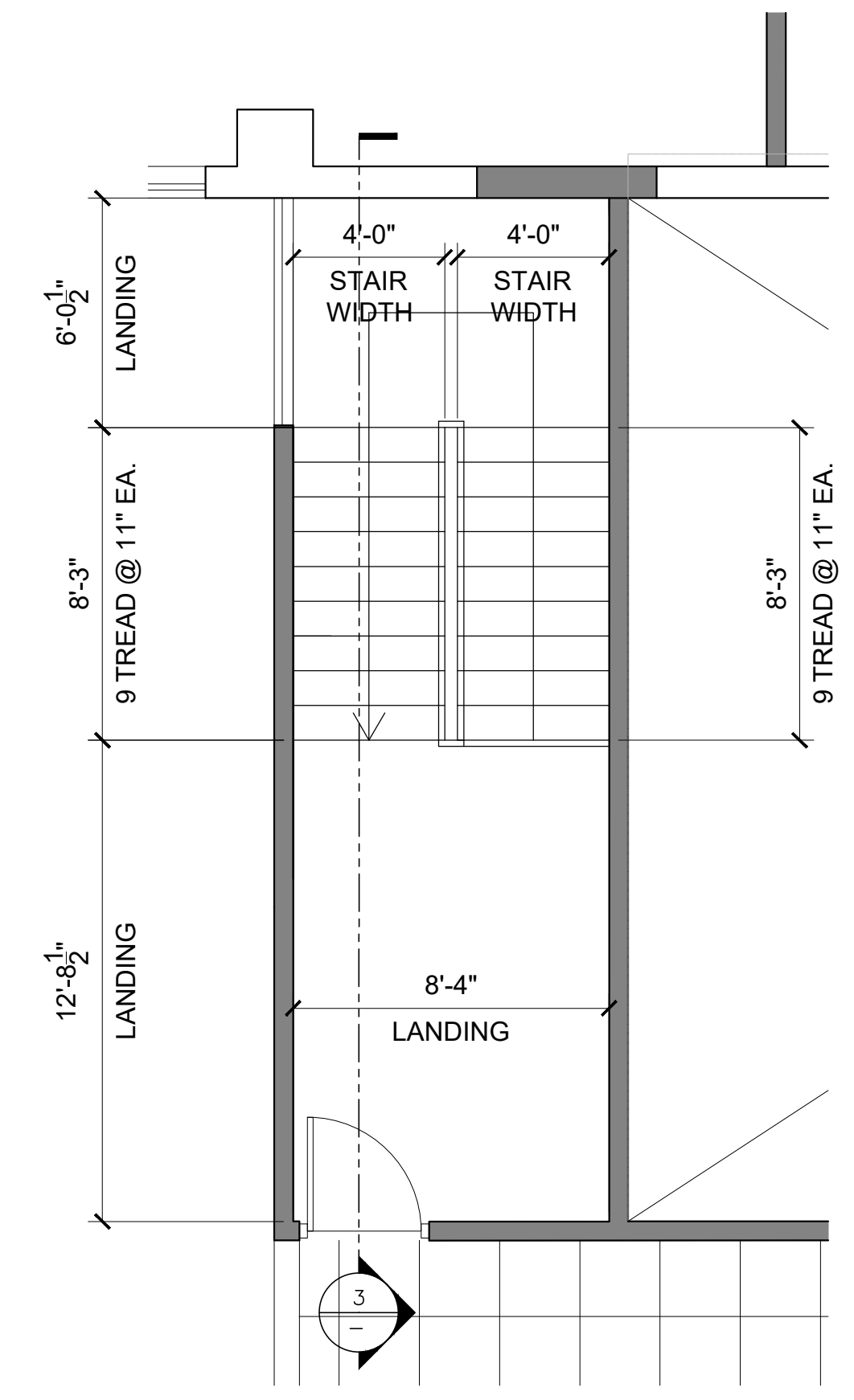
9 STAIR #8 BASEMENT FLOOR PLAN
1/4" = 1'-0"



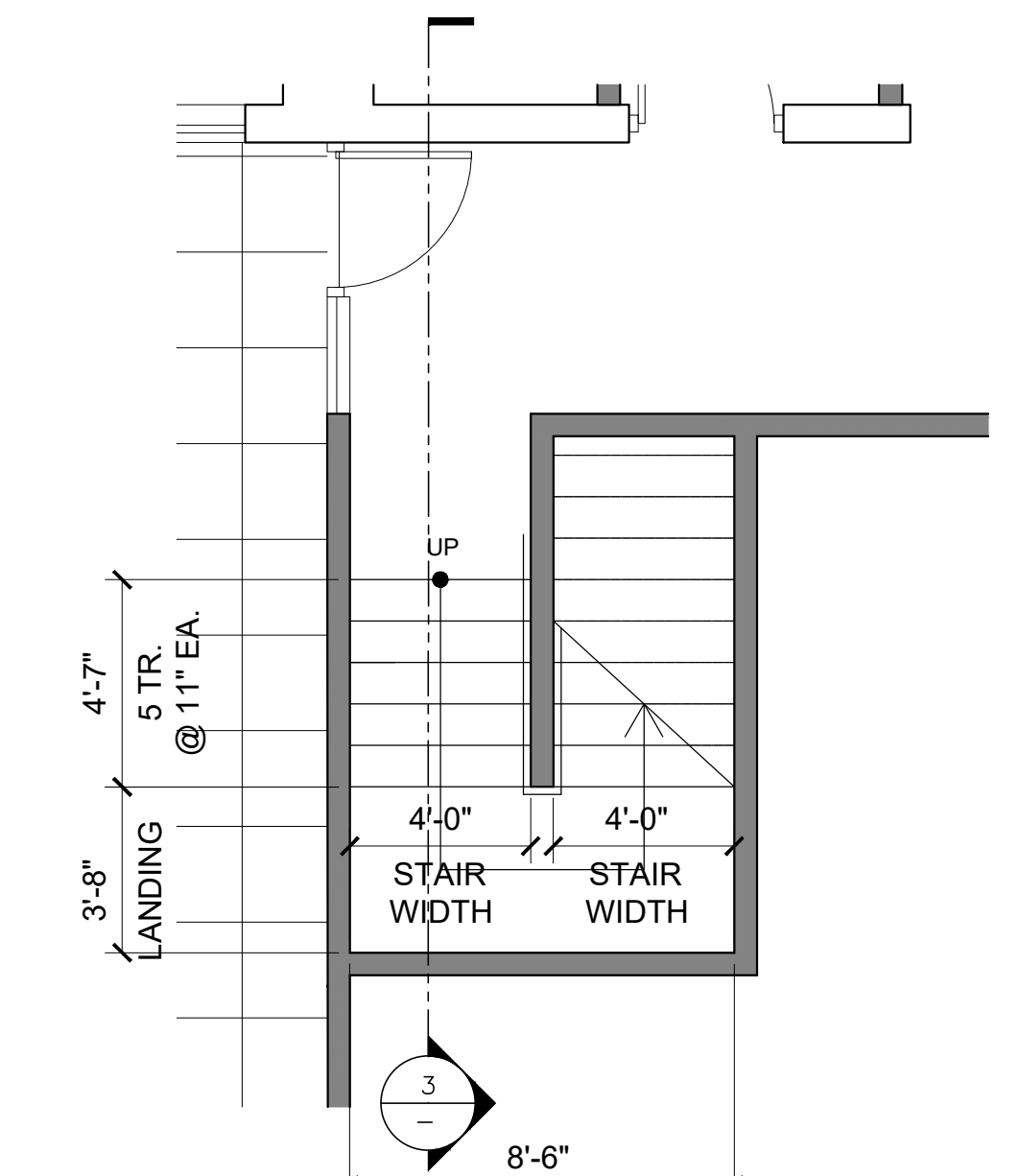
6 STAIR #7 ARCADE FLOOR PLAN
1/4" = 1'-0"



5 STAIR #6 ARCADE FLOOR PLAN
1/4" = 1'-0"



2 STAIR #5 3RD FLOOR PLAN
1/4" = 1'-0"



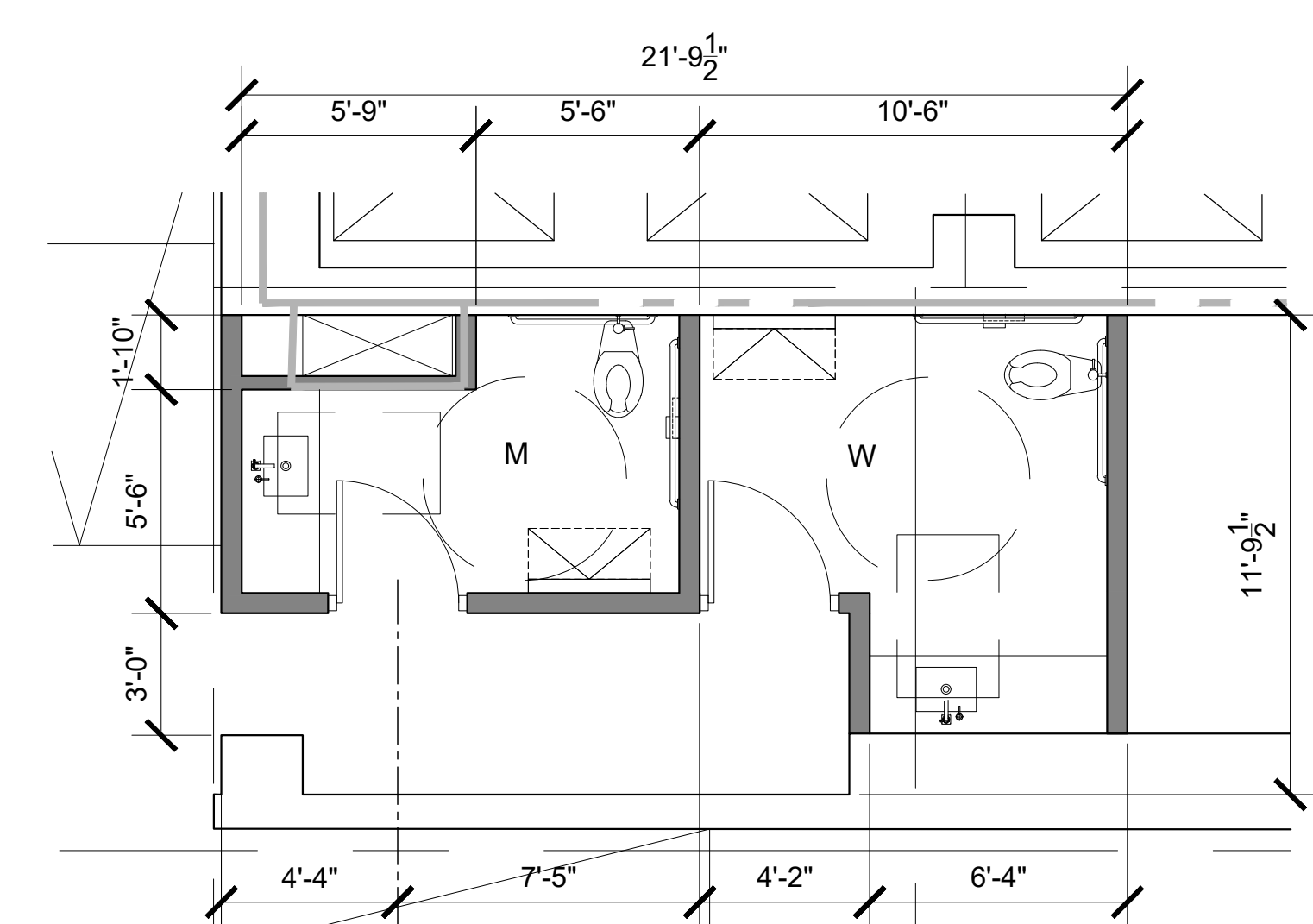
1 STAIR #5 2ND FLOOR PLAN
1/4" = 1'-0"

BREAKERS
HOTEL
RENOVATION

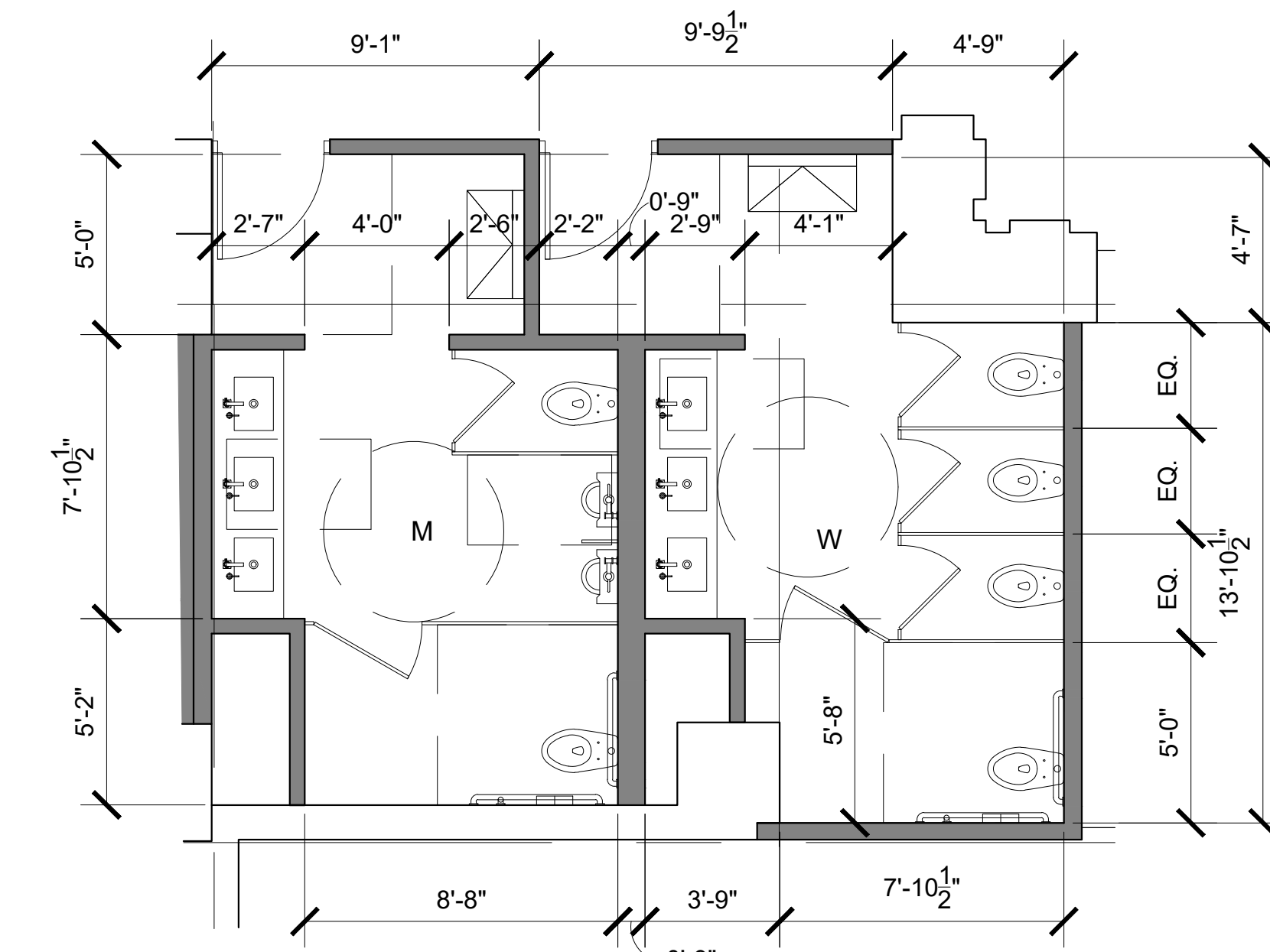
210 E OCEAN BLVD, LONG BEACH, CA 90802		
REVISIONS:	ISSUE DESCRIPTION:	ISSUE DATE:
NO.		
	PLANNING APPROVAL	10/30/2018
NADEL PROJECT NO:	18016	
DRAWING DATE:	08/10/2018	
SCALE	1/8"=1'-0"	

ENLARGED PUBLIC
AREA PLANS

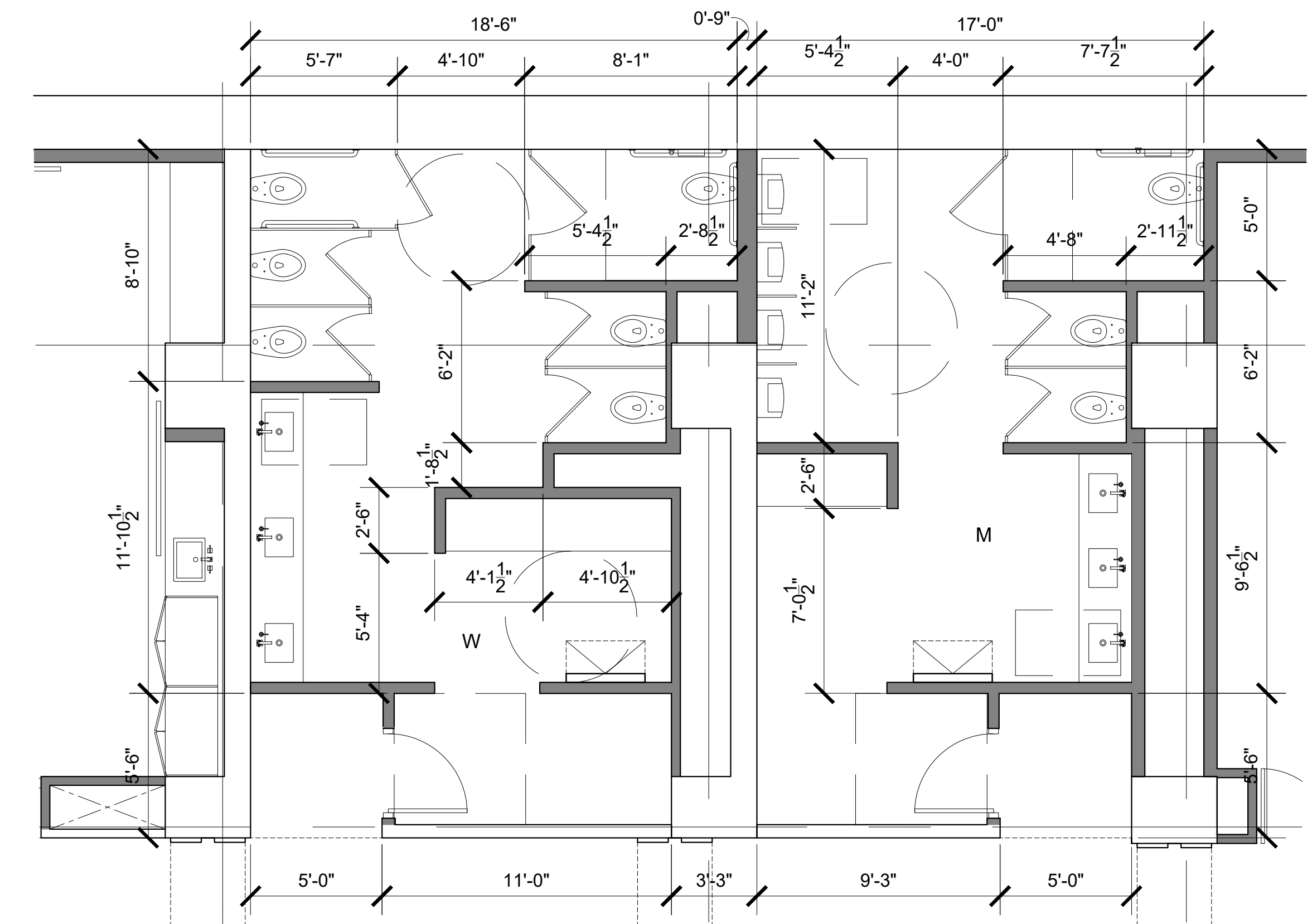
A6.01



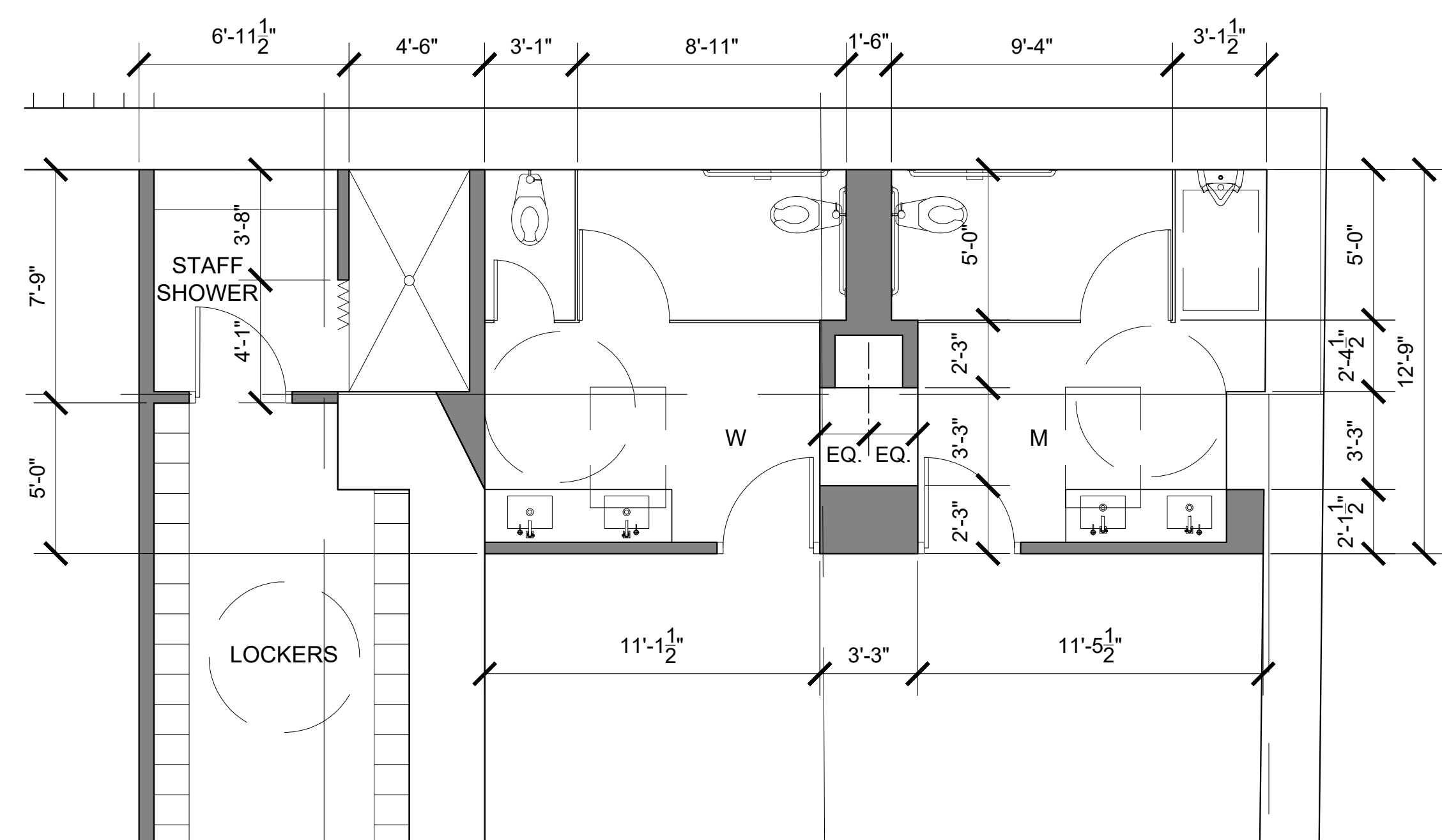
4 2ND FLOOR PUBLIC TOILETS
1/4" = 1'-0"



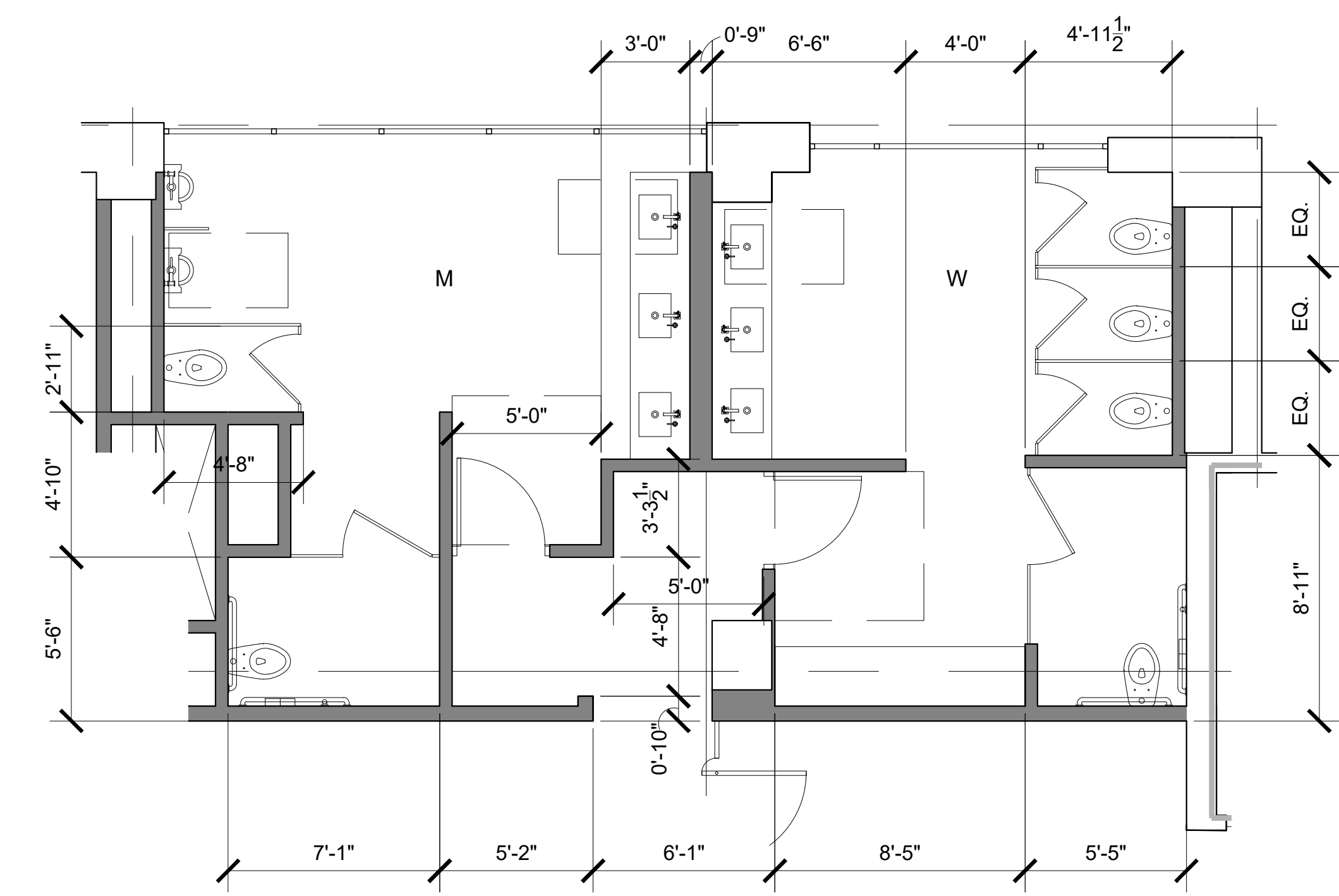
3 GROUND FLOOR PUBLIC TOILETS
1/4" = 1'-0"



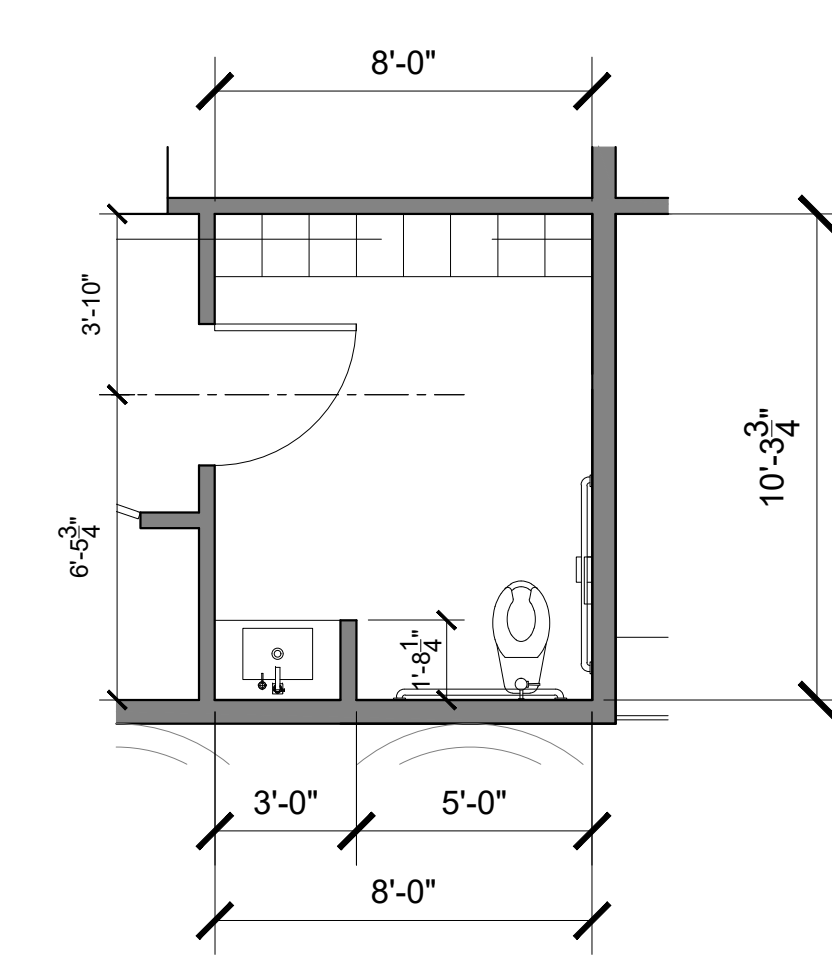
2 BANQUET (ARCADE) FLOOR PUBLIC TOILETS
1/4" = 1'-0"



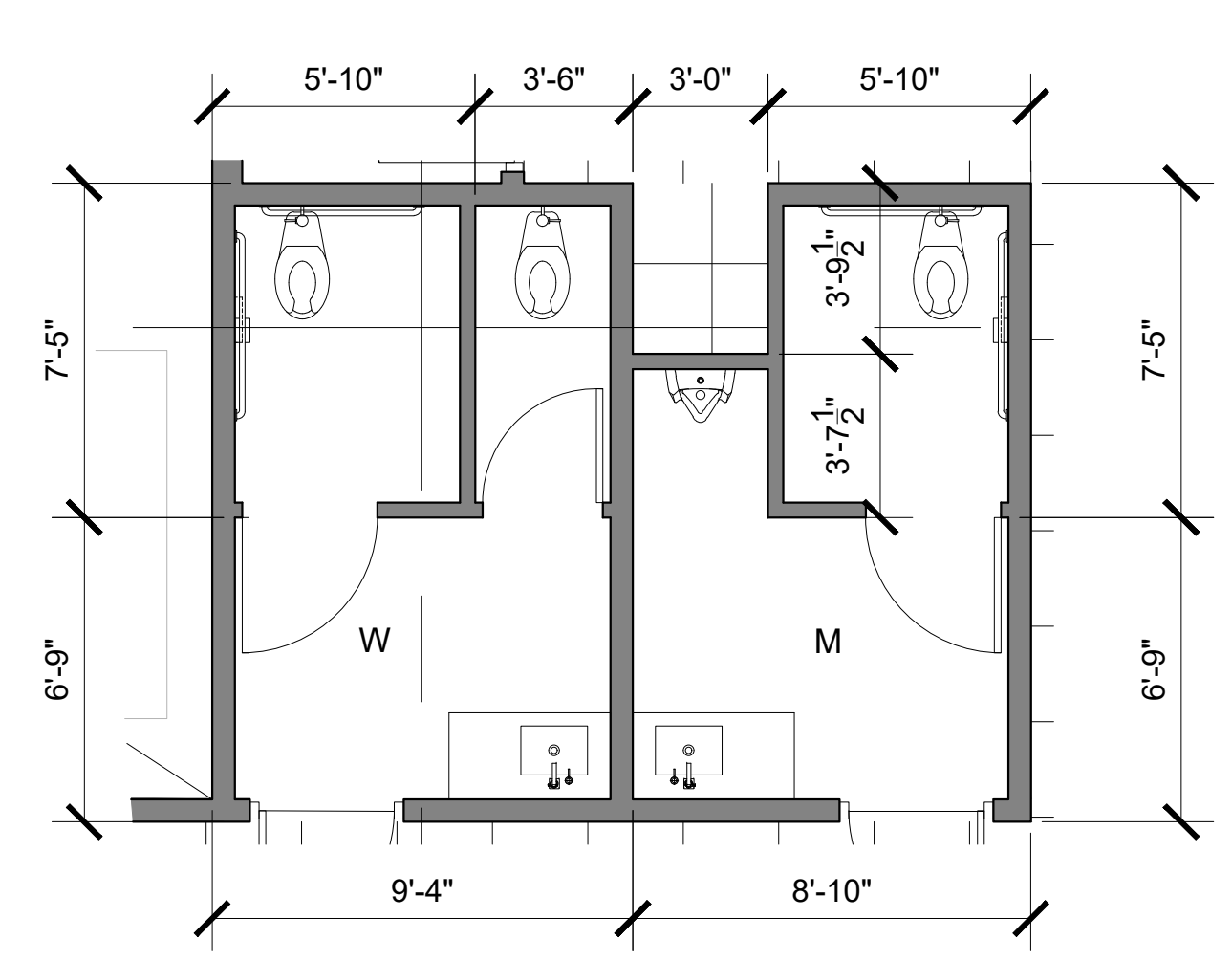
1 STAFF TOILETS / LOCKERS
1/4" = 1'-0"



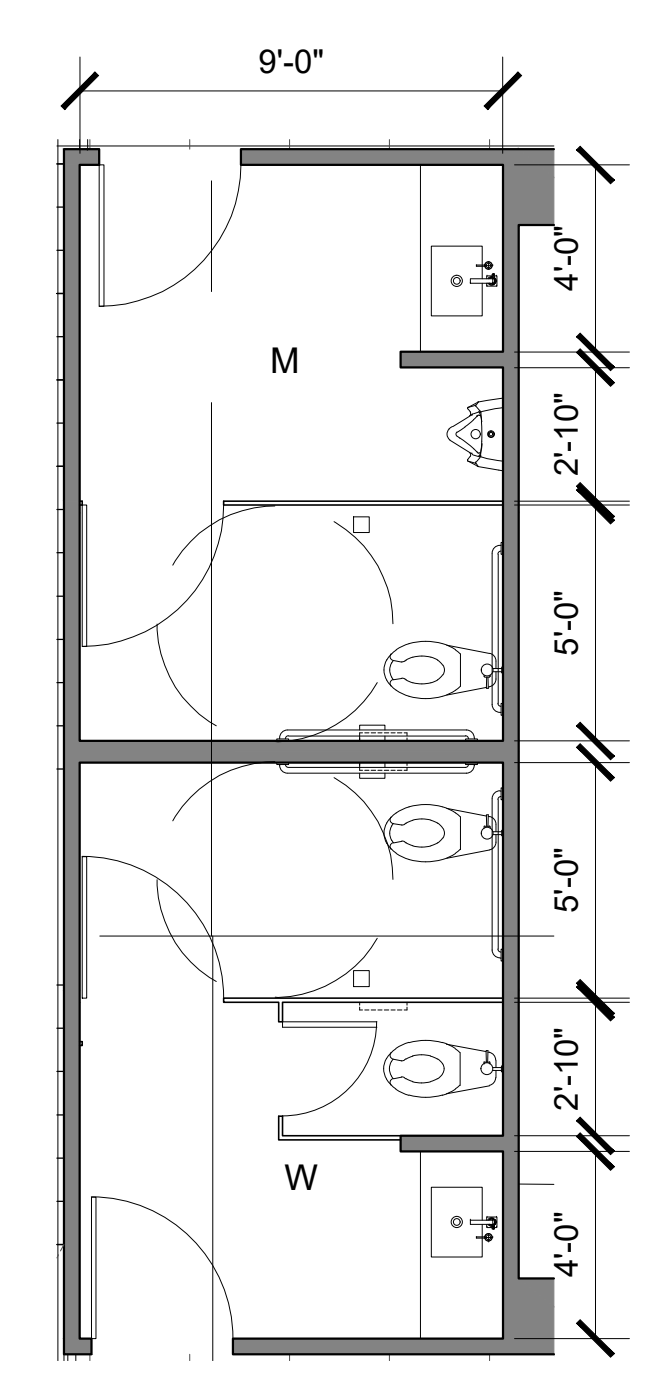
7 SKY BAR PUBLIC TOILET
1/4" = 1'-0"



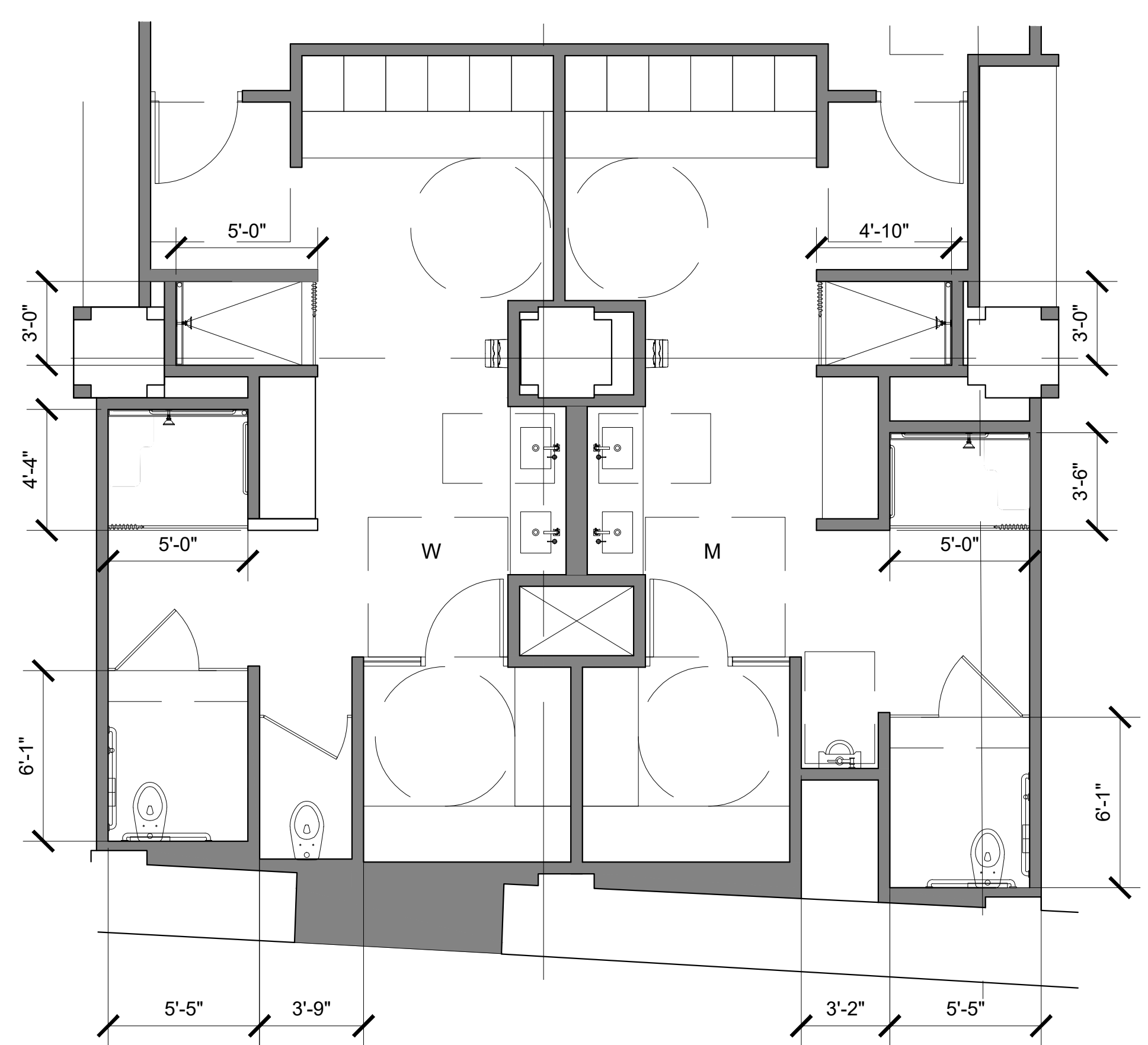
6 13TH FLOOR SKYBAR SERVICE TOILET
1/4" = 1'-0"



5 POOL LEVEL
1/4" = 1'-0"



9 ROOF DECK
1/4" = 1'-0"



8 SPA
1/4" = 1'-0"



0 E OCEAN BLVD,
LONG BEACH,
CA 90802

REVISIONS:	ISSUE DATE:	ISSUE PLANNING APPROVAL: 10-30-2018
ISSUE DESCRIPTION:		
PLANNING APPROVAL	10/30/2018	
MODEL PROJECT No:	18016	
DRAWING DATE:	08/10/2018	

SCALE
1/8"=1'-0"

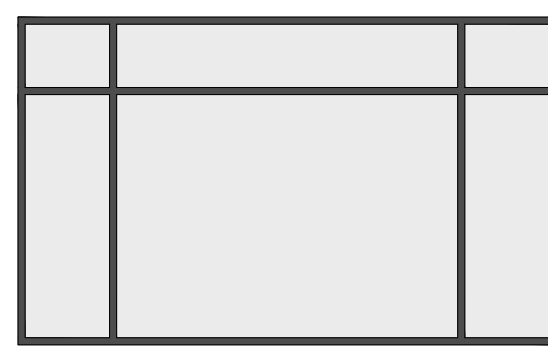
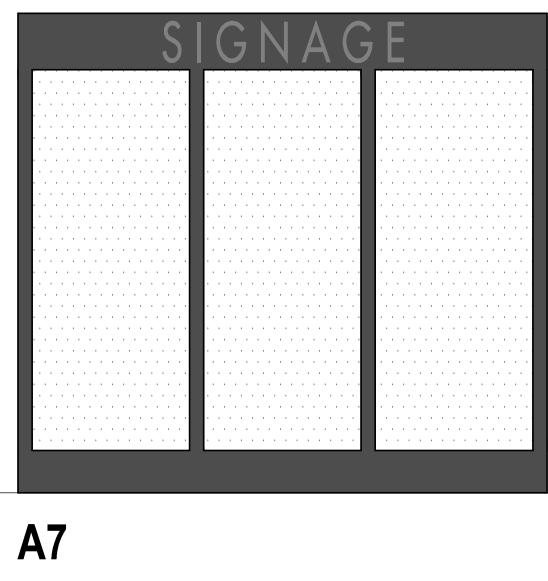
A6.11



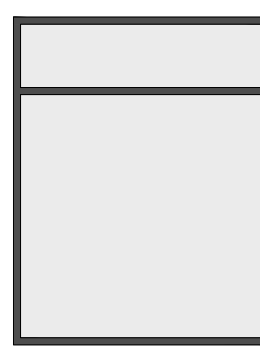
WINDOW SCHEDULE

- WINDOW SYSTEMS:**
EXISTING HISTORIC WINDOWS SYSTEMS TO REMAIN:
- STEEL AND GLASS STOREFRONT WINDOW AT OCEAN AVE WILL BE CLEANED AND REPAIRED AS REQUIRED.
 - STEEL AND GLASS ARCHED WINDOWS WILL BE CLEANED AND REPAIRED AS REQUIRED.
 - STEEL AND GLASS FIXED/CASEMENT WINDOWS AT THE SECOND FLOOR, WINDOWS WILL BE CLEANED AND REPAIRED AS REQUIRED, AND WILL HAVE A NEW SECONDARY ALUMINUM W/ INSULATED GLASS WINDOW SYSTEM INSTALLED DIRECTLY BEHIND, THE MULLION SIZE WILL BE SIZED TO MATCH THE EXISTING WINDOWS
 - STEEL AND GLASS FIXED/CASEMENT WINDOWS AT THE THIRTEENTH FLOOR, WINDOWS WILL BE CLEANED AND REPAIRED AS REQUIRED.
 - SKY ROOM ROOF STRUCTURE/WINDOW SYSTEM, WILL BE REPAIRED AND CLEANED AS REQUIRED. THE INTEGRITY OF THE ROOF STRUCTURE NEEDS TO BE VERIFIED DURING CONSTRUCTION.
- ALUMINUM AND GLASS STOREFRONT SYSTEM:
- THIS STOREFRONT IS INTENDED TO MIMIC THE HISTORIC WINDOWS SYSTEMS INSTALLED IN 1926. THE SYSTEM WILL BE AN ALUMINUM FRAMED STOREFRONT SYSTEM WITH 4X 4-1/2" CENTER GLAZED, BY WAUSAU OR SIM.
- ALUMINUM AND GLASS SIMULATED DOUBLE HUNG WINDOWS SYSTEM:
- 1450 HR SERIES BY WINCO OR SIM.
- STEEL REPLICA WINDOWS:
- 3250 SERIES BY WINCO OR SIM.
- ALL GLASS WINDOW SYSTEM:
- CRL US ALUMINUM- GLASS DOOR PATCH SYSTEMS

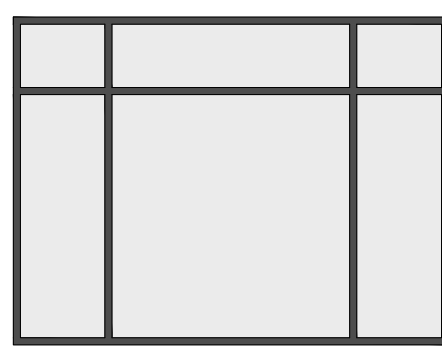
WINDOW NUMBER	OPENING SIZE WIDTH x HEIGHT ALL DIMENSIONS W/F	FRAME MATERIAL / FINISH
A	10'-8" x 17'-0"	AL / PT / P2
A1	10'-8" x 17'-0"	AL / PT / P2
A2	15'-8" x 17'-0"	AL / PT / P2
A3	9'-8" x 17'-0"	AL / PT / P2
A4	9'-8" x 17'-0"	AL / PT / P2
A5	16'-2" x 17'-0"	AL / PT / P2
A6	15'-8" x 17'-0"	WD, EXISTING TO REMAIN
A7	12'-6" x 11'-4"	AL / PT / P2 (DISPLAY CASE)
A8	4'-0" x 6'-0"	AL / PT / P2
A9	2'-8" x 3'-0"	AL / PT / P2
A10	2'-8" x 4'-7"	AL / PT / P2
B	12'-8" x 7'-9"	STL, EXISTING TO REMAIN
B1	6'-0" x 7'-9"	STL, EXISTING TO REMAIN
B2	10'-3" x 7'-9"	STL, EXISTING TO REMAIN
B3	13'-0" x 7'-9"	STL, EXISTING TO REMAIN
B4	15'-8" x 7'-9"	STL, EXISTING TO REMAIN
B5	15'-8" x 7'-9"	STL / PT / P2
B6	2'-8" x 4'-7"	AL / PT / P3
B7	3'-0" x 8'-6"	AL / PT / P3
B8	3'-0" x 8'-6"	AL / PT / P3
B9	7'-7" x 13'-8"	STL, EXISTING TO REMAIN
B10	7'-7" x 13'-8"	STL, EXISTING TO REMAIN
C	4'-0" x 6'-0"	AL / PT / P3
C1	4'-0" x 6'-0"	AL / PT / P2
C2	4'-0" x 6'-0"	AL / PT / P3
C3	2'-10" x 6'-0"	AL / PT / P3
C4	1'-6" x 4'-0"	AL / PT / P3
C5	2'-10" x 6'-0"	AL / PT / P3
C6	11'-3" x 5'-6"	STL, EXISTING TO REMAIN
C7	10'-0" x 3'-10"	STL, EXISTING TO REMAIN
C8	10'-0" x 3'-10"	STL / PT / P3
C9	5'-0" x 5'-8"	AL / PT / P3
C10	48'-10" x 5'-6"	STL, EXISTING TO REMAIN
C11	28'-0" x 6'-0"	STL, EXISTING TO REMAIN
C12	54'-10" x 5'-10"	STL, EXISTING TO REMAIN
C12.1	9'-5" x 5'-5"	STL / PT / P3
C13	3'-0" x 18'-0"	STL, EXISTING TO REMAIN
C14	2'-0" x 6'-0"	AL / PT / P3
C15	2'-0" x 6'-0"	AL / PT / P2
C16	4'-6" x 5'-8"	AL / PT / P3
C17	4'-6" x 5'-8"	AL / PT / P2
D	7'-5" x 10'-4"	AL / PT / P2
D1	7'-4" x 7'-10"	AL / PT / P2
D2	6'-6" x 8'-10"	AL / PT / P2
D3	4'-0" x 6'-0"	AL / PT / P2
D4	7'-5" x 3'-2"	AL / PT / P2
D5	4'-0" x 4'-0"	AL / PT / P2
D6	7'-8" x 2'-6"	AL / PT / P2
D7	7'-8" x 4'-10"	AL / PT / P2
AL	ALUMINUM	
PT	PAINT	
STL	STEEL	
WD	WOOD	
PT2	BLACK, LT601-70 70%, 2 COAT NON INHOUSE BLEND, LINETEC O.S.	
PT3	BONE WHITE, LT609-70 70%, 2 COAT NON INHOUSE BLEND, LINETEC O.S.	



B, EXISTING



B1, EXISTING



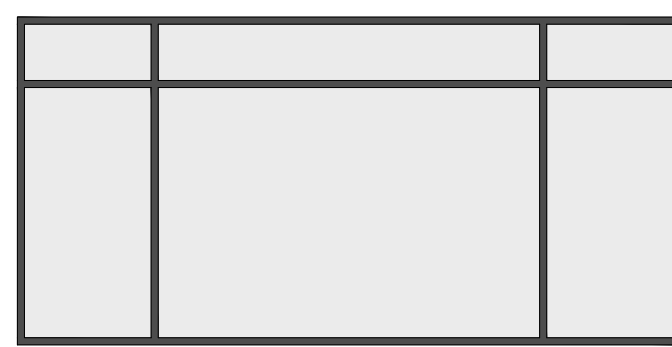
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B3, EXISTING

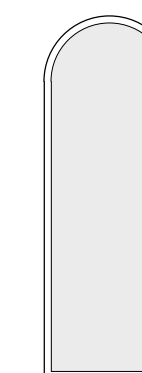


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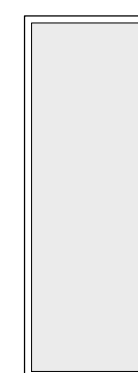


B5

FLOOR LINE



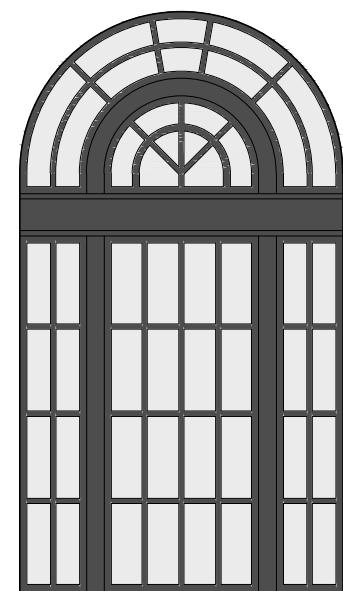
B6



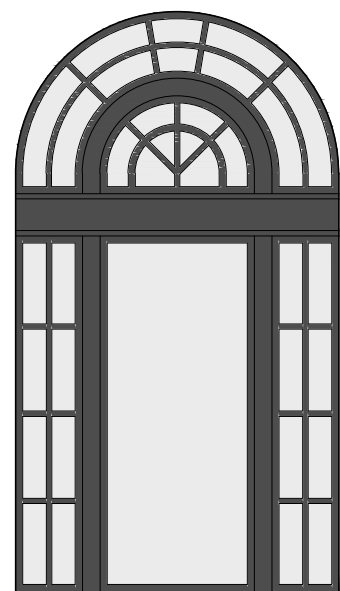
B7



B8

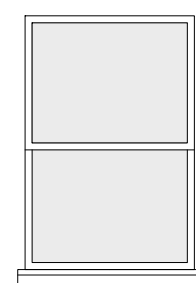


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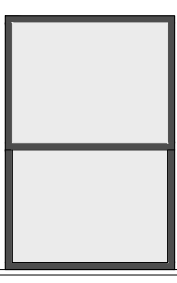


B10, EXISTING

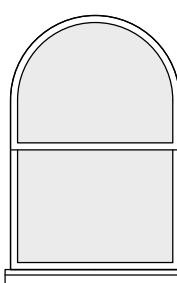
FLOOR LINE



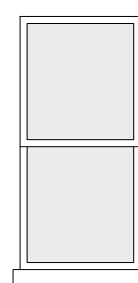
C



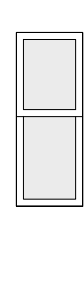
C1



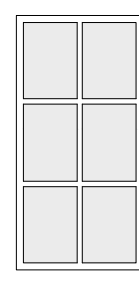
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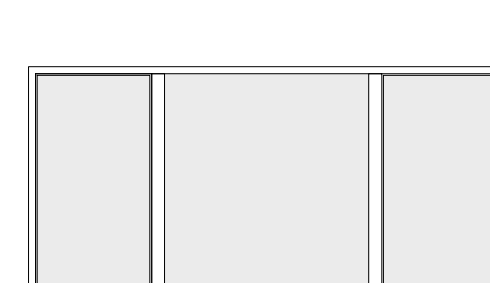
C3



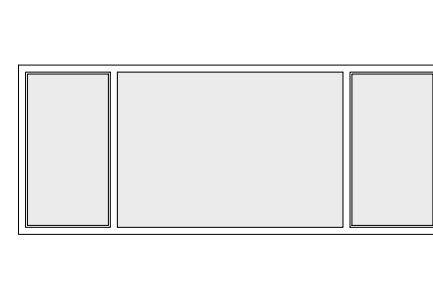
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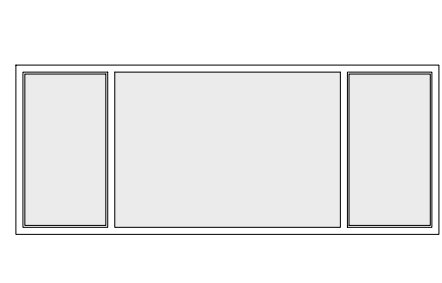
C5



C6, EXISTING

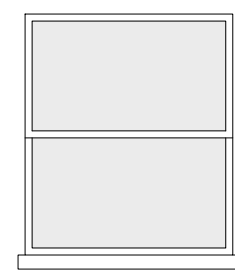


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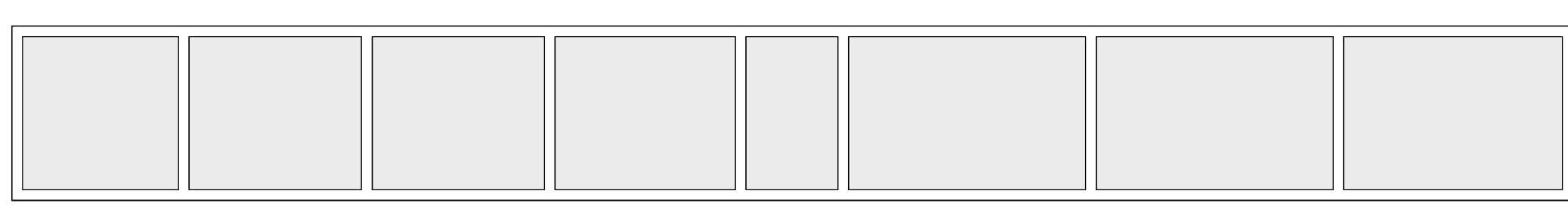


C8

FLOOR LINE



C9

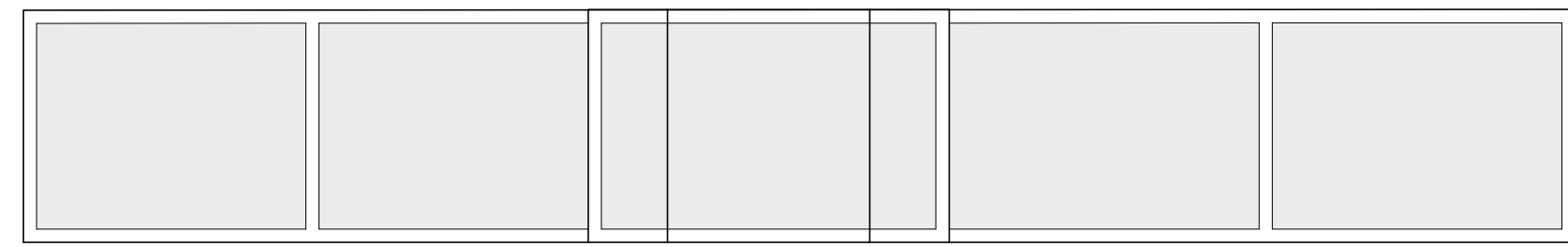


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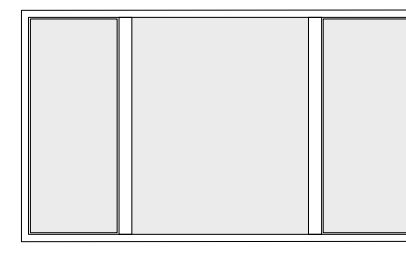


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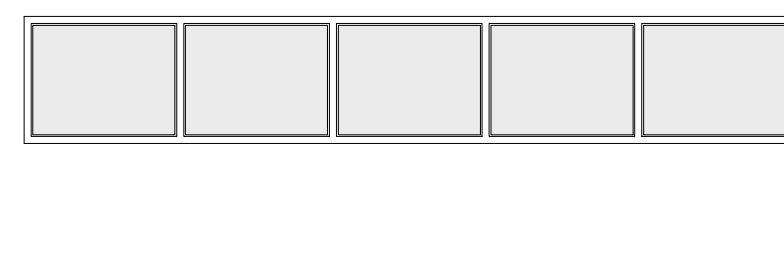
FLOOR LINE



C12, EXISTING



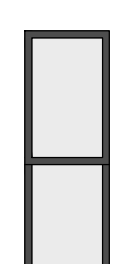
C12.1



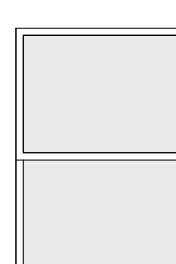
C13, EXISTING



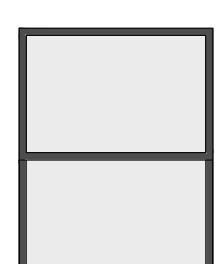
C14



C15

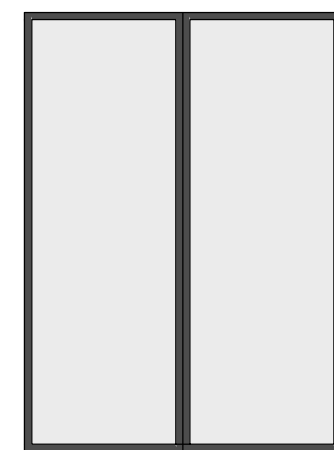


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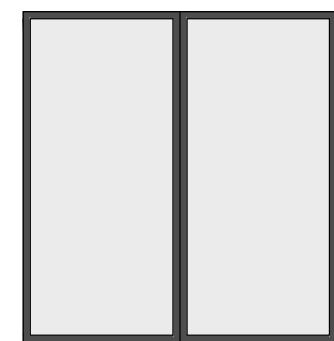


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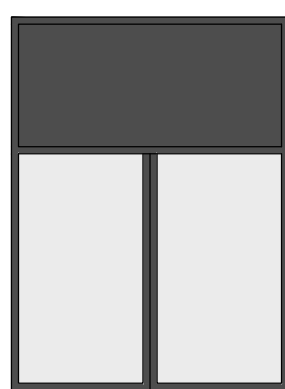
FLOOR LINE



D



D1



D2



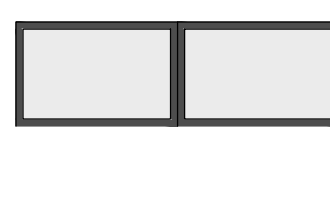
D3



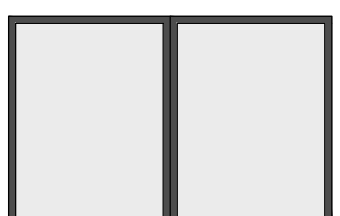
D4



D5



D6



D7

FLOOR LINE

BREAKERS
HOTEL
RENOVATION

210 E OCEAN BLVD,
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REVISIONS:	
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1. ISSUE DESCRIPTION:	1. ISSUE DATE:
2. ISSUE DESCRIPTION:	2. ISSUE DATE:
3. ISSUE DESCRIPTION:	3. ISSUE DATE:
4. ISSUE DESCRIPTION:	4. ISSUE DATE:
5. ISSUE DESCRIPTION:	5. ISSUE DATE:

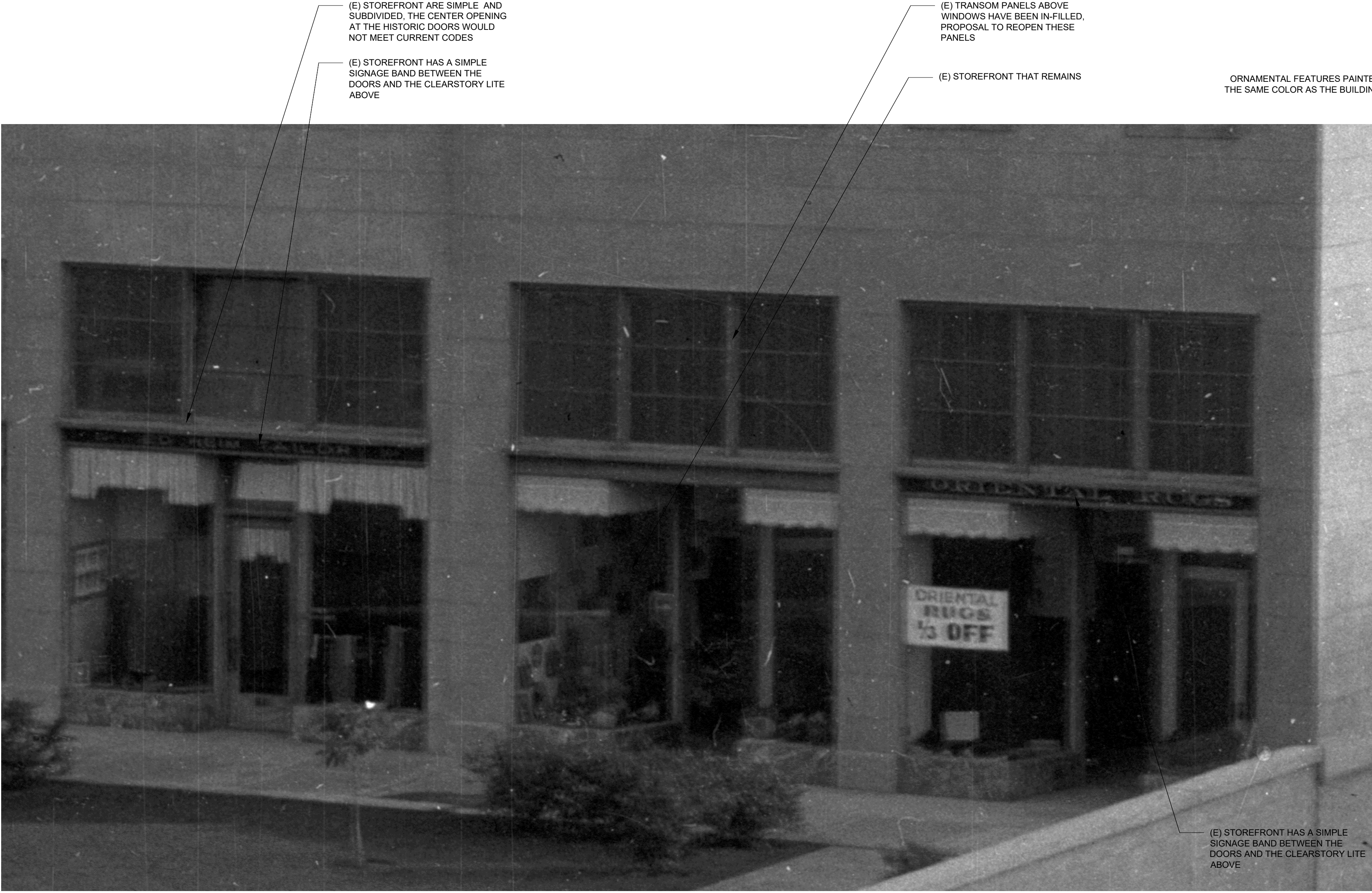
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DRAWING DATE:	08/10/2018
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HISTORIC
PHOTOS

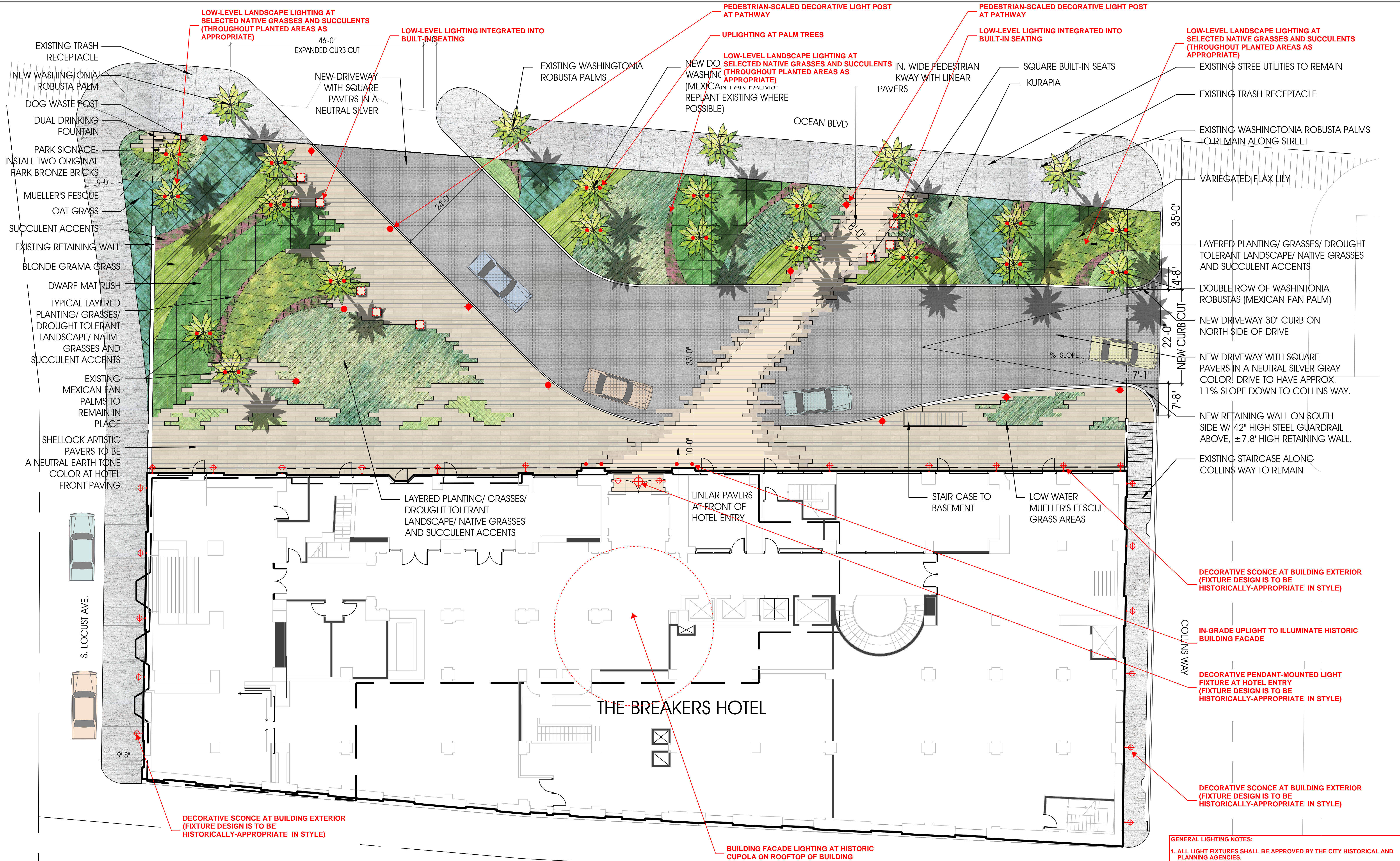
A9.02



1-NORTH - WEST ELEVATION FROM 1926 PHOTO



2- ENLARGED NORTH ELEVATION FROM 1926 PHOTO

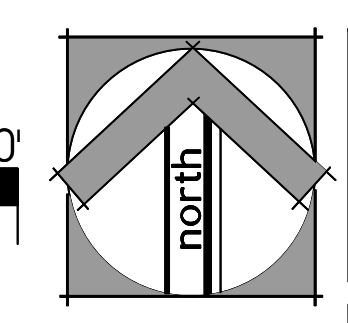
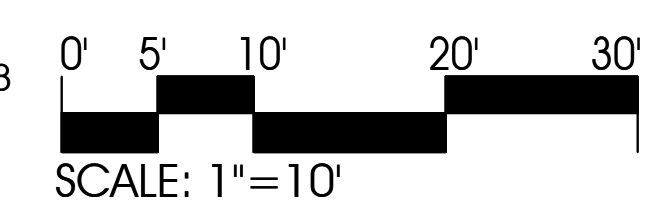


CONCEPTUAL LIGHTING DESIGN

THE BREAKERS HOTEL

LONG BEACH, CA

DATE: 10-25-18



conceptual design & planning company

3195-C Airport Loop Dr, Studio One, Costa Mesa, CA 92626
T: 949.399.0870 F: 949.399.0882 www.cdpcinc.com

6659 Morro Road, Atascadero, CA 93422
T: 805.466.3385 F: 805.466.3204

75 E. Santa Clara St., 6th Floor, San Jose, CA 95113
CDPC PROJECT#: 18056



(E) FLAG POLE TO REMAIN

(E) ROOF TILE TO REMAIN,
PROTECT IN PLACE

(N) ALL GLASS WINDOW SYSTEM BEHIND
(E) COLUMNS, CAPITALS & BALUSTER

(N) ALUMINUM
CAP

(N) BELT COURSE TO
MATCH (E)

(N) STAIR AND ELEVATOR TOWER
WITH SMOOTH CEMENT PLASTER
P4

(N) ALUMINUM AND GLASS
WINDOW SYSTEM TO REPLACE (E)
SAME SIZE, SIMULATED DOUBLE
HUNG WINDOW, P3

(E) ROOF TILE TO REMAIN, PROTECT
IN PLACE

(N) CEMENT PLASTER WALL AT
BACK SIDE OF (E) PARAPET WALL

(E) STEEL AND GLASS WINDOW CLEAN,
REPAIR AND PROTECT IN PLACE WITH (N)
INSULATED GLASS PANELS BEHIND (E)
ALUMINUM MULLION SYSTEM TO ALIGN
WITH (E) STEEL MULLION WINDOWS, P2

(E) FIRE ESCAPE LANDING REMOVE
LADDER AND INFILL LANDING

(N) PAINTED WOOD, STEEL AND
GLASS STOREFRONT SYSTEM, P2

(E) STOREFRONT WINDOW SYSTEM
TO REMAIN, PROTECT IN PLACE

(N) PAINTED WOOD, STEEL AND
GLASS STOREFRONT SYSTEM, P2

POSTER DISPLAY
CASE

(N) 42" LOW IRON
GLASS RAIL

(E) ROOF TILE TO REMAIN,
PROTECT IN PLACE, TYP.

(E) WINDOWS TO REMAIN

(N) ALUMINUM COPING

(E) ROOF TILE TO REMAIN,
PROTECT IN PLACE

(E) BELT COURSE AND
FRIEZE TO
REMAIN, PROTECT IN
PLACE

(E) FAUX BALCONY TO
REMAIN, PROTECT IN
PLACE (3 LOCATIONS)

P1

(N) WINDOWS, PAINTED
ALUMINUM, P3

P4

(N) WINDOWS, PAINTED
ALUMINUM, P2

P1

NADEL SPECIAL
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CLIENT:
ARCO
CONSTRUCTION
OWNER:

pacific6

BREAKERS HOTEL RENOVATION

210 E OCEAN BLVD.
LONG BEACH,
CA 90802

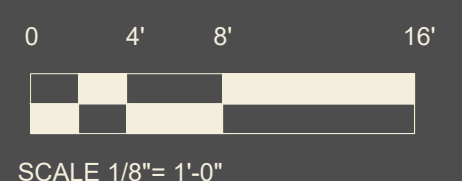
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NO.	DESCRIPTION	
1	PLANNING APPROVAL	10/30/2018

NADEL PROJECT No: 18016
DRAWING DATE: 08/10/2018

SCALE
1/8"=1'-0"

NORTH
ELEVATION

A1



**BREAKERS
HOTEL
RENOVATION**

210 E OCEAN BLVD.
LONG BEACH,
CA 90802

REVISIONS:		ISSUE	DATE
NO.	DESCRIPTION		
	PLANNING APPROVAL		10/30/2018

NADEL PROJECT No: 18016
DRAWING DATE: 08/10/2018

SCALE 1/8"=1'-0"

WEST
ELEVATION

A2

(E) ROOF TILE TO
REMAIN,PROTECT IN PLACE

(N) ALL GLASS WINDOW
SYSTEM BEHIND
(E) COLUMNS & CAPITALS

(N) 42" LOW IRON
GLASS RAIL

(N) PAINTED STEEL
GUARDRAIL

(E) ROOF TILES TO
REMAIN,PROTECT IN PLACE

(E) WINDOW
SYSTEM TO REMAIN

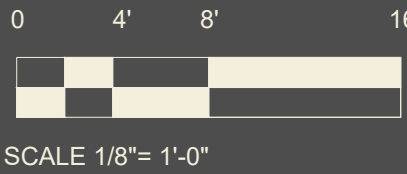
P1

(N) WINDOWS PAINTED
ALUMINUM, P3

P4

(N) WINDOWS PAINTED
ALUMINUM, P2

(E) WINDOW
TO REMAIN, P2



**BREAKERS
HOTEL
RENOVATION**

210 E OCEAN BLVD.
LONG BEACH,
CA 90802

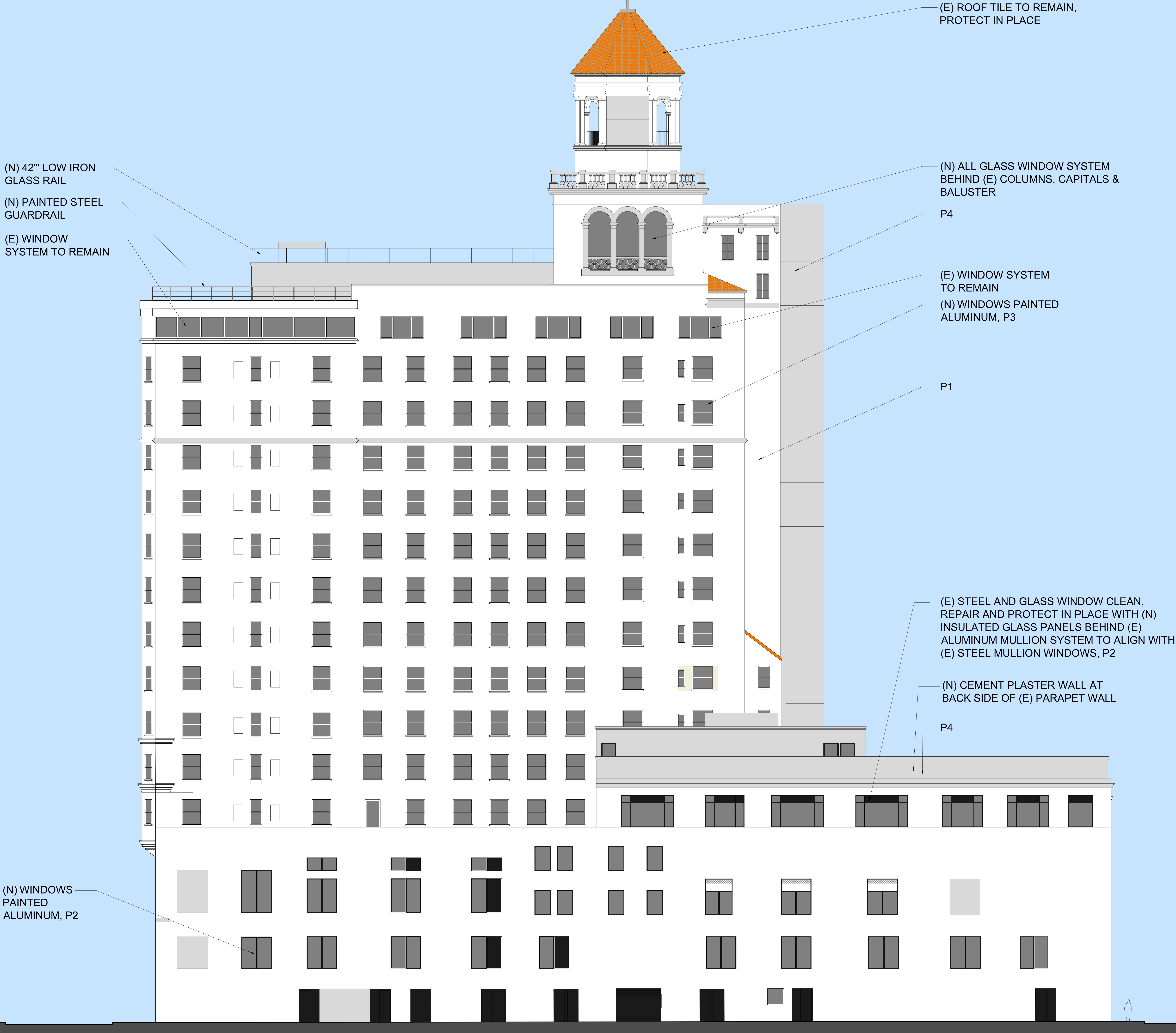
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NO.	DESCRIPTION	
	PLANNING APPROVAL	10/30/2018

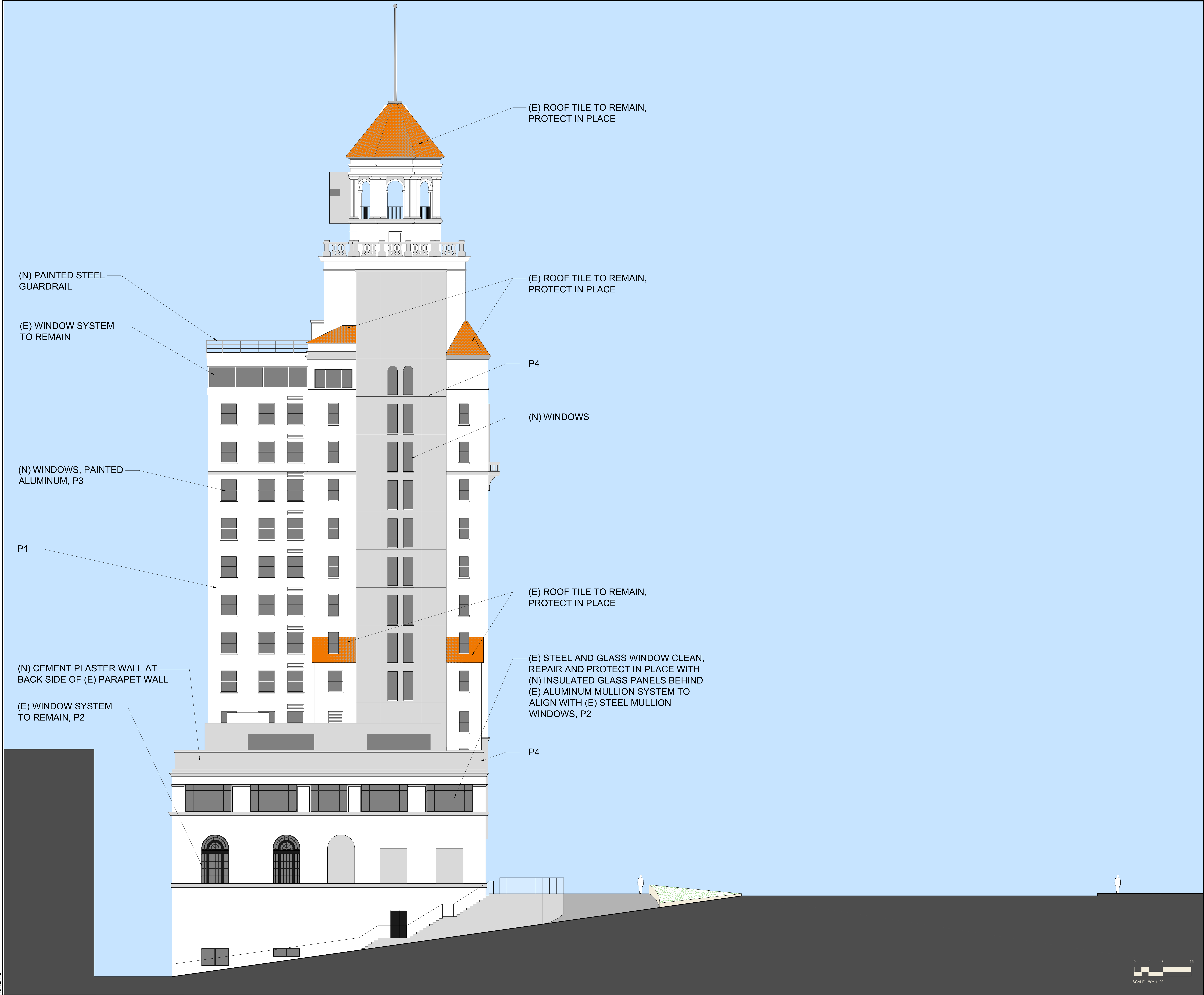
NADEL PROJECT No: 18016
DRAWING DATE: 08/10/2018

SCALE
1/8"=1'-0"

**SOUTH
ELEVATION**

A3





**BREAKERS
HOTEL
RENOVATION**

210 E OCEAN BLVD.
LONG BEACH,
CA 90802

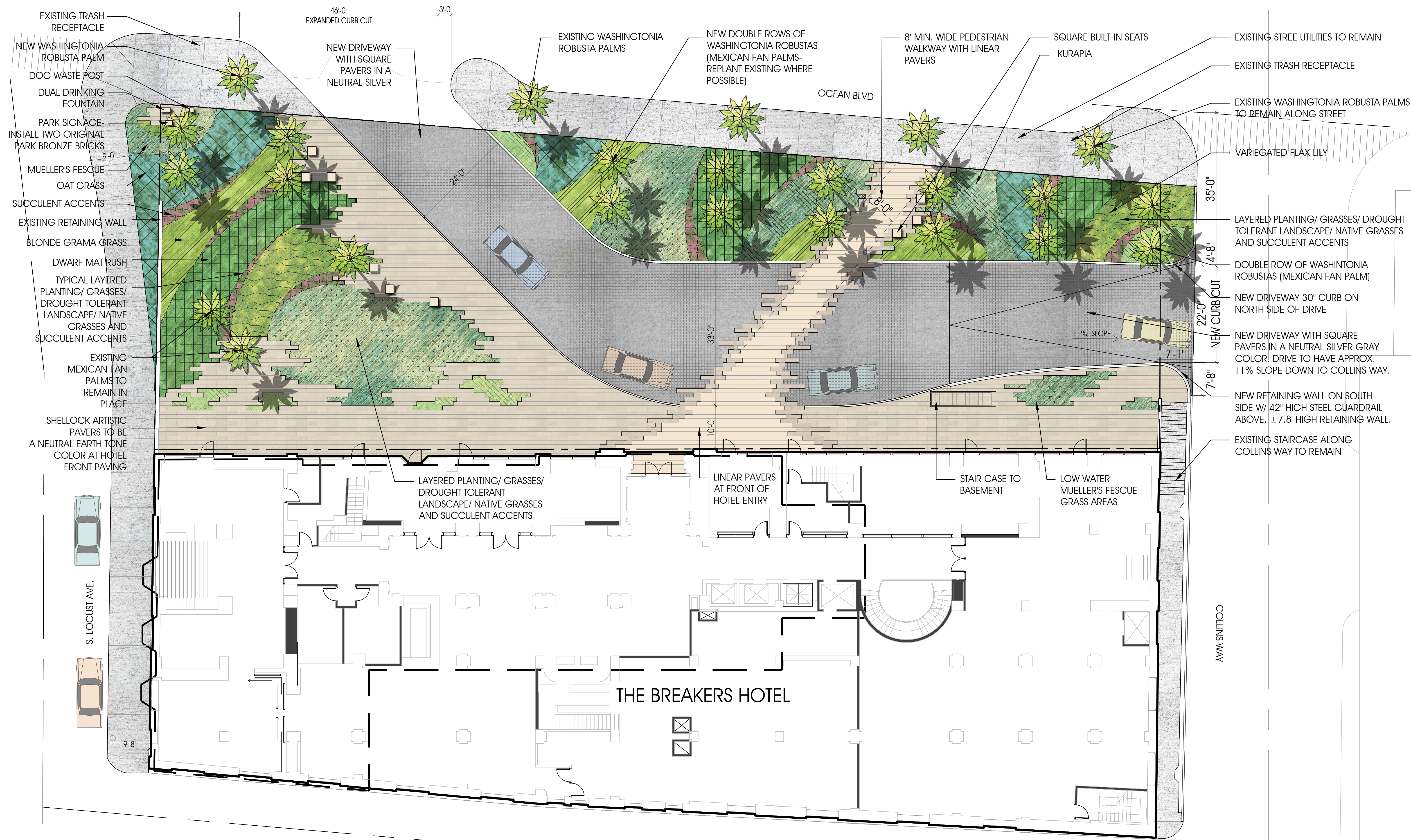
REVISIONS:		ISSUE DATE
NO.	DESCRIPTION	
1	PLANNING APPROVAL	10/30/2018

NADEL PROJECT No: 18016
DRAWING DATE: 08/10/2018

SCALE
1/8"=1'-0"

**EAST
ELEVATION**

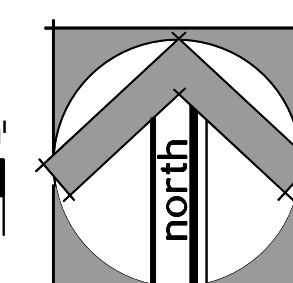
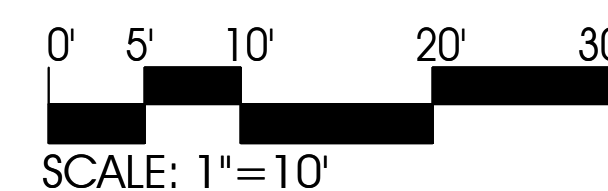
A4



CONCEPTUAL LANDSCAPE DESIGN THE BREAKERS HOTEL

LONG BEACH, CA

DATE: 10-25-18



conceptual design & planning company

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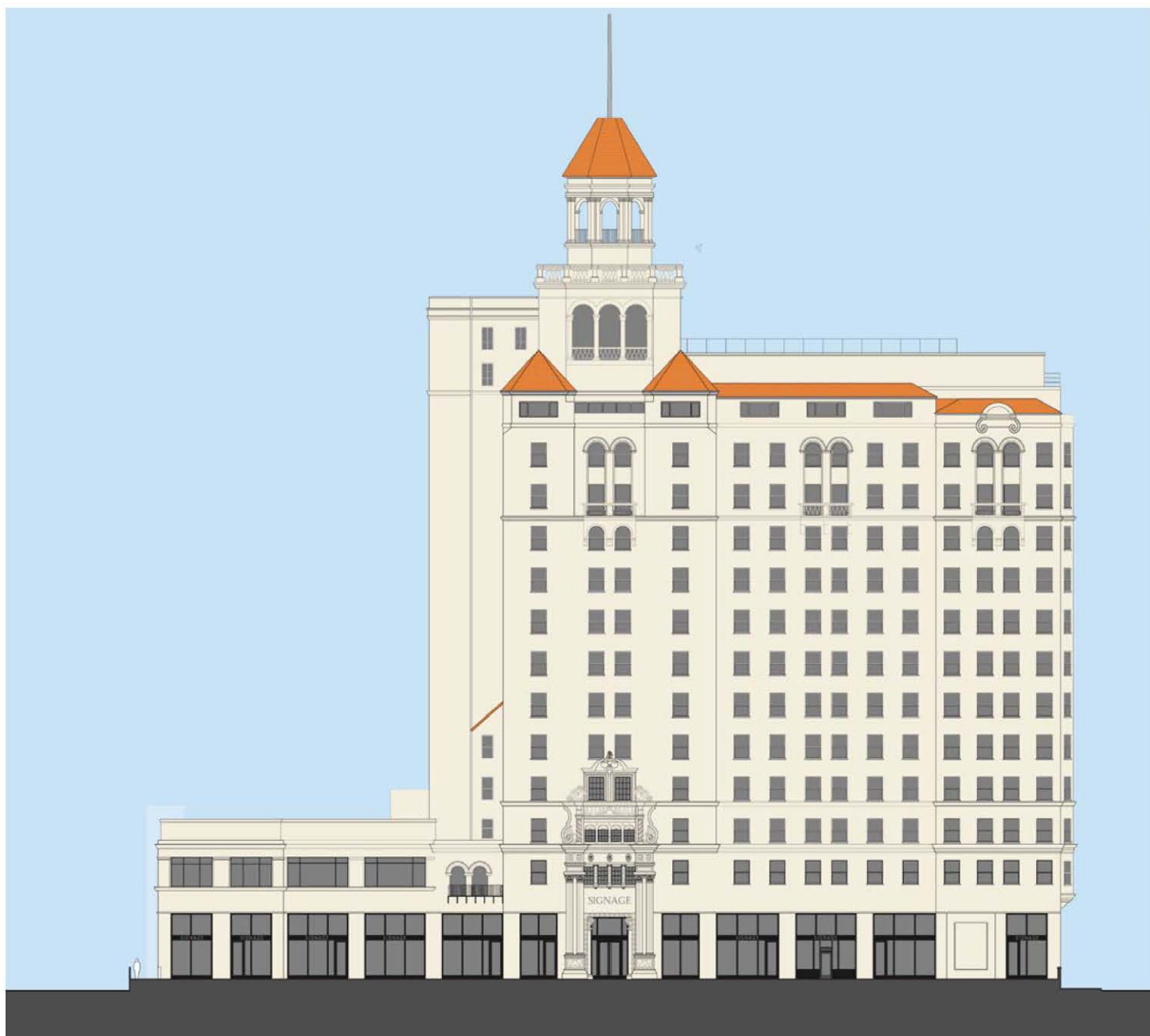
CDPC PROJECT#: 18056



Overland Traffic Consultants, Inc.

BREAKERS HOTEL

TRANSPORTATION DEMAND MANAGEMENT PLAN



**Located at
210 E OCEAN BOULEVARD
in the City of Long Beach**

OCTOBER 2018

TRANSPORTATION DEMAND MANAGEMENT PLAN

Breakers Hotel – 210 E Ocean Boulevard

I. Introduction

The Breakers Hotel is located on the south side of Ocean Boulevard between Locust Avenue and Collins Way. The project development proposes to renovate the existing historic building for a 185-room hotel, 7,785 square foot spa/fitness center and return of the 990 square foot Cielo and 4,140 square foot Sky Room Bar & Restaurant. This Transportation Demand Management (TDM) Plan has been developed to promote actions to reduce vehicle trips during peak commute hours to/from the site and reduce parking demand by encouraging changes to single occupant vehicle behavior.

II. Goals of the TDM Plan

The Breakers Hotel is located in an area where there is mass transit, ridesharing and cycling opportunities available to guests of the hotel, patrons of the spa/fitness area, restaurant and bar and employees. This is a Project whereby guests of the hotel will likely make use of the spa/fitness area, restaurant, and bar opportunities available on site.

The success of the TDM plan is dependent on the type and level of TDM strategies implemented. The key to developing an effective program is to determine what strategies the guests, patrons and employees of the Breakers Hotel Project would be able to use and then build the program incentives around those strategies.

The highlight of this TDM Plan for hotel guests who would arrive to the area and/or would like to visit other areas of the City of Long Beach and employees of the hotel, spa, restaurant and bar is its proximity to the Transit Gallery and Metro Rail Station. This entry to the Transit Gallery is across Ocean Avenue from the hotel and approximately 1,120 feet walking distance from the Project to the Metro Transit Center at Long Beach Boulevard and 1st Street. These are City amenities likely to reduce vehicle trips to and from the site more than any other feature.

This TDM plan has been prepared as the first step in the implementation of an on-site program to effectively further reduce vehicle trips to and from the site.

III. Scope of TDM Programs

The scope of the TDM program is detailed below for the Breakers Hotel Transportation Demand Management Office.

a. Transportation Management Office (TMO) for Hotel, Residential and Commercial Components of the Project

The Breakers Hotel Transportation Management Office (TMO) will be charged with accomplishing trip reductions through the development and refinement of a site-specific TDM program. The TMO office may be part of the hotel concierge service or a property management office. The TDM program will encompass alternatives to driving alone and the strategies that encourage use of other modes of transportation. The TDM strategies will rely on incentives or disincentives to make these changes in the travel behavior attractive. Sponsorship of the TMO staffing and operations will be the responsibility of the hotel and commercial ownership (including spa, restaurant(s) and bar) of the Breakers Hotel Project.

TMO Responsibilities:

1. Development of TDM Program - The TMO will define and refine the program goals (e.g., a change in average vehicle occupancy; a reduction in daily trips; and/or a reduction in peak hour vehicle trips) based on a voluntary acceptance level of site congestion and parking utilization.
2. Selection of TDM Strategies - Site-specific analysis and examination of the target population (hotel and commercial) will be conducted by the TMO to define the baseline for selecting the most appropriate strategies for the Breakers Hotel TDM program. The difference in the baseline and program goals defines how aggressive the program will be. Site analysis should include periodic guest/patron/employee surveys, traffic flow and parking occupancy counts.
3. Distribution of Ridesharing Information - A transportation coordinator will assist individuals in assessing transit options. The transportation coordinator will assist individuals in identifying the easiest way for them to purchase their mass transit passes. The TMO will provide bus and rail schedules, maps of bicycle routes, relevant phone numbers including Long Beach Transit Services and Metro Rail services. A computer terminal or assistance will be available to research alternative modes of travel.
4. Distribution of Transit Information - A transportation coordinator will assist individuals in assessing transit options. The transportation coordinator will assist individuals in identifying the easiest way for them to access and purchase their mass transit passes. The Transportation Management Office will provide bus and rail schedules, maps of bicycle routes, relevant phone numbers. A

computer terminal or assistance will be available to research alternative modes of travel.

5. Marketing & Promotion - The Transportation Management Office will be located on the Project site so as to be available to both employees of the hotel and commercial components. Concierge services will assist guests of the hotel with alternate mode of transportation options and guidance. The TMO will provide promotional ridesharing information to all new employees within two weeks of employment. The hotel guests will be provided ridesharing options including local transit services and cycling as part of hotel services in each room. In addition, the TMO will conduct marketing and promotional items such as, an annual ridesharing event planned by the TMO office to provide visibility to the program. The TMO will be responsible for building and maintaining management support of the program, "corporate commitment".
6. The Transportation Management Office will maintain a display which will be located in a centralized area for viewing transit options. Bus and rail maps will be displayed. In addition, incentives and benefits for alternative modes of travel will be prominently displayed including social, economic and health benefits.
7. Program Evaluation and Refinement - A periodical review of the TDM program will be conducted by the TMO to measure the attainment of program goals, to refine ineffective strategies and to adjust the TDM plan to reflect changing circumstances associated with the site.

b. Encouraging Alternative Modes of Travel – Hotel Guests

The Breakers Hotel Project is in a good location for encouraging alternative modes of transportation. The pedestrian, cycling and transit opportunities offer a stay without reliance on a vehicle.

1. The Breakers Hotel is immediately adjacent to the Long Beach Convention Entertainment Center east of Collins Way and southeast of Collins Way and Seaside Way. Pedestrian access is available along Ocean Avenue, Collins Way and Seaside Way.
2. On site bicycles will be available to guests. In addition, bicycle rental services are provided on the north side of Ocean Avenue across from the Hotel along The Promenade. The Breakers Hotel will provide bicycle route maps available to guests with assistance and guidance if needed.

3. Transit opportunities are available upon arrival and departure from the Long Beach Airport without reliance on a vehicle. Guests arriving or departing from the Long Beach Airport may take Route 111-112 from the airport and arrive at the Long Beach Transit Gallery on 1st Street between Pacific Avenue and Long Beach Boulevard. It is approximately a 650-foot walk to the hotel.
4. Transit opportunities are available upon arrival and departure from the Long Beach Cruise Center without reliance on a vehicle. Guests arriving or departing from the Cruise Center may take the free Passport bus service and/or a Water Taxi. There is a stop on Ocean Avenue east of Collins Way approximately 300 feet from the entrance to the hotel.
5. The Free Passport bus service provides transport to/from many destinations within the City of Long Beach including the Queen Mary, Aquarium of the Pacific, City Place Mall, The Pike at Rainbow Harbor, Shoreline Village and the Long Beach Transit's water taxis.
6. Breakers Hotel will highlight the opportunities available to guests to arrive, depart and enjoy their stay without the use of a vehicle. This will promotion will be conducted on their website, check in material, pamphlets, concierge service and within the guestrooms.

c. Encouraging Alternative Modes of Travel - Employees

The following strategies for encouraging alternatives to the single occupant vehicles will be available to employees of the hotel and commercial components at the site. The strategies fall into three categories: providing commute alternative information and marketing; providing incentives to employees who use commute alternatives; and parking management programs.

1. Alternative Work Arrangements –
 - a. Standard Hour Weekly Employees:
 - i. Compliance with California's parking cash-out law which requires certain employers who provide subsidized parking or their employees to offer a cash allowance in lieu of a parking space for retail and hotel employees.

- ii. Where feasible, staggered work hours where employees start work times are scheduled at intervals so that different groups of employees begin work at a different time.
- iii. Where feasible, compressed work week programs that allow employees that work standard weekday hours to instead work a full work in fewer than five days such as four – ten-hour days, or two weeks with eight – nine-hour days and one eight-hour day.
- iv. Guaranteed Ride Home services encourage employees to use alternative modes of travel

2. Transit Availability –

- a. There is an existing Transit Gallery on 1st Street between Long Beach Boulevard and Locust Avenue approximately 650 feet walking distance from the Project site.
- b. There are several transit options for employees of the commercial components. These include:
 - i. Metro Blue line provides service between downtown Long Beach and downtown Los Angeles. There are multiple stops within the City of Long Beach including Anaheim Street and Long Beach Boulevard, Pacific Coast Highway and Long Beach Boulevard, Willow Street and Long Beach Boulevard, Wardlow Road and Long Beach Boulevard, and Del Amo Boulevard and Santa Fe Avenue. Northerly the Metrorail line stops at the Artesia Boulevard station east of Santa Fe in Carson, then in Compton, Watts, Florence, Grand Avenue south of the I-10 Freeway, Pico along Flower/Hope Street and the 7th Street Metro Center. This Line connects to the Metro Red Line and Metro Purple Line at the 7th Street Metro Center.
 - iii. Long Beach Transit provides bus service 71 and 72 along Ocean Avenue. These routes provide multiple stops in the City of Long Beach with service along

Ocean Boulevard, Alamitos Avenue, Orange Avenue and Rosecrans Avenue. There is a stop on Ocean Avenue east of Collins Way approximately 300 feet walking distance from the front door of the hotel for eastbound travel. There is a stop on Ocean Avenue west of Locust Avenue approximately 650 feet walking distance from the front door of the hotel for westbound travel.

iiii. Numerous other bus routes are in the Project area. A current map of the options available is attached and current map should be provided on the centrally located display and employee packages. The TMO office will provide transit options upon employment on the display and upon request.

3. Carpooling –

Carpool matching will be conducted by the TMO office for employees of the restaurants, bar and spa and hotel.

4. Vanpooling –

Vanpool matching will be conducted by the TMO office for employees of the restaurant, bar, spa and hotel.

5. Pedestrian & Bicycle Facilities –

- a. The project provides pedestrian access ways and secure bicycle facilities to accommodate storage of bicycles.
- b. An on-site bicycle sharing program will be developed for the employees of the site.
- c. Showers are provided on site for employees' use.

6. Drop off/Pick up areas for ridesharing will be provided with an existing porte-cochere area along the front of the hotel

7. Transit & Ridesharing Incentives - The TMO office will provide incentives to employee transit and ridesharing participants. The incentives can be on a regular basis such as quarterly, or as an introductory incentive to encourage first time use of commute alternatives. Subsidies can include free first-time metro rail ride, discounted transit passes; or incentives with

indirect economic value (e.g., paid time off, points/coupons for merchandise, free or discounted bicycles, equipment, etc.). To qualify for the incentives, the employees must register with the TMO office and rideshare, use mass transit, walk or ride a bicycle a minimum of four days per week.

8. **Guaranteed Ride Home** - Some employees may hesitate to walk/bicycle/rideshare/use mass transit because there is concern that they will not be able to get home easily in the event of an emergency. Employees registered with the TMO office will qualify for a guaranteed ride home via taxi, Uber, Lyft etc. in the event of an emergency such as a sick/injured child or parent.

IV. Sample of Written Information to Employees – see attachment A (Copy of the current area and connecting transit services, local bikeways, and program incentives to be included with information upon presentation).

Attachment A

Sample of Written Information to Employees

Note: Current Transit and cycling attachments will be provided upon presentation of letter. Draft Cover letter and October 2018 Transit only shown.

BREAKERS HOTEL

Transportation Demand Management

For Employees

The BREAKERS HOTEL has a commitment to the community to reduce vehicular trips to and from the site. The goal of the project is to reduce congestion, improve air quality and improve quality of life through choices to limit single occupancy vehicle usage. This can be accomplished in a variety of ways including: walking, bicycling, carpooling, vanpooling, and using mass transit.

Breakers Hotel has a Transportation Management Office located at XX which can assist you in identifying ways to participate.

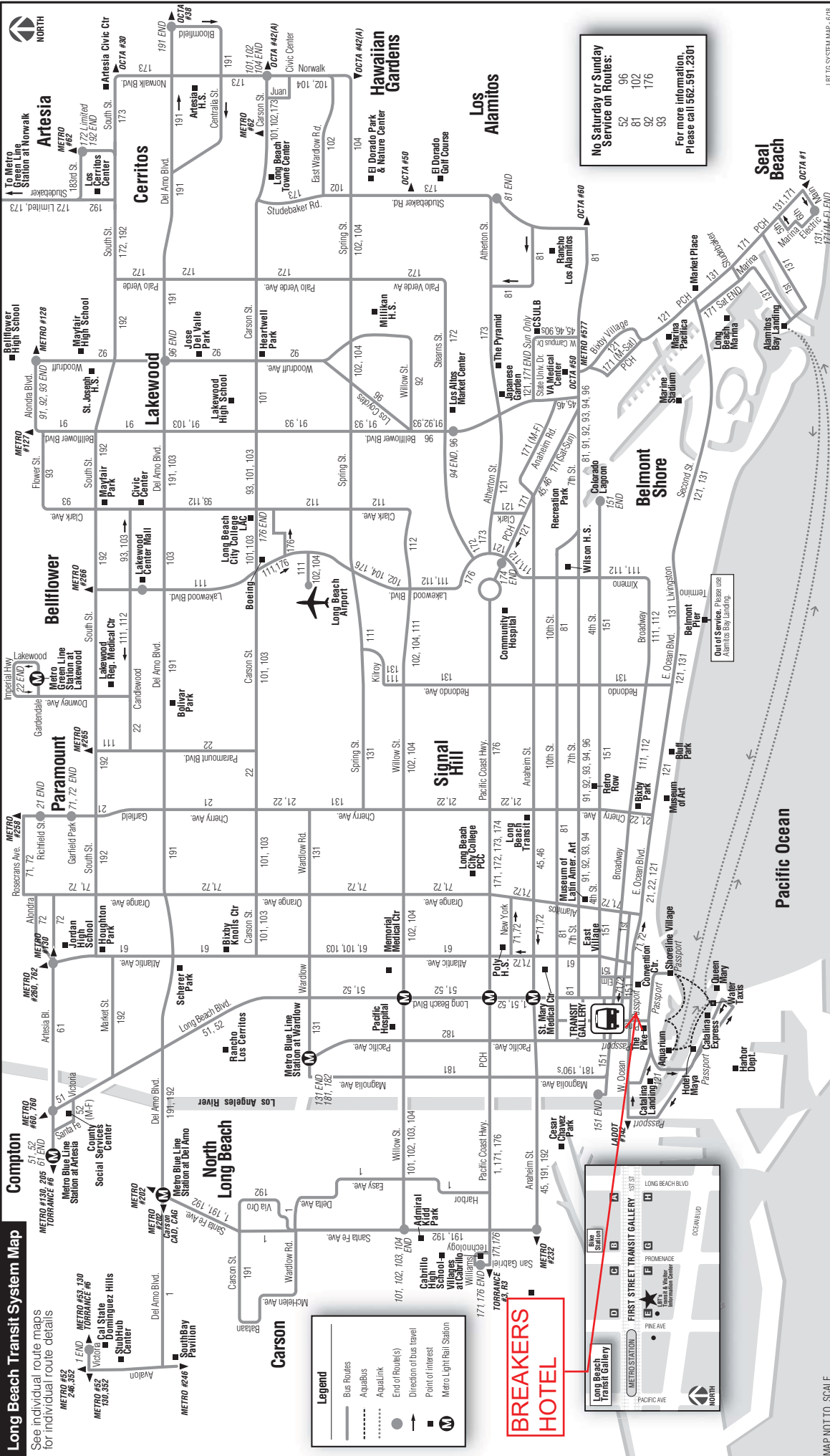
- Comfort – You can get where you're going without doing the driving. Relax, nap, read, or visit with other passengers.
- Time Savings: As traffic congestion increases, you can frequently save time by hopping on a local Metro bus and commuter bus
- Cost Savings – Mass Transit passes are available at a reduced rate through the TMO Office
- Raffles – We want to thank you for your participation in assisting us to reach our vehicle trip reductions. We will hold monthly raffles for all participants registered with the TMO. Potential prizes include items such as theater tickets, movie tickets, and lunch vouchers.

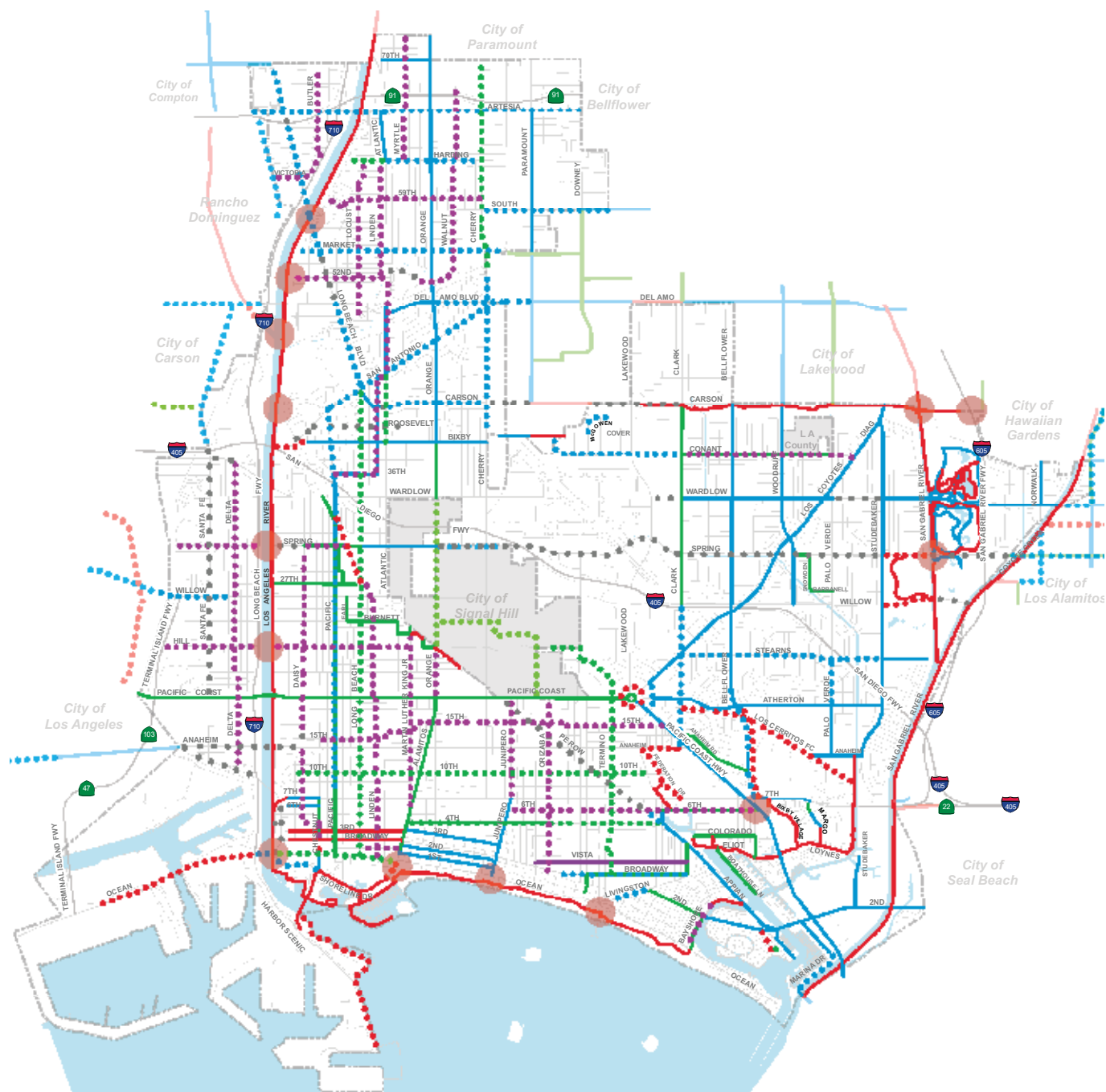
Breakers Hotel is located in the Long Beach area which offers so several opportunities for you to help us achieve our vehicle reduction goals.

- Walking: Immediately surrounding Breakers Hotel are many entertainment, dining and shopping opportunities. Maps are attached which display the multitude of venues in the surrounding area.
- Bicycling: Traveling on a bicycle in the area has become more prevalent in recent years. Breakers Hotel provides secure bicycle lockers for your use located at XX. In addition, if needed, showers are provided at XX.
- Carpooling/Vanpooling:
 - The TMO office can assist you in identifying other employees of this and nearby venues who share a similar work schedule and route as you do. A drop-off and pick-up area is conveniently located along the front of the building for your use.
- Mass Transit: You work in an area which has several mass transit, ridesharing walking and cycling opportunities. The Transit Gallery is 650 feet (less than 1/8th of a mile) from the site. You can get just about anywhere from here. Transit Maps are attached. Visit the TMO office for assistance and to purchase your transit pass at a reduced price.




Long Beach Transit System Map

See individual route maps for individual route details





Existing Bikeways

- Bike Boulevard
-  Class I Bikeway/Protected Lanes
- Class II Bikeway
-  Class III Bikeway/Sharrows
- To Be Determined
-  Bike Bridge/Access Improvement

**SITE PLAN REVIEW FINDINGS
210 East Ocean Boulevard
Application No. 1806-19 / SPR18-033
November 15, 2018**

Pursuant to Section 21.25.506 of the Zoning Ordinance, the Planning Commission shall not approve a Site Plan Review unless the following findings are made. These findings and staff analysis are presented for consideration, adoption, and incorporation into the record of proceedings.

A. THE DESIGN IS HARMONIOUS, CONSISTENT, AND COMPLETE WITHIN ITSELF AND IS COMPATIBLE IN DESIGN, CHARACTER, AND SCALE WITH NEIGHBORING STRUCTURES AND THE COMMUNITY IN WHICH IT IS LOCATED;

The proposed Breakers Hotel (Project) involves the renovation and change of use of The Breakers Hotel (City-designated Historic Landmark) into a 185-room hotel with food and beverage venues (with on-site alcohol), banquet/meeting areas, and amenity uses in the Coastal Zone at 210 East Ocean. The project would reuse an existing landmark building located on a site that measures 0.49 acres and has frontages on Locust Avenue (west) and Collins Way (east). Victory Park, a public park, buffers the site from Ocean Boulevard to the north. The centerline of a vacated alley (former Marine Way) forms the southern property line of the site. The site shares its southern boundary with a multi-family residential development (five-stories of apartments over a two-story parking garage) located at 207 Seaside Way, which is currently under construction. The site is improved with a thirteen-story building, constructed in 1925, with a 14th floor cupola and rooftop area. There is no on-site parking for the existing building. At present, vehicle access to the building is maintained through a circular driveway in Victory Park with one entrance and one exit on Ocean Boulevard.

The Project is harmonious, consistent, and complete within itself. The project will restore the building back to its original use as a hotel. The use will include food and beverage venues, banquet/meeting facilities, and amenity uses that would serve both local and hotel patrons. The use will introduce new accommodations to further serve tourists, business visitors, concert and playgoers, and special interest groups in the greater downtown environment. The exterior modifications to the building would work within the constraints of the existing building and site, and would be subject to the Secretary of Interior's (SOI) Standards for Rehabilitation.

The 10-foot addition to the tower portion of the building would accommodate a new stairwell and service elevator. The addition of the stairwell and service elevator is a necessary life safety improvement for the building that provides a gurney elevator and code compliant stairwell. The Cultural Heritage Commission (CHC) has approved and placed conditions on the design of the stairwell addition to ensure that the new work complies with the SOI Standards for Rehabilitation.

In addition, the new pool deck and terrace areas on the 3rd floor and 14th floor roofs were designed to minimize visibility, while providing amenity space for the proposed use.

Ground floor storefronts would feature a historically appropriate storefront system, and all above grade non-historic windows would be replaced with new aluminum windows.

Building elements for the new stairwell addition, new 3rd floor parapet, and 14th floor terrace have been conditionally approved by the CHC to integrate into the building design, while also differentiating the new and original building elements.

The proposed design modifications to the City-designated landmark building were approved by the CHC in August 2018. The required findings determined that the modifications, as conditioned, would comply with the SOI Standards for Rehabilitation. These findings ensure that the proposed building modifications, are harmonious, consistent, and complete within itself. The design of these modifications would be compatible, but differentiated from the original structure, pursuant to the SOI Standards.

B. THE DESIGN CONFORMS TO ANY APPLICABLE SPECIAL DESIGN GUIDELINES ADOPTED BY THE PLANNING COMMISSION OR SPECIFIC PLAN REQUIREMENTS, SUCH AS THE DESIGN GUIDELINES FOR R-3 AND R-4 MULTI-FAMILY DEVELOPMENT, THE DOWNTOWN DESIGN GUIDELINES, PD GUIDELINES, OR THE GENERAL PLAN;

The Project site is located within Subarea 7 of the Downtown Shoreline Planned Development District (PD-6). Subarea 7 references the Breakers Hotel building and overall standards that apply to all development projects in this specific subarea. The project would reuse the existing landmark building and all new building enhancements would be required to comply with the standards outlined in PD-6. As conditioned, the Project would be consistent with the listed general guidelines, which includes pedestrian oriented walkways, bird-safe building design, and lighting standards.

Subarea 7 of PD-6 permits residential, hotel, and office with hotel or residential uses. In addition, commercial uses are permitted at the Ocean Boulevard level and levels below Ocean Boulevard. In addition, restaurants may be permitted on the top levels of buildings in this subarea. The proposed use is a hotel with restaurants, banquet/meeting space, and commercial areas consistent with the provisions outlined for Subarea 7. In addition, the use is consistent with the PD-6 (Subarea 7) provisions for the Breakers Hotel site, "If the Breakers is replaced, its site shall be reused for hotel or residential use" (p. 48, [a]). With regard to the provision of affordable overnight visitor accommodations, the proposed use is compatible with the permitted uses for Subarea 7 (and specifically the Breakers Hotel Building) and the mitigation policy for affordable overnight accommodations is specifically outlined for Subarea 1(a) (Golden Shore Master Plan).

The conceptual changes to Victory Park would provide new landscaping and amenities to the park that are not present under existing conditions. The driveway realignment would remove the existing vehicle exit from Ocean Boulevard and relocate vehicles onto Collins Way. The relocation of this vehicular exit would be an improvement to park and pedestrian safety. This relocation would eliminate one point of vehicle and pedestrian conflict along Ocean Boulevard. In addition, the relocation of the driveway exit onto Collins Way would provide a more continuous area of Victory Park along the Ocean Boulevard frontage. PD-6 acknowledges that existing buildings maintain vehicular access from Ocean Boulevard and may keep existing access points for vehicles, "Existing buildings may utilize existing Ocean Boulevard access provided that such access is only for passenger loading and unloading" (p. 48, [b.1]). The new walkways and seating areas in Victory Park would improve the overall pedestrian access to and use of the park, consistent with the general development and use standards for PD-6.

The overall landscape design is proposed in a manner to provide both drought tolerant landscaping and hardscape areas that allow for new public seating areas. The proposed landscaping would consist of a sustainable planting palette that would provide attractive landscape design to enhance the existing park space. The addition of walkways and seating areas represent public amenities that are not present under the existing conditions.

The Project is consistent with the design guidelines in a number of other ways as well, including the provision of ground floor uses accessible from Ocean Boulevard, appropriate site lighting, and overall restoration of the landmark building.

C. THE DESIGN WILL NOT REMOVE SIGNIFICANT MATURE TREES OR STREET TREES, UNLESS NO ALTERNATIVE IS POSSIBLE;

Victory Park buffers the 0.49-acre project site from Ocean Boulevard. At present, there are turf areas, palm trees, and planting areas within the park. As part of this entitlement, the project would include reconfiguring the driveway in Victory Park and installing new landscaping. The landscaping and architectural details of Victory Park are conceptual and subject to minor changes and adjustments prior to final construction. A condition of approval has been included in the project to reuse or relocate the existing palm trees within the park.

The existing street trees along Ocean Boulevard would be protected in place as part of Project activities.

D. THERE IS AN ESSENTIAL NEXUS BETWEEN THE PUBLIC IMPROVEMENT REQUIREMENTS ESTABLISHED BY THIS ORDINANCE AND THE LIKELY IMPACTS OF THE PROPOSED DEVELOPMENT;

The applicant/developer is required to comply with all public improvement requirements including parkway improvements and property dedications found by

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the Department of Public Works to apply to this project. The change of use and the potential pedestrian and transit traffic generated by the Project necessitates these public improvements, such as the reconstruction of curb ramps and closure of unused driveways. As conditioned, the Department of Public Works has required the applicant to provide a new Americans With Disabilities Act (ADA) -compliant curb ramp at the corner of Collins Way and Ocean Boulevard.

E. THE PROJECT CONFORMS TO ALL REQUIREMENTS SET FORTH IN CHAPTER 21.64 (TRANSPORTATION DEMAND MANAGEMENT); AND

The Project contains less than 25,000 square feet of new, non-residential development and thus is exempt from Transportation Demand Management requirements. However, the Project's location in PD-6 requires preparation of a Transportation Demand Management (TDM) Plan. The project site is in a transit rich environment. The owner/operator of the hotel shall be required to implement the TDM Plan, which includes transit information and incentives for both employees and hotel/venue patrons. Additionally, the Project has incorporated a basement level bicycle storage area for employees and on-site showers for employees that commute by bicycle. Additional on-site bicycles will be available for rent to hotel patrons, including other strategies to promote bicycle use and reduce vehicle trips.

F. THE APPROVAL IS CONSISTENT WITH THE GREEN BUILDING STANDARDS FOR PUBLIC AND PRIVATE DEVELOPMENT, AS LISTED IN SECTION 21.45.400.

The site is developed with an existing City-designated historic landmark building. All improvements to the building and site will be consistent with all applicable green building standards.

LOCAL COASTAL DEVELOPMENT PERMIT FINDINGS
210 East Ocean Boulevard
Application No. 1806-19 / LCDP18-022
November 15, 2018

Pursuant to Section 21.25.904.C of the Zoning Ordinance, a Local Coastal Development Permit shall not be approved unless the following findings are made. These findings and staff analysis are presented for consideration, adoption, and incorporation into the record of proceedings.

A. THE PROPOSED DEVELOPMENT CONFORMS TO THE CERTIFIED LOCAL COASTAL PROGRAM INCLUDING BUT NOT LIMITED TO ALL REQUIREMENTS FOR REPLACEMENT OF LOW AND MODERATE-INCOME HOUSING; AND

The site is located within Downtown Shoreline area of the Local Coastal Program (LCP). The Downtown Shoreline subarea is characterized by mid- to high-rise office and residential buildings and large scale public recreation and entertainment facilities. Its planning is greatly influenced by the program for revitalization and redevelopment of the commercial shopping district north of Ocean Boulevard, just outside the coastal zone.

The proposed project consists of the conversion of a City-designated landmark building into a 185-room hotel with associated amenity uses in the Planned Development District 6 (PD-6), Subarea 7 zone (Council District 2). Under the PD-6 zoning designation, the intended hotel and visitor-serving uses meet all present-day codes and requirements. The existing structure would maintain the existing food and beverage venues and banquet/meeting areas, while also providing new ground-floor and rooftop areas for use. The proposed on-site uses would maintain the existing non-conforming parking rights established for the building, while also providing a minimum of 250 of-site parking spaces.

The Downtown Shoreline area of the LCP incorporates the PD-6 standards, which includes the provisions for Subarea 7, which permits residential, hotel, and office with hotel or residential uses. The proposed use is a hotel with restaurants, banquet/meeting space, and commercial areas consistent with the provisions outlined for Subarea 7. In addition, the use is consistent with the PD-6 (Subarea 7) provisions for the Breakers Hotel site, "If the Breakers is replaced, its site shall be reused for hotel or residential use" (p. 48, [a]). The PD-6 discussion of a mitigation policy for affordable overnight visitor accommodations is specifically outlined for Subarea 1(a) (Golden Shore Master Plan).

The specific LCP provision of low and moderate-income housing replacement would not apply to this project. The previous congregate care facility has ceased operation and the conditions of approval for that entitlement did not require a covenant or deed-restriction of affordability. No low and moderate-income housing will be removed as a result of the development.

The LCP Downtown Shoreline Policy Plan calls for the Breakers Area (Area 14) to include uses consisting of Victory Park, residential, hotel, parking, or mixed use office with hotel or residential. The LCP also calls for the strengthening of the entry to Promenade South on Ocean Boulevard near Pine Avenue. While the project site does not abut that specific entry to the Promenade South, the change of use to a hotel with food and beverage venues, banquet/meeting areas, and amenity uses would constitute visitor-serving uses. The LCP and the Coastal Act include policies that relate to coastal tourism, including overnight accommodations and recreation and visitor serving facilities. As noted in the LCP, new development or changes in use in the Downtown Coastal Zone are intended to support the overall economic development of the City and promote efforts aimed at downtown revitalization. The proposed hotel's adjacency to the Long Beach Convention and Entertainment Center would provide overnight accommodations to further serve tourists, business visitors, concert and playgoers, and special interest groups.

In addition to the proposed uses on site, the hotel would include a Transportation Demand Management Plan and off-site parking to increase reliance on transit and active transportation modes, while also ensuring the availability of parking to support on-site uses.

Victory Park will remain a public park under the proposed project. The reconfiguration of the existing driveway would not change the ownership of the property. Drought-tolerant landscaping and new park amenities would be added to enhance the existing park area. While no net loss of dedicated parkland will occur, the widened driveway would reduce the active/passive park space for private access. As conditioned, the applicant will replace the displaced parkland at a 2:1 ratio. Existing parkland shall not be permanently displaced until the replacement parkland (excluding roadways and parking) is guaranteed, under construction, or developed elsewhere.

The approval of this Site Plan Review and Conditional Use Permit for on-site alcohol uses will conform to the Local Coastal Program as this area is allocated for the Downtown Shoreline area.

B. THE PROPOSED DEVELOPMENT CONFORMS TO THE PUBLIC ACCESS AND RECREATION POLICIES OF CHAPTER 3 OF THE COASTAL ACT. THIS SECOND FINDING APPLIES ONLY TO DEVELOPMENT LOCATED SEAWARD OF THE NEAREST PUBLIC HIGHWAY TO THE SHORELINE.

Chapter 3 of the Coastal Act concerns the public's right to use beach and water resources for recreational purposes. The chapter provides the basis for state and local government beach access requirements with a stated objective of prohibiting development projects that hinder public access to the beach and/or water resources.

The proposed project is located within the Downtown Shoreline subarea, south of East Ocean Boulevard, north of Seaside Way, situated between Locust Avenue and Collins Way. The proposed scope of work includes a change of use, a stairwell

addition to provide life-safety facilities, and building modifications that will pose no obstruction to recreational and visitor serving uses in the Coastal Zone.

The proposed hotel would represent a visitor-serving use within the Coastal Zone. As outlined in Section 30222 of the Coastal Act, "The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry." The proposed hotel, restaurant, retail, and banquet/meeting facilities would provide accommodations and uses in the Coastal Zone that enhance public opportunities for access to coastal recreation. In addition, the provision of off-site parking for the uses (where no on-site parking currently exists) and a Transportation Demand Management (TDM) Plan would ensure that adequate parking facilities serve the site and access to public and active transportation is encouraged for visitors, patrons, and employees. These provisions related to access by various modes of transportation and the enhancement of Victory Park access and design, described below, would maintain and enhance public access to the coast through on-site and off-site improvements and operational provisions consistent with Sections 30252 and 30253 (4) of the Coastal Act. The use of a TDM Plan in conjunction with the use of existing off-site parking resources is consistent with the City LCP goals related to transportation and access, which emphasize an increase on public transit (TDM Plan), decrease reliance on automobiles (reuse of off-site parking resources [valet only] rather than constructing new parking), provide slightly more parking (surplus off-site parking leased by applicant), and increase pedestrian and bicycle access opportunities (relocation of vehicle exit onto Ocean Boulevard, improved pedestrian access and amenities in Victory Park, TDM Plan provisions for bike share and employee access to facilities for active transportation commuters).

The applicant proposes to make improvements to Victory Park, a public park along Ocean Boulevard within Subarea 7. The redesigned Victory Park would include linear pavers on the walkway areas, new layered drought tolerant landscaping, fixed seating, a drinking fountain, a dog waste post, and public park signage. The overall Victory Park proposal increases the hardscape in the park, but improves the landscaping and provides new passive park amenities that are not present under existing conditions. The drought tolerant landscaping would be consistent with the Model Water Efficient Landscape Ordinance (MWELO) and provide a sustainable planting palette as compared to the existing turf areas in the park.

There are no seating areas or public use amenities in the existing portion of Victory Park adjoining the Breakers Hotel Building. Consistent with the Section 30252 of the Coastal Act, this private development would provide enhancements to the existing public park areas in order to enhance the public utilization of the existing recreational resource. The park would remain public park areas and appropriate signage would be added to further designate this area as public park space. In addition, the relocation of the driveway onto Collins would remove an existing point

of conflict between vehicles and pedestrians traveling on the Ocean Boulevard public sidewalk. The relocation of this driveway would also provide a more continuous park area along the Ocean Boulevard frontage.

CONDITIONAL USE PERMIT FINDINGS
210 East Ocean Boulevard
Application No. 1806-19 / CUP18-015
November 15, 2018

Pursuant to Section 21.25.206 of the Zoning Ordinance, the Planning Commission shall not approve a Conditional Use Permit unless the following findings are made. These findings and staff analysis are presented for consideration, adoption, and incorporation into the record of proceedings.

A. THE APPROVAL IS CONSISTENT WITH AND CARRIES OUT THE GENERAL PLAN, ANY APPLICABLE SPECIFIC PLANS SUCH AS THE LOCAL COASTAL PROGRAM AND ALL ZONING REGULATIONS OF THE APPLICABLE DISTRICT;

The project site is located in Land Use District (LUD) 7 – Mixed Uses. LUD No. 7 is intended to include vital activity centers. A combination of land uses intended for this district include employment centers such as retail, medical facilities, higher density residences, visitor-serving facilities, personal and professional services, or recreational facilities. The existing Sky Room Restaurant was approved for a Conditional Use Permit Exemption (CUPEX) that allows the sale of general alcohol at an existing restaurant with a fixed bar. In addition, the banquet room/halls were re-established on the site in 1998 through a use permit. The proposed changes to the floor plan of the landmark building trigger the requirement to issue a Conditional Use Permit (CUP) for all uses on site. There is no proposed change to the existing alcohol licenses on site (Type 47 – On Sale General – Eating Place, Type 58 – Caterers Permit, and Type 68 – Portable Bar). The Conditional Use Permit request for existing restaurant uses and new food and beverage venues within the Breakers Hotel is consistent with the requirements of this district (PD-6) and is consistent with the General Plan. The subject site is located in the Coastal Zone. Conformance with the Local Coastal Program has been met and is demonstrated by the findings subsequently found under the Local Coastal Development Permit Findings. The project is consistent with the zoning regulations of the Downtown Shoreline Planned Development District (PD-6) as the sale of alcoholic beverages for on-site consumption at a hotel and within food and beverage venues is allowed through the Conditional Use Permit process, and includes conditions of approval to prevent nuisances and minimize potential negative impacts to surrounding areas.

B. THE PROPOSED USE WILL NOT BE DETRIMENTAL TO THE SURROUNDING COMMUNITY INCLUDING PUBLIC HEALTH, SAFETY OR GENERAL WELFARE, ENVIRONMENTAL QUALITY OR QUALITY OF LIFE;

The existing Sky Room Restaurant (13th floor), Cielo Bar (14th floor), and banquet/meeting areas are existing uses on site and would continue to operate under the proposed project. In addition to existing uses, the hotel would include new food and beverage uses that would include the service of alcohol. The overall operation of the food and beverage uses would be accessory to the proposed hotel use. The serving of alcohol is currently permitted on the subject site and the

expansion of those uses within the building envelope would not be detrimental to the surrounding area. The proposed changes to the floor plan of the building trigger the need for a Conditional Use Permit. Conditions of approval are included to ensure minimization of any possible negative impacts associated with the operation of the proposed project. Conditions include security measures to prevent nuisances and loitering and to ensure safe operations of the facility.

C. THE APPROVAL IS IN COMPLIANCE WITH THE SPECIAL CONDITIONS FOR SPECIFIC CONDITIONAL USES, AS LISTED IN CHAPTER 21.52; AND

THE FOLLOWING CONDITIONS SHALL APPLY TO ALL ALCOHOLIC BEVERAGE SALES USES REQUIRING A CONDITIONAL USE PERMIT:

Section 21.52.210 states that the following conditions shall apply to all alcoholic beverages sales uses requiring a Conditional Use Permit:

a. THE OPERATOR OF THE USE SHALL PROVIDE PARKING FOR THE USE EQUIVALENT TO THE PARKING REQUIRED FOR NEW CONSTRUCTION REGARDLESS OF THE STATUS OF THE PREVIOUS USE AS TO LEGAL NONCONFORMING RIGHTS;

The Breakers Hotel is a standalone structure with no on-site parking. The building has non-conforming parking rights to a 233-unit congregate care facility with restaurant uses and banquet/meeting areas. The applicant proposes to reduce the amount of ballroom/meeting area by 4,250 square feet and the retail square footage by 670 square feet.

The parking requirement for the uses serving alcohol under this CUP would be 218 parking spaces. The required 250 off-site parking spaces would cover this requirement. All parking would be through a valet service. As conditioned, a minimum of 250 off-site parking spaces shall be leased at all times.

b. THE OPERATOR OF THE USE SHALL PROVIDE NIGHT LIGHTING AND OTHER SECURITY MEASURES TO THE SATISFACTION OF THE CHIEF OF POLICE;

The Long Beach Police Department (LBPD) reviewed this application. The LBPD had no objections to the request provided that the project incorporate Conditions of Approval that require security measures such as night lighting, security cameras, and an operations plan for alcohol sales have been incorporated.

c. THE OPERATOR OF THE USE SHALL PREVENT LOITERING OR OTHER ACTIVITY IN THE PARKING LOT THAT WOULD BE A NUISANCE TO ADJACENT USES AND/OR RESIDENTIAL NEIGHBORHOODS;

A Condition of Approval has been incorporated in the project approvals to require the operator prevent loitering and other related nuisances, such trash and debris on the sidewalk and in Victory Park.

- d. THE USE SHALL NOT BE IN A REPORTING DISTRICT WITH MORE THAN THE RECOMMENDED MAXIMUM CONCENTRATION OF THE APPLICABLE ON OR OFF-PREMISES SALES USE, AS RECOMMENDED BY THE STATE OF CALIFORNIA ALCOHOLIC BEVERAGE CONTROL BOARD, NOR WITH A HIGH CRIME RATE AS REPORTED BY THE LONG BEACH POLICE DEPARTMENT, EXCEPT: (1) LOCATIONS IN THE GREATER DOWNTOWN AREA; OR (2) STORES OF MORE THAN TWENTY THOUSAND (20,000) SQUARE FEET FLOOR AREA, AND ALSO PROVIDING FRESH FRUIT, VEGETABLES AND MEAT, IN ADDITION TO CANNED GOODS; AND**

In consideration of a Conditional Use Permit application for the sale of alcoholic beverages, staff evaluates the number of existing alcohol licenses in the subject Census Tract (5760.01) in which the use is located, as well as the total number of reported crimes in the subject Police Reporting District.

The proposed project includes the transfer of the existing on-site alcohol licenses to the applicant/owner. While the project site Census Tract is over concentrated for on-sale alcohol licenses as reported by Alcohol Beverage Control (ABC), presently having 78 existing on-sale licenses with 5 as the ABC recommended maximum, the project site is already licensed under three types of licenses: Type 47 (On-Sale General Eating Place), Type 58 (Caterers Permit), and Type 68 (Portable Bar). In addition, the site is within a high crime as reported by the Long Beach Police Department (LBPD). Staff consulted with the LBPD on this application and the LBPD expressed no opposition provided security measures such as security cameras and adequate lighting are included in the approval conditions.

- e. THE USE SHALL NOT BE LOCATED WITHIN FIVE HUNDRED FEET (500') OF A PUBLIC SCHOOL, OR PUBLIC PARK, EXCEPT: (1) LOCATIONS IN THE GREATER DOWNTOWN AREA; OR (2) STORES OF MORE THAN TWENTY THOUSAND (20,000) SQUARE FEET OF FLOOR AREA, AND ALSO PROVIDING FRESH FRUIT, VEGETABLES AND MEAT IN ADDITION TO CANNED GOODS.**

Although the project site abuts a public park, the subject site is located within the greater downtown Long Beach area. The sale of alcoholic beverages for on-site consumption at existing venues within the building

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have been previously covered under valid alcohol licenses. The previous alcohol licenses (active since 1997) would be transferred to the project applicant/owner. The hotel will be adding new venue areas to be covered by the existing alcohol licenses.

D. THE RELATED DEVELOPMENT APPROVAL, IF APPLICABLE, IS CONSISTENT WITH THE GREEN BUILDING STANDARDS FOR PUBLIC AND PRIVATE DEVELOPMENT, AS LISTED IN SECTION 21.45.400.

The site is developed with an existing City-designated historic landmark building. All improvements to the building and site will be consistent with all applicable green building standards.

**SITE PLAN REVIEW,
CONDITIONAL USE PERMIT, AND
LOCAL COASTAL DEVELOPMENT PERMIT
CONDITIONS OF APPROVAL
210 East Ocean Boulevard
Application No. 1806-19 / SPR18-033, CUP18-015, LCDP18-022
November 15, 2018
*Revised***

Special Conditions:

1. This Site Plan Review, Conditional Use Permit, and Local Coastal Development Permit Approval is for the change of use and renovation of The Breakers Hotel (City-designated Historic Landmark) into a 185-room hotel with food and beverage venues (with on-site alcohol), banquet/meeting areas, and amenity uses in the Coastal Zone at 210 East Ocean Boulevard in the Downtown Shoreline Planned Development District (PD-6).
2. All work shall be carried out in accordance with the activities shown on plans received by the Department of Development Services, Planning Bureau, submitted in October 2018.
3. All work on or affecting The Breakers Hotel, a designated historic landmark building, shall comply with the Certificate of Appropriateness (HP18-099, August 13, 2018) and appurtenant conditions issued by the Cultural Heritage Commission for The Breakers Building.
4. No alterations not granted prior approval (dated August 13, 2018) for the alteration, remodel, enlarging, or improvements to The Breakers Building, shall be issued prior to review by the Cultural Heritage Commission (CHC) and issuance by the CHC of a certificate of appropriateness.
5. The developer shall provide a sample of all final exterior finish and architectural materials and colors selected for construction to the Planning Bureau for review by the Director of Development Services, prior to issuance of a building permit for new construction. If these materials are found to be below the standards approved in concept, the developer shall remedy the deficiency by revising plans to include exterior finish and architectural materials and colors to the satisfaction of the Director of Development Services.
 - i. Proposed glass and structural features on the rooftop areas shall be designed to incorporate bird-safe building treatments. Prior to building permit approval, the applicant shall provide documentation noting the incorporation of these treatments into final project plans.
6. All temporary exterior fencing shall be removed prior to final Planning Bureau approval and issuance of a Certificate of Occupancy.

7. A minimum of 250 parking spaces shall be permanently maintained and in useful operation off-site for use by the proposed hotel and amenity uses at all times.
8. An executed lease for required off-site parking shall be provided to Planning Bureau staff prior to the issuance of building permits.
9. The property owner shall record Release of Restrictive Covenant, signed by the Director of Development Services, with the Los Angeles County Clerk-Recorder prior to the issuance of building permits. This covenant release shall remove the deed restriction recorded on October 4, 1990 (Document No. 90-1699860) requiring that each head of household in the congregate care unit be a senior citizen, 62 years old or older.
10. All required off-site street improvements shall be installed or provided to the satisfaction of the Director of Public Works prior to the final approval inspection.
11. Proposed improvements in Victory Park shall be completed prior to final Planning Bureau inspection approval and issuance of a Certificate of Occupancy.
12. Victory Park shall be restored to the existing conditions documented in a memorandum dated July 16, 2018 under the following conditions:
 - i. If the required entitlements (Site Plan Review, Conditional Use Permit, Local Coastal Development Permit) for the hotel are not approved, all fixtures, landscaping, and materials in Victory Park shall be restored to a condition similar to, or better than, existing conditions documented in the memorandum.
 - ii. In addition, if construction of the project has not commenced within one year of the date on the memorandum (July 16, 2018), the applicant will be required to remove the temporary construction fencing around Victory Park and restore the park back to existing conditions documented in the memorandum.
13. The proposed changes to Victory Park include widening and reconfiguring the existing driveway. The developer shall replace parkland at a 2:1 ratio. Existing parkland shall not be displaced until the replacement parkland (excluding roadways and parking) is under construction or developed elsewhere.
14. A new driveway easement in Victory Park shall be recorded to align with the reconfigured driveway. The easement shall reflect the existing locations of building area under the park and the basement access stairs. The revised easement shall replace the previous easements recorded on the property. The easement shall be recorded prior to the issuance of building permits.
15. The property owner shall be responsible for maintenance of Victory Park.
16. The driveway in Victory Park shall be only for passenger loading and unloading.

17. There shall be no parking of vehicles outside of the designated driveway in Victory Park. At no time shall vehicles be parked on landscaped areas in Victory Park.
18. No private signage for the private hotel, restaurant, or amenity uses shall be placed in Victory Park.
19. The landscaping and architectural details of Victory Park are conceptual and subject to minor changes and adjustments prior to final construction. The Director of Development Services is authorized to approve minor modifications to the approved design plans for Victory Park.
20. Signage shall be located in a conspicuous location in Victory Park that clearly indicates that the park is public property. All signage shall be consistent with the citywide wayfinding signage.
21. The existing two metal Victory Park plaques inlaid in the brick walkways shall be preserved and reinstalled in the redesigned Victory Park. The plaques shall be located in an area visible from the sidewalk along Ocean Boulevard that abuts Victory Park.
22. The existing palm trees in Victory Park shall be relocated and incorporated into the final landscape plan to the greatest extent feasible.
23. All modifications to vegetation in Victory Park shall comply with the Migratory Bird Treaty Act (MBTA), including the completion of nesting bird surveys prior to any tree removal.
24. The operator shall maintain full compliance with all applicable laws, Alcohol Beverage Control laws, ordinances, and stated conditions. In the event of a conflict between the requirements of this permit, Conditional Use Permit, or Alcoholic Beverage Control license, the more stringent regulation shall apply.
25. The sale of alcoholic beverages for consumption off-premises is strictly prohibited.
26. Exterior lighting shall be maintained to the satisfaction of the Police Chief and the Director of Development Services.
27. The operator shall maintain exterior video security cameras at the front and rear of the business with full view of the public right-of-way. The cameras shall record video for a minimum of 30 days and be accessible via the Internet by the LBPD. A Public Internet Protocol (IP) address and user name/password to allow LBPD to view live and recorded video from the cameras over the Internet are also required. All video security cameras shall be installed to the satisfaction of the Police Chief, Director of Technology Services, and Director of Development Services.

28. Any and all employees hired to sell alcoholic beverages shall provide evidence that they have either:
 - i. Completed training from the State of California of Alcoholic Beverage Control “Leadership and Education in Alcohol and Drugs” (LEAD) program as confirmed by receipt of an ABC-issued certificate of completion; or,
 - ii. Completed equivalent training acceptable to the ABC District Office to ensure proper distribution of beer, wine, distilled spirits, tobacco, and inhalants to adults of legal age.
 - iii. If any prospective employee designated to sell alcoholic beverages, tobacco or inhalants does not currently have such training then:
 - iv. The ABC-licensed proprietors shall have confirmed with the Development Services Department within 15 days of the final approval of the CUP or within 15 days of the opening to the public of a new store, whichever is later, that a date certain has been scheduled with the local ABC Office for said prospective employees to take the LEAD Program course; and
 - v. Within 30 days of taking said course the employee(s) or responsible employer shall deliver to the Planning Department each required LEAD Program Certificate evidencing completion of said course.
29. Noise levels emanating from the project’s common outdoor areas (rooftop terrace, outdoor pool deck, etc.) shall not exceed applicable noise standards specified in Long Beach Municipal Code Section 8.80.15 – Exterior Noise Limits.
30. Prior to the issuance of a Temporary or Final Certificate of Occupancy, whichever comes first, an operations plan related to alcohol service, patio and terrace areas, large events, and security measures shall be submitted to the Planning Bureau for review and approval. The contents of this operations plan shall include procedures for maintaining on-site security and ensuring compliance with regulations pertaining to alcohol service, noise standards, and venue occupancy. A copy of the approved operations plan shall be maintained on-site at all times.
31. The pool area shall be for the use of hotel and spa guests only.
32. Prior to issuance of a building permit, the applicant shall provide information on fixtures and mounting heights and locations for lobby lighting, building lighting, landscape lighting, parking area and pedestrian lighting to be approved by the Director of Development Services. All lighting fixtures shall be of historic design and approved by the Historic Preservation staff within the Planning Bureau.
33. A final lighting plan shall be submitted to the Planning Bureau in compliance with the lighting design standards established in the Downtown Shoreline Planned Development District (PD-6).

34. Prior to issuance of a Temporary or Final Certificate of Occupancy, whichever comes first, the applicant shall fully comply with all applicable Transportation Demand Management and Trip Reduction measures. The applicant shall implement the program measures outlined in the Transportation Demand Management (TDM) Program submitted to the Planning Bureau.
35. A reciprocal access agreement shall be secured for access to the vacated alley between the subject property and the owners of 207 Seaside Way. Documentation of the reciprocal access agreement shall be provided to Planning Bureau staff prior to the issuance of building permits.
36. The vacated alley shall be for the temporary loading and unloading of vehicles only.
37. The applicant shall install an interpretive display describing the historic significance of the building, including reference to the World War II-era pill box.
38. Plans shall be submitted showing the reconfiguration of the driveway on Ocean Boulevard shall not result in the loss of on-street parking.
39. The applicant shall submit a Master Sign Program for review and approval by the Director of Development Services.
40. Prior to issuance of building permits, a hotel operations plan shall be submitted to the Planning Bureau. The operations plan shall document all vehicular operations, including, but not limited to, valet operations, delivery locations, and rideshare drop off and pick-up locations. The valet operations plan shall document protocol for parking specialized Americans with Disabilities Act (ADA) accessible vehicles that arrive for valet parking in accordance with ADA requirements.
41. Indoor bicycle parking spaces shall be provided for and maintained on site per the Transportation Demand Management (TDM) Plan. The indoor bicycle storage shall have restricted access exclusive to employees. The type, spacing and placement of exterior bicycle racks shall follow the guidelines of the Bicycle Master Plan to the satisfaction of the Director of Development Services.
42. One or several central satellite television/data receiver dish(es) shall be located on the roof of the building or in another utility area so that a separate satellite receiver dish is not needed for each hotel room or venue.
43. Pursuant to section 21.45.400 (i), the project shall provide:
 - i. Bicycle parking shall be provided at a minimum of one (1) space for each five thousand (5,000) square feet of new commercial building area. Fractions shall be rounded up to whole numbers;
 - ii. A designated area for the collection of recyclables shall be provided adjacent to the area for the collection of waste.

The developer shall provide for the following to the satisfaction of the Director of Public Works:

General Requirements

44. Prior to the start of any on-site/off-site demolition or construction, the Developer shall submit a construction plan for pedestrian protection, construction area perimeter fencing with custom-printed screen(s), street lane closures, construction staging, shoring excavations and the routing of construction vehicles (excavation hauling, concrete and other deliveries, etc.).
45. The Developer shall submit a Traffic Control Plan prepared by a registered Civil or Traffic Engineer in the State of California, with wet seal and signature, for review and approval by the Department of Public Works.
46. The Developer shall construct all off-site improvements needed to provide full ADA accessibility compliance within the adjacent public right-of-way, to the satisfaction of the Director of Public Works. At this stage in the entitlement process the plans are conceptual in nature, and plan check is required for in-depth review of ADA compliancy. As determined during the plan check process, the Developer shall dedicate additional right-of-way necessary to satisfy unfulfilled ADA requirements.
47. Public improvements shall be constructed in accordance with Public Works construction standards, and per plans reviewed and approved by the Department of Public Works. The City's Public Works Engineering Standard Plans are available online at www.longbeach.gov/pw/resources/engineering/standard-plans. Prior to issuance of a building permit, detailed off-site improvement plans shall be prepared by a licensed Civil Engineer, stamped, signed and submitted to Public Works for review and approval.
48. All conditions of approval, including cover letter signed by the Planning Officer and Case Planner, must be printed verbatim on all plans submitted for plan review to the Department of Public Works.

Public Right-of-Way

49. The Developer shall be responsible for the relocation of existing utilities and/or obstructions within the alley as necessary to accommodate the development, to the satisfaction of the interested agency, City Department, and the Director of Public Works.

Note: The east-west alley (Marine Way) adjacent to the development site was vacated by Resolution No. C-23207, and an easement was reserved along the full length and width of the alley for utility purposes. The Developer's site plan indicates two-way vehicular traffic along Marine Way, but the development only has rights to the northerly 10 feet of the vacated alley; a 20-foot alley width is required to support two-way traffic. The Developer shall be responsible for addressing this issue.

50. The Developer's site plan proposes construction in the vicinity of an existing easement, granted by the City for access to the building through the adjacent park property. The Developer shall be responsible for quitclaiming the old easement and requesting a new easement for the proposed access routes and dining areas along the north boundary of the development site, to the satisfaction of the interested City Department and the Director of Public Works.

Note: Attached for reference is the Right-of-Way sketch, Sketch No. 22 (EG), showing the existing easement area providing access to the building.

51. Public Works suggests that the Developer explore the option of converting South Locust Avenue and Collins Way to one-way streets as this may improve traffic circulation within the vicinity of the development. Subject to the results of the traffic impact analysis prepared for this project and Developer's selection, the Developer shall be responsible for providing the necessary off-site improvements, processing fee(s) and documentation to convert South Locust Avenue and Collins Way to one-way streets. Separate approval from the City of Long Beach City Council is required to change the designation of a two-way street.

Off-Site Improvements

52. Subject to resolution of the issue regarding two-way vehicular access along the alley, the Developer shall reconstruct the alley intersections and curb returns on South Locust Avenue and Collins Way to align with the limits of the vacated alley, to the satisfaction of the Director of Public Works. Alley improvements shall be constructed with Portland cement concrete.

Note: The Developer's site plan shows doors swinging into the vacated alley. Public Works suggests that the Developer adjust the swing direction of the door openings, to avoid potential conflict with vehicular traffic.

53. The Developer shall remove unused driveways and curb cuts, or portions thereof, and replace with full-height curb, curb gutter and sidewalk pavement to the satisfaction of the Director of Public Works. Sidewalk improvements shall be constructed with Portland cement concrete.
54. Subject to the improvement limits of the proposed driveways along Collins Way and East Ocean Boulevard, the Developer shall provide for the relocation of the existing facilities in conflict with the new points of access, to the satisfaction of the Director of Public Works. The Developer shall contact the interested agency or City Department to schedule the relocation work prior to submitting on-site grading plans. Approved plans for relocation shall be submitted to Public Works along with the on-site grading plans.
55. Subject to approval of the proposed park improvements, the Developer shall demolish the existing sidewalk and curb ramp located at the corner of Collins Way

and East Ocean Boulevard adjacent to the park property, and construct a new ADA compliant curb ramp to the satisfaction of the Director of Public Works.

56. The Developer's plan set shows modifications to the existing public infrastructure adjacent to the project site along South Locust Avenue and Collins Way, including removal of the existing sidewalk pavement along both streets and installation of a new railing at the top of the stairs along Collins Way. The Developer shall work with the Department of Public Works to ensure ADA requirements are satisfied in the adjacent public right-of-way. The Developer shall be responsible for providing all necessary modifications to provide ADA accessibility compliance, to the satisfaction of the Director of Public Works. Based on preliminary review, the Developer shall install a conventional steel railing system at the top of the stairs along Collins Way, and provide a minimum 5-foot wide sidewalk clear path around all existing street fixtures (street lights, traffic signal poles, etc.) along South Locust Avenue.
57. The Developer shall reconstruct cracked, deteriorated, or uplifted/depressed sections of sidewalk pavement, curb and curb gutter adjacent to the development site along South Locust Avenue and Collins Way. Subject to approval of the proposed park improvements, the Developer shall also be responsible for reconstructing any cracked, deteriorated, uplifted/depressed sections of sidewalk pavement, curb and curb gutter adjacent to the park property. Sidewalk improvements shall be constructed with Portland cement concrete and to the satisfaction of the Director of Public Works. All sidewalk removal limits shall consist of entire panel replacements (from joint line to joint line).
58. The Developer shall install Custom Printed Flex Mesh screen(s) along the perimeter of the development site, such as FenceScreen.com Series 311, or equivalent, fence screening, and provide for the printed graphic to the satisfaction of the Director of Public Works. The graphics shall depict positive images of the City or other artistic concepts. Prior to submitting the graphic design for printing, the Developer shall consult with the Department of Public Works to review and approve.
59. The Developer shall be responsible for the maintenance, repair and replacement of off-site improvements abutting the project boundary during construction of the on-site improvements, until final inspection of the on-site improvements by the City. All off-site improvements, adjacent to the development site and/or along the truck delivery route, found damaged as a result of construction activities shall be reconstructed or replaced by the Developer to the satisfaction of the Director of Public Works.
60. The Developer shall provide for the resetting to grade of manholes, pull boxes, meters, and other existing facilities in conjunction with the required off-site improvements, to the satisfaction of the Director of Public Works.

61. To the satisfaction of the Director of Public Works, the Developer shall submit for approval a shoring plan, for any temporary or permanent tiebacks/soil nails that are required to extend beneath the public rights-of-way adjacent to the project site. Tiebacks/soil nails shall be installed, maintained and removed per the standards and requirement of Long Beach Municipal Code Chapter 14.08.
62. The Developer shall submit a grading plan with hydrology and hydraulic calculations showing building elevations and drainage pattern and slopes, for review and approval by the Director of Planning and Building Services and the Director of Public Works, prior to issuance of a building permit.

Traffic & Transportation Bureau

63. A revised traffic impact analysis must be submitted to the City Traffic Engineer for review, prior to issuance of a building permit. The Developer shall include within the scope of the analysis the effects of converting South Locust Avenue and Collins Way, respectively, to northbound and southbound one-way streets. Any conditions generated by the analysis shall be made a part of these conditions.
64. Prior to issuance of a building permit, the Developer shall submit for review to the City Traffic Engineer a scaled drawing stamped by a registered Civil Engineer in the State of California for any physical street improvements.

Note: Subject to the results of the traffic impact analysis and Developer's selection, the Developer shall be responsible for providing necessary improvements to physically convert South Locust Avenue and Collins Way to one-way streets, to the satisfaction of the City Traffic Engineer. Right-of-way improvements shall consist of, but may not be limited to, new traffic signal equipment, striping, pavement markings and signage. The Developer shall provide a signing and striping plan for these improvements.

65. The Developer shall be responsible to improve traffic signal related equipment to current CA MUTCD and/or City of Long Beach Standards, at the corner of South Locust Avenue and East Ocean Boulevard adjacent to the project site. If not existing, the Traffic Signal related equipment shall include, but may not be limited to the following:
 - i. All 8" Traffic Signal indications shall be updated to 12" LED units.
 - ii. Vehicular detection shall be installed on all approaches to the signalized intersection. This may include presence, mid or advance detection per City direction. Options will include standard Type E loops or video detection.
 - iii. All pedestrian indications shall be upgraded to LED Countdown Modules within all pedestrian crossings.
 - iv. All pedestrian push buttons shall be upgraded to the most current City Standard.

- v. All signalized intersections will require the installation of Emergency Vehicle Pre-Emption (EVPE) equipment. The equipment and installation must be completed per the most current City Standard.
- vi. Because of the fact that so many City of Long Beach traffic signals operate and share coordinated signal timing plans, the Developer shall install a GPS Module at all traffic signals that are directly impacted by their project. The GPS Modules create accurate time-based communications between nearby traffic signals.
- vii. The Developer may be asked to update the traffic signal controller located in the traffic signal cabinet. The existing traffic signal controller may not have the capability to handle the complexities of new traffic patterns that are directly related to the Developer's project. In such cases, the Developer will be asked to install a new traffic signal controller based on the most current City Standard, McCain 2070 Controllers.

Note: Subject to the results of the traffic impact analysis and Developer's selection, additional traffic signal modifications shall be provided at the intersection of South Locust Avenue and East Ocean Boulevard for the one-way street conversion on South Locust Avenue.

- 66. New continental style crosswalks in the vicinity of the project shall be added by the Developer to the satisfaction of the City Traffic Engineer. The Developer shall be responsible to upgrade all existing crosswalks, and install all new marked crosswalks, to the newest City standards.
- 67. The Developer shall be responsible to implement the most recent Bicycle Master Plan of the City at its frontage blocks, or contribute a fair share fee to the City for future implementation, to the satisfaction of the City Traffic Engineer.
- 68. The Developer shall be responsible to provide new public bicycle parking and related facilities adjacent to the project site, to the satisfaction of the City Traffic Engineer.
- 69. The size and configuration of all proposed driveways serving the project site shall be subject to review and approval of the City Traffic Engineer. Driveways greater than 28 feet in width require a variance; contact the Transportation Mobility Bureau, at (562) 570-6331, to request additional information regarding driveway construction requirements.

Note: The Developer shall maintain line of sight for the proposed driveway at Collins Way.

- 70. The Developer shall replace all traffic signs and mounting poles damaged or misplaced as result of construction activities to the satisfaction of the City Traffic Engineer.

71. The Developer shall repaint all traffic markings obliterated or defaced by construction activities to the satisfaction of the City Traffic Engineer.
72. The Developer shall contact the Transportation Mobility Bureau, at (562) 570-6331, to modify any existing curb marking zones adjacent to the project site.
73. All traffic control device installations, including pavement markings within the private parking lot, shall be installed in accordance with the provisions of the Manual on Uniform Traffic Control Devices (MUTCD), 2012 or current edition (i.e. white parking stalls, stop signs, entry treatment signage, handicapped signage, etc.).

Standard Conditions – Plans, Permits, and Construction:

74. The applicant shall comply with all comments from the Long Beach Police, Energy Resources, Public Works, Parks, Recreation, and Marine, Water, and Fire Departments and Building Bureau.
75. Prior to the issuance of a building permit, the applicant shall submit a revised set of plans reflecting all of the design changes set forth in the conditions of approval, to the satisfaction of the Director of Development Services.
76. All conditions of approval must be printed verbatim on all plans submitted for plan review to the Department of Development Services. These conditions must be printed on the site plan or a subsequent reference page.
77. The plans submitted for plan review must explicitly call out and describe all materials, textures, accents, colors, window, door, planter, and paving details that were approved by the Site Plan Review Committee or the Planning Commission. No substantial changes shall be made without prior written approval of the Site Plan Review Committee or the Planning Commission.
78. Prior to the issuance of a building permit, the applicant must depict all utility apparatus, such as, but not limited to, backflow devices and Edison transformers, on both the site plan and the landscape plan. These devices shall not be located in any front, side, or rear yard area that is adjacent to a public street. Furthermore, these devices shall be screened by landscaping or another screening method approved by the Director of Development Services.
79. The Director of Development Services is authorized to approve minor modifications to the approved design plans or to any of the conditions of approval if such modifications shall not significantly change or alter the approved project. Any major modifications shall be reviewed by the Zoning Administrator, Site Plan Review Committee, or Planning Commission, respectively.
80. All rooftop mechanical equipment shall be fully screened from public view and views from taller, adjacent rooftops. Said screening must be architecturally compatible with the building in terms of theme, materials, colors and textures. If

the screening is not specifically designed into the building, a rooftop mechanical equipment screening plan must be submitted for approval by the Director of Development Services prior to the issuance of a building permit.

81. Upon plan approval and prior to issuance of a building permit, the applicant shall submit an 11"x17" size set of final construction plans for the project file.
82. A permit from the Department of Public Works shall be required for any work to be performed in or over the public right-of-way.
83. Any off-site improvements found to be damaged as a result of construction activities related to this project shall be replaced to the satisfaction of the Director of Public Works.
84. Separate building permits are required for fences, retaining walls, flagpoles, and pole-mounted yard lighting foundations.
85. The applicant shall file a separate plan check submittal to the Long Beach Fire Department for review and approval prior to the issuance of a building permit.
86. Prior to the issuance of a building permit, the applicant shall submit architectural, landscaping and lighting drawings for the review and approval of the Police Department for their determination of compliance with Police Department security recommendations.
87. All structures shall conform to the Long Beach Building Code requirements. Notwithstanding this subject permit, all other required permits from the Building Bureau must be secured.
88. Site development, including landscaping, shall conform to the approved plans on file with the Department of Development Services. At least one set of approved plans containing Planning, Building, Fire, and, if applicable, Redevelopment and Health Department stamps shall be maintained at the job site, at all times for reference purposes during construction and final inspection.
89. Prior to the issuance of a building permit, the applicant must submit complete landscape and irrigation plans for the approval of the Director of Development Services.
90. All landscaped areas shall comply with the State of California's Model Water Efficient Landscape Ordinance (MWELO). Landscaped areas shall be planted primarily with drought tolerant plant materials and shall be provided with water conserving automatic irrigation systems designed to provide complete and adequate coverage to sustain and promote healthy plant life. The irrigation system shall not cause water to spray or flow across a public sidewalk.
91. All landscaping irrigation systems shall use high efficiency sprinkler nozzles. The models used and flow rates shall be specified on the landscaping plan. For residential-type or small-scale sprinkler systems, sprinkler head flow rates shall

not exceed 1.00 GPM and shall be of the rotating type. Where feasible, drip irrigation shall be used instead. If an in-ground irrigation system is to be installed, such system shall be controlled by an automatic self-adjusting weather-based irrigation controller.

92. Permeable pavement shall be utilized where feasible, to the satisfaction of the Director of Development Services. Public right-of-way improvements shall be exempt from this requirement. If the feasibility of using permeable pavement is uncertain, it shall be the developer's responsibility to demonstrate that a given application of permeable pavement is not feasible, to the satisfaction of the Director of Development Services.
93. All outdoor fountains or water features shall utilize water recycling or re-circulation systems. The plans submitted for review shall specifically identify such systems.
94. Energy conserving equipment, lighting, and construction features shall be utilized in this project.
95. Low-flow fixtures shall be used for all lavatory faucets, kitchen faucets, showerheads, toilets, and urinals. Toilets may be either low-flow or dual flush. Maximum flow rates for each fixture type shall be as follows: lavatory faucet – 2.75 GPM, kitchen faucet – 2.20 GPM, showerhead – 2.00 GPM, toilet – 1.3 GPF, dual flush toilet – 0.8/1.6 GPF, urinal – 1.0 GPF. Plans submitted for review shall specifically identify such fixtures and flow rates.
96. For commercial food service facilities, low-flow pre-rinse sprayers with average flow rates of no more than 2.0 GPM shall be used. Flow rates shall be specified on plans.
97. Demolition, site preparation, and construction activities are limited to the following (except for the pouring of concrete which may occur as needed):
 - i. Weekdays and federal holidays: 7:00 a.m. to 7:00 p.m.;
 - ii. Saturday: 9:00 a.m. - 6:00 p.m.; and
 - iii. Sundays: not allowed
98. This permit and all development rights hereunder shall terminate two years from the effective date of this permit unless construction is commenced or a time extension is granted, based on a written and approved request submitted prior to the expiration of the two year period as provided in Section 21.21.406 of the Long Beach Municipal Code.
99. This permit shall be invalid if the owner(s) and/or applicant(s) have failed to return written acknowledgment of their acceptance of the conditions of approval on the Conditions of Approval Acknowledgment Form supplied by the Planning Bureau. This acknowledgment must be submitted within 30 days from the effective date of

approval (final action date or, if in the appealable area of the Coastal Zone, 21 days after the local final action date).

100. If, for any reason, there is a violation of any of the conditions of this permit or if the use/operation is found to be detrimental to the surrounding community, including public health, safety or general welfare, environmental quality or quality of life, such shall cause the City to initiate revocation and termination procedures of all rights granted herewith.
101. This approval is required to comply with these conditions of approval as long as the use is on the subject site. As such, the site shall allow periodic re-inspections, at the discretion of city officials, to verify compliance. The property owner shall reimburse the City for the inspection cost as per the special building inspection specifications established by City Council (Sec. 21.25.412, 21.25.212).
102. In the event of transfer of ownership of the property involved in this application, the new owner shall be fully informed of the permitted use and development of said property as set forth by this permit together with all conditions that are a part thereof. These specific requirements must be recorded with all title conveyance documents at time of closing escrow.
103. Approval of this development project is expressly conditioned upon payment (prior to building permit issuance or prior to Certificate of Occupancy, as specified in the applicable Ordinance or Resolution for the specific fee) of impact fees, connection fees and other similar fees based upon additional facilities needed to accommodate new development at established City service level standards, including, but not limited to, sewer capacity charges, Park Fees and Transportation Impact Fees.
104. No publicly accessible telephones shall be maintained on the exterior of the premises. Any existing publicly accessible telephones shall be removed.
105. The property shall be developed and maintained in a neat, quiet, and orderly condition and operated in a manner so as not to be detrimental to adjacent properties and occupants.
106. The property owner shall prevent loitering in all Victory Park, driveway, and landscaping areas serving the use during and after hours of operation. The operator must clean the park, driveway, and landscaping areas of trash and debris on a daily basis. Failure to do so shall be grounds for permit revocation. If loitering problems develop, the Director of Development Services may require additional preventative measures such as but not limited to, additional lighting or private security guards.
107. Exterior security bars and roll-up doors applied to windows and pedestrian building entrances shall be prohibited.
108. Any graffiti found on site must be removed within 24 hours of its appearance.

109. All required utility easements shall be provided to the satisfaction of the concerned department, agency, or utility company.
110. All trash and refuse containers shall be fully screened from public view to the satisfaction of the Director of Development Services.
111. As a condition of any City approval, the applicant shall defend, indemnify, and hold harmless the City and its agents, officers, and employees from any claim, action, or proceeding against the City or its agents, officers, and employees to attack, set aside, void, or annul the approval of the City concerning the processing of the proposal/entitlement or any action relating to, or arising out of, such approval. At the discretion of the City and with the approval of the City Attorney, a deposit of funds by the applicant may be required in an amount sufficient to cover any anticipated litigation costs and staff time required as a result of litigation activity.

UNITEHERE! Local 11

464 Lucas Ave., Suite 201 • Los Angeles, California 90017 • (213) 481-8530 • FAX (213) 481-0352

November 15, 2018

VIA EMAIL:

Planning Commission
City of Long Beach
333 West Ocean Blvd., 4th Floor
Long Beach, CA 90802
christopher.koontz@longbeach.gov
(cc: maryanne.cronin@longbeach.gov)

Re: Item No. 18-082PL, Planning Commission Hearing 11/15/18; Breakers Hotel Project (210 E. Ocean Blvd.); Categorical Exemption Case No. CE-18-152; Site Plan Review Case No. SPR18-033; Local Coastal Development Permit LCDP18-022

Dear Chair Lewis and Honorable Planning Commissioners:

On behalf of UNITE HERE Local 11, Jeremy Arnold, and José Nuñez Díaz (“Commenters”), we respectfully provide the City of Long Beach (“City”) the following comments regarding the categorical exemptions (“CE”) in addition to the Site Plan Review, Conditional Use Permit, and Local Coastal Development Permit (“Entitlements”) requested by Patrick Enrich and Nathan Morries of Arco Construction for the renovation of The Breakers Hotel (“Project”). Commenters are concerned with the Project’s compliance with the California Environmental Quality Act, Pub. Res. Code § 21000 *et seq.*, (“CEQA”) and the Long Beach Municipal Code (“LBMC”).

The Applicant argues that the Project is categorically exempt from CEQA requirements, but as discussed below, the Project does not qualify for any of the four different classes of categorical exemption Applicant seeks (Class 1, Class 3, Class 31, and Class 32). The proposed Project would convert a currently out-of-use building into a 185-room hotel with rooftop pool, bar, restaurant and retail uses. Such a dramatic change in use could have a significant impact on traffic, air quality, noise, land use, and historical resources. For example, the Traffic Impact Study is far too narrow to have accurately studied the traffic impacts of the proposed Project, which is likely to generate significantly more vehicular traffic than its current use. Commenters are also concerned about the Project’s impacts on historical resources, as the proposed modifications could threaten the site’s eligibility for the California and National Registers of Historic Places. As a City Historic Landmark, the Breakers Hotel building is a valuable historic resource for the City of Long Beach. Additionally, because required findings for the requested land use entitlements cannot be made, the Planning Commission cannot grant them at this time.

Because the Project is not exempt from CEQA, an Initial Study and Environmental Impact Report (“EIR”) or Mitigated Negative Declaration (“MND”) must be prepared. **The Planning Commission should reject the requested CE and land use entitlements, and direct the City to prepare an Initial Study and EIR or MND.**

1. Project Background

The Project site is located on the south side of Ocean Boulevard, between Collins Way to the east and Locust Avenue to the west, and Victory Park to the north. To the south across Marine Way, a five-story residential development is currently under construction at 207 Seaside Way. The site is currently improved with an existing 13-story building with a 14th floor rooftop area, and two additional lower levels located below street level at Ocean Boulevard. The building was most recently used as a 233-unit congregate care facility, which closed in 2015, in addition to a restaurant and bar that recently closed. The building was designated a City Historic Landmark in 1989. The Project proposes several interior and exterior modifications, such as an interior floor plan reconfiguration, an addition of an outdoor rooftop pool and deck area, an enclosed outdoor staircase, and service elevator. The Project also includes improvements to the adjacent Victory Park, including several additions to the hardscape in the park, additional landscaping, and new park amenities.

2. Standing of Commenters

Mr. Arnold is a Long Beach resident living approximately 0.8 miles from the Project site. Mr. Díaz lives approximately 1.1 miles from the Project site. Such geographic proximity alone is sufficient to establish standing under CEQA. *See Bozung v. LAFCO* (1975) 13 Cal.3d 263, 272 (plaintiff living 1,800 feet from annexed property has standing to challenge the annexation); *see also Citizens Ass’n for Sensible Dev. v. County of Inyo* (1985) 172 Cal.App.3d 151, 158 (“a property owner, taxpayer, or elector who establishes a geographical nexus with the site of the challenged project has standing.”). Furthermore, absent adequate analysis and full mitigation of Project-related impacts, Commenters will be adversely affected by the Project’s impacts on traffic. Hence, Commenters have a beneficial interest in the Project’s compliance with CEQA. *See Braude v. City of Los Angeles* (1990) 226 Cal.App.3d 83, 87.

Local 11 represents more than 30,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Arizona. Members of Local 11, including over 500 who work in Long Beach and many Long Beach residents, join together to fight for improved living standards and working conditions. As such, Local 11 is a stakeholder in this Project, and worker and labor organizations have a long history of engaging in the CEQA process to secure safe working conditions, reduce environmental impacts, and maximize community benefits. The courts have held that “unions have standing to litigate environmental claims.” *Bakersfield Citizens v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.

Furthermore, this comment letter is made to exhaust remedies under Pub. Res Code § 21177 concerning the Project, and incorporates by this reference all written and oral comments

submitted on the Project by any commenting party or agency. It is well established that any party, as Commenters here, who participates in the administrative process can assert all factual and legal issues raised by anyone. *See Citizens for Open Government v. City of Lodi* (2006) 144 Cal.App.4th 865, 875.

3. Background on CEQA, the “fair argument” standard, and categorical exemptions

CEQA is "an integral part of any public agency's decision making process." Pub. Res. Code § 21006; *see also Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 564. CEQA was enacted to require public agencies and decision-makers to document and consider the environmental implications of their actions before formal decisions are made. *See* Pub. Res. Code §§ 21000, 21001; *see also Laurel Heights Improvement Ass'n v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.

Built into CEQA is a strong presumption in favor of requiring preparation of an EIR. This presumption is reflected in what is known as the "fair argument" standard, under which an agency must prepare an EIR whenever substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment. *See Laurel Heights Improvement Ass'n v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1123; *see also No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75.

The fair argument test is a "low threshold" test for requiring the preparation of an EIR and a preference for resolving doubts in favor of environmental review. *See No Oil*, 13 Cal.3d at 84; *see also Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 332. An agency must prepare an EIR if there is any substantial evidence in the record supporting a fair argument that a project may have a significant effect on the environment, regardless of any other evidence in the record. *See Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 776; *Friends of "B" Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1002. The determination of whether a fair argument exists is a question of law. *See Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1319.

CEQA Guidelines § 15384(a) defines "substantial evidence" as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, **even though other conclusions might also be reached . . .**" (emphasis added). Facts, reasonable assumptions predicated on facts, and expert opinions supported by facts can constitute substantial evidence. *See* Pub. Res. Code §§ 21080(e), 21082.2(c), and CEQA Guidelines §§ 15064(f)(5) & 15384.

CEQA contains categorical exemptions for projects that are unlikely to have environmental impacts. *See* Pub. Res. Code § 21084. These exemptions are to be construed narrowly and are not to be expanded beyond the scope of their plain language. *See Castaic Lake Water Agency v. City of Santa Clarita* (1995) 41 Cal. App.4th 1257; *see also Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 205. They must also be construed in light of their statutory authorization, which limits such exemptions to classes of projects that have been determined not

to have significant effects on the environment – ensuring categorical exemptions are interpreted in a manner affording the greatest environmental protection. *See Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1192; *see also Save Our Schools v. Barstow Unified Sch. Distr. Bd. of Educ.* (2015) 240 Cal.App.4th 128, 140; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 966.

Exceptions to categorical exemptions also exist, requiring agencies to perform an Initial Study (“IS”) and further environmental review whenever a project is subject to one of the “exceptions-to-the-exemptions.” *See* CEQA Guidelines § 15300.2. Moreover, lead agencies may not avoid conducting an IS by merely adopting mitigation measures into a project. *See Salmon Protection & Watershed Network v. County of Marin* (2004) 125 Cal.App.4th 1098, 1102 (holding project must be reviewed under CEQA when mitigation was required to avoid triggering sensitive environment, significant impact, or cumulative impacts exceptions to the use of categorical exemptions); *see also Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1200 (observing CEQA Guidelines do not authorize consideration of mitigation measures with the categorical exemption and that the project required at minimum an MND).

4. The Project does not qualify for any categorical exemption.

Here, Applicant seeks to exempt the Project from CEQA through four separate classes of categorical exemptions: Class 1, Class 3, Class 31, and Class 32. *See* CEQA Guidelines §§ 15300; 15301; 15303; 15331; 15332. Because the Project does not qualify for any class of categorical exemption, the Planning Commission must reject Applicant’s request that the Project be found categorically exempt from CEQA.

a. The Project does not qualify for a Class 1 categorical exemption.

Class 1 consists of “the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures . . . *involving negligible or no expansion of use beyond that existing at the time of the lead agency’s determination.*” CEQA Guidelines § 15301 (emphasis added). Class 1 categorical exemptions are clearly meant to apply to projects involving no change in use. To the best of Commenters’ knowledge, the subject property is completely out of use at this time. The Project would convert it into a 185-room hotel with rooftop entertainment facilities, onsite bar, restaurant, and retail—a radical change from the building’s current non-use. This Project plainly does not qualify for a Class 1 categorical exemption.

Even if this Project involved negligible or no expansion of use, it would not qualify for a Class 1 categorical exemption because the alterations to the structure are not “minor.” The Project proposes the addition of an enclosed staircase and service elevator which will extend the tower eastward approximately 10 feet. It also includes a widening of the driveway on Ocean Avenue by 1,398 square feet and an increase in the adjacent Victory Park hardscape by 249

square feet.¹ Because these expansions go beyond minor alterations of the existing structure, the Project does not qualify for a Class 1 categorical exemption.

In sum, the Project does not qualify for a Class 1 categorical exemption because it involves a drastic change in use and because it proposes major alterations to the existing structure.

b. The Project does not qualify for a Class 3 categorical exemption.

The Class 3 categorical exemption consists of, *inter alia*, the construction of “new, small facilities or structures” and the “conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure.” CEQA Guidelines § 15303. Here, the Project does not involve the construction of new, small facilities or structures. The Project is also not a “conversion of existing small structures from one use to another,” because the structure is very large. CEQA Guidelines § 15303(c) limits the construction of new structures in urbanized areas to 10,000 square feet in total floor area. The subject property is approximately 172,000 square feet in area, far beyond what may qualify under Class 3.

The Project also does not qualify for a Class 3 categorical exemption because it would involve significant modifications to the exterior of the structure. As stated above, the alterations to the exterior of the building are not “minor.” They include the addition of an enclosed staircase and service elevator, which will extend the tower eastward approximately 10 feet, an expansion of the driveway on Ocean Avenue by 1,398 square feet, and the addition of a swimming pool poll deck, and a terrace.

In Sum, the Project does not qualify for a Class 3 categorical exemption because it does not involve the construction of new, small facilities or structures and because it involves significant modifications to the exterior of the structure.

c. The Project does not qualify for a Class 31 categorical exemption.

The Class 31 categorical exemption applies to “projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of historical resources . . .” CEQA Guidelines § 15331. Because the Project involves a radical change and intensification in use, from an out-of-use congregate care facility to a brand new hotel, the Planning Commission cannot find that it is “limited” to the restoration of the structure as an historical resource. Because the conversion of an historical landmark into a hotel is plainly not a mere restoration of that landmark, the Project does not qualify for a Class 31 categorical exemption.

d. The Project does not qualify for a Class 32 categorical exemption.

¹ Taken from renderings of the Project obtained from the Project Planner.

Class 32 categorical exemptions are limited to in-fill development projects that, *inter alia*, are “consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations” and “would not result in any significant effects relating to traffic, noise, air quality or water quality.” CEQA Guidelines § 15332(a), (d). As explained below, the Project does not qualify for a Class 32 categorical exemption because it is (1) inconsistent with the applicable general plan and (2) because it cannot be readily perceived that the Project will not result in any significant effects relating to traffic, noise, air quality or water quality.

1. The Project is inconsistent with applicable land use plans and zoning.

In order to qualify for a Class 32 categorical exemption, the Project must be “consistent with applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.” CEQA Guidelines § 15332(a). The Project is located within Subarea 7 of the Downtown Shoreline Planned Development District (PD-6), and within General Plan Land Use District Number 7 (LUD 7). The Project as it is currently proposed is inconsistent with more than one element of the applicable general plan policies. General Use and Development Standard (j) for PD-6 states: “It shall be the goal of the City to develop a program/policy for the Downtown Shoreline area that protects and encourages lower cost visitor accommodations.”² As it appears that no such program/policy exists, individual developments should advance the goal of providing lower cost visitor accommodations. The Project proposes a rooftop pool, terrace, food/beverage, and banquet/meeting spaces, a spa, and a fitness center, amenities typical of luxury hotels. As currently proposed, the Project conflicts with Development Standard (j) in that it proposes luxury amenities, strongly suggesting that it will provide expensive rather than affordable overnight visitor accommodations.

The Project also does not provide nearly enough public benefits. The introduction to PD-6 specifically highlights that there is a “high degree of public interest in this area . . . due to the potential public benefits that can be derived from its uses,” indicating that public benefits are critical to the fulfillment of the Downtown Shoreline Community Plan.³ The Project proposes a hotel with bar, retail, and food service venues. All of these uses would be contained within a private development. A project of this magnitude would better serve the community as housing and with ancillary uses that genuinely serve the public, such as, for example, meeting spaces that could be reserved out free of charge or public art gallery space.

The Project does not qualify for a Class 32 categorical exemption because it conflicts with applicable general plan policies in that it does not propose affordable accommodations nor is it proposed to provide enough public benefits.

2. The Project may have significant traffic impacts.

² Ordinance No. ORD-11-0017, Downtown Shoreline Planned Development District (PD-6), p. 14, available at: <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=2463>

³ *Id.*, p. 2.

In order to qualify for a Class 32 categorical exemption, a project must not result in any significant effects relating to traffic. CEQA Guidelines § 15332(d). The Traffic Impact Study (“TIS”) prepared for the Project fails to provide an adequate analysis of traffic impacts. For the reasons discussed below, the TIS fails to provide an accurate and conservative traffic analysis. In order to receive a Class 32 categorical exemption, a revised traffic study must be prepared.

a. The Traffic Impact Study area is unacceptably narrow.

The TIS studies only ten intersections (TIS, p. 2). This deviates from the City’s practice of requiring the study of many more intersections for similar or nearby projects, including: 31 intersections for the 2nd/PCH project,⁴ 30 intersections for the Shoreline Gateway East Tower addendum⁵ and Golden Shore Master Plan project⁶ and 14 intersections analyzed for the Oceanaire Apartment project.⁷ This narrow study area fails to account for the Project’s cumulative impact on intersections already operating and/or anticipated to operate at an unacceptable LOS when considering other related projects, as discussed below.

b. The Traffic Impact Study fails to study intersections already or anticipated to be operating on unacceptable levels.

As confirmed by other nearby project traffic studies,⁸ intersections nearby the Project Site are already operating at or near a LOS of E or F and/or anticipated to be operating at such levels (anticipated levels in 2017-2020). As summarized in the table below, previous traffic counts conducted between 2008-2016 show various V/C levels, the majority of which either operating at or below an acceptable LOS of D (see figures in red). Moreover, those same traffic studies anticipated V/C levels in 2017-2020 to be operating well below a LOS of D (also in red). Given these intersections are already and/or anticipated to be suffering deteriorating LOS, it is reasonable that a slight increase in V/C generated by the project could trigger an applicable threshold, which warrants mitigation. Therefore, these intersections must be analyzed in a revised traffic study.

⁴ 2nd/PCH mixed retail project (Apr. 2017) Draft EIR, pp. IV.K-8-9,
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6498>.

⁵ Shoreline Gateway E. Tower (10/3/16) Addendum Traffic Study, PDF p. 10,
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6153>.

⁶ Golden Shore Master Plan project (10/2/09) DEIR Traffic Study, PDF pp. 9,
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=3199>;

⁷ Oceanaire project (Mar. 2015) IS/MND, pp. 101-103,
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4978>.

⁸ Oceanaire project (2/24/15) Traffic Study, PDF pp. 29-30 (Tbls. 7 and 8),
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4977>; 207 Seaside Way project (2/19/15) Traffic Study, PDF p. 49-50 (Tbls. 8-1 & 8-2), <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4954>;
Shoreline Gateway E. Tower project (10/3/16) Addendum Traffic Study, PDF pp. 39-41 (Tbl. 3-4), pp. 69-74 [Tbl. 8-2], <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6153>; Golden Shore (10/2/09) Addendum Traffic Study, PDF pp. 30-31 (Tbl. 3-4), PDF pp. 56-59 (Tbl. 8-1),
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=3199>; Land Use Element/Urban Design Element (May 2016) Draft EIR Traffic Study, PDF pp. 11-12 (Tbl. A),
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6079>;

Intersections Operating At/Near Unacceptable Levels

Intersection		Recorded LOS (2008 -2016)		Anticipated (2017-2020)	
		V/C	LOS	V/C	LOS
Alamitos/ Ocean	am	0.746 - 1.120	C - F	0.820 - 1.267	D - F
	pm	0.854 - 1.062	D - F	0.966 - 1.199	E-F
Alamitos / 3rd	am	0.853 - 1.048	D - F	1.006 - 1.014	F
	pm	0.577 - 0.659	A-B	0.77	C
Alamitos / 7th	am	0.825 - 0.902	D - E	0.993 - 1.004	E - F
	pm	0.735 - 0.763	C	0.881 - 1.253	D - F
Alamitos / Broadway	am	0.713 - 0.900	C - E	0.859 - 0.910	D - E
	pm	0.747 - 0.945	C - E	0.832 - 0.991	D - E
Long Beach / 7th	am	0.658 - 0.730	B - C	0.818 - 0.952	D - E
	pm	0.484 - 0.550	A	0.633 - 0.795	B - C
Magnolia / Ocean	am	0.748 - 0.848	C - D	0.945 - 1.001	E - F
	pm	0.661 - 0.744	A - B	0.845 - 0.880	D
Alamitos / 4th	am	0.707	C	0.821	D
	pm	0.888	D	1.021	F

c. The Traffic Impact Study uses an improper baseline of existing conditions.

The TIS conducted only a single a.m./p.m. traffic count on June 7, 2018 (TIS, p. 21). However, the traffic volumes recorded seem to be significant lower than traffic counts previously conducted by other projects. The table below compares the traffic levels of five intersections studied in the TIS to five different traffic studies from City projects. For example, the Pine/Seaside intersection was analyzed in the TIS, which recorded a volume-to-capacity ratio (“V/C”) of 0.202 during a.m.-peak and 0.255 during p.m.-peak (TIS, Table 4, p. 26). However, under the 207 Seaside Project traffic study, that intersection was recorded as having a V/C level of 0.400 during the a.m.-peak and 0.477 during the p.m.-peak—roughly 98 and 87 percent higher, respectively, than purported in the TIS.

As shown in the table below, the TIS appears to have recorded significantly lower baseline traffic counts in at least these five intersections. Differences in red indicate V/C levels that were higher in other traffic studies than in the TIS. This suggests that the traffic count conducted for the TIS is a potential outlier, which warrants utilizing the highest value of known traffic counts conducted in the area, as the City has done in other projects.⁹ Moreover, additional

⁹ See e.g., Oceanair project (2/24/15) Traffic Study, PDF p. 11, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4977>; 207 Seaside Way project (2/19/15) Traffic Study, PDF p. 16, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4954>.

traffic counts should be performed.

Comparison of Existing Traffic Levels between TIS and Other City Projects

Intersection		Project ¹⁰		Oceanair Project ¹¹			207 Seaside Project ¹²			Shoreline Project ¹³		
		Int.	V/C	Int.	V/C	Diff.	Int.	V/C	Diff.	Int.	V/C	Diff.
Pacific/Ocean	am pm	2	0.580 0.521	3	0.553 0.503	-4.7% -3.5%	2	0.547 0.5	-5.7% -4.0%	23	0.649 0.504	11.9% -3.3%
Pine/Ocean	am pm	4	0.494 0.623	4	0.532 0.674	7.7% 8.2%	3	0.532 0.674	7.7% 8.2%	24	0.623 0.778	26.1% 24.9%
Long Beach/Ocean	am pm	9	0.571 0.518	6	0.517 0.483	-9.5% -6.8%	7	0.517 0.483	-9.5% -6.8%	25	0.639 0.538	11.9% 3.9%
Pine/Shoreline	am pm	6	0.323 0.450	10	0.342 0.477	5.9% 6.0%	5	0.352 0.51	9.0% 13.3%	30	0.373 0.492	15.5% 9.3%
Pine/Seaside	am pm	5	0.202 0.255	9	0.287 0.286	42.1% 12.2%	4	0.4 0.477	98.0% 87.1%	n/a		

Intersection		Project		Golden Shore Project ¹⁴			Land Use Element ¹⁵		
		Int.	V/C	Int.	V/C	Diff.	Int.	V/C	Diff.
Pacific/Ocean	am pm	1	0.580 0.521	19	0.689 0.632	18.8% 21.3%	6	0.814 0.713	40.3% 36.9%
Pine/Ocean	am pm	2	0.494 0.623	20	0.634 0.774	28.3% 24.2%	n/a		
Long Beach/Ocean	am pm	3	0.571 0.518	21	0.718 0.584	25.7% 12.7%	11	0.723 0.632	26.6% 22.0%
Pine/Shoreline	am pm	4	0.323 0.450	30	0.355 0.486	9.9% 8.0%	n/a		
Pine/Seaside	am pm	5	0.202 0.255	26	0.263 0.308	30.2% 20.8%	n/a		

¹⁰ Traffic Impact Study for Breakers Hotel, Table 4, p. 26.

¹¹ Oceanair project (Mar. 2015) IS/MND, p. 108, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4978>.

¹² 207 Seaside project (Mar. 2015) IS/MND, p. 105, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4949>.

¹³ Shoreline Gateway E. Tower (10/3/16) Addendum Traffic Study, PDF p. 68, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6153>.

¹⁴ Golden Shore Master Plan project (10/2/09) Addendum Traffic Study, PDF pp. 28-31, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=3199>.

¹⁵ Land Use Element/Urban Design Element (May 2016) Draft EIR Traffic Study, PDF pp. 11-14, 32 (fig. 1) <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6079>

d. The Traffic Impact Study fails to include all related projects.

The TIS identifies 37 related projects (TIS, Table 7, pp. 32-33), but fails to identify numerous related projects that should have been incorporated into the analysis. These include:

- Silversands apartment/hotel project: including 33 dwelling units and 72 hotel room mixed-use development at 2010 E. Ocean Blvd. estimated to generate 807 average daily trips (“ADTs”).¹⁶
- City Hall East Edison apartment project: including 126 apartment units and 3,621 SF of retail at 100 Long Beach Blvd. estimated to generate 1,192 ADTs.¹⁷
- Pike Outlet retail project: 392,992-SF conversion of a new retail outlet south of Seaside Way (between Cedar Ave. and Pine Ave.) estimated to generate 2,266 ADTs.¹⁸
- Commercial Reuse project: 3,657 SF restaurant with a bar at 743 E. 4th St. estimated to generate 418 ADTs.
- Queensway Drive hotel project: 178-room hotel development at 600 Queensway Dr. estimated to generate 1,588 ADTs.
- 25 S. Chestnut Place condo project: 246 condo-unit development at 25 S. Chestnut Pl. estimated to generate 1,028 ADTs.
- Hotel Sierra (red thumbtack H): 191-room hotel development at 290 Bay Street estimated to generate 1,115 ADTs.¹⁹
- Bay Street hotel project: 138-room hotel development at 285 Bay St. estimated to generate 1,231 ADTs.
- 421 W. Broadway apartment project: 291 apartment units and 15,580 SF of commercial development at 421 W. Broadway estimated to generate 2,604 ADTs.
- George Deukmejian Courthouse: 531,000-SF municipal building containing commercial/retail space at 275 Magnolia Avenue completed in 2013 and estimated to generate 1,920 ADTs.²⁰
- Pine Avenue project: 18 dwelling units and 15,000 SF of commercial development at 433 Pine Avenue estimated to generate 764 ADTs.
- Long Beach Boulevard mixed-use project: 82 dwelling units and 7,000 SF of commercial development at 350 Long Beach Blvd. estimated to generate 1,086 ADTs.
- Ocean Boulevard dwelling/hotel project: 51 dwelling units and 47 hotel room development at 1628-1724 E. Ocean Blvd. estimated to generate 715 ADTs.

¹⁶ Long Beach Post (9/11/18) After tumultuous battle, hotel and condominium project on Long Beach shoreline moves forward, <https://lbpost.com/commentary/renderings-hotel-condominium-long-beach-shoreline-labor/>.

¹⁷ Curbed LA (8/19/16) Long Beach’s City Hall East becomes luxury apartments, renting from \$1,880, <https://la.curbed.com/2016/8/19/12527650/long-beach-city-hall-east-edison-apartments>.

¹⁸ City (5/4/16) CPC report RE: Planning Commission 2015 in Review, p. 16, <http://www.longbeach.gov/globalassets/city-manager/media-library/documents/memos-to-the-mayor-tabbed-file-list-folders/2016/may-4--2016---planning-commission-2015-in-review>.

¹⁹ Hotel Sierra (May 2009) Addendum to Supplemental EIR 14-04, <http://www.lbds.info/civica/filebank/blobload.asp?BlobID=2968>.

²⁰ California Courts (2018) Courthouse Projects, <http://www.courts.ca.gov/facilities-la-longbeach.htm>;;

- West Gateway project: 40-story tower including 694 residential units at 600 W. Broadway.²¹
- Rockefeller Partners project: eight-story mixed-use development with 120 residential units and 6,000 square feet of retail space at 1101 Long Beach Blvd.²²
- Security Pacific National Bank project: adaptive reuse project into a 13-story hotel with 189 guestrooms at 110 Pine Ave.²³

These other related projects not included in the TIS will generate at least an estimated 21,158 average daily trips (“ADTs”) that, when combined with the Project’s estimated 1,631 ADTs (Traffic Study pp. 12-13, Table 2), may result in a cumulative significant traffic impact at nearby intersections. A revised traffic study must include all related projects to ensure a conservative cumulative traffic impact analysis.

e. The TIS uses overly high internal trip credit assumptions.

The TIS applied various trip credits in its estimate of the Project’s trip generation, including a 25 percent internal trip credit for the restaurant and bar and a 50 percent internal trip credit for the spa (TIS, p. 11). These assumptions appear to be much higher than the trip credits applied to similar hotel/mixed-use projects near the LA Convention Center located in the City of Los Angeles, which apply a maximum internal trip credit of 20 percent, maximum pass-by trip credit of 20 percent, and no presumption of ridesharing services.²⁴ The TIS should be revised using more conservative and appropriate trip credits.

f. The TIS fails to analyze traffic impacts during the Project’s construction phase.

The TIS analyzes only the estimated traffic impacts of the operational phase of the Project. It completely ignores potential traffic impacts during the construction phase, when substantial renovation to the exterior of the building and rooftops will be conducted. The failure to analyze construction phase traffic impacts prevents the City and the public from achieving a full understanding of the traffic impacts of the Project. The TIS must be revised to analyze these impacts.

²¹ <https://la.curbed.com/maps/long-beach-development-downtown-project-map>; CurbedLA (8/29/18) 40-story skyscraper would be Long Beach’s tallest, <https://la.curbed.com/2018/8/29/17797158/long-beach-development-tallest-tower-40-stories>.

²² CurbedLA (Listed as project number 23), <https://la.curbed.com/maps/long-beach-development-downtown-project-map>;

²³ *Id.*, (Listed as project number 27).

²⁴ See e.g., Fig+Pico Conference Center Hotels (Sep. 2017) Draft EIR, pp. 4.10-26-4.10-33, <https://planning.lacity.org/eir/FigPico/files/4.10%20Transportation%20and%20Traffic.pdf>; 1020 S. Figueroa Street Project (Sep. 2016) Draft EIR, pp. 4.J-28, 4.J-36- 4.J-39, http://planning.lacity.org/eir/1020SoFigueroa/DEIR/4_J_Transportation_and_Traffic.pdf.

In sum, the Project does not qualify for a Class 32 categorical exemption because it may result in significant traffic impacts. The TIS inadequately studied the Project's traffic impacts and a revised and substantially more thorough study must be prepared.

3. The Project may have significant noise impacts.

The Statement of Support for Class 32 categorical exemption states that the "hotel and ancillary uses will not introduce a substantial new noise source relative to existing conditions and the project will operate within the standards of the adopted Noise Ordinance."²⁵ This claim is completely unsubstantiated, as no noise analysis was prepared for this Project. The Project will undoubtedly introduce substantial new noise sources, as the building would be converted from an out-of-use congregate care facility into a 185-room hotel with a rooftop pool and bar and an indoor minibar, restaurant, and retail uses. The City's own Noise Element Existing Conditions Report specifically lists "restaurants" and "bars" as uses that "have the potential to generate noise which may be perceived as annoying or disturbing."²⁶ Therefore, the Project does not qualify for a Class 32 categorical exemption because it may have significant impacts on noise.

4. The Project may have significant impacts on air quality.

In order to qualify for a Class 32 categorical exemption, approval of a project must not result in any impacts on air quality. CEQA Guidelines § 15332(d). The Applicant does not address whether or not the Project will have significant impacts on air quality. Given that the Project would convert a currently out-of-use building into a hotel, it will at the very least generate far more mobile source emissions. The building is currently out-of-use, generating no traffic, neither operational nor construction-related. The proposed additions to the building will generate construction-related traffic, and the proposed hotel, restaurant, bars, and retail will be open to the public. Many of these patrons are likely to travel by car. The Planning Commission cannot confirm that the Project will not have significant impacts on air quality if no study at all has been prepared for such a radical intensification of use. Because the Project may have significant impacts on air quality, it does not qualify for a Class 32 categorical exemption.

5. The Project may have significant impacts on water quality.

In order to qualify for a Class 32 categorical exemption, the Project must not result in any significant impacts on water quality. The Statement of Support states that "there are three sites located approximately 350 feet east of the project site that are listed under a tiered permit or military evaluation." Given the proximity of these sites to the Project site, there could be potential significant impacts on water quality and other aspects of the environment. "The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on

²⁵ California Environmental Quality Act Statement of Support, Class 32 (Infill Development) Exemption Determination, Section D

²⁶ General Plan Noise Element Update, "Existing Conditions Report," p. 1-15.

scientific and factual data.” CEQA Guidelines § 15064(b). The Statement of Support mentions these three sites in passing, yet does not offer any further detail about the nature or risks of these sites to water quality and human health in general. Without further study or explanation, the public cannot know whether or not mitigation measures are required. The Project does not qualify for a Class 32 categorical exemption because it may have significant impacts on water quality.

For all of the reasons stated above, the Project does not qualify for a Class 32 categorical exemption.

5. The Project does not qualify for a categorical exemption because exceptions-to-the-exemptions apply.

A project falling within a categorical exemption may nevertheless require environmental review if the project is subject to one of the exceptions-to-the-exemptions. CEQA Guidelines § 15300.2. As explained below, multiple exceptions apply to this Project because of significant cumulative impacts and potentially adverse impacts on historical resources.

a. There are significant cumulative impacts caused by other projects of the same type in the area.

Categorical exemptions “are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.” CEQA Guidelines § 15300.2(b). There are at least four projects of the same type in various stages of planning within two miles of the Project site, including the following:

- Jergins Tunnel Hotel Project, 100 E. Ocean Blvd.
- 110 Pine St. Hotel
- Queen Mary Hotel, 1126 Queens Hwy.
- Long Beach Civic Center Hotel, West Gateway²⁷

The concentration of projects in this area are precisely the kind of “successive projects of the same type in the same place” which may result in cumulative impacts.

In addition, at a presentation this past August, Mayor Robert Garcia announced plans for a development boom within the downtown core. He listed over 30 residential and commercial projects that are currently in planning or underway. There are at least four other major projects in the various stages of planning within less than half a mile from the Project site alone:

Sonata Modern Flats, 207 E. Seaside Way
Oceanaire, 150 W Ocean Blvd.
Ocean View Tower, 200 W. Ocean Blvd.

²⁷ <https://la.curbed.com/maps/long-beach-development-downtown-project-map>

Blue Line renovations, 107 E. First St.²⁸

Because of the significant cumulative impacts on the environment due to this Project, other hotels, and other major projects in the area, the Project is excepted from any categorical exemption from CEQA.

b. The Project may cause a substantial adverse change in the significance of a historical resource.

“A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.” CEQA Guidelines § 15300.2(f). In this case, arguably the most significant element of the Project is that the historic Breakers structure would not only be converted from an out-of-use congregate care facility into a hotel with a rooftop pool and food, beverage, and retail outlets, but it would include several major physical alterations to the existing building. The Project is currently designated a local historical landmark, making it presumed historically or culturally significant under CEQA. CEQA Guidelines § 21084.1. Modifications to the existing building could threaten the building’s eligibility for designation as a local landmark or for inclusion in the California Register of Historical Resources. Because the Project may cause a substantial adverse change in the historical significance of the Breakers structure, it does not qualify for a categorical exemption.

In sum, even if the Project did qualify for a categorical exemption, it would be excepted from an exemption due to significant cumulative impacts and potential adverse impacts on the significance of a historical resource.

6. The required findings for the requested entitlements cannot be made

A site plan review shall not be approved unless six findings of fact are made. The first finding states:

The design is harmonious, consistent and complete within itself and is compatible in design, character and scale, with neighboring structures and the community in which it is located. LBMC § 21.25.506(A)(1).

The Project may negatively impact the abutting Victory Park, requiring further consideration of the interaction between the two sites. Vehicular access to the Breakers Hotel will pass through the public park by way of a circular driveway, introducing potential for vehicular-pedestrian accidents. This may also interrupt recreation in the park due to consistent vehicular entrances to the Project for all of its uses, including overnight stay and restaurant and alcohol patronage. Proposed changes to the park include widening and reconfiguring the existing driveway, further limiting the acreage of open space. Because the potential for disruptive interactions between the Project and abutting park conflict with the requirement of the finding that the project design is

²⁸ *Id.*

“harmonious” and compatible “with neighboring structures and the community in which it is located,” this finding cannot be made.

In addition, the another required finding of fact states: “The design will not remove significant mature trees or street trees, unless no alternative design is possible.” LBMC § 21.25.506(A)(3). The existing palm trees are proposed to be relocated from their current positions and incorporated into the final landscape. However, the unnecessary removal of these trees could potentially harm them in the interim, and no evidence suggests that there is not a possible alternative design.

Because two of the required findings of fact cannot be made, the Planning Commission cannot approve the Site Plan Review at this time.

a. The required findings for the Conditional Use Permit “CUP” cannot be made.

In order to grant a Conditional Use Permit, the Planning Commission must find, *inter alia*, that “[t]he approval is consistent with and carries out the General Plan, any applicable specific plans such as the local coastal program and all zoning regulations of the applicable district.” LBMC § 21.25.206(A). This finding cannot be made because the Project conflicts with elements of PD-6. As mentioned earlier, PD-6 General Use and Development Standard (j) encourages a “program/policy . . . that protects and encourages lower cost visitor accommodations.” There is no mention of this general goal for the Downtown Shoreline area in the project proposal. Additionally, for any local visitors to the Project, the only option for parking off-site valet parking, which may deter middle or low-income guests, further separating the proposed Breakers Hotel from the Downtown Shoreline Area Plan goals to provide affordable visitor options.

In addition, there are numerous requirements and plan amendments listed as conditions of approval that would substantially alter the Project and that should be completed before granting the CUP. The conditions of approval for the CUP note that, prior to the issuance of building permits, City staff must review and approve the following: a hotel operations plan that includes all vehicular operations, valet operations, delivery locations, and rideshare drop off and pick-up, a revised traffic impact analysis, a grading plan with hydrology and hydraulic calculations, off-site parking lease, improvement and improvement plans, and ADA compliance.²⁹ The requirements listed for the hotel operations plan alone, especially given the many issues related to parking and on-site vehicular traffic, are substantial, and should be reviewed prior to approval of the CUP, not only as a condition for the issuance of building permits. Since there are still extensive plans that are yet to be completed and reviewed by City experts, and these numerous plan updates and approvals will affect the general welfare of the community as well as potential safety hazards, a CUP should not be granted at this time.

²⁹ See: Special Conditions of Approval 5, 8, 10, 11, 14, 19, 23, 30, 32, 34, 40, 44, 47, 58, 62, 63, 64 75, 77, 78, 80, 81, 85, 86, 89.

The staff report states that, under the LBMC, special conditions apply to alcohol beverage sales uses requiring a conditional use permit. LBMC § 21.52.210(D) requires that the use:

shall not be in a reporting district with more than the recommended maximum concentration of the applicable on or off-premises sales use, as recommended by the State of California Alcoholic Beverage Control Board, nor with a high crime rate as reported by the Long Beach Police Department.

The staff report admits that the Project site census tract is oversaturated with on-sale alcohol licenses as reported by Alcohol Beverage Control (ABC), with 78 licenses issued licenses, 73 more than the ABC recommended maximum of 5.³⁰ While there are current alcohol licenses at the location site being extended to the Project, the new extensions allow for an increase in number of on-site venues where alcoholic beverages may be consumed, potentially increasing the alcohol consumption overall.

In sum, because the Project conflicts with applicable land use plans, and the Project is located in a reporting district with more than the ABC recommended maximum concentration of on-sale alcohol licenses, the required findings cannot be made, and the Planning Commission cannot grant the CUP at this time.

b. The required findings for the requested Local Coastal Development Permit cannot be made.

The Project requires a Local Coastal Development Permit (“LCDP”) because it is located within the Coastal Zone. LBMC § 21.25.903. In order to issue an LCDP, the Planning Commission must make two required findings pursuant to LBMC § 21.25.9049(C):

1. The proposed development conforms to the certified local coastal program including but not limited to all requirements for replacement of low and moderate-income housing; and
2. The proposed development conforms to the public access and recreation policies of Chapter 3 of the Coastal Act. This second finding applies only to development located seaward of the nearest public highway to the shoreline.

Neither finding can be made because the proposed Project is inconsistent with the Local Coastal Program (“LCP”) and does not conform to the public access and recreation policies of Chapter 3 of the Coastal Act.

³⁰ Conditional Use Permit Findings, Section C(d)

The first required finding cannot be made because the Project is inconsistent with the LCP. First, the proposed Project does not strengthen the entry to Promenade South on Ocean Boulevard at the southeast corner of Pine Avenue as required by the provisions of Area 14, Breakers, of the Downtown Shoreline Policy Plan. In reference to this requirement, the LCDP findings suggest that “visitor-serving uses” can serve as a substitute: “While the project site does not abut that specific entry to the Promenade South, the change of use to a hotel . . . would constitute visitor-serving uses.”³¹ “Visitor-serving uses” cannot substitute for a requirement to strengthen an entry. The Applicant should be required to accomplish this goal concretely by, for example, widening the pathway to or explicitly directing pedestrians towards the Promenade.

In addition, the proposed Project does not comply with Building Design provision (4)G(a) of Downtown Shoreline Planned Development District (PD-6), Subarea 7, which requires a project that includes a change of use of an existing building to “provide for the eastward continuation of the east/west pedestrian walkway across the subject sites.” Because the Project includes a significant change in use, this requirement applies. Project documentation does not demonstrate that this pedestrian walkway will not be obstructed by the Project.

The second required finding cannot be made because the Project does not encourage lower cost recreational and visitor facilities. Chapter 3 of the Coastal Act requires: “Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.” Pub. Res. Code § 30213. As stated above, the Project does not propose lower cost facilities. In fact, the developer boasts “best-in-class amenities, entertainment, and dining,” in a recent press release regarding renovation plans for the existing building, suggesting that the proposed project will not be accessible to lower-income guests.³² One of the main goals of the Coastal Act is to “[m]aximize public access to and along the coast.” Pub. Res. Code § 30001.5(c). In order to fully comply with the Coastal Act, the Project should maximize public uses within the building and ensure that they are accessible to lower-income patrons.

Finally, underlying the above concerns is that the current LCP was certified in 1980 and was most recently amended in 1994. The existing conditions of the area outlined in the LCP are nearly four decades old. Since then, the entire city of Long Beach has changed dramatically, both demographically and in terms of the built environment. With the current development boom in downtown, the potential increase in traffic alone is enough of a change to delay further changes in the area. The City should not consider further dramatic changes within the legally-protected Coastal Zone until the LCP is updated and fully certified by the California Coastal Commission.

In sum, the required findings of fact for the LCDP cannot be made due to inconsistencies with applicable land use plans and Chapter 3 of the Coastal Act, and it cannot be approved at this time.

³¹ Local Coastal Development Permit Findings, Section A

³² <http://www.prweb.com/releases/2018/01/prweb15074263.htm>

7. Conclusion

To summarize, Commenters are concerned with various issues related to CEQA, including potential significant impacts on historical resources and traffic, in addition to compliance with the LBMC. The Planning Commission should deny the requested CE and land use entitlements, and the City should prepare an Initial Study and an EIR, or, at the very least, an MND.

Commenters reserve the right to supplement these comments at future hearings and proceedings for the projects. *See Cmtys. For a Better Env't*, 184 Cal.App.4th at 86; *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120.

Finally, on behalf of Commenters, Commenters request, to the extent not already on the notice list, all notices of CEQA actions and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. *See* Pub. Res. Cod § 21080.4, 21083.9, 21092, 21092.2, 21108, 21167(f) and Gov. Code § 65092. Please send notice by electronic and regular mail to: Danielle Wilson 464 Lucas Ave. #201, Los Angeles, CA 90017, danielle.wilson@unitehere11.org (cc: cdu@unitehere11.org).

Thank you for consideration of these comments. We ask that this letter is placed in the administrative record for the Project.

Sincerely,

Danielle Wilson
Research Analyst
UNITE HERE Local 11



CITY OF LONG BEACH

DEPARTMENT OF DEVELOPMENT SERVICES

333 West Ocean Blvd., 5th Floor

Long Beach, CA 90802

(562) 570-6194

FAX (562) 570-6068

PLANNING BUREAU

APPLICATION FOR APPEAL

An appeal is hereby made to Your Honorable Body from the decision of the

- ☐ Site Plan Review Committee
☐ Zoning Administrator
☒ Planning Commission
☐ Cultural Heritage Commission

Which was taken on the Nov day of 15, 2018.Project Address: 210 E. Ocean Blvd.

I/We, your appellant(s), hereby respectfully request that Your Honorable Body **reject** the decision and ☐ **Approve** / ☒ **Deny** the application or permit in question.

ALL INFORMATION BELOW IS REQUIRED

Reasons for Appeal: Landscape plan does not meet the criteria and rules of the Victory Park Design Guide Lines

Appellant Name(s): David P. DenevanOrganization (if representing) NoAddress: 4322 Charlemagne AveCity Long Beach State CA ZIP 90808 Phone: (562) 425-9910Signature(s) David P. Denevan Date _____

- A separate appeal form is required for each appellant party, except for appellants from the same address, or an appellant representing an organization.
- Appeals must be filed within 10 days after the decision is made (LBMC 21.21.502).
- You must have established *aggrieved* status by presenting oral or written testimony at the hearing where the decision was rendered; otherwise, you may not appeal the decision.
- See reverse of this form for the statutory provisions on the appeal process.

BELOW THIS LINE FOR STAFF USE ONLY

☐ Appeal by Applicant☒ Appeal by Third PartyReceived by: RTCCase. No.: 18-015Appeal Filing Date: 11/21/18Fee: 100☒ Fee PaidProject (receipt) No.: PLN 43763

LICENSED CONTRACTORS DECLARATION				WORKER'S COMPENSATION DECLARATION			
<p>I hereby affirm that I am licensed under provisions of Chapter 9 (Commencing with Section 7000) of Division 3 of the Business and Professional Code, and my license is</p> <p>License _____ Date _____ Contract _____</p> <p style="text-align: center;">OWNER-BUILDER DECLARATION</p> <p>I hereby affirm that I am exempt from the Contractors License Law for the following reason (Sec.7031 California Business and Professional Code: Any City which requires a permit to construct, alter, improve, demolish or repair any structure prior to its issuance also requires the applicant for such permit to file a signed statement that he is a licensed contractor pursuant to the provisions of the Contractors License Law {Ch.9} {Commencing with Sec.7000 of Div.3 of the B. & P. C.} or that he is exempt therefrom and the basis for the alleged exemption. Any violation of Sec.7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars (\$500.00):</p> <p>• I as owner of the property, or my employees with wages as their sole compensation, will do the work and the structure is not intended or offered for sale {Sec.7044, B. & P. C. : The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who does such work himself or through his own employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvements is sold within one year of completion, the owner-builder will have burden of proving that he did not build or improve for the</p> <p>• I am exempt under _____, B. & P. C. for this _____</p> <p>Date _____ Owner _____</p> <p style="text-align: center;">- IMPORANT -</p> <p>Application is hereby made to the Superintendent of Building and Safety for a permit subject to the conditions and restrictions set forth on the front faces of this application</p> <p>1. Each person upon whose behalf this application is made and each person at whose benefit work is performed under or pursuant to any permit issued as a result of this application agrees to and shall indemnify and hold harmless the City of Long Beach its officers, agents, and employees from any liability arising out of the issuance of any permit from this application.</p> <p>2. Any permit issued as a result of this application becomes null and void if work is</p>				<p>____ I have and will maintain workers' compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workers' compensation insurance carrier and policy number are:</p> <p>Carrier: _____ Policy: _____</p> <p style="text-align: center;">(This Section need not be completed if the permit is for one hundred dollars (\$100) or less)</p> <p>____ I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the workers' compensation laws of California, and agree that if I should become subject to the workers' compensation provisions of Section 3700 of the Labor Code, I shall</p> <p>Date _____ Applica _____</p> <p>WARNING: FAILURE TO SECURE WORKERS' COMPENSATION COVERAGE IS UNLAWFUL, AND SHALL SUBJECT AN EMPLOYER TO CRIMINAL PENALTIES AND CIVIL FINES UP TO ONE HUNDRED THOUSAND DOLLARS, IN ADDITION TO THE COST OF COMPENSATION DAMAGES AS PROVIDED FOR IN SECTION</p> <p>I hereby state that there is a construction lending agency for the performance of the work for which this permit is issued {Sec.3907, Civ. C.},</p> <p>Lender's _____</p> <p>Lender's _____</p> <p>I certify that I have read this application and state that the above information is correct. I agree to comply with all City and State laws relating to the building construction, and hereby authorize representatives of this city to enter upon the</p> <p>_____ Signature of Owner or Contractor</p> <p>_____ Date</p>			
JOB ADDRESS 210 OCEAN BLVD				RECEIPT NO. 03406643		DATE 11/21/18	
						PROJECT NO. PLNE43763	
JOB DESCRIPTION Appeal by David P. Denevan						AREA 0	
OWNER LONG BEACH PROPERTY LLC				OCCUPANCY		PLANNING MIXED USES	
ADDRESS 22900 VENTURA BLVD 200				ASSESSOR NO.		ZONE PD-6	
CITY WOODLAND HILLS CA		STATE CA		ZIP CODE 91364-1279		CENSUS TRACT 576100	
APPLICANT LONG BEACH PROPERTY LLC							
CONTRACTOR							
ADDRESS							
CITY		STATE		ZIP CODE		PHONE NO.	
STATE LICENSE NO.				CITY LICENSE NO.			
ARCHITECT/ENGINEER				LICENSE NO.			
ADDRESS							
CITY		STATE		ZIP CODE		PHONE NO.	
VALUATION 0.00		PRESENT BLDG USE		PROPOSED BLDG USE		BLDG HEIGHT 0	
						TYPE OF CONSTRUCTION	
LEGAL DESCRIPTION							

Paid by: **DAVID P DENEVAN**
\$100.00 Cash (CA)

8027360

100.00 COA Appeal Fee

N

100.00

CHECK

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
200 OceanGate, Suite 1000
Long Beach, CA 90802-4302
(562) 590-5071



✓
April 4, 2003

Greg Carpenter, Zoning Administrator
City of Long Beach Department of Planning and Building
333 West Ocean Boulevard
Long Beach, CA 90802

Subject: Victory Park Strip, 330 W. Ocean Blvd. (between Pacific Ave. & Chestnut Place).

Dear Mr. Carpenter:

In a letter dated February 5, 2003, we requested a copy of the City's action approving non-park related development within the 80-foot wide Victory Park strip located on the south side of Ocean Boulevard between Pacific Avenue and Chestnut Place. The non-park related development consists of concrete pads, retaining walls, fences and electric transformers housed in green cabinets. You responded to our request in a letter dated February 12, 2003. Thank you for your prompt response.

In your letter dated February 12, 2003, you assert that the City approved the non-park related development within the 80-foot wide Victory Park strip as part of condition compliance procedure that had been delegated to the City Recreation Commission by Special Condition No. 46 of Local Coastal Development Permit No.0002-25. The Planning Commission approved Local Coastal Development Permit No.0002-25 on November 16, 2000 for "The Park at Harbour View" (Camden Development Inc.). We continue to maintain that Local Coastal Development Permit No.0002-25 did not include authorization for any non-park related uses within the 80-foot wide Victory Park strip that fronts the development site.

Special Condition No. 46 of Local Coastal Development Permit No.0002-25 states:

Prior to issuance of a building permit or approval of a final map, the applicant shall obtain approval from the Recreation Commission for the Victory Park improvement plan. Any section of the Victory Park area, if it has not been properly dedicated for park purpose, the applicant shall offer such a dedication with the approval of a final map.

Further, the City's adopted findings for the approval of Local Coastal Development Permit No.0002-25 state:

"The proposed development conforms to the certified Local Coastal Plan...
...Furthermore, the entire strip of land designated as Victory Park located within the proposed subdivision will be properly dedicated for park purpose with the approval of a final map."

The proposed and City-approved plans for the proposed subdivision designated Victory Park as the entire 80-foot wide strip of land located southerly of the Ocean Boulevard curblin, consistent with the requirement of the certified Local Coastal Plan.

The certified City of Long Beach Local Coastal Plan, in regards to Victory Park, states:

All new development between Ocean Boulevard and Seaside Way, above the Ocean Boulevard curb level, shall be set back a minimum of eighty feet from the Ocean Boulevard curblineline, as existing on July 1, 1989, or set back the width of the City park strip, whichever is greater." [PD-6 General Development and Use Standards, Section (c)].

The Commission, in good faith, relies on the local government's findings and conditions when it decides whether or not to appeal a local decision on a coastal development permit that affects coastal resources. In this case, the Commission determined that the above-stated special condition and finding of consistency would ensure that the entire Victory Park strip in the project area would be protected for public access and recreation in perpetuity as required by the certified Local Coastal Plan.

Your letter dated February 12, 2003 states that Special Condition No. 46 of Local Coastal Development Permit No.0002-25 enabled the City to permit non-park related uses (transformers) to displace portions of the 80-foot wide Victory Park strip that was previously approved and required as part of the development authorized by the Planning Commission on November 16, 2000. Special Condition No. 46 requires the applicant to, "...obtain approval from the Recreation Commission for the Victory Park improvement plan."

We disagree with your assertion that the Recreation Commission's approval of the Victory Park improvement plan could be used to alter the size or dimensions of the previously approved and required 80-foot wide Victory Park strip or to add non-park related uses.

The certified LCP (Page III-DS-34) states:

"No parkland which has been dedicated or designated within the coastal zone shall be committed to another use unless the City replaces such parkland on an acre-for-acre basis within or adjacent to the coastal zone **with the approval of the California Coastal Commission.**" [Emphasis added.]

The Special Condition No. 46 of Local Coastal Development Permit No.0002-25 authorizes the Recreation Commission to approve a Victory Park improvement plan. We assert that in carrying out Special Condition No. 46, the Recreation Commission's authority to approve the Victory Park improvement plan is limited to approving the design of the improvements for the previously delineated park strip, absent any further review by the Coastal Commission to consider possible revisions. The Recreation Commission's approval of the Victory Park improvement plan pursuant to Special Condition No. 46 can not be used to justify a change in the park boundaries, permitting of non-park uses, or any displacement of parkland, whether consistent with the certified LCP or not. The change to the dimensions of the Victory Park strip is not consistent with the plans approved by the City on November 16, 2000 and reviewed shortly thereafter by Commission staff. As such, the originally approved dimensions of the Victory Park strip remain part of the duly approved coastal development permit. Any change to the dimensions of the park or addition of non-park uses to the park strip can be approved only as part of an amendment to the previously approved local coastal development permit.

Such an amendment would be appealable to the Coastal Commission. The Coastal Commission would then review the proposed changes to the park, including any parkland replacement plan, for compliance with the policies of the certified LCP and the public access policies of the Coastal Act.

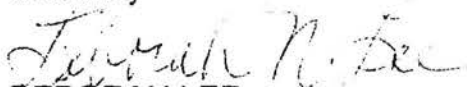
Since the City did not follow this process, we consider the non-park uses (e.g., concrete pads, retaining walls, fences and electric transformers housed in green cabinets) now located within the 80-foot wide Victory Park strip to be unpermitted development in Victory Park.

✓ We are also concerned that the City's proposed design for the Victory Park strip, between Pacific Avenue and Chestnut Place, may not conform to the Victory Park Design Guidelines, adopted by the Planning Commission on October 26, 1989. The Victory Park Design Guidelines include the following design requirements: the park strip shall be developed as an informal landscaped public park, and not be utilized to accent the entrance to the adjacent development; one pedestrian walkway, no wider than eight feet, is permitted to connect each development to the Ocean Boulevard sidewalk; one public bench shall be installed in the park for each sixty feet of frontage; and trash receptacles and drinking fountains shall be provided. Our office would welcome any additional opportunity to comment on the City's proposed park improvement plan.

In order to avoid problems like this in the future, we suggest that the final design plans for all parkland improvements be reviewed and approved as part of the local coastal development permit process, instead of being delegated for approval after the City takes its final action on the local coastal development permit. We will carefully review all future local coastal development permits that include development in or adjacent to Victory Park (or other parkland) to ensure that they include protection of all affected parkland and recreational resources. Commission staff will consider appealing any local approval that lacks such assurances or does not maintain and protect the Victory Park strip.

Thank you for your cooperation in this matter and we look forward to working with you and your staff in the future. Please call Charles Posner at (562) 590-5071 if you have any questions.

Sincerely



DEBORAH LEE
Deputy Director

Dayna Bochco, Chair
California Coastal Commission
45 Fremont St.
Suite 2000
San Francisco, CA 94105

Nov. 20, 2018

Dear Dayna Bochco,

Pursuant to the Victory Park Design Guidelines, I'm appealing the Nov. 15, 2018 Long Beach Planning Commission's approval to remove lawn and park space from the beleaguered Victory Park in front of the Breakers' building at 210 E. Ocean Blvd. (I have no problem with the conversion of the adjacent Breakers to a 4 star hotel.)

Keep the existing lawn which has been there since at least 1925. To conserve water, install moisture sensors. Don't turn this park area into a desertscape! In the burgeoning heart of Downtown, we need lush, green public spaces to soften all the blacktop, concrete, stucco, glass, glare and din.

Most of it dating from 1889, Victory Park, along with Santa Cruz Park to the west, is a ribbon of lush lawn between Alamitos and Golden Avenue, broken in places by streets and gross overuse of concrete pavement in a public park.. The two parks are dedicated "in perpetuity." They are protected by the LCP (Local Coastal Program) , that is supported by the Victory Park Design Guidelines. These documents are worthless if government officials don't enforce them!

In 1977, there was a public outcry after a long history of the adjacent property owners and developers degrading these public parks! That eventually resulted in inclusion of the parks in the LCP, and creation of the Guidelines, all with broadly-based public input and support!

As new buildings were proposed for the south side of Ocean Blvd., concerned citizens successfully fought for inclusion of park signage, benches, drinking fountains, etc. But the damage had been done! Part of the 14 storey Union Bank sits in what had been a section of

the Olmsted Brothers design for Santa Cruz Park. (This firm had also designed the White House grounds.) Without park signage and benches, long swaths of precious park became de facto front yards for adjacent property owners on Ocean Blvd. One office building's raised concrete terrace replaced park lawn!

In 1983, an ARCO Tower's guard ejected me from Santa Cruz Park lawn, saying, "This is not a park. I have orders to run people out." With the help of the ARCO CEO, Parks and Rec. and the neighborhood group CHAG, \$5,000 was raised to reclaim OUR park. A concrete 12 - foot long "SANTA CRUZ PARK " sign was installed!

Pursuant to the Guidelines I want the following:

1. No loss of park space.
2. The lawn area preserved in grass.
3. Concrete park identification signage that's easy to read by people passing by on Ocean Blvd. A 2 x 5 foot sign should read:
SANTA CRUZ PARK
Established 1889
City of Long Beach
4. Inviting, comfortable wood and steel benches. **NO CONCRETE BENCHES!**
5. Drinking fountain and trash receptacles.
6. Limit the permitted new sidewalk across the park to 8 feet in width, with no staggered sections of concrete walk.

See specifications for all of the above in the Victory Park Design Guidelines.

Sincerely,



David P. Denevan
4322 Charlemagne Ave.
Long Beach, CA 90808
562- 425- 9910
Enclosures

Nov. 20, 2018

**Attention: City Clerk
Long Beach City Council
333 W. Ocean Blvd.
Long Beach , CA 90802**

Dear Mayor Garcia and Members of the Council,

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See specifications for all of the above in the Victory Park Design Guidelines.

Sincerely,



David P. Denevan
4322 Charlemagne Ave.
Long Beach, CA 90808
562- 425- 9910
Enclosures

Nov. 15, 2018

Dear Members of the Long Beach Planning Commission,

The landscape plan for Victory Park in front of The Breakers does not comply with the Victory Park Design Guidelines.

**NOT ENOUGH GRASS! TOO MUCH PAVING!
REDUCTION OF PRECIOUS PARK SPACE!**

Guidelines are not suggestions. They carry out the mandate of the California Coastal Commission's Local Coastal Plan (Program) for OUR park.

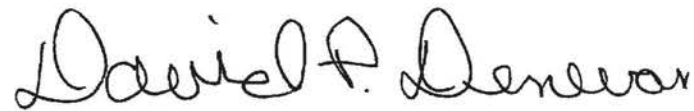
Twelve civic groups were successful in getting Victory and Santa Cruz Parks into the Local Coastal Plan that called for a consistent design for a grassy ribbon of lush green from Alamitos Ave. to Golden Ave. on Ocean Blvd.

This was after these parks had become venues for commercial signage; sections of park had been paved over, and some turned into sterile rarely used terraces. Large swaths of grass were turned into defacto front yards by adjacent property owners, without any indication that they were public parks

NOTE: Several decades ago, after the local Coastal Commision had put the guidelines in force, the THEN owners of The Breakers removed benches and light fixtures from Victory Park, not replacing them. So please stay alert, informed, and stand up for Victory Park.

For 41 years, with other park preservationists, we have successfully fought for park signage, benches, drinking fountains, trash containers and we saved 2 magnificent trees in Santa Cruz Park. There was always a fight against some developer, but we persevered.

Sincerely,

A handwritten signature in black ink that reads "David P. Denevan". The signature is written in a cursive style with a large, stylized "D" at the beginning.

David P. Denevan

4322 Charlemagne Ave.

Long Beach, CA 90808

VICTORY PARK DESIGN GUIDELINES

October 26, 1989

Victory Park was deeded to the City in 1889. Since that time the area has historically served as the front yard to the Long Beach Central Business District. Today, the area functions as the major passive linear park in the Greater Downtown.

PURPOSE

Victory Park was formally declared and dedicated for public park purposes in 1980. The purpose of these guidelines is to insure that the land is available for the enjoyment of the citizens and general public of Long Beach. At the same time, the guidelines serve to coordinate the design and renovation of the park to cause a design that is reminiscent of historic Long Beach and reinforces the character of Ocean Boulevard as a grand boulevard.

APPLICABILITY

These guidelines apply to all portions of Victory Park from Alamitos to Golden Avenue and shall govern for both new construction and renovation.

PRINCIPAL USE

The principal use of the park surface is passive and visual public open space.

The following uses and elements are prohibited:

- All private and commercial uses.
- All new driveways, ramps, parking at or above grade, porte cochere, bicycle paths, retaining and freestanding walls or architectural elements not listed as permitted.
- Directional, private and commercial signs.

Between Pacific Avenue and Long Beach Boulevard, mobile commercial vendors and public information kiosks may be permitted, as determined appropriate by the City Planning Commission.

DESIGN CHARACTER

The design shall be developed as an informal landscaped public park.

TOPOGRAPHY

Grading and Drainage:

The northern 75% of the park width shall be graded to appear to be level with the top of curb and sidewalk. The maximum grade permitted is 3.0% starting from the top of curb at Ocean Boulevard and extending to the southern 75% of the park. Drainage shall be accomplished by area drains.

Low berms are permitted in the southern 25% of the park, provided the area is planted with groundcover, shrubs and/or seasonal color. Berms shall not be located in or interfere with required view corridors. Berms shall be informally shaped, with a maximum slope of 2:1 and shall not exceed five feet in height above the top of the Ocean Boulevard curb.



ARCHITECTURAL ELEMENTS

Fountains and Sculptures

- Appropriately designed fountains, and sculptures are permitted in the southern 25% of park (only). It is intended that these features accentuate the park and public usage, while at the same time protect the continuity of the lawn. These features shall not be utilized to accent an entrance to the adjacent development.

Walkway

- One pedestrian walkway is permitted to connect the Ocean Boulevard sidewalk to each development south of the park. The intent is that the walkway be unobtrusive and does not "read" as a major entrance to the adjacent development, nor should the walk serve as a major design element in the park. The walk shall be no greater than 8' in width and shall be surfaced with dark brown iron stone pavers, running bond pattern parallel to the walk length. Pavers shall be as specified by the Public Works Department. One half inch mortar joints shall be provided. The walk shall be flush with the lawn.

- Entrances to the promenade and treatment of required view corridors shall be as specified in the Local Coastal Plan and subject to Site Plan Review.

Mowing Strip

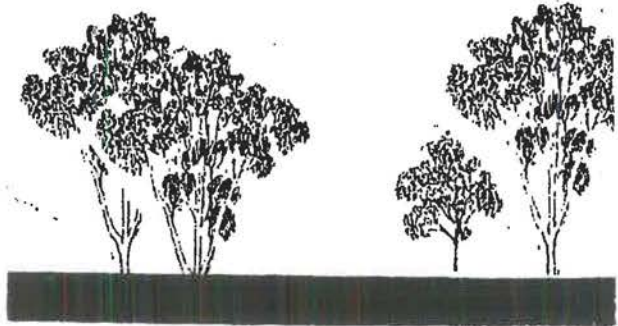
- A 6" wide concrete mowing strip shall be installed to separate lawn areas from groundcover and shrub beds. The strip shall be of natural color and shall be flush with lawn grade.

Seating

- One bench shall be installed for each 60' of frontage. Benches shall be informally spaced and placed directly adjacent to the mowing strip. Benches shall be placed on a natural color concrete pad which shall be the scale dimension as the bench. The concrete pad shall be flush with the lawn. Benches shall be as manufactured by Victor Stanley or approved equal as follows:

Model UB 318-4

Specifications—Bench shall have eighteen (18) wood slats in a reverse contour design, six (6) foot in length. Wood shall be "IPE", 2" x 3" slats with leading edges of the top and bottom slat having large radius finish detail. Leg and center-brace contour bars shall be solid 3/4" thick x 3" wide steel bars. Legs shall be in-ground mount—high-tensile strength 2" square tubular steel welded directly to formed contour bar. All steel shall have "Publicote", powder-coated finish. Bench frame shall include "Unislat" bracket design complete with applicable hardware.



- Sculptural benches may be substituted for that specified, providing that the bench is executed or designed by a recognized artist and the bench is found to be appropriate to the parking design.

Trash Receptacles

- One trash receptacle shall be provided for each 150 linear feet of Ocean Boulevard frontage. Receptacles shall be placed adjacent to the Ocean Boulevard sidewalk upon a concrete pad the size of the container. Receptacles shall be as manufactured by Victor Stanley or approved, equal as follows:

Model HF-24

Specifications—Waste container to be 24 gallon capacity. There shall be 24 - 2" x 3" wood slats attached to "Publicote", powder-coated, treated, welded steel frame. Wood shall be "IPE". Each frame to consist of three (3) steel rings (1/2" x 1" flat steel), welded to eight (8) vertical rods, with eight rods across the base. Lid shall be fiberglass attached by stainless steel aircraft cable. A high density plastic liner shall be provided.

Drinking Fountain

- One drinking fountain shall be provided for each block face. Drinking fountains shall be adjacent to the Ocean Boulevard sidewalk. Drinking fountains shall be as manufactured by Haws, model number B176 concrete aggregate, with number 6610 sand trap or approved equal.
- Sculptural drinking fountains may be substituted for that specified providing that it is executed or designed by a recognized artist and is found to be appropriate to the park design.

Signage

- A sign shall be placed at the intersection of each north/south street and shall contain the following information:

Victory Park
Established in 1889
City of Long Beach

Such signs shall either be in the form of a bronze plaque, flush in the Ocean Boulevard sidewalk or as a monument sign not to exceed two feet in height (from grade) by five feet in length. Such signs shall be in concrete lettering size and styles shall be as specified by the Public Works Department.

✓ PLANTING

- ✓ A double row of palm trees (*Washingtonia robusta*) spaced 30' on center shall be planted on either side of the Ocean Boulevard sidewalk. Palms shall be 20' in height when installed.
- ✓ The northern 75% of the park depth shall be planted in lawn. Sod is mandatory and shall consist of Hybrid Bermuda Hybrid "Marathon".
- ✓ The southern 25% of the park shall be planted and coordinated with groundcover and seasonal color beds, shrubs and trees as follows:

Groundcover perennials and seasonal color beds:

The purpose of these beds is to provide a lush, changing display of seasonal color. Although planting is to be informal, major emphasis shall be placed on coordinated mass.

Shall be evergreen and may consist of Star Jasmine (*Trachelospermum jasminoides*), Lily-of-the-Nile (*Agapanthus africanus*), Bird of Paradise (*Strelitzia*), Saxifraga, (*Saxifraga umbrosa*) as well as seasonal annual color.

The minimum size for groundcover shall be flats planted a maximum of 12" on center. Perennials shall be a minimum of 1 gallon size, planted a maximum of 18" on center. Seasonal color shall be a minimum of "quarts" and planted a maximum of 12" on center.

Shrub Beds:

It is intended that the shrub beds serve as the backdrop for the groundcover and seasonal color.

Low growing shrubs are encouraged, provided there is to be strong coordination with the groundcover and seasonal color. The minimum size for shrubs is 5 gallon, maximum spacing is 3', on center shrubs shall be grouped and planted informally.

The following species are permitted: Azalea sp. Mirror Plant (*Coprosma repens*), Indian Hawthorn (*Raphiolepis indica*), Gardenia (*Gardenia* sp.) Hibiscus (*Hibiscus* sp.)

✓ Trees:

Trees will serve as a backdrop to the park. Primary trees shall be utilized to define the end of the park space. Secondary trees shall be utilized to accentuate and to provide interest. All trees shall be informally spaced. Groupings are preferred over individual plantings.

Primary trees shall consist of Coral trees (*Erythrina caffra*) and Eucalyptus, *sideroxylon*, minimum size 60" box. A minimum of one tree shall be provided for each 35' linear feet of property line. Trees shall be informally planted in the southern 25% of the park per block.

Secondary trees shall be provided at the rate of one tree per 30' of linear frontage, informally spaced and shall be of 48" box size. Secondary trees shall consist of one or more of the following: *Albizia julibrissin*, *Melaleuca leucadendra* or *McIlveya nesophila*. *Metrosideros tomentosa*, *Ficus rubiginosa*, *Pinus hallpensis* and *Prunus* sp. (flowering peach is strongly encouraged).

DECORATIVE LIGHTING

Uplighting on palm trees: Each of the palms in the double row of trees at the Ocean Boulevard sidewalk shall be uplighted. Single upright floodlights shall be strapped to the trunk 10 feet above grade to the specification of the Director of Public Works.

Floodlighting of shrubs: Shrubs groundcover, and seasonal color shall be lighted. All light sources shall be concealed.

REQUIRED PLANS

Prior to approval of site plan review, the applicant shall submit three sets of the following working drawings to the Director of Planning and Building:

- grading and drainage plans, which shall include the location of all architectural elements. Plans shall indicate by spot elevation, contours and drainage lines of the topography.
- complete planting plans, specify species, size and location.
- night illumination plans, specify the location and type of fixtures.
- complete irrigation plans.

MAINTENANCE

The landscaping shall be maintained to the standards as established by Public Works Department by the adjacent property owners.

✓ These guidelines have been prepared in cooperation with the following Long Beach Departments:

✓ City Manager's Office
Community Development
Parks and Recreation
Police
Public Works

VICTORY PARK DESIGN GUIDELINES

✓ ADOPTED OCTOBER 26, 1989
LONG BEACH CITY PLANNING COMMISSION
CITY OF LONG BEACH



beachweek

PARK: Condos raise ire

CONTINUED FROM BW1

"These are all symbols of public parks," Denevan said. "If the public doesn't perceive this as a park, they're not going to use it as a park."

The council agreed, telling the developer to include benches in front of the berm where people can see them, add the fountain and erect the signs.

While the landscaping plan is complete, the project has at least one more hurdle to overcome before construction can begin.

Community activist James Sturm filed a petition for a restraining order preventing construction from commencing.

Sturm asserts in his petition that the city is giving away

public land to a private developer.

And he asserts the city is destroying a public park — an area where "many healthy, mature, irreplaceable shade trees (provide shelter for) many kinds of birds, including the endangered migrating spotted-white owl, squirrels and other park creatures."

City Attorney Bob Shannon said he was aware of the filing but had not had an opportunity to review it.

The filing is expected to be heard Dec. 13 in Presiding Judge Tracy Moreno's courtroom.

"We will appear," Shannon said. "We will oppose."

Staff Writer Joe Segura contributed to this report.

Press-Telegram

A8 WEDNESDAY, DECEMBER 12, 2001

NEWS

L.B. approves Bicycle Master Plan

Council: Proposal sets upgrade timing, location to raise bike ridership.

By Jason Gewirtz

Staff writer

LONG BEACH — The city has talked for years about adding new bicycle lanes, paths and routes to its existing network.

On Tuesday, the City Council approved a plan that spells out how, where and when those new routes will be built.

The city's first Bicycle Master Plan offers city planners ways to encourage more people to use pedal power as their mode of transportation.

"A lot of people are going to ride safer because of it," Councilman Ray Grabinski said.

The plan will also allow the city to go after state and federal funding for bicycle improvements, said Tim Price, executive director of Long Beach Cyclists, a bicycle advocacy group.

The plan has a goal of increasing city bicycle ridership by 5 percent over the next 20 years. Included in the plan are short- and long-term goals for where bike paths, lanes and routes should be placed throughout the city.

Also, the plan encourages bicycle education to remind drivers and bike riders of the rules of the road.

New lanes won't appear overnight. Rather, the new plan encourages city officials to make roads more bicycle friendly by adding bicycle lanes or wide shoulders when roads are repaired and re-striped, Price said.

Mariposa dancing

Mariposa restaurant will be able to offer dancing on two more days — Wednesdays and Sundays — as the council approved a new permit Tuesday.

The Police Department had originally opposed the application, citing excessive noise and rowdiness during dancing hours Thurs-

day to Saturday at the 135 Pine Ave. restaurant.

But Tuesday, Police Chief Jerome Lance said the department has been working with Mariposa's owner since then and those problems have been addressed.

The permit approval comes with several conditions, including that the restaurant close its doors and windows when music is played.

Victory Park

Several mature trees will be removed from a grassy area near Ocean Boulevard to make way for a new apartment complex. But the redeveloped park will include new trees, more benches, an extra drinking fountain and signs identifying the area as a park.

The council on Tuesday approved a landscaping plan for the 21-story, 556-unit Genesis Realty project, which will be built between Linden Avenue and Hart Place.

About 20 of the 58 mature trees will be destroyed: 38 will be

removed and replanted in the park. The area is part of Victory Park, which extends along the south end of Ocean Boulevard from Alamitos Avenue to Cedar Avenue. The park includes the grassy areas in front of most high-rises on the south side of Ocean Boulevard.

Resident David Denevan argued for the benches, fountains and signs saying people should be encouraged to use the park.

Fast food

Plans for a Taco Bell at the northeast corner of Long Beach Boulevard and Wardlow Road won approval Tuesday, but the City Council denied a drive-through lane and window for the project.

Several residents argued that the lane would attract too much traffic and trash to the area. Grabinski, whose 7th District includes the site, agreed.

"I don't think this is a good thing for the community," he said.

LAST MINUTE COMPROMISE DEAL

Additional Signs, Benches Lead To Approval For Victory Park Plan

By Kurt Helin
Editor

After a couple of last-minute changes, the City Council became the latest — and last — body to approve a plan to tear up and rebuild a portion of Victory Park downtown as part of construction of a new condominium complex.

The council backed the plan with a unanimous vote, after concerns about the size of signs in the park and other amenities that will make the redone area look and feel more like a park.

While that was a victory for some park activists, others that were looking to stop the adjacent condominium project or to save some of the larger trees currently on the site fell short of their goals. One activist on the issue — Jim Sturm — said he had filed a lawsuit aimed at blocking both the changes to the park and the condo project.

That condominium project and the plans for the park have stirred the ire of some activists since they were announced more than a year ago. Called the Ocean Villas condominiums, the two 18-story towers will be built by Dallas-based developer Genesis Realty. The \$75 million project is located on the south side of Ocean Boulevard bisected by Elm Avenue. Last week, the Redevelopment Agency granted the developer three more months to start work, pushing a start date back to March of next year.

Fronting the property — as with other recently-built condominium projects along the south side of Ocean Boulevard east of Alamos — is Victory Park. Called for in 1898, re-dedicated by the council in 1980, the park is supposed to honor the nation's veterans.

Park activists have said that instead, the park has been ignored by city officials and has been taken over by the owners of the large condominium and office owners that have gone up along Ocean Boulevard. Some council members agreed that the park has not always been thought of as a park.

"What has happened in the last 30 years is we forgot this was a park for the people and we have to put in amenities for the people," said Seventh District Councilman Ray Grabinski.

Genesis proposes an underground parking structure for its project that would extend under Victory Park, something that is permitted in the Local Coastal Plan, city staff told the council members (although some activists questioned that). However, to do that will involve tearing up part of the park and rebuilding it afterward.

Of the 58 trees on the site, 38 would be taken out then replanted after the work, according to the plans. However, the largest and most recognizable trees on the site would be removed permanently and destroyed, something that park activist Ann Cantrell and others said should not happen. City officials said the trees are diseased and would not survive a move to another location. When the park is replanted, there will be 25 new coral trees, 21 rusty fig leaf trees and an assortment of other new plants.

Where activists earned a victory was a push to have the park look and feel like a park. In the design presented to the council, following the park guidelines, the first two-thirds of the park is

flat and at the level of Ocean Boulevard. Behind that is a berm where most of the plants would be, and behind that berm were the benches and fountains.

"All I'm asking for today is (park) signs large enough to be seen from Ocean Boulevard, another drinking fountain and park benches in front of the berm," said David Denevan, one of the people who appealed the ap-

proval of the landscaping to the council.

Denevan and the project developers talked at the meeting while council members and other members of the public spoke, and in the end came to a compromise deal that includes Denevan's demands.

With that compromise, the council members had no problem supporting the park plan.

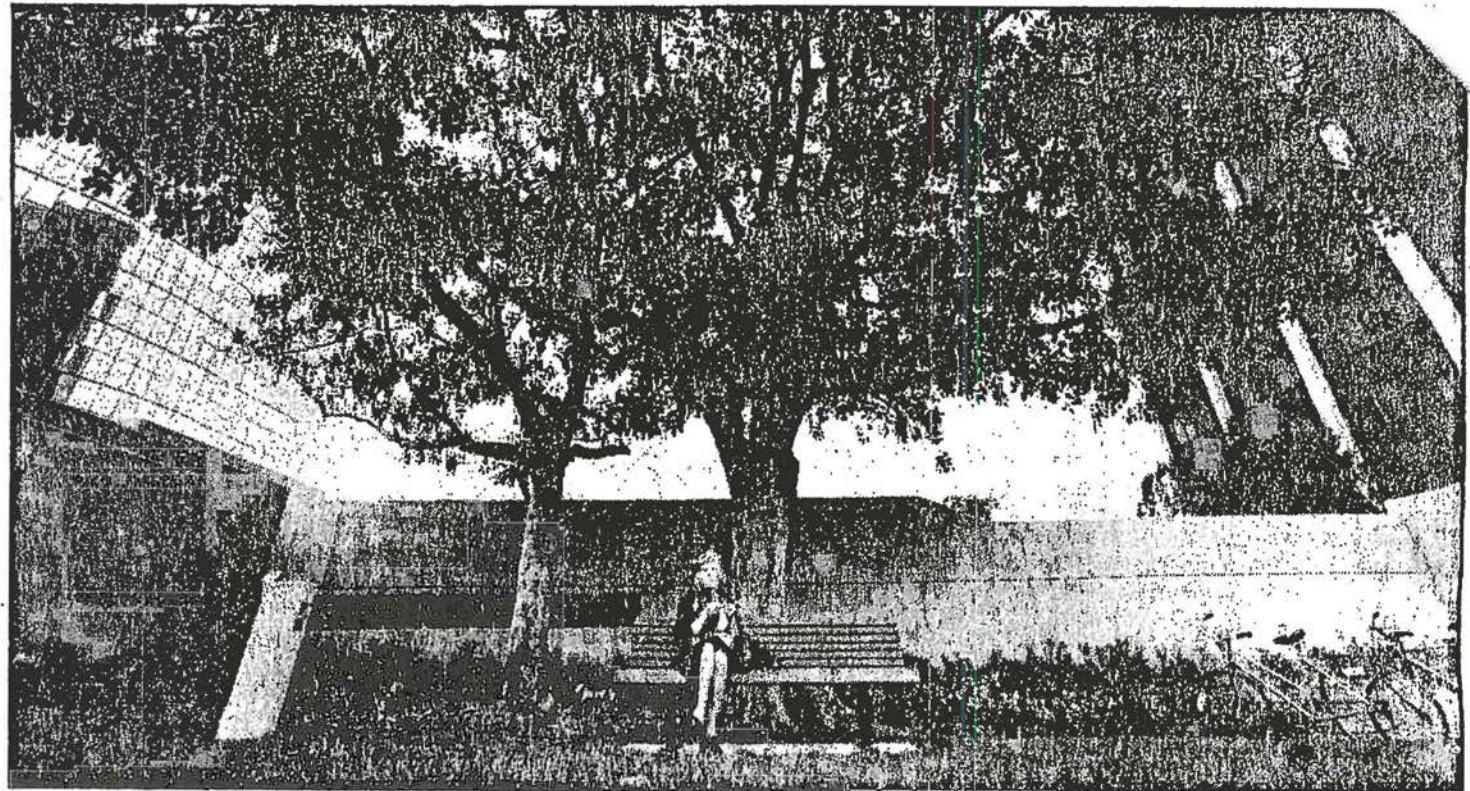
Long Beach

The City Council on Tuesday asked the city manager to investigate a resident's complaint that Atlantic Richfield Co. apparently was violating an agreement to retain public access to the remnants of an abandoned municipal park that forms part of the site of the oil firm's new downtown office building.

Resident David Denevan told the council in a letter that a security guard recently ejected him from the 40-foot-wide landscaped strip in front of the Arco Towers. The guard said the area was private property, Denevan wrote.

He asked the council to order Arco to place a sign identifying the area as public property. The blocklong strip was once a part of Santa Cruz Park, built in 1889 south of West Ocean Boulevard and later abandoned by the city.

The council acted unanimously and without debate.



PRESS-TELEGRAM/ROGER COAR

New look for old L.B. park

Santa Cruz Park, a 94-year-old downtown park that ranks as one of the city's oldest, was reopened Wednesday. And Emmeline Miller, a longtime Long Beach resident, made immediate use of one of its new

benches to pass some time knitting. The small park, noted for its towering old eucalyptus and Moreton Bay fig trees, is located on Ocean Boulevard between the new Arco Towers and the Union Bank building.

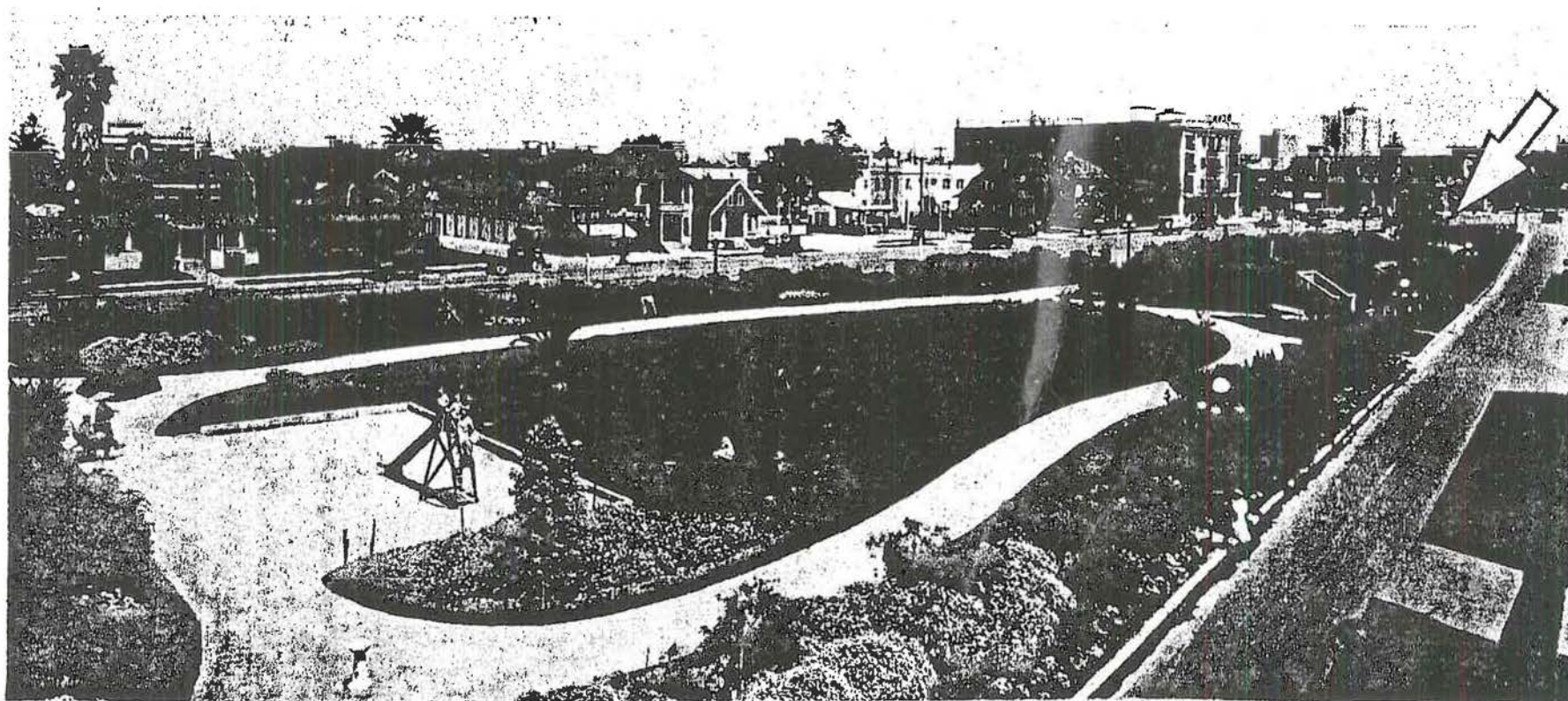
SECTION B/PRESS-TELEGRAM/THURSDAY, JUNE 30, 1983

SANTA CRUZ PARK PICNIC

YOU ARE CORDIALLY INVITED TO ENJOY A "BROWN BAG" PICNIC IN THE SHADE OF SANTA CRUZ PARK'S MAJESTIC MORETON BAY FIG TREES. HELP US CELEBRATE THE REOPENING OF ONE OF OUR CITY'S OLDEST PARKS (ESTABLISHED IN 1889). THERE WILL BE A RIBBON CUTTING CEREMONY.

NOON WEDNESDAY, JUNE 29th
700 WEST OCEAN BOULEVARD

(In Front of Arco Center)



Santa Cruz Park. Circa 1926. View looking north toward Ocean Boulevard. Photo was taken from a location that is presently occupied by the Union Bank Building. The Olmsted firm, which planned New York Central Park and the U.S. Capitol grounds, designed the Long Beach park in 1923. Arrow points to eucalyptus sapling, now one of the old park's three surviving trees. The trees are among the largest in the Downtown area.

In the 1970's the park was reduced in size by West Beach redevelopment and widening of Ocean Boulevard. At the request of a dozen citizen groups, the Redevelopment Agency, City Council and Planning Commission agreed to

preserve the remainder of the park for public use. New lawns, oak benches and a drinking fountain were recently installed. Santa Cruz Park's greenery and connection with the City's early history complements the adjacent glass and steel office towers.

Homeowners Downtown Associates, sponsor of the picnic, will dedicate the vestpocket park to the memory of the late Grace Rose, Minta Springer and Admiral Lawrence Ruff, three of the many people who worked to save the park and its stately trees.

Takeover of Long Beach Park Space Stirs Debate

By DAN WEIKEL
TIMES STAFF WRITER

In 1889, two public parks that formed a mile-long promenade of flower beds, eucalyptus and Moreton Bay fig trees on the coastal bluffs of downtown Long Beach were dedicated in perpetuity for recreation. Today, Santa Cruz and Victory parks along Ocean Boulevard don't seem so public anymore.

Modern office buildings, high-rise condos, walls, steps and driveways encroach on much of the land. Giant slabs of modern sculpture and 18 commercial real estate signs also intrude, most of them without permission.

Passersby who venture onto some of the remaining parcels risk being shooed away by security guards.



KEN LUBAS Los Angeles Times

Traci Wilson-Kleekamp and daughter Erin visit Stearns Champions Park, which she helped save.

Over the decades, downtown development decisions by City Hall have transformed Victory and Santa Cruz into little more than landscaping for private property. Such cannibalizing of parkland for

uses other than public recreation has been a regular occurrence in Long Beach, already affecting or threatening an estimated 20 sites.

Now, a public outcry is growing over those losses and ongoing at-

tempts by local government to take recreational areas for other uses. Consequently, elected officials are beginning to rethink guidelines for the city's 70 parks.

Please see PARKS, B2

PARKS: History of Takeovers Stirs Debate

Continued from B1

Last week, a City Council committee embarked on a plan to inventory recreational land, identify new park sites and give citizens more of a say in how their parks will be used. The panel also held the first in a series of public hearings on the issue.

"A lot of people have been waiting a long time for this," said City Councilman Ray Grabinski, who proposed the park meeting. "We need to make sure that no short-term gain takes away from the long-term gain of saving what we have and acquiring more land for parks and open space."

Long Beach, which is the state's fifth-largest city, has about 2,500 acres of parkland, including beaches, municipal golf courses and public school playgrounds. The parks vary in size from so-called pocket parks of less than half an acre to massive El Dorado Park with 650 acres.

The National Recreation and Parks Assn. recommends that cities have a minimum of 10 acres of parks per 1,000 residents. But Long Beach has about six acres per 1,000, less than many major metropolitan areas, including New York City.

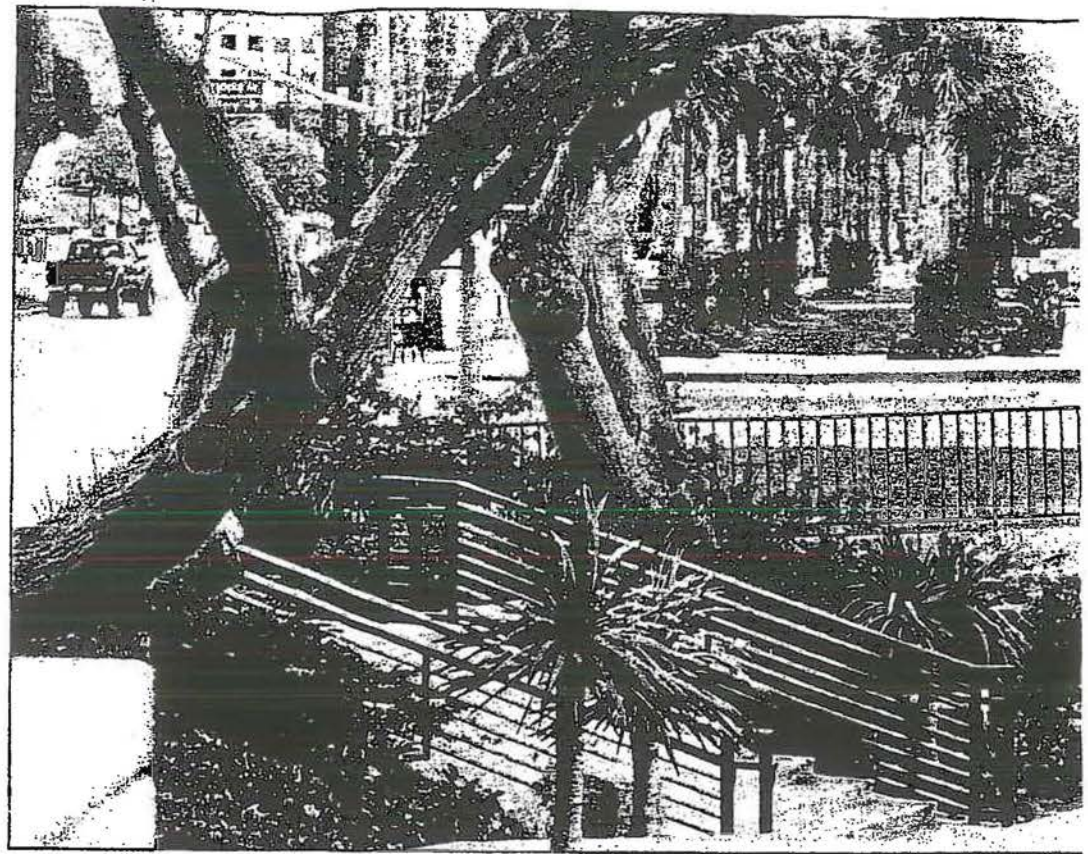
More Space in Affluent Areas

Most of the recreational land is concentrated on the city's affluent east side. The 3rd and 5th council districts, for example, have four acres and 18 acres of parks per 1,000 residents, respectively. The 1st Council District in downtown, among the poorest, has less than half an acre per 1,000 residents.

Preservationists say that demand for parks is growing with the population and that Long Beach should end its long history of trying to put private and non-recreational facilities on public parkland.

Much of Lincoln Park, the city's first and perhaps most famous, was taken in the 1970s for a massive expansion of the main library and construction of a concrete plaza in front of the new City Hall.

A temporary police station sits in Scherer Park. Heartwell Park contains a large day care center. Five



Driveways and stairs have replaced grass in some parts of Santa Cruz Park in Long Beach

stations, government buildings, freeways and redevelopment projects now sit on what was once other parkland or public beaches.

Still other recreational lands have been lost due to subsidence from oil drilling, changes in the city master plan, and expansion of the Port of Long Beach, one of the busiest harbors in the nation.

Victory and Santa Cruz parks, which run from Golden Shore to Alamitos Boulevard, have practically been erased by commercial development approved by the city over the last three decades.

"It's been a giveaway and the slow privatization of public land," said Lester Denevan, a former city planner, whose complaints about illegal real estate signs in both parks are being reviewed by Long Beach park officials.

Preservationists and city officials partly blame the situation on a lack of clear guidelines designating what can be built on parkland. Long Beach, they say, has never formally differentiated its parks from other city property.

"We need direction for the future," said city Parks Director Phil Hester. "There needs to be a balance between open space, natural areas, recreational facilities and government uses."

Under current zoning, day-care centers, preschools, communication towers, parking lots, certain private clubs, community service organizations and school play

grounds, as well as government buildings, can be located in parks.

The ordinance is "too broad," said Pat Garrow, a Long Beach city planner. "There should be open space and recreational uses. As far as other structures [are concerned], I would like to see us draw a line somewhere."

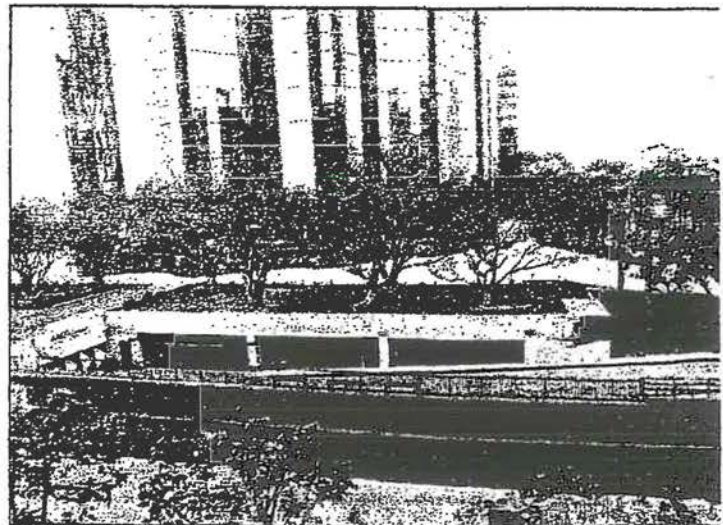
But park advocates and neighborhood leaders contend that vague laws aren't the only culprits. In some cases, they say, city officials have viewed building in parks as a way to hold down the cost of municipal projects and prevent private property from being removed from the tax rolls.

"Parks should not be looked

upon as building pads," said David A. Sundstrom, a member of an environmental task force that helped develop the city's strategic plan. "We can't afford to burn park space whenever someone's project comes up."

Sundstrom and others, including some city officials, say using park land for other projects is shortsighted, considering the high cost of acquiring urban parkland. The property for 12-acre Cesar Chavez Park, the city's newest, cost about \$1 million an acre.

To open-space advocates and city officials, the park meeting represents an important juncture after seven years of almost uninter-



Photos by KEN LUBAS / Los Angeles Times

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CE 18-152



CITY OF LONG BEACH

DEPARTMENT OF DEVELOPMENT SERVICES

333 West Ocean Blvd., 5th Floor

Long Beach, CA 90802

(562) 570-8194

FAX (562) 570-8068

PLANNING BUREAU

APPLICATION FOR APPEAL

An appeal is hereby made to Your Honorable Body from the decision of the

- ☐ Site Plan Review Committee
- ☐ Zoning Administrator
- ☒ Planning Commission
- ☐ Cultural Heritage Commission

Which was taken on the 15th day of November, 2018.

Project Address: 210 East Ocean Boulevard, Long Beach CA

I/We, your appellant(s), hereby respectfully request that Your Honorable Body **reject** the decision and ☐ Approve / ☒ Deny the application or permit in question.

ALL INFORMATION BELOW IS REQUIRED

Reasons for Appeal: See attached Appeal Letter

Appellant Name(s): Danielle Wilson

Organization (if representing) UNITE HERE Local 11

Address: 464 Lucas Ave. #201

City Los Angeles State CA ZIP 90017 Phone 213-481-8530

Signature(s) Danielle Wilson Date 11/26/18

- A separate appeal form is required for each appellant party, except for appellants from the same address, or an appellant representing an organization.
- Appeals must be filed within 10 days after the decision is made (LBMC 21.21.502).
- You must have established *aggrieved* status by presenting oral or written testimony at the hearing where the decision was rendered; otherwise, you may not appeal the decision.
- See reverse of this form for the statutory provisions on the appeal process.

BELOW THIS LINE FOR STAFF USE ONLY

☐ Appeal by Applicant ☒ Appeal by Third Party

Received by: MC

Case. No.: APL18-002

Appeal Filing Date: 11/26/18

Fee: \$100

☒ Fee Paid

Project (receipt) No.: PLNB43781

LICENSED CONTRACTORS DECLARATION				WORKER'S COMPENSATION DECLARATION			
<p>I hereby affirm that I am licensed under provisions of Chapter 9 (Commencing with Section 7000) of Division 3 of the Business and Professional Code, and my license is</p> <p>License _____ License _____ Dat _____ Contract _____</p> <p style="text-align: center;">OWNER-BUILDER DECLARATION</p> <p>I hereby affirm that I am exempt from the Contractors License Law for the following reason {Sec.7031 California Business and Professional Code: Any City which requires a permit to construct, alter, improve, demolish or repair any structure prior to its issuance also requires the applicant for such permit to file a signed statement that he is a licensed contractor pursuant to the provisions of the Contractors License Law {Ch.9} {Commencing with Sec.7000 of Div.3 of the B. & P. C.} or that he is exempt therefrom and the basis for the alleged exemption. Any violation of Sec.7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars (\$500.00).:</p> <p>I as owner of the property, or my employees with wages as their sole compensation, will do the work and the structure is not intended or offered for sale {Sec.7044, B. & P. C. : The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who does such work himself or through his own employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvements is sold within one year of completion, the owner-builder will have burden of proving that he did not build or improve for the</p> <p>• I am exempt under _____, B. & P. C. for this _____ Dat _____ Owne _____</p> <p style="text-align: center;">- IMPORANT -</p> <p>Application is hereby made to the Superintendent of Building and Safety for a permit subject to the conditions and restrictions set forth on the front faces of this application</p> <p>1. Each person upon whose behalf this application is made and each person at whose benefit work is performed under or pursuant to any permit issued as a result of this application agrees to and shall indemnify and hold harmless the City of Long Beach its officers, agents, and employees from any liability arising out of the issuance of any permit from this application.</p> <p>2. Any permit issued as a result of this application becomes null and void if work is</p>				<p>— I have and will maintain workers' compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workers' compensation insurance carrier and policy number are:</p> <p>Carrier _____ Policy _____</p> <p style="text-align: center;">(This Section need not be completed if the permit is for one hundred dollars (\$100) or less)</p> <p>— I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the workers' compensation laws of California, and agree that if I should become subject to the workers' compensation provisions of Section 3700 of the Labor Code, I shall</p> <p>Dat _____ Applica _____</p> <p>WARNING: FAILURE TO SECURE WORKERS' COMPENSATION COVERAGE IS UNLAWFUL, AND SHALL SUBJECT AN EMPLOYER TO CRIMINAL PENALTIES AND CIVIL FINES UP TO ONE HUNDRED THOUSAND DOLLARS, IN ADDITION TO THE COST OF COMPENSATION DAMAGES AS PROVIDED FOR IN SECTION</p> <p>I hereby state that there is a construction lending agency for the performance of the work for which this permit is issued {Sec.3907, Civ. C.}.</p> <p>Lender's _____ .. _____</p> <p>Lender's _____ ... _____</p> <p>I certify that I have read this application and state that the above information is correct. I agree to comply with all City and State laws relating to the building construction, and hereby authorize representatives of this city to enter upon the</p> <p style="text-align: right;">_____ Signature of Owner or Contractor</p> <p style="text-align: right;">_____ Date</p>			
JOB ADDRESS 210 OCEAN BLVD		RECEIPT NO. 03407958	DATE 11/26/18	PROJECT NO. PLNB43781			
JOB DESCRIPTION Third Party Appeal of 1806-19						AREA 0	
OWNER LONG BEACH PROPERTY LLC		OCCUPANCY		PLANNING MIXED USES			
ADDRESS 22900 VENTURA BLVD 200		ASSESSOR NO.		ZONE PD-6			
CITY WOODLAND HILLS CA	STATE CA	ZIP CODE 91364-1279	FSB	S	RSB	CENSUS TRACT 576100	
APPLICANT DANIELLE WILSON							
CONTRACTOR							
ADDRESS							
CITY		STATE		ZIP CODE		PHONE NO.	
STATE LICENSE NO.				CITY LICENSE NO.			
ARCHITECT/ENGINEER				LICENSE NO.			
ADDRESS							
CITY		STATE		ZIP CODE		PHONE NO.	
VALUATION 0.00	PRESENT BLDG USE		PROPOSED BLDG USE		BLDG HEIGHT 0	TYPE OF CONSTRUCTION APPTHPTY	
LEGAL DESCRIPTION							

Paid by: KATHERINE F SPEAR

\$100.00 Credit or Debit Card (PC)

8030605

100.00 Appeal by Third Party

100.00

CHECK

UNITE **HERE!** Local 11

464 Lucas Ave., Suite 201 • Los Angeles, California 90017 • (213) 481-8530 • FAX (213) 481-0352

November 26, 2018

VIA HAND DELIVERY:

City Council, City of Long Beach
333 West Ocean Blvd., 4th Floor
Long Beach, CA 90802

Re: Item No. 18-082PL, Planning Commission Hearing 11/15/18; Breakers Hotel Project (210 E. Ocean Blvd.); Categorical Exemption Case No. CE-18-152; Site Plan Review Case No. SPR18-033; Local Coastal Development Permit LCDP18-022

Dear Honorable City Council Members:

On behalf of UNITE HERE Local 11, Jeremy Arnold, and José Nuñez Díaz (“Appellants”), we respectfully provide the City of Long Beach (“City”) with the following appeal (the “Appeal”) of the Planning Commission’s approval of categorical exemption (“CE”) from the California Environmental Quality Act, Pub. Res. Code § 21000 *et seq.*, (“CEQA”) and various land use approvals (“Entitlements”) for the Breakers Hotel project (“Project”).

As discussed below, the Project does not qualify for any of the four different classes of categorical exemption the Applicant seeks (Class 1, Class 3, Class 31, and Class 32). The proposed Project would convert a currently out-of-use building into a 185-room hotel with rooftop pool, bar, restaurant and retail uses. Such a dramatic change in use could have a significant impact on traffic, air quality, noise, land use, and historical resources. Appellants are also concerned about the Project’s compliance with the Long Beach Municipal Code (“LBMC”), including inconsistencies with applicable land use plans. Additionally, the required findings could not be made for the requested entitlements for similar and additional reasons.

Appellants’ objections were explained in a November 15, 2018 comment letter attached hereto as Exhibit A. At the Planning Commission hearing on November 15, 2018, verbal remarks were made in response to the comment letter without supporting evidence or sufficient justification for rejecting Appellants’ concerns. Due to insufficient analysis of potential impacts on the environment under CEQA and inconsistencies with the LBMC, Appellants respectfully urge the City Council to **reverse the Planning Commission’s decisions and withhold all Entitlements until a CEQA-compliant IS and EIR or MND is prepared for the Project.**

This Appeal is made to exhaust remedies under Pub. Res. Code § 21177 concerning the Project and incorporates by this reference in their entirety all written and oral comments submitted on the Project by any commenting party or agency.

1. Reasons for this Appeal

Appellants challenges this Project chiefly on two grounds: (1) The Project does not qualify for any categorical exemption, and (2) the required findings for the requested Entitlements cannot be made. As discussed herein, the Project does not meet the requirements for Class 1, Class 3, Class 31, or Class 32 categorical exemptions and an EIR or MND must therefore be prepared. Additionally, the required findings for the Entitlements cannot be made due to inconsistencies with applicable land use plans, including the Downtown Shoreline Shoreline Planned Development District (PD-6), General Plan Land Use District Number 7 (LUD 7), and Chapter 3 of the Coastal Act.

2. Appellants Have Standing and Are Aggrieved

Mr. Arnold is a Long Beach resident living approximately 0.8 miles from the Project site. Mr. Díaz lives approximately 1.1 miles from the Project site. Such geographic proximity alone is sufficient to establish standing under CEQA. *See Bozung v. LAFCO* (1975) 13 Cal.3d 263, 272 (plaintiff living 1,800 feet from annexed property has standing to challenge the annexation); *see also Citizens Ass'n for Sensible Dev. v. County of Inyo* (1985) 172 Cal.App.3d 151, 158 (“a property owner, taxpayer, or elector who establishes a geographical nexus with the site of the challenged project has standing.”). Furthermore, absent adequate analysis and full mitigation of Project-related impacts, Appellants will be adversely affected by the Project’s impacts on traffic. Hence, Appellants have a beneficial interest in the Project’s compliance with CEQA. *See Braude v. City of Los Angeles* (1990) 226 Cal.App.3d 83, 87.

Local 11 represents more than 30,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Arizona. Members of Local 11, including over 500 who work in Long Beach and many Long Beach residents, join together to fight for improved living standards and working conditions. As such, Local 11 is a stakeholder in this Project, and worker and labor organizations have a long history of engaging in the CEQA process to secure safe working conditions, reduce environmental impacts, and maximize community benefits. The courts have held that “unions have standing to litigate environmental claims.” *Bakersfield Citizens v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.

Furthermore, Appellants submitted a letter to the City during its consideration of the Project regarding the insufficient analysis of the Project’s potential impacts on the environment. It is well established that any party, as Appellants here, who participates in the administrative process can assert all factual and legal issues raised by anyone. *See Citizens for Open Government v. City of Lodi* (2006) 144 Cal.App.4th 865, 875.

3. Agency Erred and Abused Its Discretion

When granting the Project Approvals, the Planning Commission abused its discretion by (1) failing to prepare a CEQA-required EIR or MND, and (2) granting Entitlements when the Project conflicts with City and State plans and codes.

First, the Planning Commission erred in ruling that the Project is exempt under CEQA and does not need to undergo any further environmental review. Under CEQA there is a strong

presumption in favor of requiring the preparation of an EIR, especially when substantial evidence establishes a “fair argument” that a project may have a significant effect on the environment. *See Laurel Heights Improvement Ass’n v. Regents of the Univ. of Cal.* (1993) 6 Cal. 4th 1112, 1123; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75. Substantial evidence includes facts, reasonable assumptions, and expert opinions supported by facts. *See* Pub. Res. Code §§ 21080(e), 21082.2(c); CEQA Guidelines §§ 15064(f)(5), 15384.

The fair argument standard is a “low threshold” that requires lead agencies to prepare an EIR whenever there is a reasonable probability or inferences that a project may cause significant effects on the environment – regardless of other evidence in the record or even if the project is beneficial. *See e.g., No Oil, Inc.*, 13 Cal.3d at 83-84; *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 776; *Friends of “B” Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1002; *see also* Pub. Res. Code §§ 21100, 21151; CEQA Guidelines §§ 15063(b)(1), 15384(a). Here, there is substantial evidence establishing a fair argument that the Project may cause a significant environmental impact. Under the “low threshold” governing the “fair argument” standard, the City cannot grant this Project approvals until a MND or EIR has been prepared, even if other substantial evidence supports the opposite conclusion. *Mejia v. Los Angeles* (2005) 130 Cal.App.4th 322; *Pocket Protectors v. Sacramento* (2005) 124 Cal.App.4th 903. A lead agency’s decision not to require an EIR can be upheld only when there is no credible evidence to the contrary. *Sierra Club v. County of Sonoma* (1992) 6 Cal. App. 4th 1307, 1318.

Further, exceptions to categorical exemptions also exist within the CEQA Guidelines, requiring agencies to perform an Initial Study (“IS”) and further environmental review whenever a project is subject to one of the “exceptions-to-the-exemptions.” *See* CEQA Guidelines § 15300.2. Moreover, lead agencies may not avoid conducting an IS by merely adopting mitigation measures into a project. *See Salmon Protection & Watershed Network v. County of Marin* (2004) 125 Cal.App.4th 1098, 1102 (holding project must be reviewed under CEQA when mitigation was required to avoid triggering sensitive environment, significant impact, or cumulative impacts exceptions to the use of categorical exemptions); *see also Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1200 (observing CEQA Guidelines do not authorize consideration of mitigation measures with the categorical exemption and that the project required at minimum an MND). The Appellants argue that even if a categorical exemption is found for this Project, the Project is subject to exceptions-to-the-exemptions.

Second, the Planning Commission abused its discretion by failing to make necessary findings supported by substantial evidence to grant the Entitlements and disregarded inconsistencies with City and State land use plans and zoning. The Project’s design and use are inconsistent with various goals, policies, or codes in the Long Beach General Plan, Long Beach Municipal Code, Downtown Shoreline Area Plan, and Local Coastal Program.

4. Specific Points at Issue

As previously mentioned, Appellants raised numerous issues involving the Project in a comment letter presented to the Planning Commission (Exhibit A). As fully discussed therein,

the Project does not qualify for any categorical exemption. Their objections include but are not limited to:

- The Project does not qualify for a Class 1 categorical exemption because the Project involves a radical change in use and includes alterations and changes of use which are not “minor” or “negligible” (CEQA Guidelines § 15301);
- The Project does not qualify for a Class 3 categorical exemption because the Project does not involve the construction or conversion of new, small facilities or structures and also involves significant modifications to the exterior of the structure (CEQA Guidelines § 15303);
- The Project does not qualify for a Class 31 categorical exemption because the Project involves a radical change in use, which is much more than a simple restoration of an historic landmark (CEQA Guidelines § 15331);
- The Project does not qualify for a Class 32 categorical exemption because the Project is inconsistent with the applicable general plan (CEQA Guidelines § 15332(a)) and because it cannot be readily perceived that the Project will not result in any significant effects related to traffic, noise, air quality or water quality (CEQA Guidelines § 15332(d));
- Exceptions-to-the-exemptions apply under CEQA Guidelines § 15300.2 due to significant cumulative impacts and impacts on historical resources.

Additionally, Appellants object to the Planning Commission’s approval of the Entitlements because the required findings cannot be made without curing inconsistencies with applicable land use plans and state law, including but not limited to:

- Required findings to approve the requested Site Plan Review cannot be made: The Project is not “harmonious, consistent, and complete within itself” due to potential disruptive interactions between the Project and abutting park. LBMC § 21.25.506(A)(1));
- The Project proposes to remove significant mature trees from the site LBMC § 21.25.506(A)(3);
- Required findings to approve the requested Conditional Use Permit cannot be made: The Project must be “consistent with and carries out the General Plan, any applicable specific plans such as the local coastal program and all zoning regulations of the applicable district,” but elements of the Project conflict with the elements of the Long Beach General Plan and the Downtown Shoreline Area Plan to provide affordable visitor options. LBMC § 21.25.206(A));
- The Applicant does not show sufficient evidence that the Project may be granted an alcohol license in an area that is already oversaturated with on-sale alcohol licenses as reported by the Department of Alcohol Beverage Control;
- The required findings cannot be made for the Local Coastal Development Permit because the Project does not provide low-cost visitor accommodations and therefore conflicts with the public access and recreation policies of Chapter 3 of the Coastal Act.

Appellants reserve the right to supplement these comments at future hearings and proceedings for this Project. *See, e.g., Cmtys. For a Better Env’t v. City of Richmond* (2010) 184 Cal.App.4th 70, 86 (invalidating EIR based on comments submitted after completion of Final

EIR); *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120 (holding that CEQA litigation is not limited only to claims made during the EIR comment period).

Finally, Appellants request, to the extent they are not already on the notice list, all notices of CEQA actions, Appeal hearings, and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. *See* Pub. Res. Code §§ 21080.4, 21083.9, 21092, 21092.2, 21108, 21167(f); Gov. Code § 65092. Please send notice by email to danielle.wilson@unitehere11.org (cc: cdu@unitehere11.org).

Thank you for considering this Appeal. We ask that this letter is placed in the administrative record for the Project.

Sincerely,

Danielle Wilson
Research Analyst
UNITE HERE Local 11

Exhibit A

UNITE **HERE!** Local 11

464 Lucas Ave., Suite 201 • Los Angeles, California 90017 • (213) 481-8530 • FAX (213) 481-0352

November 15, 2018

VIA EMAIL:

Planning Commission
City of Long Beach
333 West Ocean Blvd., 4th Floor
Long Beach, CA 90802
christopher.koontz@longbeach.gov
(cc: maryanne.cronin@longbeach.gov)

Re: Item No. 18-082PL, Planning Commission Hearing 11/15/18; Breakers Hotel Project (210 E. Ocean Blvd.); Categorical Exemption Case No. CE-18-152; Site Plan Review Case No. SPR18-033; Local Coastal Development Permit LCDP18-022

Dear Chair Lewis and Honorable Planning Commissioners:

On behalf of UNITE HERE Local 11, Jeremy Arnold, and José Nuñez Díaz (“Commenters”), we respectfully provide the City of Long Beach (“City”) the following comments regarding the categorical exemptions (“CE”) in addition to the Site Plan Review, Conditional Use Permit, and Local Coastal Development Permit (“Entitlements”) requested by Patrick Enrich and Nathan Morries of Arco Construction for the renovation of The Breakers Hotel (“Project”). Commenters are concerned with the Project’s compliance with the California Environmental Quality Act, Pub. Res. Code § 21000 *et seq.*, (“CEQA”) and the Long Beach Municipal Code (“LBMC”).

The Applicant argues that the Project is categorically exempt from CEQA requirements, but as discussed below, the Project does not qualify for any of the four different classes of categorical exemption Applicant seeks (Class 1, Class 3, Class 31, and Class 32). The proposed Project would convert a currently out-of-use building into a 185-room hotel with rooftop pool, bar, restaurant and retail uses. Such a dramatic change in use could have a significant impact on traffic, air quality, noise, land use, and historical resources. For example, the Traffic Impact Study is far too narrow to have accurately studied the traffic impacts of the proposed Project, which is likely to generate significantly more vehicular traffic than its current use. Commenters are also concerned about the Project’s impacts on historical resources, as the proposed modifications could threaten the site’s eligibility for the California and National Registers of Historic Places. As a City Historic Landmark, the Breakers Hotel building is a valuable historic resource for the City of Long Beach. Additionally, because required findings for the requested land use entitlements cannot be made, the Planning Commission cannot grant them at this time.

Because the Project is not exempt from CEQA, an Initial Study and Environmental Impact Report (“EIR”) or Mitigated Negative Declaration (“MND”) must be prepared. **The Planning Commission should reject the requested CE and land use entitlements, and direct the City to prepare an Initial Study and EIR or MND.**

1. Project Background

The Project site is located on the south side of Ocean Boulevard, between Collins Way to the east and Locust Avenue to the west, and Victory Park to the north. To the south across Marine Way, a five-story residential development is currently under construction at 207 Seaside Way. The site is currently improved with an existing 13-story building with a 14th floor rooftop area, and two additional lower levels located below street level at Ocean Boulevard. The building was most recently used as a 233-unit congregate care facility, which closed in 2015, in addition to a restaurant and bar that recently closed. The building was designated a City Historic Landmark in 1989. The Project proposes several interior and exterior modifications, such as an interior floor plan reconfiguration, an addition of an outdoor rooftop pool and deck area, an enclosed outdoor staircase, and service elevator. The Project also includes improvements to the adjacent Victory Park, including several additions to the hardscape in the park, additional landscaping, and new park amenities.

2. Standing of Commenters

Mr. Arnold is a Long Beach resident living approximately 0.8 miles from the Project site. Mr. Díaz lives approximately 1.1 miles from the Project site. Such geographic proximity alone is sufficient to establish standing under CEQA. *See Bozung v. LAFCO* (1975) 13 Cal.3d 263, 272 (plaintiff living 1,800 feet from annexed property has standing to challenge the annexation); *see also Citizens Ass’n for Sensible Dev. v. County of Inyo* (1985) 172 Cal.App.3d 151, 158 (“a property owner, taxpayer, or elector who establishes a geographical nexus with the site of the challenged project has standing.”). Furthermore, absent adequate analysis and full mitigation of Project-related impacts, Commenters will be adversely affected by the Project’s impacts on traffic. Hence, Commenters have a beneficial interest in the Project’s compliance with CEQA. *See Braude v. City of Los Angeles* (1990) 226 Cal.App.3d 83, 87.

Local 11 represents more than 30,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Arizona. Members of Local 11, including over 500 who work in Long Beach and many Long Beach residents, join together to fight for improved living standards and working conditions. As such, Local 11 is a stakeholder in this Project, and worker and labor organizations have a long history of engaging in the CEQA process to secure safe working conditions, reduce environmental impacts, and maximize community benefits. The courts have held that “unions have standing to litigate environmental claims.” *Bakersfield Citizens v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.

Furthermore, this comment letter is made to exhaust remedies under Pub. Res Code § 21177 concerning the Project, and incorporates by this reference all written and oral comments

submitted on the Project by any commenting party or agency. It is well established that any party, as Commenters here, who participates in the administrative process can assert all factual and legal issues raised by anyone. *See Citizens for Open Government v. City of Lodi* (2006) 144 Cal.App.4th 865, 875.

3. Background on CEQA, the “fair argument” standard, and categorical exemptions

CEQA is “an integral part of any public agency's decision making process.” Pub. Res. Code § 21006; *see also Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 564. CEQA was enacted to require public agencies and decision-makers to document and consider the environmental implications of their actions before formal decisions are made. *See* Pub. Res. Code §§ 21000, 21001; *see also Laurel Heights Improvement Ass'n v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.

Built into CEQA is a strong presumption in favor of requiring preparation of an EIR. This presumption is reflected in what is known as the “fair argument” standard, under which an agency must prepare an EIR whenever substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment. *See Laurel Heights Improvement Ass'n v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1123; *see also No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75.

The fair argument test is a “low threshold” test for requiring the preparation of an EIR and a preference for resolving doubts in favor of environmental review. *See No Oil*, 13 Cal.3d at 84; *see also Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 332. An agency must prepare an EIR if there is any substantial evidence in the record supporting a fair argument that a project may have a significant effect on the environment, regardless of any other evidence in the record. *See Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 776; *Friends of “B” Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1002. The determination of whether a fair argument exists is a question of law. *See Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1319.

CEQA Guidelines § 15384(a) defines “substantial evidence” as “enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, **even though other conclusions might also be reached . . .**” (emphasis added). Facts, reasonable assumptions predicated on facts, and expert opinions supported by facts can constitute substantial evidence. *See* Pub. Res. Code §§ 21080(e), 21082.2(c), and CEQA Guidelines §§ 15064(f)(5) & 15384.

CEQA contains categorical exemptions for projects that are unlikely to have environmental impacts. *See* Pub. Res. Code § 21084. These exemptions are to be construed narrowly and are not to be expanded beyond the scope of their plain language. *See Castaic Lake Water Agency v. City of Santa Clarita* (1995) 41 Cal. App.4th 1257; *see also Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 205. They must also be construed in light of their statutory authorization, which limits such exemptions to classes of projects that have been determined not

to have significant effects on the environment – ensuring categorical exemptions are interpreted in a manner affording the greatest environmental protection. *See Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1192; *see also Save Our Schools v. Barstow Unified Sch. Distr. Bd. of Educ.* (2015) 240 Cal.App.4th 128, 140; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 966.

Exceptions to categorical exemptions also exist, requiring agencies to perform an Initial Study (“IS”) and further environmental review whenever a project is subject to one of the “exceptions-to-the-exemptions.” *See* CEQA Guidelines § 15300.2. Moreover, lead agencies may not avoid conducting an IS by merely adopting mitigation measures into a project. *See Salmon Protection & Watershed Network v. County of Marin* (2004) 125 Cal.App.4th 1098, 1102 (holding project must be reviewed under CEQA when mitigation was required to avoid triggering sensitive environment, significant impact, or cumulative impacts exceptions to the use of categorical exemptions); *see also Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1200 (observing CEQA Guidelines do not authorize consideration of mitigation measures with the categorical exemption and that the project required at minimum an MND).

4. The Project does not qualify for any categorical exemption.

Here, Applicant seeks to exempt the Project from CEQA through four separate classes of categorical exemptions: Class 1, Class 3, Class 31, and Class 32. *See* CEQA Guidelines §§ 15300; 15301; 15303; 15331; 15332. Because the Project does not qualify for any class of categorical exemption, the Planning Commission must reject Applicant’s request that the Project be found categorically exempt from CEQA.

a. The Project does not qualify for a Class 1 categorical exemption.

Class 1 consists of “the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures . . . involving negligible or no expansion of use beyond that existing at the time of the lead agency’s determination.” CEQA Guidelines § 15301 (emphasis added). Class 1 categorical exemptions are clearly meant to apply to projects involving no change in use. To the best of Commenters’ knowledge, the subject property is completely out of use at this time. The Project would convert it into a 185-room hotel with rooftop entertainment facilities, onsite bar, restaurant, and retail—a radical change from the building’s current non-use. This Project plainly does not qualify for a Class 1 categorical exemption.

Even if this Project involved negligible or no expansion of use, it would not qualify for a Class 1 categorical exemption because the alterations to the structure are not “minor.” The Project proposes the addition of an enclosed staircase and service elevator which will extend the tower eastward approximately 10 feet. It also includes a widening of the driveway on Ocean Avenue by 1,398 square feet and an increase in the adjacent Victory Park hardscape by 249

square feet.¹ Because these expansions go beyond minor alterations of the existing structure, the Project does not qualify for a Class 1 categorical exemption.

In sum, the Project does not qualify for a Class 1 categorical exemption because it involves a drastic change in use and because it proposes major alterations to the existing structure.

b. The Project does not qualify for a Class 3 categorical exemption.

The Class 3 categorical exemption consists of, *inter alia*, the construction of “new, small facilities or structures” and the “conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure.” CEQA Guidelines § 15303. Here, the Project does not involve the construction of new, small facilities or structures. The Project is also not a “conversion of existing small structures from one use to another,” because the structure is very large. CEQA Guidelines § 15303(c) limits the construction of new structures in urbanized areas to 10,000 square feet in total floor area. The subject property is approximately 172,000 square feet in area, far beyond what may qualify under Class 3.

The Project also does not qualify for a Class 3 categorical exemption because it would involve significant modifications to the exterior of the structure. As stated above, the alterations to the exterior of the building are not “minor.” They include the addition of an enclosed staircase and service elevator, which will extend the tower eastward approximately 10 feet, an expansion of the driveway on Ocean Avenue by 1,398 square feet, and the addition of a swimming pool poll deck, and a terrace.

In Sum, the Project does not qualify for a Class 3 categorical exemption because it does not involve the construction of new, small facilities or structures and because it involves significant modifications to the exterior of the structure.

c. The Project does not qualify for a Class 31 categorical exemption.

The Class 31 categorical exemption applies to “projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of historical resources . . .” CEQA Guidelines § 15331. Because the Project involves a radical change and intensification in use, from an out-of-use congregate care facility to a brand new hotel, the Planning Commission cannot find that it is “limited” to the restoration of the structure as an historical resource. Because the conversion of an historical landmark into a hotel is plainly not a mere restoration of that landmark, the Project does not qualify for a Class 31 categorical exemption.

d. The Project does not qualify for a Class 32 categorical exemption.

¹ Taken from renderings of the Project obtained from the Project Planner.

Class 32 categorical exemptions are limited to in-fill development projects that, *inter alia*, are “consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations” and “would not result in any significant effects relating to traffic, noise, air quality or water quality.” CEQA Guidelines § 15332(a), (d). As explained below, the Project does not qualify for a Class 32 categorical exemption because it is (1) inconsistent with the applicable general plan and (2) because it cannot be readily perceived that the Project will not result in any significant effects relating to traffic, noise, air quality or water quality.

1. The Project is inconsistent with applicable land use plans and zoning.

In order to qualify for a Class 32 categorical exemption, the Project must be “consistent with applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.” CEQA Guidelines § 15332(a). The Project is located within Subarea 7 of the Downtown Shoreline Planned Development District (PD-6), and within General Plan Land Use District Number 7 (LUD 7). The Project as it is currently proposed is inconsistent with more than one element of the applicable general plan policies. General Use and Development Standard (j) for PD-6 states: “It shall be the goal of the City to develop a program/policy for the Downtown Shoreline area that protects and encourages lower cost visitor accommodations.”² As it appears that no such program/policy exists, individual developments should advance the goal of providing lower cost visitor accommodations. The Project proposes a rooftop pool, terrace, food/beverage, and banquet/meeting spaces, a spa, and a fitness center, amenities typical of luxury hotels. As currently proposed, the Project conflicts with Development Standard (j) in that it proposes luxury amenities, strongly suggesting that it will provide expensive rather than affordable overnight visitor accommodations.

The Project also does not provide nearly enough public benefits. The introduction to PD-6 specifically highlights that there is a “high degree of public interest in this area . . . due to the potential public benefits that can be derived from its uses,” indicating that public benefits are critical to the fulfillment of the Downtown Shoreline Community Plan.³ The Project proposes a hotel with bar, retail, and food service venues. All of these uses would be contained within a private development. A project of this magnitude would better serve the community as housing and with ancillary uses that genuinely serve the public, such as, for example, meeting spaces that could be reserved out free of charge or public art gallery space.

The Project does not qualify for a Class 32 categorical exemption because it conflicts with applicable general plan policies in that it does not propose affordable accommodations nor is it proposed to provide enough public benefits.

2. The Project may have significant traffic impacts.

² Ordinance No. ORD-11-0017, Downtown Shoreline Planned Development District (PD-6), p. 14, available at: <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=2463>

³ *Id.*, p. 2.

In order to qualify for a Class 32 categorical exemption, a project must not result in any significant effects relating to traffic. CEQA Guidelines § 15332(d). The Traffic Impact Study (“TIS”) prepared for the Project fails to provide an adequate analysis of traffic impacts. For the reasons discussed below, the TIS fails to provide an accurate and conservative traffic analysis. In order to receive a Class 32 categorical exemption, a revised traffic study must be prepared.

a. The Traffic Impact Study area is unacceptably narrow.

The TIS studies only ten intersections (TIS, p. 2). This deviates from the City’s practice of requiring the study of many more intersections for similar or nearby projects, including: 31 intersections for the 2nd/PCH project,⁴ 30 intersections for the Shoreline Gateway East Tower addendum⁵ and Golden Shore Master Plan project⁶ and 14 intersections analyzed for the Oceanaire Apartment project.⁷ This narrow study area fails to account for the Project’s cumulative impact on intersections already operating and/or anticipated to operate at an unacceptable LOS when considering other related projects, as discussed below.

b. The Traffic Impact Study fails to study intersections already or anticipated to be operating on unacceptable levels.

As confirmed by other nearby project traffic studies,⁸ intersections nearby the Project Site are already operating at or near a LOS of E or F and/or anticipated to be operating at such levels (anticipated levels in 2017-2020). As summarized in the table below, previous traffic counts conducted between 2008-2016 show various V/C levels, the majority of which either operating at or below an acceptable LOS of D (see figures in red). Moreover, those same traffic studies anticipated V/C levels in 2017-2020 to be operating well below a LOS of D (also in red). Given these intersections are already and/or anticipated to be suffering deteriorating LOS, it is reasonable that a slight increase in V/C generated by the project could trigger an applicable threshold, which warrants mitigation. Therefore, these intersections must be analyzed in a revised traffic study.

⁴ 2nd/PCH mixed retail project (Apr. 2017) Draft EIR, pp. IV.K-8-9,

<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6498>.

⁵ Shoreline Gateway E. Tower (10/3/16) Addendum Traffic Study, PDF p. 10,

<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6153>.

⁶ Golden Shore Master Plan project (10/2/09) DEIR Traffic Study, PDF pp. 9,

<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=3199>;

⁷ Oceanaire project (Mar. 2015) IS/MND, pp. 101-103,

<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4978>.

⁸ Oceanaire project (2/24/15) Traffic Study, PDF pp. 29-30 (Tbls. 7 and 8),

<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4977>; 207 Seaside Way project (2/19/15) Traffic

Study, PDF p. 49-50 (Tbls. 8-1 & 8-2), <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4954>;

Shoreline Gateway E. Tower project (10/3/16) Addendum Traffic Study, PDF pp. 39-41 (Tbl. 3-4), pp. 69-74

[Tbl. 8-2), <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6153>; Golden Shore (10/2/09) Addendum

Traffic Study, PDF pp. 30-31 (Tbl. 3-4), PDF pp. 56-59 (Tbl. 8-1),

<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=3199>; Land Use Element/Urban Design Element

(May 2016) Draft EIR Traffic Study, PDF pp. 11-12 (Tbl. A),

<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6079>;

Intersections Operating At/Near Unacceptable Levels

Intersection		Recorded LOS (2008 -2016)		Anticipated (2017-2020)	
		V/C	LOS	V/C	LOS
Alamitos/ Ocean	am	0.746 - 1.120	C - F	0.820 - 1.267	D - F
	pm	0.854 - 1.062	D - F	0.966 - 1.199	E-F
Alamitos / 3rd	am	0.853 - 1.048	D - F	1.006 - 1.014	F
	pm	0.577 - 0.659	A-B	0.77	C
Alamitos / 7th	am	0.825 - 0.902	D - E	0.993 - 1.004	E - F
	pm	0.735 - 0.763	C	0.881 - 1.253	D - F
Alamitos / Broadway	am	0.713 - 0.900	C - E	0.859 - 0.910	D - E
	pm	0.747 - 0.945	C - E	0.832 - 0.991	D - E
Long Beach / 7th	am	0.658 - 0.730	B - C	0.818 - 0.952	D - E
	pm	0.484 - 0.550	A	0.633 - 0.795	B - C
Magnolia / Ocean	am	0.748 - 0.848	C - D	0.945 - 1.001	E - F
	pm	0.661 - 0.744	A - B	0.845 - 0.880	D
Alamitos / 4th	am	0.707	C	0.821	D
	pm	0.888	D	1.021	F

c. The Traffic Impact Study uses an improper baseline of existing conditions.

The TIS conducted only a single a.m./p.m. traffic count on June 7, 2018 (TIS, p. 21). However, the traffic volumes recorded seem to be significant lower than traffic counts previously conducted by other projects. The table below compares the traffic levels of five intersections studied in the TIS to five different traffic studies from City projects. For example, the Pine/Seaside intersection was analyzed in the TIS, which recorded a volume-to-capacity ratio ("V/C") of 0.202 during a.m.-peak and 0.255 during p.m.-peak (TIS, Table 4, p. 26). However, under the 207 Seaside Project traffic study, that intersection was recorded as having a V/C level of 0.400 during the a.m.-peak and 0.477 during the p.m.-peak—roughly 98 and 87 percent higher, respectively, than purported in the TIS.

As shown in the table below, the TIS appears to have recorded significantly lower baseline traffic counts in at least these five intersections. Differences in red indicate V/C levels that were higher in other traffic studies than in the TIS. This suggests that the traffic count conducted for the TIS is a potential outlier, which warrants utilizing the highest value of known traffic counts conducted in the area, as the City has done in other projects.⁹ Moreover, additional

⁹ See e.g., Oceanair project (2/24/15) Traffic Study, PDF p. 11, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4977>; 207 Seaside Way project (2/19/15) Traffic Study, PDF p. 16, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4954>.

traffic counts should be performed.

Comparison of Existing Traffic Levels between TIS and Other City Projects

Intersection	Project ¹⁰		Oceanair Project ¹¹			207 Seaside Project ¹²			Shoreline Project ¹³		
	Int.	V/C	Int.	V/C	Diff.	Int.	V/C	Diff.	Int.	V/C	Diff.
Pacific/ am	2	0.580	3	0.553	-4.7%	2	0.547	-5.7%	23	0.649	11.9%
Ocean pm		0.521		0.503	-3.5%		0.5	-4.0%		0.504	-3.3%
Pine/ am	4	0.494	4	0.532	7.7%	3	0.532	7.7%	24	0.623	26.1%
Ocean pm		0.623		0.674	8.2%		0.674	8.2%		0.778	24.9%
Long Beach/ am	9	0.571	6	0.517	-9.5%	7	0.517	-9.5%	25	0.639	11.9%
Ocean pm		0.518		0.483	-6.8%		0.483	-6.8%		0.538	3.9%
Pine/ am	6	0.323	10	0.342	5.9%	5	0.352	9.0%	30	0.373	15.5%
Shoreline pm		0.450		0.477	6.0%		0.51	13.3%		0.492	9.3%
Pine/ am	5	0.202	9	0.287	42.1%	4	0.4	98.0%	n/a		
Seaside pm		0.255		0.286	12.2%		0.477	87.1%			

Intersection	Project		Golden Shore Project ¹⁴			Land Use Element ¹⁵		
	Int.	V/C	Int.	V/C	Diff.	Int.	V/C	Diff.
Pacific/ am	1	0.580	19	0.689	18.8%	6	0.814	40.3%
Ocean pm		0.521		0.632	21.3%		0.713	36.9%
Pine/ am	2	0.494	20	0.634	28.3%	n/a		
Ocean pm		0.623		0.774	24.2%			
Long Beach/ am	3	0.571	21	0.718	25.7%	11	0.723	26.6%
Ocean pm		0.518		0.584	12.7%		0.632	22.0%
Pine/ am	4	0.323	30	0.355	9.9%	n/a		
Shoreline pm		0.450		0.486	8.0%			
Pine/ am	5	0.202	26	0.263	30.2%	n/a		
Seaside pm		0.255		0.308	20.8%			

¹⁰ Traffic Impact Study for Breakers Hotel, Table 4, p. 26.

¹¹ Oceanair project (Mar. 2015) IS/MND, p. 108, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4978>.

¹² 207 Seaside project (Mar. 2015) IS/MND, p. 105,
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4949>.

¹³ Shoreline Gateway E. Tower (10/3/16) Addendum Traffic Study, PDF p. 68,
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6153>.

¹⁴ Golden Shore Master Plan project (10/2/09) Addendum Traffic Study, PDF pp. 28-31,
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=3199>.

¹⁵ Land Use Element/Urban Design Element (May 2016) Draft EIR Traffic Study, PDF pp. 11-14, 32 (fig. 1)
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6079>

d. The Traffic Impact Study fails to include all related projects.

The TIS identifies 37 related projects (TIS, Table 7, pp. 32-33), but fails to identify numerous related projects that should have been incorporated into the analysis. These include:

- Silversands apartment/hotel project: including 33 dwelling units and 72 hotel room mixed-use development at 2010 E. Ocean Blvd. estimated to generate 807 average daily trips (“ADTs”).¹⁶
- City Hall East Edison apartment project: including 126 apartment units and 3,621 SF of retail at 100 Long Beach Blvd. estimated to generate 1,192 ADTs.¹⁷
- Pike Outlet retail project: 392,992-SF conversion of a new retail outlet south of Seaside Way (between Cedar Ave. and Pine Ave.) estimated to generate 2,266 ADTs.¹⁸
- Commercial Reuse project: 3,657 SF restaurant with a bar at 743 E. 4th St. estimated to generate 418 ADTs.
- Queensway Drive hotel project: 178-room hotel development at 600 Queensway Dr. estimated to generate 1,588 ADTs.
- 25 S. Chestnut Place condo project: 246 condo-unit development at 25 S. Chestnut Pl. estimated to generate 1,028 ADTs.
- Hotel Sierra (red thumbtack H): 191-room hotel development at 290 Bay Street estimated to generate 1,115 ADTs.¹⁹
- Bay Street hotel project: 138-room hotel development at 285 Bay St. estimated to generate 1,231 ADTs.
- 421 W. Broadway apartment project: 291 apartment units and 15,580 SF of commercial development at 421 W. Broadway estimated to generate 2,604 ADTs.
- George Deukmejian Courthouse: 531,000-SF municipal building containing commercial/retail space at 275 Magnolia Avenue completed in 2013 and estimated to generate 1,920 ADTs.²⁰
- Pine Avenue project: 18 dwelling units and 15,000 SF of commercial development at 433 Pine Avenue estimated to generate 764 ADTs.
- Long Beach Boulevard mixed-use project: 82 dwelling units and 7,000 SF of commercial development at 350 Long Beach Blvd. estimated to generate 1,086 ADTs.
- Ocean Boulevard dwelling/hotel project: 51 dwelling units and 47 hotel room development at 1628-1724 E. Ocean Blvd. estimated to generate 715 ADTs.

¹⁶ Long Beach Post (9/11/18) After tumultuous battle, hotel and condominium project on Long Beach shoreline moves forward, <https://lbpost.com/commentary/renderings-hotel-condominium-long-beach-shoreline-labor/>.

¹⁷ Curbed LA (8/19/16) Long Beach’s City Hall East becomes luxury apartments, renting from \$1,880, <https://la.curbed.com/2016/8/19/12527650/long-beach-city-hall-east-edison-apartments>.

¹⁸ City (5/4/16) CPC report RE: Planning Commission 2015 in Review, p. 16, <http://www.longbeach.gov/globalassets/city-manager/media-library/documents/memos-to-the-mayor-tabbed-file-list-folders/2016/may-4--2016---planning-commission-2015-in-review>.

¹⁹ Hotel Sierra (May 2009) Addendum to Supplemental EIR 14-04, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=2968>.

²⁰ California Courts (2018) Courthouse Projects, <http://www.courts.ca.gov/facilities-la-longbeach.htm>;;

- West Gateway project: 40-story tower including 694 residential units at 600 W. Broadway.²¹
- Rockefeller Partners project: eight-story mixed-use development with 120 residential units and 6,000 square feet of retail space at 1101 Long Beach Blvd.²²
- Security Pacific National Bank project: adaptive reuse project into a 13-story hotel with 189 guestrooms at 110 Pine Ave.²³

These other related projects not included in the TIS will generate at least an estimated 21,158 average daily trips (“ADTs”) that, when combined with the Project’s estimated 1,631 ADTs (Traffic Study pp. 12-13, Table 2), may result in a cumulative significant traffic impact at nearby intersections. A revised traffic study must include all related projects to ensure a conservative cumulative traffic impact analysis.

e. The TIS uses overly high internal trip credit assumptions.

The TIS applied various trip credits in its estimate of the Project’s trip generation, including a 25 percent internal trip credit for the restaurant and bar and a 50 percent internal trip credit for the spa (TIS, p. 11). These assumptions appear to be much higher than the trip credits applied to similar hotel/mixed-use projects near the LA Convention Center located in the City of Los Angeles, which apply a maximum internal trip credit of 20 percent, maximum pass-by trip credit of 20 percent, and no presumption of ridesharing services.²⁴ The TIS should be revised using more conservative and appropriate trip credits.

f. The TIS fails to analyze traffic impacts during the Project’s construction phase.

The TIS analyzes only the estimated traffic impacts of the operational phase of the Project. It completely ignores potential traffic impacts during the construction phase, when substantial renovation to the exterior of the building and rooftops will be conducted. The failure to analyze construction phase traffic impacts prevents the City and the public from achieving a full understanding of the traffic impacts of the Project. The TIS must be revised to analyze these impacts.

²¹ <https://la.curbed.com/maps/long-beach-development-downtown-project-map>; CurbedLA (8/29/18) 40-story skyscraper would be Long Beach’s tallest, <https://la.curbed.com/2018/8/29/17797158/long-beach-development-tallest-tower-40-stories>.

²² CurbedLA (Listed as project number 23), <https://la.curbed.com/maps/long-beach-development-downtown-project-map>;

²³ *Id.*, (Listed as project number 27).

²⁴ See e.g., Fig+Pico Conference Center Hotels (Sep. 2017) Draft EIR, pp. 4.10-26-4.10-33, <https://planning.lacity.org/eir/FigPico/files/4.10%20Transportation%20and%20Traffic.pdf>; 1020 S. Figueroa Street Project (Sep. 2016) Draft EIR, pp. 4.J-28, 4.J-36- 4.J-39, http://planning.lacity.org/eir/1020SoFigueroa/DEIR/4_J_Transportation_and_Traffic.pdf.

In sum, the Project does not qualify for a Class 32 categorical exemption because it may result in significant traffic impacts. The TIS inadequately studied the Project's traffic impacts and a revised and substantially more thorough study must be prepared.

3. The Project may have significant noise impacts.

The Statement of Support for Class 32 categorical exemption states that the "hotel and ancillary uses will not introduce a substantial new noise source relative to existing conditions and the project will operate within the standards of the adopted Noise Ordinance."²⁵ This claim is completely unsubstantiated, as no noise analysis was prepared for this Project. The Project will undoubtedly introduce substantial new noise sources, as the building would be converted from an out-of-use congregate care facility into a 185-room hotel with a rooftop pool and bar and an indoor minibar, restaurant, and retail uses. The City's own Noise Element Existing Conditions Report specifically lists "restaurants" and "bars" as uses that "have the potential to generate noise which may be perceived as annoying or disturbing."²⁶ Therefore, the Project does not qualify for a Class 32 categorical exemption because it may have significant impacts on noise.

4. The Project may have significant impacts on air quality.

In order to qualify for a Class 32 categorical exemption, approval of a project must not result in any impacts on air quality. CEQA Guidelines § 15332(d). The Applicant does not address whether or not the Project will have significant impacts on air quality. Given that the Project would convert a currently out-of-use building into a hotel, it will at the very least generate far more mobile source emissions. The building is currently out-of-use, generating no traffic, neither operational nor construction-related. The proposed additions to the building will generate construction-related traffic, and the proposed hotel, restaurant, bars, and retail will be open to the public. Many of these patrons are likely to travel by car. The Planning Commission cannot confirm that the Project will not have significant impacts on air quality if no study at all has been prepared for such a radical intensification of use. Because the Project may have significant impacts on air quality, it does not qualify for a Class 32 categorical exemption.

5. The Project may have significant impacts on water quality.

In order to qualify for a Class 32 categorical exemption, the Project must not result in any significant impacts on water quality. The Statement of Support states that "there are three sites located approximately 350 feet east of the project site that are listed under a tiered permit or military evaluation." Given the proximity of these sites to the Project site, there could be potential significant impacts on water quality and other aspects of the environment. "The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on

²⁵ California Environmental Quality Act Statement of Support, Class 32 (Infill Development) Exemption Determination, Section D

²⁶ General Plan Noise Element Update, "Existing Conditions Report," p. 1-15.

scientific and factual data.” CEQA Guidelines § 15064(b). The Statement of Support mentions these three sites in passing, yet does not offer any further detail about the nature or risks of these sites to water quality and human health in general. Without further study or explanation, the public cannot know whether or not mitigation measures are required. The Project does not qualify for a Class 32 categorical exemption because it may have significant impacts on water quality.

For all of the reasons stated above, the Project does not qualify for a Class 32 categorical exemption.

5. The Project does not qualify for a categorical exemption because exceptions-to-the-exemptions apply.

A project falling within a categorical exemption may nevertheless require environmental review if the project is subject to one of the exceptions-to-the-exemptions. CEQA Guidelines § 15300.2. As explained below, multiple exceptions apply to this Project because of significant cumulative impacts and potentially adverse impacts on historical resources.

a. There are significant cumulative impacts caused by other projects of the same type in the area.

Categorical exemptions “are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.” CEQA Guidelines § 15300.2(b). There are at least four projects of the same type in various stages of planning within two miles of the Project site, including the following:

- Jergins Tunnel Hotel Project, 100 E. Ocean Blvd.
- 110 Pine St. Hotel
- Queen Mary Hotel, 1126 Queens Hwy.
- Long Beach Civic Center Hotel, West Gateway²⁷

The concentration of projects in this area are precisely the kind of “successive projects of the same type in the same place” which may result in cumulative impacts.

In addition, at a presentation this past August, Mayor Robert Garcia announced plans for a development boom within the downtown core. He listed over 30 residential and commercial projects that are currently in planning or underway. There are at least four other major projects in the various stages of planning within less than half a mile from the Project site alone:

Sonata Modern Flats, 207 E. Seaside Way
Oceanaire, 150 W Ocean Blvd.
Ocean View Tower, 200 W. Ocean Blvd.

²⁷ <https://la.curbed.com/maps/long-beach-development-downtown-project-map>

Blue Line renovations, 107 E. First St.²⁸

Because of the significant cumulative impacts on the environment due to this Project, other hotels, and other major projects in the area, the Project is excepted from any categorical exemption from CEQA.

b. The Project may cause a substantial adverse change in the significance of a historical resource.

“A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.” CEQA Guidelines § 15300.2(f). In this case, arguably the most significant element of the Project is that the historic Breakers structure would not only be converted from an out-of-use congregate care facility into a hotel with a rooftop pool and food, beverage, and retail outlets, but it would include several major physical alterations to the existing building. The Project is currently designated a local historical landmark, making it presumed historically or culturally significant under CEQA. CEQA Guidelines § 21084.1. Modifications to the existing building could threaten the building’s eligibility for designation as a local landmark or for inclusion in the California Register of Historical Resources. Because the Project may cause a substantial adverse change in the historical significance of the Breakers structure, it does not qualify for a categorical exemption.

In sum, even if the Project did qualify for a categorical exemption, it would be excepted from an exemption due to significant cumulative impacts and potential adverse impacts on the significance of a historical resource.

6. The required findings for the requested entitlements cannot be made

A site plan review shall not be approved unless six findings of fact are made. The first finding states:

The design is harmonious, consistent and complete within itself and is compatible in design, character and scale, with neighboring structures and the community in which it is located. LBMC § 21.25.506(A)(1).

The Project may negatively impact the abutting Victory Park, requiring further consideration of the interaction between the two sites. Vehicular access to the Breakers Hotel will pass through the public park by way of a circular driveway, introducing potential for vehicular-pedestrian accidents. This may also interrupt recreation in the park due to consistent vehicular entrances to the Project for all of its uses, including overnight stay and restaurant and alcohol patronage. Proposed changes to the park include widening and reconfiguring the existing driveway, further limiting the acreage of open space. Because the potential for disruptive interactions between the Project and abutting park conflict with the requirement of the finding that the project design is

²⁸ *Id.*

“harmonious” and compatible “with neighboring structures and the community in which it is located,” this finding cannot be made.

In addition, the another required finding of fact states: “The design will not remove significant mature trees or street trees, unless no alternative design is possible.” LBMC § 21.25.506(A)(3). The existing palm trees are proposed to be relocated from their current positions and incorporated into the final landscape. However, the unnecessary removal of these trees could potentially harm them in the interim, and no evidence suggests that there is not a possible alternative design.

Because two of the required findings of fact cannot be made, the Planning Commission cannot approve the Site Plan Review at this time.

a. The required findings for the Conditional Use Permit “CUP” cannot be made.

In order to grant a Conditional Use Permit, the Planning Commission must find, *inter alia*, that “[t]he approval is consistent with and carries out the General Plan, any applicable specific plans such as the local coastal program and all zoning regulations of the applicable district.” LBMC § 21.25.206(A). This finding cannot be made because the Project conflicts with elements of PD-6. As mentioned earlier, PD-6 General Use and Development Standard (j) encourages a “program/policy . . . that protects and encourages lower cost visitor accommodations.” There is no mention of this general goal for the Downtown Shoreline area in the project proposal. Additionally, for any local visitors to the Project, the only option for parking off-site valet parking, which may deter middle or low-income guests, further separating the proposed Breakers Hotel from the Downtown Shoreline Area Plan goals to provide affordable visitor options.

In addition, there are numerous requirements and plan amendments listed as conditions of approval that would substantially alter the Project and that should be completed before granting the CUP. The conditions of approval for the CUP note that, prior to the issuance of building permits, City staff must review and approve the following: a hotel operations plan that includes all vehicular operations, valet operations, delivery locations, and rideshare drop off and pick-up, a revised traffic impact analysis, a grading plan with hydrology and hydraulic calculations, off-site parking lease, improvement and improvement plans, and ADA compliance.²⁹ The requirements listed for the hotel operations plan alone, especially given the many issues related to parking and on-site vehicular traffic, are substantial, and should be reviewed prior to approval of the CUP, not only as a condition for the issuance of building permits. Since there are still extensive plans that are yet to be completed and reviewed by City experts, and these numerous plan updates and approvals will affect the general welfare of the community as well as potential safety hazards, a CUP should not be granted at this time.

²⁹ See: Special Conditions of Approval 5, 8, 10, 11, 14, 19, 23, 30, 32, 34, 40, 44, 47, 58, 62, 63, 64 75, 77, 78, 80, 81, 85, 86, 89.

The staff report states that, under the LBMC, special conditions apply to alcohol beverage sales uses requiring a conditional use permit. LBMC § 21.52.210(D) requires that the use:

shall not be in a reporting district with more than the recommended maximum concentration of the applicable on or off-premises sales use, as recommended by the State of California Alcoholic Beverage Control Board, nor with a high crime rate as reported by the Long Beach Police Department.

The staff report admits that the Project site census tract is oversaturated with on-sale alcohol licenses as reported by Alcohol Beverage Control (ABC), with 78 licenses issued licenses, 73 more than the ABC recommended maximum of 5.³⁰ While there are current alcohol licenses at the location site being extended to the Project, the new extensions allow for an increase in number of on-site venues where alcoholic beverages may be consumed, potentially increasing the alcohol consumption overall.

In sum, because the Project conflicts with applicable land use plans, and the Project is located in a reporting district with more than the ABC recommended maximum concentration of on-sale alcohol licenses, the required findings cannot be made, and the Planning Commission cannot grant the CUP at this time.

b. The required findings for the requested Local Coastal Development Permit cannot be made.

The Project requires a Local Coastal Development Permit ("LCDP") because it is located within the Coastal Zone. LBMC § 21.25.903. In order to issue an LCDP, the Planning Commission must make two required findings pursuant to LBMC § 21.25.9049(C):

1. The proposed development conforms to the certified local coastal program including but not limited to all requirements for replacement of low and moderate-income housing; and
2. The proposed development conforms to the public access and recreation policies of Chapter 3 of the Coastal Act. This second finding applies only to development located seaward of the nearest public highway to the shoreline.

Neither finding can be made because the proposed Project is inconsistent with the Local Coastal Program ("LCP") and does not conform to the public access and recreation policies of Chapter 3 of the Coastal Act.

³⁰ Conditional Use Permit Findings, Section C(d)

The first required finding cannot be made because the Project is inconsistent with the LCP. First, the proposed Project does not strengthen the entry to Promenade South on Ocean Boulevard at the southeast corner of Pine Avenue as required by the provisions of Area 14, Breakers, of the Downtown Shoreline Policy Plan. In reference to this requirement, the LCDP findings suggest that “visitor-serving uses” can serve as a substitute: “While the project site does not abut that specific entry to the Promenade South, the change of use to a hotel . . . would constitute visitor-serving uses.”³¹ “Visitor-serving uses” cannot substitute for a requirement to strengthen an entry. The Applicant should be required to accomplish this goal concretely by, for example, widening the pathway to or explicitly directing pedestrians towards the Promenade.

In addition, the proposed Project does not comply with Building Design provision (4)G(a) of Downtown Shoreline Planned Development District (PD-6), Subarea 7, which requires a project that includes a change of use of an existing building to “provide for the eastward continuation of the east/west pedestrian walkway across the subject sites.” Because the Project includes a significant change in use, this requirement applies. Project documentation does not demonstrate that this pedestrian walkway will not be obstructed by the Project.

The second required finding cannot be made because the Project does not encourage lower cost recreational and visitor facilities. Chapter 3 of the Coastal Act requires: “Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.” Pub. Res. Code § 30213. As stated above, the Project does not propose lower cost facilities. In fact, the developer boasts “best-in-class amenities, entertainment, and dining,” in a recent press release regarding renovation plans for the existing building, suggesting that the proposed project will not be accessible to lower-income guests.³² One of the main goals of the Coastal Act is to “[m]aximize public access to and along the coast.” Pub. Res. Code § 30001.5(c). In order to fully comply with the Coastal Act, the Project should maximize public uses within the building and ensure that they are accessible to lower-income patrons.

Finally, underlying the above concerns is that the current LCP was certified in 1980 and was most recently amended in 1994. The existing conditions of the area outlined in the LCP are nearly four decades old. Since then, the entire city of Long Beach has changed dramatically, both demographically and in terms of the built environment. With the current development boom in downtown, the potential increase in traffic alone is enough of a change to delay further changes in the area. The City should not consider further dramatic changes within the legally-protected Coastal Zone until the LCP is updated and fully certified by the California Coastal Commission.

In sum, the required findings of fact for the LCDP cannot be made due to inconsistencies with applicable land use plans and Chapter 3 of the Coastal Act, and it cannot be approved at this time.

³¹ Local Coastal Development Permit Findings, Section A

³² <http://www.prweb.com/releases/2018/01/prweb15074263.htm>

7. Conclusion

To summarize, Commenters are concerned with various issues related to CEQA, including potential significant impacts on historical resources and traffic, in addition to compliance with the LBMC. The Planning Commission should deny the requested CE and land use entitlements, and the City should prepare an Initial Study and an EIR, or, at the very least, an MND.

Commenters reserve the right to supplement these comments at future hearings and proceedings for the projects. *See Cmtys. For a Better Env't*, 184 Cal.App.4th at 86; *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120.

Finally, on behalf of Commenters, Commenters request, to the extent not already on the notice list, all notices of CEQA actions and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. *See* Pub. Res. Cod § 21080.4, 21083.9, 21092, 21092.2, 21108, 21167(f) and Gov. Code § 65092. Please send notice by electronic and regular mail to: Danielle Wilson 464 Lucas Ave. #201, Los Angeles, CA 90017, danielle.wilson@unitehere11.org (cc: cdu@unitehere11.org).

Thank you for consideration of these comments. We ask that this letter is placed in the administrative record for the Project.

Sincerely,

Danielle Wilson
Research Analyst
UNITE HERE Local 11



CITY OF LONG BEACH

DEPARTMENT OF DEVELOPMENT SERVICES

333 West Ocean Blvd., 5th Floor

Long Beach, CA 90802

(562) 570-6194

FAX (562) 570-6068

PLANNING BUREAU

APPLICATION FOR APPEAL

An appeal is hereby made to Your Honorable Body from the decision of the

- ☐ Site Plan Review Committee
- ☐ Zoning Administrator
- ☒ Planning Commission
- ☐ Cultural Heritage Commission

Which was taken on the 15th day of November, 2018.

Project Address: 210 East Ocean Boulevard, Long Beach, CA

I/We, your appellant(s), hereby respectfully request that Your Honorable Body **reject** the decision and ☐ Approve / ☒ Deny the application or permit in question.

ALL INFORMATION BELOW IS REQUIRED

Reasons for Appeal: see attached Appeal Letter

Appellant Name(s): Jeremy Arnold

Organization (if representing) _____

Address: 447 W Melrose Way

City Long Beach State CA ZIP 90802 Phone (310)-998-7555

Signature(s) Jeremy Arnold Date 11/26/2018

- A separate appeal form is required for each appellant party, except for appellants from the same address, or an appellant representing an organization.
- Appeals must be filed within 10 days after the decision is made (LBMC 21.21.502).
- You must have established *aggrieved* status by presenting oral or written testimony at the hearing where the decision was rendered; otherwise, you may not appeal the decision.
- See reverse of this form for the statutory provisions on the appeal process.

BELOW THIS LINE FOR STAFF USE ONLY

☐ Appeal by Applicant ☒ Appeal by Third Party

Received by: MC

Case No.: APL18-003

Appeal Filing Date: 11/26/18

Fee: \$100

☒ Fee Paid

Project (receipt) No.: PLNB43782

LICENSED CONTRACTORS DECLARATION				WORKER'S COMPENSATION DECLARATION			
<p>I hereby affirm that I am licensed under provisions of Chapter 9 (Commencing with Section 7000) of Division 3 of the Business and Professional Code, and my license is</p> <p>License _____ License _____</p> <p>Dat _____ Contract _____</p> <p style="text-align: center;">OWNER-BUILDER DECLARATION</p> <p>I hereby affirm that I am exempt from the Contractors License Law for the following reason (Sec.7031 California Business and Professional Code: Any City which requires a permit to construct, alter, improve, demolish or repair any structure prior to its issuance also requires the applicant for such permit to file a signed statement that he is a licensed contractor pursuant to the provisions of the Contractors License Law (Ch.9) (Commencing with Sec.7000 of Div.3 of the B. & P. C.) or that he is exempt therefrom and the basis for the alleged exemption. Any violation of Sec.7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars (\$500.00).:</p> <p>• I as owner of the property, or my employees with wages as their sole compensation, will do the work and the structure is not intended or offered for sale (Sec.7044, B. & P. C. : The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who does such work himself or through his own employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvements is sold within one year of completion, the owner-builder will have burden of proving that he did not build or improve for the</p> <p>• I am exempt under _____, B. & P. C. for this</p> <p>Dat _____ Owne _____</p> <p style="text-align: center;">- IMPORANT -</p> <p>Application is hereby made to the Superintendent of Building and Safety for a permit subject to the conditions and restrictions set forth on the front faces of this application</p> <p>1. Each person upon whose behalf this application is made and each person at whose benefit work is performed under or pursuant to any permit issued as a result of this application agrees to and shall indemnify and hold harmless the City of Long Beach its officers, agents, and employees from any liability arising out of the issuance of any permit from this application.</p> <p>2. Any permit issued as a result of this application becomes null and void if work is</p>				<p>_____ I have and will maintain workers' compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workers' compensation insurance carrier and policy number are:</p> <p>Carrier: _____ Policy _____</p> <p style="text-align: center;">(This Section need not be completed if the permit is for one hundred dollars (\$100) or less)</p> <p>_____ I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the workers' compensation laws of California, and agree that if I should become subject to the workers' compensation provisions of Section 3700 of the Labor Code, I shall</p> <p>Dat _____ Applica _____</p> <p>WARNING: FAILURE TO SECURE WORKERS' COMPENSATION COVERAGE IS UNLAWFUL, AND SHALL SUBJECT AN EMPLOYER TO CRIMINAL PENALTIES AND CIVIL FINES UP TO ONE HUNDRED THOUSAND DOLLARS, IN ADDITION TO THE COST OF COMPENSATION DAMAGES AS PROVIDED FOR IN SECTION</p> <p>I hereby state that there is a construction lending agency for the performance of the work for which this permit is issued (Sec.3907, Civ. C.).</p> <p>Lender's _____</p> <p>Lender's _____</p> <p>I certify that I have read this application and state that the above information is correct. I agree to comply with all City and State laws relating to the building construction, and hereby authorize representatives of this city to enter upon the</p> <p style="text-align: right;">Signature of Owner or Contractor _____ Date _____</p>			
JOB ADDRESS 210 OCEAN BLVD				RECEIPT NO. 03407957		DATE 11/26/18	
JOB DESCRIPTION Third Party Appeal of 1806-19				PROJECT NO. PLNB43782		AREA 0	
OWNER LONG BEACH PROPERTY LLC				OCCUPANCY		PLANNING MIXED USES	
ADDRESS 22900 VENTURA BLVD 200				ASSESSOR NO.		ZONE PD-6	
CITY WOODLAND HILLS CA		STATE CA		ZIP CODE 91364-1279		CENSUS TRACT 576100	
APPLICANT JEREMY ARNOLD				FSB			
CONTRACTOR				S			
ADDRESS				RSB			
CITY				CENSUS TRACT			
STATE				576100			
ZIP CODE							
PHONE NO.							
STATE LICENSE NO.				CITY LICENSE NO.			
ARCHITECT/ENGINEER				LICENSE NO.			
ADDRESS							
CITY							
STATE							
ZIP CODE							
PHONE NO.							
VALUATION 0.00		PRESENT BLDG USE		PROPOSED BLDG USE		BLDG HEIGHT 0	
LEGAL DESCRIPTION						TYPE OF CONSTRUCTION APPTHPTY	

Paid by: KATHERINE F SPEAR

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8030604

100.00 Appeal by Third Party

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CHECK

UNITEHERE! Local 11

464 Lucas Ave., Suite 201 • Los Angeles, California 90017 • (213) 481-8530 • FAX (213) 481-0352

November 26, 2018

VIA HAND DELIVERY:

City Council, City of Long Beach
333 West Ocean Blvd., 4th Floor
Long Beach, CA 90802

Re: Item No. 18-082PL, Planning Commission Hearing 11/15/18; Breakers Hotel Project (210 E. Ocean Blvd.); Categorical Exemption Case No. CE-18-152; Site Plan Review Case No. SPR18-033; Local Coastal Development Permit LCDP18-022

Dear Honorable City Council Members:

On behalf of UNITE HERE Local 11, Jeremy Arnold, and José Nuñez Díaz (“Appellants”), we respectfully provide the City of Long Beach (“City”) with the following appeal (the “Appeal”) of the Planning Commission’s approval of categorical exemption (“CE”) from the California Environmental Quality Act, Pub. Res. Code § 21000 *et seq.*, (“CEQA”) and various land use approvals (“Entitlements”) for the Breakers Hotel project (“Project”).

As discussed below, the Project does not qualify for any of the four different classes of categorical exemption the Applicant seeks (Class 1, Class 3, Class 31, and Class 32). The proposed Project would convert a currently out-of-use building into a 185-room hotel with rooftop pool, bar, restaurant and retail uses. Such a dramatic change in use could have a significant impact on traffic, air quality, noise, land use, and historical resources. Appellants are also concerned about the Project’s compliance with the Long Beach Municipal Code (“LBMC”), including inconsistencies with applicable land use plans. Additionally, the required findings could not be made for the requested entitlements for similar and additional reasons.

Appellants’ objections were explained in a November 15, 2018 comment letter attached hereto as Exhibit A. At the Planning Commission hearing on November 15, 2018, verbal remarks were made in response to the comment letter without supporting evidence or sufficient justification for rejecting Appellants’ concerns. Due to insufficient analysis of potential impacts on the environment under CEQA and inconsistencies with the LBMC, Appellants respectfully urge the City Council to **reverse the Planning Commission’s decisions and withhold all Entitlements until a CEQA-compliant IS and EIR or MND is prepared for the Project.**

This Appeal is made to exhaust remedies under Pub. Res. Code § 21177 concerning the Project and incorporates by this reference in their entirety all written and oral comments submitted on the Project by any commenting party or agency.

1. Reasons for this Appeal

Appellants challenges this Project chiefly on two grounds: (1) The Project does not qualify for any categorical exemption, and (2) the required findings for the requested Entitlements cannot be made. As discussed herein, the Project does not meet the requirements for Class 1, Class 3, Class 31, or Class 32 categorical exemptions and an EIR or MND must therefore be prepared. Additionally, the required findings for the Entitlements cannot be made due to inconsistencies with applicable land use plans, including the Downtown Shoreline Shoreline Planned Development District (PD-6), General Plan Land Use District Number 7 (LUD 7), and Chapter 3 of the Coastal Act.

2. Appellants Have Standing and Are Aggrieved

Mr. Arnold is a Long Beach resident living approximately 0.8 miles from the Project site. Mr. Díaz lives approximately 1.1 miles from the Project site. Such geographic proximity alone is sufficient to establish standing under CEQA. *See Bozung v. LAFCO* (1975) 13 Cal.3d 263, 272 (plaintiff living 1,800 feet from annexed property has standing to challenge the annexation); *see also Citizens Ass'n for Sensible Dev. v. County of Inyo* (1985) 172 Cal.App.3d 151, 158 (“a property owner, taxpayer, or elector who establishes a geographical nexus with the site of the challenged project has standing.”). Furthermore, absent adequate analysis and full mitigation of Project-related impacts, Appellants will be adversely affected by the Project’s impacts on traffic. Hence, Appellants have a beneficial interest in the Project’s compliance with CEQA. *See Braude v. City of Los Angeles* (1990) 226 Cal.App.3d 83, 87.

Local 11 represents more than 30,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Arizona. Members of Local 11, including over 500 who work in Long Beach and many Long Beach residents, join together to fight for improved living standards and working conditions. As such, Local 11 is a stakeholder in this Project, and worker and labor organizations have a long history of engaging in the CEQA process to secure safe working conditions, reduce environmental impacts, and maximize community benefits. The courts have held that “unions have standing to litigate environmental claims.” *Bakersfield Citizens v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.

Furthermore, Appellants submitted a letter to the City during its consideration of the Project regarding the insufficient analysis of the Project’s potential impacts on the environment. It is well established that any party, as Appellants here, who participates in the administrative process can assert all factual and legal issues raised by anyone. *See Citizens for Open Government v. City of Lodi* (2006) 144 Cal.App.4th 865, 875.

3. Agency Erred and Abused Its Discretion

When granting the Project Approvals, the Planning Commission abused its discretion by (1) failing to prepare a CEQA-required EIR or MND, and (2) granting Entitlements when the Project conflicts with City and State plans and codes.

First, the Planning Commission erred in ruling that the Project is exempt under CEQA and does not need to undergo any further environmental review. Under CEQA there is a strong

presumption in favor of requiring the preparation of an EIR, especially when substantial evidence establishes a “fair argument” that a project may have a significant effect on the environment. *See Laurel Heights Improvement Ass’n v. Regents of the Univ. of Cal.* (1993) 6 Cal. 4th 1112, 1123; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75. Substantial evidence includes facts, reasonable assumptions, and expert opinions supported by facts. *See Pub. Res. Code* §§ 21080(e), 21082.2(c); CEQA Guidelines §§ 15064(f)(5), 15384.

The fair argument standard is a “low threshold” that requires lead agencies to prepare an EIR whenever there is a reasonable probability or inferences that a project may cause significant effects on the environment – regardless of other evidence in the record or even if the project is beneficial. *See e.g., No Oil, Inc.*, 13 Cal.3d at 83-84; *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 776; *Friends of “B” Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1002; *see also Pub. Res. Code* §§ 21100, 21151; CEQA Guidelines §§ 15063(b)(1), 15384(a). Here, there is substantial evidence establishing a fair argument that the Project may cause a significant environmental impact. Under the “low threshold” governing the “fair argument” standard, the City cannot grant this Project approvals until a MND or EIR has been prepared, even if other substantial evidence supports the opposite conclusion. *Mejia v. Los Angeles* (2005) 130 Cal.App.4th 322; *Pocket Protectors v. Sacramento* (2005) 124 Cal.App.4th 903. A lead agency’s decision not to require an EIR can be upheld only when there is no credible evidence to the contrary. *Sierra Club v. County of Sonoma* (1992) 6 Cal. App. 4th 1307, 1318.

Further, exceptions to categorical exemptions also exist within the CEQA Guidelines, requiring agencies to perform an Initial Study (“IS”) and further environmental review whenever a project is subject to one of the “exceptions-to-the-exemptions.” *See CEQA Guidelines* § 15300.2. Moreover, lead agencies may not avoid conducting an IS by merely adopting mitigation measures into a project. *See Salmon Protection & Watershed Network v. County of Marin* (2004) 125 Cal.App.4th 1098, 1102 (holding project must be reviewed under CEQA when mitigation was required to avoid triggering sensitive environment, significant impact, or cumulative impacts exceptions to the use of categorical exemptions); *see also Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1200 (observing CEQA Guidelines do not authorize consideration of mitigation measures with the categorical exemption and that the project required at minimum an MND). The Appellants argue that even if a categorical exemption is found for this Project, the Project is subject to exceptions-to-the-exemptions.

Second, the Planning Commission abused its discretion by failing to make necessary findings supported by substantial evidence to grant the Entitlements and disregarded inconsistencies with City and State land use plans and zoning. The Project’s design and use are inconsistent with various goals, policies, or codes in the Long Beach General Plan, Long Beach Municipal Code, Downtown Shoreline Area Plan, and Local Coastal Program.

4. Specific Points at Issue

As previously mentioned, Appellants raised numerous issues involving the Project in a comment letter presented to the Planning Commission (Exhibit A). As fully discussed therein,

the Project does not qualify for any categorical exemption. Their objections include but are not limited to:

- The Project does not qualify for a Class 1 categorical exemption because the Project involves a radical change in use and includes alterations and changes of use which are not “minor” or “negligible” (CEQA Guidelines § 15301);
- The Project does not qualify for a Class 3 categorical exemption because the Project does not involve the construction or conversion of new, small facilities or structures and also involves significant modifications to the exterior of the structure (CEQA Guidelines § 15303);
- The Project does not qualify for a Class 31 categorical exemption because the Project involves a radical change in use, which is much more than a simple restoration of an historic landmark (CEQA Guidelines § 15331);
- The Project does not qualify for a Class 32 categorical exemption because the Project is inconsistent with the applicable general plan (CEQA Guidelines § 15332(a)) and because it cannot be readily perceived that the Project will not result in any significant effects related to traffic, noise, air quality or water quality (CEQA Guidelines § 15332(d));
- Exceptions-to-the-exemptions apply under CEQA Guidelines § 15300.2 due to significant cumulative impacts and impacts on historical resources.

Additionally, Appellants object to the Planning Commission’s approval of the Entitlements because the required findings cannot be made without curing inconsistencies with applicable land use plans and state law, including but not limited to:

- Required findings to approve the requested Site Plan Review cannot be made: The Project is not “harmonious, consistent, and complete within itself” due to potential disruptive interactions between the Project and abutting park. LBMC § 21.25.506(A)(1));
- The Project proposes to remove significant mature trees from the site LBMC § 21.25.506(A)(3);
- Required findings to approve the requested Conditional Use Permit cannot be made: The Project must be “consistent with and carries out the General Plan, any applicable specific plans such as the local coastal program and all zoning regulations of the applicable district,” but elements of the Project conflict with the elements of the Long Beach General Plan and the Downtown Shoreline Area Plan to provide affordable visitor options. LBMC § 21.25.206(A));
- The Applicant does not show sufficient evidence that the Project may be granted an alcohol license in an area that is already oversaturated with on-sale alcohol licenses as reported by the Department of Alcohol Beverage Control;
- The required findings cannot be made for the Local Coastal Development Permit because the Project does not provide low-cost visitor accommodations and therefore conflicts with the public access and recreation policies of Chapter 3 of the Coastal Act.

Appellants reserve the right to supplement these comments at future hearings and proceedings for this Project. *See, e.g., Cmtys. For a Better Env’t v. City of Richmond* (2010) 184 Cal.App.4th 70, 86 (invalidating EIR based on comments submitted after completion of Final

EIR); *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120 (holding that CEQA litigation is not limited only to claims made during the EIR comment period).

Finally, Appellants request, to the extent they are not already on the notice list, all notices of CEQA actions, Appeal hearings, and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. *See* Pub. Res. Code §§ 21080.4, 21083.9, 21092, 21092.2, 21108, 21167(f); Gov. Code § 65092. Please send notice by email to danielle.wilson@unitehere11.org (cc: cdu@unitehere11.org).

Thank you for considering this Appeal. We ask that this letter is placed in the administrative record for the Project.

Sincerely,

Danielle Wilson
Research Analyst
UNITE HERE Local 11

Exhibit A

UNITE **HERE!** Local 11

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November 15, 2018

VIA EMAIL:

Planning Commission
City of Long Beach
333 West Ocean Blvd., 4th Floor
Long Beach, CA 90802
christopher.koontz@longbeach.gov
(cc: maryanne.cronin@longbeach.gov)

Re: Item No. 18-082PL, Planning Commission Hearing 11/15/18; Breakers Hotel Project (210 E. Ocean Blvd.); Categorical Exemption Case No. CE-18-152; Site Plan Review Case No. SPR18-033; Local Coastal Development Permit LCDP18-022

Dear Chair Lewis and Honorable Planning Commissioners:

On behalf of UNITE HERE Local 11, Jeremy Arnold, and José Nuñez Díaz (“Commenters”), we respectfully provide the City of Long Beach (“City”) the following comments regarding the categorical exemptions (“CE”) in addition to the Site Plan Review, Conditional Use Permit, and Local Coastal Development Permit (“Entitlements”) requested by Patrick Enrich and Nathan Morris of Arco Construction for the renovation of The Breakers Hotel (“Project”). Commenters are concerned with the Project’s compliance with the California Environmental Quality Act, Pub. Res. Code § 21000 *et seq.*, (“CEQA”) and the Long Beach Municipal Code (“LBMC”).

The Applicant argues that the Project is categorically exempt from CEQA requirements, but as discussed below, the Project does not qualify for any of the four different classes of categorical exemption Applicant seeks (Class 1, Class 3, Class 31, and Class 32). The proposed Project would convert a currently out-of-use building into a 185-room hotel with rooftop pool, bar, restaurant and retail uses. Such a dramatic change in use could have a significant impact on traffic, air quality, noise, land use, and historical resources. For example, the Traffic Impact Study is far too narrow to have accurately studied the traffic impacts of the proposed Project, which is likely to generate significantly more vehicular traffic than its current use. Commenters are also concerned about the Project’s impacts on historical resources, as the proposed modifications could threaten the site’s eligibility for the California and National Registers of Historic Places. As a City Historic Landmark, the Breakers Hotel building is a valuable historic resource for the City of Long Beach. Additionally, because required findings for the requested land use entitlements cannot be made, the Planning Commission cannot grant them at this time.

Because the Project is not exempt from CEQA, an Initial Study and Environmental Impact Report (“EIR”) or Mitigated Negative Declaration (“MND”) must be prepared. **The Planning Commission should reject the requested CE and land use entitlements, and direct the City to prepare an Initial Study and EIR or MND.**

1. Project Background

The Project site is located on the south side of Ocean Boulevard, between Collins Way to the east and Locust Avenue to the west, and Victory Park to the north. To the south across Marine Way, a five-story residential development is currently under construction at 207 Seaside Way. The site is currently improved with an existing 13-story building with a 14th floor rooftop area, and two additional lower levels located below street level at Ocean Boulevard. The building was most recently used as a 233-unit congregate care facility, which closed in 2015, in addition to a restaurant and bar that recently closed. The building was designated a City Historic Landmark in 1989. The Project proposes several interior and exterior modifications, such as an interior floor plan reconfiguration, an addition of an outdoor rooftop pool and deck area, an enclosed outdoor staircase, and service elevator. The Project also includes improvements to the adjacent Victory Park, including several additions to the hardscape in the park, additional landscaping, and new park amenities.

2. Standing of Commenters

Mr. Arnold is a Long Beach resident living approximately 0.8 miles from the Project site. Mr. Díaz lives approximately 1.1 miles from the Project site. Such geographic proximity alone is sufficient to establish standing under CEQA. *See Bozung v. LAFCO* (1975) 13 Cal.3d 263, 272 (plaintiff living 1,800 feet from annexed property has standing to challenge the annexation); *see also Citizens Ass’n for Sensible Dev. v. County of Inyo* (1985) 172 Cal.App.3d 151, 158 (“a property owner, taxpayer, or elector who establishes a geographical nexus with the site of the challenged project has standing.”). Furthermore, absent adequate analysis and full mitigation of Project-related impacts, Commenters will be adversely affected by the Project’s impacts on traffic. Hence, Commenters have a beneficial interest in the Project’s compliance with CEQA. *See Braude v. City of Los Angeles* (1990) 226 Cal.App.3d 83, 87.

Local 11 represents more than 30,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Arizona. Members of Local 11, including over 500 who work in Long Beach and many Long Beach residents, join together to fight for improved living standards and working conditions. As such, Local 11 is a stakeholder in this Project, and worker and labor organizations have a long history of engaging in the CEQA process to secure safe working conditions, reduce environmental impacts, and maximize community benefits. The courts have held that “unions have standing to litigate environmental claims.” *Bakersfield Citizens v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.

Furthermore, this comment letter is made to exhaust remedies under Pub. Res Code § 21177 concerning the Project, and incorporates by this reference all written and oral comments

submitted on the Project by any commenting party or agency. It is well established that any party, as Commenters here, who participates in the administrative process can assert all factual and legal issues raised by anyone. *See Citizens for Open Government v. City of Lodi* (2006) 144 Cal.App.4th 865, 875.

3. Background on CEQA, the "fair argument" standard, and categorical exemptions

CEQA is "an integral part of any public agency's decision making process." Pub. Res. Code § 21006; *see also Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 564. CEQA was enacted to require public agencies and decision-makers to document and consider the environmental implications of their actions before formal decisions are made. *See* Pub. Res. Code §§ 21000, 21001; *see also Laurel Heights Improvement Ass'n v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.

Built into CEQA is a strong presumption in favor of requiring preparation of an EIR. This presumption is reflected in what is known as the "fair argument" standard, under which an agency must prepare an EIR whenever substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment. *See Laurel Heights Improvement Ass'n v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1123; *see also No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75.

The fair argument test is a "low threshold" test for requiring the preparation of an EIR and a preference for resolving doubts in favor of environmental review. *See No Oil*, 13 Cal.3d at 84; *see also Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 332. An agency must prepare an EIR if there is any substantial evidence in the record supporting a fair argument that a project may have a significant effect on the environment, regardless of any other evidence in the record. *See Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 776; *Friends of "B" Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1002. The determination of whether a fair argument exists is a question of law. *See Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1319.

CEQA Guidelines § 15384(a) defines "substantial evidence" as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, **even though other conclusions might also be reached . . .**" (emphasis added). Facts, reasonable assumptions predicated on facts, and expert opinions supported by facts can constitute substantial evidence. *See* Pub. Res. Code §§ 21080(e), 21082.2(c), and CEQA Guidelines §§ 15064(f)(5) & 15384.

CEQA contains categorical exemptions for projects that are unlikely to have environmental impacts. *See* Pub. Res. Code § 21084. These exemptions are to be construed narrowly and are not to be expanded beyond the scope of their plain language. *See Castaic Lake Water Agency v. City of Santa Clarita* (1995) 41 Cal. App.4th 1257; *see also Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 205. They must also be construed in light of their statutory authorization, which limits such exemptions to classes of projects that have been determined not

to have significant effects on the environment – ensuring categorical exemptions are interpreted in a manner affording the greatest environmental protection. *See Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1192; *see also Save Our Schools v. Barstow Unified Sch. Distr. Bd. of Educ.* (2015) 240 Cal.App.4th 128, 140; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 966.

Exceptions to categorical exemptions also exist, requiring agencies to perform an Initial Study (“IS”) and further environmental review whenever a project is subject to one of the “exceptions-to-the-exemptions.” *See* CEQA Guidelines § 15300.2. Moreover, lead agencies may not avoid conducting an IS by merely adopting mitigation measures into a project. *See Salmon Protection & Watershed Network v. County of Marin* (2004) 125 Cal.App.4th 1098, 1102 (holding project must be reviewed under CEQA when mitigation was required to avoid triggering sensitive environment, significant impact, or cumulative impacts exceptions to the use of categorical exemptions); *see also Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1200 (observing CEQA Guidelines do not authorize consideration of mitigation measures with the categorical exemption and that the project required at minimum an MND).

4. The Project does not qualify for any categorical exemption.

Here, Applicant seeks to exempt the Project from CEQA through four separate classes of categorical exemptions: Class 1, Class 3, Class 31, and Class 32. *See* CEQA Guidelines §§ 15300; 15301; 15303; 15331; 15332. Because the Project does not qualify for any class of categorical exemption, the Planning Commission must reject Applicant’s request that the Project be found categorically exempt from CEQA.

a. The Project does not qualify for a Class 1 categorical exemption.

Class 1 consists of “the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures . . . *involving negligible or no expansion of use beyond that existing at the time of the lead agency’s determination.*” CEQA Guidelines § 15301 (emphasis added). Class 1 categorical exemptions are clearly meant to apply to projects involving no change in use. To the best of Commenters’ knowledge, the subject property is completely out of use at this time. The Project would convert it into a 185-room hotel with rooftop entertainment facilities, onsite bar, restaurant, and retail—a radical change from the building’s current non-use. This Project plainly does not qualify for a Class 1 categorical exemption.

Even if this Project involved negligible or no expansion of use, it would not qualify for a Class 1 categorical exemption because the alterations to the structure are not “minor.” The Project proposes the addition of an enclosed staircase and service elevator which will extend the tower eastward approximately 10 feet. It also includes a widening of the driveway on Ocean Avenue by 1,398 square feet and an increase in the adjacent Victory Park hardscape by 249

square feet.¹ Because these expansions go beyond minor alterations of the existing structure, the Project does not qualify for a Class 1 categorical exemption.

In sum, the Project does not qualify for a Class 1 categorical exemption because it involves a drastic change in use and because it proposes major alterations to the existing structure.

b. The Project does not qualify for a Class 3 categorical exemption.

The Class 3 categorical exemption consists of, *inter alia*, the construction of “new, small facilities or structures” and the “conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure.” CEQA Guidelines § 15303. Here, the Project does not involve the construction of new, small facilities or structures. The Project is also not a “conversion of existing small structures from one use to another,” because the structure is very large. CEQA Guidelines § 15303(c) limits the construction of new structures in urbanized areas to 10,000 square feet in total floor area. The subject property is approximately 172,000 square feet in area, far beyond what may qualify under Class 3.

The Project also does not qualify for a Class 3 categorical exemption because it would involve significant modifications to the exterior of the structure. As stated above, the alterations to the exterior of the building are not “minor.” They include the addition of an enclosed staircase and service elevator, which will extend the tower eastward approximately 10 feet, an expansion of the driveway on Ocean Avenue by 1,398 square feet, and the addition of a swimming pool poll deck, and a terrace.

In Sum, the Project does not qualify for a Class 3 categorical exemption because it does not involve the construction of new, small facilities or structures and because it involves significant modifications to the exterior of the structure.

c. The Project does not qualify for a Class 31 categorical exemption.

The Class 31 categorical exemption applies to “projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of historical resources . . .” CEQA Guidelines § 15331. Because the Project involves a radical change and intensification in use, from an out-of-use congregate care facility to a brand new hotel, the Planning Commission cannot find that it is “limited” to the restoration of the structure as an historical resource. Because the conversion of an historical landmark into a hotel is plainly not a mere restoration of that landmark, the Project does not qualify for a Class 31 categorical exemption.

d. The Project does not qualify for a Class 32 categorical exemption.

¹ Taken from renderings of the Project obtained from the Project Planner.

Class 32 categorical exemptions are limited to in-fill development projects that, *inter alia*, are “consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations” and “would not result in any significant effects relating to traffic, noise, air quality or water quality.” CEQA Guidelines § 15332(a), (d). As explained below, the Project does not qualify for a Class 32 categorical exemption because it is (1) inconsistent with the applicable general plan and (2) because it cannot be readily perceived that the Project will not result in any significant effects relating to traffic, noise, air quality or water quality.

1. The Project is inconsistent with applicable land use plans and zoning.

In order to qualify for a Class 32 categorical exemption, the Project must be “consistent with applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.” CEQA Guidelines § 15332(a). The Project is located within Subarea 7 of the Downtown Shoreline Planned Development District (PD-6), and within General Plan Land Use District Number 7 (LUD 7). The Project as it is currently proposed is inconsistent with more than one element of the applicable general plan policies. General Use and Development Standard (j) for PD-6 states: “It shall be the goal of the City to develop a program/policy for the Downtown Shoreline area that protects and encourages lower cost visitor accommodations.”² As it appears that no such program/policy exists, individual developments should advance the goal of providing lower cost visitor accommodations. The Project proposes a rooftop pool, terrace, food/beverage, and banquet/meeting spaces, a spa, and a fitness center, amenities typical of luxury hotels. As currently proposed, the Project conflicts with Development Standard (j) in that it proposes luxury amenities, strongly suggesting that it will provide expensive rather than affordable overnight visitor accommodations.

The Project also does not provide nearly enough public benefits. The introduction to PD-6 specifically highlights that there is a “high degree of public interest in this area . . . due to the potential public benefits that can be derived from its uses,” indicating that public benefits are critical to the fulfillment of the Downtown Shoreline Community Plan.³ The Project proposes a hotel with bar, retail, and food service venues. All of these uses would be contained within a private development. A project of this magnitude would better serve the community as housing and with ancillary uses that genuinely serve the public, such as, for example, meeting spaces that could be reserved out free of charge or public art gallery space.

The Project does not qualify for a Class 32 categorical exemption because it conflicts with applicable general plan policies in that it does not propose affordable accommodations nor is it proposed to provide enough public benefits.

2. The Project may have significant traffic impacts.

² Ordinance No. ORD-11-0017, Downtown Shoreline Planned Development District (PD-6), p. 14, available at: <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=2463>

³ *Id.*, p. 2.

In order to qualify for a Class 32 categorical exemption, a project must not result in any significant effects relating to traffic. CEQA Guidelines § 15332(d). The Traffic Impact Study (“TIS”) prepared for the Project fails to provide an adequate analysis of traffic impacts. For the reasons discussed below, the TIS fails to provide an accurate and conservative traffic analysis. In order to receive a Class 32 categorical exemption, a revised traffic study must be prepared.

a. The Traffic Impact Study area is unacceptably narrow.

The TIS studies only ten intersections (TIS, p. 2). This deviates from the City’s practice of requiring the study of many more intersections for similar or nearby projects, including: 31 intersections for the 2nd/PCH project,⁴ 30 intersections for the Shoreline Gateway East Tower addendum⁵ and Golden Shore Master Plan project⁶ and 14 intersections analyzed for the Oceanaire Apartment project.⁷ This narrow study area fails to account for the Project’s cumulative impact on intersections already operating and/or anticipated to operate at an unacceptable LOS when considering other related projects, as discussed below.

b. The Traffic Impact Study fails to study intersections already or anticipated to be operating on unacceptable levels.

As confirmed by other nearby project traffic studies,⁸ intersections nearby the Project Site are already operating at or near a LOS of E or F and/or anticipated to be operating at such levels (anticipated levels in 2017-2020). As summarized in the table below, previous traffic counts conducted between 2008-2016 show various V/C levels, the majority of which either operating at or below an acceptable LOS of D (see figures in red). Moreover, those same traffic studies anticipated V/C levels in 2017-2020 to be operating well below a LOS of D (also in red). Given these intersections are already and/or anticipated to be suffering deteriorating LOS, it is reasonable that a slight increase in V/C generated by the project could trigger an applicable threshold, which warrants mitigation. Therefore, these intersections must be analyzed in a revised traffic study.

⁴ 2nd/PCH mixed retail project (Apr. 2017) Draft EIR, pp. IV.K-8-9,
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6498>.

⁵ Shoreline Gateway E. Tower (10/3/16) Addendum Traffic Study, PDF p. 10,
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6153>.

⁶ Golden Shore Master Plan project (10/2/09) DEIR Traffic Study, PDF pp. 9,
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=3199>;

⁷ Oceanaire project (Mar. 2015) IS/MND, pp. 101-103,
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4978>.

⁸ Oceanaire project (2/24/15) Traffic Study, PDF pp. 29-30 (Tbls. 7 and 8),
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4977>; 207 Seaside Way project (2/19/15) Traffic Study, PDF p. 49-50 (Tbls. 8-1 & 8-2), <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4954>; Shoreline Gateway E. Tower project (10/3/16) Addendum Traffic Study, PDF pp. 39-41 (Tbl. 3-4), pp. 69-74 [Tbl. 8-2), <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6153>; Golden Shore (10/2/09) Addendum Traffic Study, PDF pp. 30-31 (Tbl. 3-4), PDF pp. 56-59 (Tbl. 8-1), <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=3199>; Land Use Element/Urban Design Element (May 2016) Draft EIR Traffic Study, PDF pp. 11-12 (Tbl. A), <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6079>;

Intersections Operating At/Near Unacceptable Levels

Intersection		Recorded LOS (2008 -2016)		Anticipated (2017-2020)	
		V/C	LOS	V/C	LOS
Alamitos/ Ocean	am	0.746 - 1.120	C - F	0.820 - 1.267	D - F
	pm	0.854 - 1.062	D - F	0.966 - 1.199	E-F
Alamitos / 3rd	am	0.853 - 1.048	D - F	1.006 - 1.014	F
	pm	0.577 - 0.659	A-B	0.77	C
Alamitos / 7th	am	0.825 - 0.902	D - E	0.993 - 1.004	E - F
	pm	0.735 - 0.763	C	0.881 - 1.253	D - F
Alamitos / Broadway	am	0.713 - 0.900	C - E	0.859 - 0.910	D - E
	pm	0.747 - 0.945	C - E	0.832 - 0.991	D - E
Long Beach / 7th	am	0.658 - 0.730	B - C	0.818 - 0.952	D - E
	pm	0.484 - 0.550	A	0.633 - 0.795	B - C
Magnolia / Ocean	am	0.748 - 0.848	C - D	0.945 - 1.001	E - F
	pm	0.661 - 0.744	A - B	0.845 - 0.880	D
Alamitos / 4th	am	0.707	C	0.821	D
	pm	0.888	D	1.021	F

c. The Traffic Impact Study uses an improper baseline of existing conditions.

The TIS conducted only a single a.m./p.m. traffic count on June 7, 2018 (TIS, p. 21). However, the traffic volumes recorded seem to be significant lower than traffic counts previously conducted by other projects. The table below compares the traffic levels of five intersections studied in the TIS to five different traffic studies from City projects. For example, the Pine/Seaside intersection was analyzed in the TIS, which recorded a volume-to-capacity ratio ("V/C") of 0.202 during a.m.-peak and 0.255 during p.m.-peak (TIS, Table 4, p. 26). However, under the 207 Seaside Project traffic study, that intersection was recorded as having a V/C level of 0.400 during the a.m.-peak and 0.477 during the p.m.-peak—roughly 98 and 87 percent higher, respectively, than purported in the TIS.

As shown in the table below, the TIS appears to have recorded significantly lower baseline traffic counts in at least these five intersections. Differences in red indicate V/C levels that were higher in other traffic studies than in the TIS. This suggests that the traffic count conducted for the TIS is a potential outlier, which warrants utilizing the highest value of known traffic counts conducted in the area, as the City has done in other projects.⁹ Moreover, additional

⁹ See e.g., Oceanair project (2/24/15) Traffic Study, PDF p. 11, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4977>; 207 Seaside Way project (2/19/15) Traffic Study, PDF p. 16, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4954>.

traffic counts should be performed.

Comparison of Existing Traffic Levels between TIS and Other City Projects

Intersection		Project ¹⁰		Oceanair Project ¹¹			207 Seaside Project ¹²			Shoreline Project ¹³		
		Int.	V/C	Int.	V/C	Diff.	Int.	V/C	Diff.	Int.	V/C	Diff.
Pacific/	am	2	0.580	3	0.553	-4.7%	2	0.547	-5.7%	23	0.649	11.9%
Ocean	pm		0.521		0.503	-3.5%		0.5	-4.0%		0.504	-3.3%
Pine/	am	4	0.494	4	0.532	7.7%	3	0.532	7.7%	24	0.623	26.1%
Ocean	pm		0.623		0.674	8.2%		0.674	8.2%		0.778	24.9%
Long Beach/	am	9	0.571	6	0.517	-9.5%	7	0.517	-9.5%	25	0.639	11.9%
Ocean	pm		0.518		0.483	-6.8%		0.483	-6.8%		0.538	3.9%
Pine/	am	6	0.323	10	0.342	5.9%	5	0.352	9.0%	30	0.373	15.5%
Shoreline	pm		0.450		0.477	6.0%		0.51	13.3%		0.492	9.3%
Pine/	am	5	0.202	9	0.287	42.1%	4	0.4	98.0%	n/a		
Seaside	pm		0.255		0.286	12.2%		0.477	87.1%			

Intersection		Project		Golden Shore Project ¹⁴			Land Use Element ¹⁵		
		Int.	V/C	Int.	V/C	Diff.	Int.	V/C	Diff.
Pacific/	am	1	0.580	19	0.689	18.8%	6	0.814	40.3%
Ocean	pm		0.521		0.632	21.3%		0.713	36.9%
Pine/	am	2	0.494	20	0.634	28.3%	n/a		
Ocean	pm		0.623		0.774	24.2%			
Long Beach/	am	3	0.571	21	0.718	25.7%	11	0.723	26.6%
Ocean	pm		0.518		0.584	12.7%		0.632	22.0%
Pine/	am	4	0.323	30	0.355	9.9%	n/a		
Shoreline	pm		0.450		0.486	8.0%			
Pine/	am	5	0.202	26	0.263	30.2%	n/a		
Seaside	pm		0.255		0.308	20.8%			

¹⁰ Traffic Impact Study for Breakers Hotel, Table 4, p. 26.

¹¹ Oceanair project (Mar. 2015) IS/MND, p. 108, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4978>.

¹² 207 Seaside project (Mar. 2015) IS/MND, p. 105, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4949>.

¹³ Shoreline Gateway E. Tower (10/3/16) Addendum Traffic Study, PDF p. 68, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6153>.

¹⁴ Golden Shore Master Plan project (10/2/09) Addendum Traffic Study, PDF pp. 28-31, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=3199>.

¹⁵ Land Use Element/Urban Design Element (May 2016) Draft EIR Traffic Study, PDF pp. 11-14, 32 (fig. 1) <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6079>

d. The Traffic Impact Study fails to include all related projects.

The TIS identifies 37 related projects (TIS, Table 7, pp. 32-33), but fails to identify numerous related projects that should have been incorporated into the analysis. These include:

- Silversands apartment/hotel project: including 33 dwelling units and 72 hotel room mixed-use development at 2010 E. Ocean Blvd. estimated to generate 807 average daily trips (“ADTs”).¹⁶
- City Hall East Edison apartment project: including 126 apartment units and 3,621 SF of retail at 100 Long Beach Blvd. estimated to generate 1,192 ADTs.¹⁷
- Pike Outlet retail project: 392,992-SF conversion of a new retail outlet south of Seaside Way (between Cedar Ave. and Pine Ave.) estimated to generate 2,266 ADTs.¹⁸
- Commercial Reuse project: 3,657 SF restaurant with a bar at 743 E. 4th St. estimated to generate 418 ADTs.
- Queensway Drive hotel project: 178-room hotel development at 600 Queensway Dr. estimated to generate 1,588 ADTs.
- 25 S. Chestnut Place condo project: 246 condo-unit development at 25 S. Chestnut Pl. estimated to generate 1,028 ADTs.
- Hotel Sierra (red thumbtack H): 191-room hotel development at 290 Bay Street estimated to generate 1,115 ADTs.¹⁹
- Bay Street hotel project: 138-room hotel development at 285 Bay St. estimated to generate 1,231 ADTs.
- 421 W. Broadway apartment project: 291 apartment units and 15,580 SF of commercial development at 421 W. Broadway estimated to generate 2,604 ADTs.
- George Deukmejian Courthouse: 531,000-SF municipal building containing commercial/retail space at 275 Magnolia Avenue completed in 2013 and estimated to generate 1,920 ADTs.²⁰
- Pine Avenue project: 18 dwelling units and 15,000 SF of commercial development at 433 Pine Avenue estimated to generate 764 ADTs.
- Long Beach Boulevard mixed-use project: 82 dwelling units and 7,000 SF of commercial development at 350 Long Beach Blvd. estimated to generate 1,086 ADTs.
- Ocean Boulevard dwelling/hotel project: 51 dwelling units and 47 hotel room development at 1628-1724 E. Ocean Blvd. estimated to generate 715 ADTs.

¹⁶ Long Beach Post (9/11/18) After tumultuous battle, hotel and condominium project on Long Beach shoreline moves forward, <https://lbpost.com/commentary/renderings-hotel-condominium-long-beach-shoreline-labor/>.

¹⁷ Curbed LA (8/19/16) Long Beach’s City Hall East becomes luxury apartments, renting from \$1,880, <https://la.curbed.com/2016/8/19/12527650/long-beach-city-hall-east-edison-apartments>.

¹⁸ City (5/4/16) CPC report RE: Planning Commission 2015 in Review, p. 16, <http://www.longbeach.gov/globalassets/city-manager/media-library/documents/memos-to-the-mayor-tabbed-file-list-folders/2016/may-4--2016---planning-commission-2015-in-review>.

¹⁹ Hotel Sierra (May 2009) Addendum to Supplemental EIR 14-04, <http://www.lbds.info/civica/filebank/blobload.asp?BlobID=2968>.

²⁰ California Courts (2018) Courthouse Projects, <http://www.courts.ca.gov/facilities-la-longbeach.htm>;;

- West Gateway project: 40-story tower including 694 residential units at 600 W. Broadway.²¹
- Rockefeller Partners project: eight-story mixed-use development with 120 residential units and 6,000 square feet of retail space at 1101 Long Beach Blvd.²²
- Security Pacific National Bank project: adaptive reuse project into a 13-story hotel with 189 guestrooms at 110 Pine Ave.²³

These other related projects not included in the TIS will generate at least an estimated 21,158 average daily trips (“ADTs”) that, when combined with the Project’s estimated 1,631 ADTs (Traffic Study pp. 12-13, Table 2), may result in a cumulative significant traffic impact at nearby intersections. A revised traffic study must include all related projects to ensure a conservative cumulative traffic impact analysis.

e. The TIS uses overly high internal trip credit assumptions.

The TIS applied various trip credits in its estimate of the Project’s trip generation, including a 25 percent internal trip credit for the restaurant and bar and a 50 percent internal trip credit for the spa (TIS, p. 11). These assumptions appear to be much higher than the trip credits applied to similar hotel/mixed-use projects near the LA Convention Center located in the City of Los Angeles, which apply a maximum internal trip credit of 20 percent, maximum pass-by trip credit of 20 percent, and no presumption of ridesharing services.²⁴ The TIS should be revised using more conservative and appropriate trip credits.

f. The TIS fails to analyze traffic impacts during the Project’s construction phase.

The TIS analyzes only the estimated traffic impacts of the operational phase of the Project. It completely ignores potential traffic impacts during the construction phase, when substantial renovation to the exterior of the building and rooftops will be conducted. The failure to analyze construction phase traffic impacts prevents the City and the public from achieving a full understanding of the traffic impacts of the Project. The TIS must be revised to analyze these impacts.

²¹ <https://la.curbed.com/maps/long-beach-development-downtown-project-map>; CurbedLA (8/29/18) 40-story skyscraper would be Long Beach’s tallest, <https://la.curbed.com/2018/8/29/17797158/long-beach-development-tallest-tower-40-stories>.

²² CurbedLA (Listed as project number 23), <https://la.curbed.com/maps/long-beach-development-downtown-project-map>;

²³ *Id.*, (Listed as project number 27).

²⁴ See e.g., Fig+Pico Conference Center Hotels (Sep. 2017) Draft EIR, pp. 4.10-26-4.10-33, <https://planning.lacity.org/eir/FigPico/files/4.10%20Transportation%20and%20Traffic.pdf>; 1020 S. Figueroa Street Project (Sep. 2016) Draft EIR, pp. 4.J-28, 4.J-36- 4.J-39, http://planning.lacity.org/eir/1020SoFigueroa/DEIR/4_J_Transportation_and_Traffic.pdf.

In sum, the Project does not qualify for a Class 32 categorical exemption because it may result in significant traffic impacts. The TIS inadequately studied the Project's traffic impacts and a revised and substantially more thorough study must be prepared.

3. The Project may have significant noise impacts.

The Statement of Support for Class 32 categorical exemption states that the "hotel and ancillary uses will not introduce a substantial new noise source relative to existing conditions and the project will operate within the standards of the adopted Noise Ordinance."²⁵ This claim is completely unsubstantiated, as no noise analysis was prepared for this Project. The Project will undoubtedly introduce substantial new noise sources, as the building would be converted from an out-of-use congregate care facility into a 185-room hotel with a rooftop pool and bar and an indoor minibar, restaurant, and retail uses. The City's own Noise Element Existing Conditions Report specifically lists "restaurants" and "bars" as uses that "have the potential to generate noise which may be perceived as annoying or disturbing."²⁶ Therefore, the Project does not qualify for a Class 32 categorical exemption because it may have significant impacts on noise.

4. The Project may have significant impacts on air quality.

In order to qualify for a Class 32 categorical exemption, approval of a project must not result in any impacts on air quality. CEQA Guidelines § 15332(d). The Applicant does not address whether or not the Project will have significant impacts on air quality. Given that the Project would convert a currently out-of-use building into a hotel, it will at the very least generate far more mobile source emissions. The building is currently out-of-use, generating no traffic, neither operational nor construction-related. The proposed additions to the building will generate construction-related traffic, and the proposed hotel, restaurant, bars, and retail will be open to the public. Many of these patrons are likely to travel by car. The Planning Commission cannot confirm that the Project will not have significant impacts on air quality if no study at all has been prepared for such a radical intensification of use. Because the Project may have significant impacts on air quality, it does not qualify for a Class 32 categorical exemption.

5. The Project may have significant impacts on water quality.

In order to qualify for a Class 32 categorical exemption, the Project must not result in any significant impacts on water quality. The Statement of Support states that "there are three sites located approximately 350 feet east of the project site that are listed under a tiered permit or military evaluation." Given the proximity of these sites to the Project site, there could be potential significant impacts on water quality and other aspects of the environment. "The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on

²⁵ California Environmental Quality Act Statement of Support, Class 32 (Infill Development) Exemption Determination, Section D

²⁶ General Plan Noise Element Update, "Existing Conditions Report," p. 1-15.

scientific and factual data.” CEQA Guidelines § 15064(b). The Statement of Support mentions these three sites in passing, yet does not offer any further detail about the nature or risks of these sites to water quality and human health in general. Without further study or explanation, the public cannot know whether or not mitigation measures are required. The Project does not qualify for a Class 32 categorical exemption because it may have significant impacts on water quality.

For all of the reasons stated above, the Project does not qualify for a Class 32 categorical exemption.

5. The Project does not qualify for a categorical exemption because exceptions-to-the-exemptions apply.

A project falling within a categorical exemption may nevertheless require environmental review if the project is subject to one of the exceptions-to-the-exemptions. CEQA Guidelines § 15300.2. As explained below, multiple exceptions apply to this Project because of significant cumulative impacts and potentially adverse impacts on historical resources.

a. There are significant cumulative impacts caused by other projects of the same type in the area.

Categorical exemptions “are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.” CEQA Guidelines § 15300.2(b). There are at least four projects of the same type in various stages of planning within two miles of the Project site, including the following:

- Jergins Tunnel Hotel Project, 100 E. Ocean Blvd.
- 110 Pine St. Hotel
- Queen Mary Hotel, 1126 Queens Hwy.
- Long Beach Civic Center Hotel, West Gateway²⁷

The concentration of projects in this area are precisely the kind of “successive projects of the same type in the same place” which may result in cumulative impacts.

In addition, at a presentation this past August, Mayor Robert Garcia announced plans for a development boom within the downtown core. He listed over 30 residential and commercial projects that are currently in planning or underway. There are at least four other major projects in the various stages of planning within less than half a mile from the Project site alone:

Sonata Modern Flats, 207 E. Seaside Way
Oceanaire, 150 W Ocean Blvd.
Ocean View Tower, 200 W. Ocean Blvd.

²⁷ <https://la.curbed.com/maps/long-beach-development-downtown-project-map>

Blue Line renovations, 107 E. First St.²⁸

Because of the significant cumulative impacts on the environment due to this Project, other hotels, and other major projects in the area, the Project is excepted from any categorical exemption from CEQA.

b. The Project may cause a substantial adverse change in the significance of a historical resource.

“A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.” CEQA Guidelines § 15300.2(f). In this case, arguably the most significant element of the Project is that the historic Breakers structure would not only be converted from an out-of-use congregate care facility into a hotel with a rooftop pool and food, beverage, and retail outlets, but it would include several major physical alterations to the existing building. The Project is currently designated a local historical landmark, making it presumed historically or culturally significant under CEQA. CEQA Guidelines § 21084.1. Modifications to the existing building could threaten the building’s eligibility for designation as a local landmark or for inclusion in the California Register of Historical Resources. Because the Project may cause a substantial adverse change in the historical significance of the Breakers structure, it does not qualify for a categorical exemption.

In sum, even if the Project did qualify for a categorical exemption, it would be excepted from an exemption due to significant cumulative impacts and potential adverse impacts on the significance of a historical resource.

6. The required findings for the requested entitlements cannot be made

A site plan review shall not be approved unless six findings of fact are made. The first finding states:

The design is harmonious, consistent and complete within itself and is compatible in design, character and scale, with neighboring structures and the community in which it is located. LBMC § 21.25.506(A)(1).

The Project may negatively impact the abutting Victory Park, requiring further consideration of the interaction between the two sites. Vehicular access to the Breakers Hotel will pass through the public park by way of a circular driveway, introducing potential for vehicular-pedestrian accidents. This may also interrupt recreation in the park due to consistent vehicular entrances to the Project for all of its uses, including overnight stay and restaurant and alcohol patronage. Proposed changes to the park include widening and reconfiguring the existing driveway, further limiting the acreage of open space. Because the potential for disruptive interactions between the Project and abutting park conflict with the requirement of the finding that the project design is

²⁸ *Id.*

“harmonious” and compatible “with neighboring structures and the community in which it is located,” this finding cannot be made.

In addition, the another required finding of fact states: “The design will not remove significant mature trees or street trees, unless no alternative design is possible.” LBMC § 21.25.506(A)(3). The existing palm trees are proposed to be relocated from their current positions and incorporated into the final landscape. However, the unnecessary removal of these trees could potentially harm them in the interim, and no evidence suggests that there is not a possible alternative design.

Because two of the required findings of fact cannot be made, the Planning Commission cannot approve the Site Plan Review at this time.

a. The required findings for the Conditional Use Permit “CUP” cannot be made.

In order to grant a Conditional Use Permit, the Planning Commission must find, *inter alia*, that “[t]he approval is consistent with and carries out the General Plan, any applicable specific plans such as the local coastal program and all zoning regulations of the applicable district.” LBMC § 21.25.206(A). This finding cannot be made because the Project conflicts with elements of PD-6. As mentioned earlier, PD-6 General Use and Development Standard (j) encourages a “program/policy . . . that protects and encourages lower cost visitor accommodations.” There is no mention of this general goal for the Downtown Shoreline area in the project proposal. Additionally, for any local visitors to the Project, the only option for parking off-site valet parking, which may deter middle or low-income guests, further separating the proposed Breakers Hotel from the Downtown Shoreline Area Plan goals to provide affordable visitor options.

In addition, there are numerous requirements and plan amendments listed as conditions of approval that would substantially alter the Project and that should be completed before granting the CUP. The conditions of approval for the CUP note that, prior to the issuance of building permits, City staff must review and approve the following: a hotel operations plan that includes all vehicular operations, valet operations, delivery locations, and rideshare drop off and pick-up, a revised traffic impact analysis, a grading plan with hydrology and hydraulic calculations, off-site parking lease, improvement and improvement plans, and ADA compliance.²⁹ The requirements listed for the hotel operations plan alone, especially given the many issues related to parking and on-site vehicular traffic, are substantial, and should be reviewed prior to approval of the CUP, not only as a condition for the issuance of building permits. Since there are still extensive plans that are yet to be completed and reviewed by City experts, and these numerous plan updates and approvals will affect the general welfare of the community as well as potential safety hazards, a CUP should not be granted at this time.

²⁹ See: Special Conditions of Approval 5, 8, 10, 11, 14, 19, 23, 30, 32, 34, 40, 44, 47, 58, 62, 63, 64 75, 77, 78, 80, 81, 85, 86, 89.

The staff report states that, under the LBMC, special conditions apply to alcohol beverage sales uses requiring a conditional use permit. LBMC § 21.52.210(D) requires that the use:

shall not be in a reporting district with more than the recommended maximum concentration of the applicable on or off-premises sales use, as recommended by the State of California Alcoholic Beverage Control Board, nor with a high crime rate as reported by the Long Beach Police Department.

The staff report admits that the Project site census tract is oversaturated with on-sale alcohol licenses as reported by Alcohol Beverage Control (ABC), with 78 licenses issued licenses, 73 more than the ABC recommended maximum of 5.³⁰ While there are current alcohol licenses at the location site being extended to the Project, the new extensions allow for an increase in number of on-site venues where alcoholic beverages may be consumed, potentially increasing the alcohol consumption overall.

In sum, because the Project conflicts with applicable land use plans, and the Project is located in a reporting district with more than the ABC recommended maximum concentration of on-sale alcohol licenses, the required findings cannot be made, and the Planning Commission cannot grant the CUP at this time.

b. The required findings for the requested Local Coastal Development Permit cannot be made.

The Project requires a Local Coastal Development Permit ("LCDP") because it is located within the Coastal Zone. LBMC § 21.25.903. In order to issue an LCDP, the Planning Commission must make two required findings pursuant to LBMC § 21.25.9049(C):

1. The proposed development conforms to the certified local coastal program including but not limited to all requirements for replacement of low and moderate-income housing; and
2. The proposed development conforms to the public access and recreation policies of Chapter 3 of the Coastal Act. This second finding applies only to development located seaward of the nearest public highway to the shoreline.

Neither finding can be made because the proposed Project is inconsistent with the Local Coastal Program ("LCP") and does not conform to the public access and recreation policies of Chapter 3 of the Coastal Act.

³⁰ Conditional Use Permit Findings, Section C(d)

The first required finding cannot be made because the Project is inconsistent with the LCP. First, the proposed Project does not strengthen the entry to Promenade South on Ocean Boulevard at the southeast corner of Pine Avenue as required by the provisions of Area 14, Breakers, of the Downtown Shoreline Policy Plan. In reference to this requirement, the LCDP findings suggest that “visitor-serving uses” can serve as a substitute: “While the project site does not abut that specific entry to the Promenade South, the change of use to a hotel . . . would constitute visitor-serving uses.”³¹ “Visitor-serving uses” cannot substitute for a requirement to strengthen an entry. The Applicant should be required to accomplish this goal concretely by, for example, widening the pathway to or explicitly directing pedestrians towards the Promenade.

In addition, the proposed Project does not comply with Building Design provision (4)G(a) of Downtown Shoreline Planned Development District (PD-6), Subarea 7, which requires a project that includes a change of use of an existing building to “provide for the eastward continuation of the east/west pedestrian walkway across the subject sites.” Because the Project includes a significant change in use, this requirement applies. Project documentation does not demonstrate that this pedestrian walkway will not be obstructed by the Project.

The second required finding cannot be made because the Project does not encourage lower cost recreational and visitor facilities. Chapter 3 of the Coastal Act requires: “Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.” Pub. Res. Code § 30213. As stated above, the Project does not propose lower cost facilities. In fact, the developer boasts “best-in-class amenities, entertainment, and dining,” in a recent press release regarding renovation plans for the existing building, suggesting that the proposed project will not be accessible to lower-income guests.³² One of the main goals of the Coastal Act is to “[m]aximize public access to and along the coast.” Pub. Res. Code § 30001.5(c). In order to fully comply with the Coastal Act, the Project should maximize public uses within the building and ensure that they are accessible to lower-income patrons.

Finally, underlying the above concerns is that the current LCP was certified in 1980 and was most recently amended in 1994. The existing conditions of the area outlined in the LCP are nearly four decades old. Since then, the entire city of Long Beach has changed dramatically, both demographically and in terms of the built environment. With the current development boom in downtown, the potential increase in traffic alone is enough of a change to delay further changes in the area. The City should not consider further dramatic changes within the legally-protected Coastal Zone until the LCP is updated and fully certified by the California Coastal Commission.

In sum, the required findings of fact for the LCDP cannot be made due to inconsistencies with applicable land use plans and Chapter 3 of the Coastal Act, and it cannot be approved at this time.

³¹ Local Coastal Development Permit Findings, Section A

³² <http://www.prweb.com/releases/2018/01/prweb15074263.htm>

7. Conclusion

To summarize, Commenters are concerned with various issues related to CEQA, including potential significant impacts on historical resources and traffic, in addition to compliance with the LBMC. The Planning Commission should deny the requested CE and land use entitlements, and the City should prepare an Initial Study and an EIR, or, at the very least, an MND.

Commenters reserve the right to supplement these comments at future hearings and proceedings for the projects. *See Cmtys. For a Better Env't*, 184 Cal.App.4th at 86; *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120.

Finally, on behalf of Commenters, Commenters request, to the extent not already on the notice list, all notices of CEQA actions and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. *See* Pub. Res. Cod § 21080.4, 21083.9, 21092, 21092.2, 21108, 21167(f) and Gov. Code § 65092. Please send notice by electronic and regular mail to: Danielle Wilson 464 Lucas Ave. #201, Los Angeles, CA 90017, danielle.wilson@unitehere11.org (cc: cdu@unitehere11.org).

Thank you for consideration of these comments. We ask that this letter is placed in the administrative record for the Project.

Sincerely,

Danielle Wilson
Research Analyst
UNITE HERE Local 11



Overland Traffic Consultants
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E-mail: liz@overlandtraffic.com

SUPPLEMENTAL TRAFFIC ANALYSIS
BREAKERS HOTEL
210 East Ocean Boulevard

Overland Traffic Consultants prepared a Traffic Impact Study dated October 25, 2018 (Approved TIS) that was reviewed and approved by the City of Long Beach Public Works, Traffic Section. Based on community input and direction from the City of Long Beach, our office has conducted a supplemental trip generation analysis for the proposed Breakers Hotel renovation and expansion project. This analysis was conducted to evaluate potential traffic conditions and determine if any additional impacts that would be created by incorporating an updated and expanded cumulative project list. Cumulative projects are projects in the area surrounding a development area that are either under construction, currently approved or entitled, in plan check, pending evaluation or pending approval. Typically, not all cumulative projects will be built or built to the intensity currently envisioned. In traffic analyses, cumulative projects provide growth to potential future traffic conditions. The City of Long Beach considers Level of Service (LOS) D to be the upper limit of satisfactory conditions. According to standards adopted by the City of Long Beach, a traffic impact is considered significant if project traffic causes an intersection to deteriorate from LOS D or better to LOS E or F or if project traffic causes an intersection operating at LOS E or F as a baseline condition to increase the intersections volume to capacity ratio by 0.02 or more. An expanded cumulative project evaluation of future traffic conditions provides for a more conservative analysis. As demonstrated below, the conclusions of the Approved TIS, that there are no significant traffic impacts created by the Breakers Hotel renovation and expansion, does not change with this supplemental traffic analysis incorporating an updated and expanded cumulative project evaluation.

Cumulative Project Update

The cumulative project list has been revised to incorporate additional cumulative projects proposed in the area since the time of the Approved TIS, those not fully constructed and an expanded study area. The new cumulative project list is developed from information provided by Long Beach Development Services Planning Bureau. Cumulative projects number 38 through 64 have been added in this analysis. In addition, cumulative project number 22 (New Civic Center Residential & Commercial Mixed-Use) has an updated project description and trip generation incorporated in the analysis. A summary of the cumulative projects included in this analysis, with their location and description, is provided in Table 1. An updated cumulative

projects map is provided on Figure 1 on page 5. The cumulative projects' trip generation is provided in Attachment A.

Table 1
Cumulative Project Summary

#	Project Address	Description	Status
1	635 Pine Avenue and 636 Pacific Avenue	Mixed Use. Two 8-story buildings connected by a breezeway containing 271 residential units with an affordable housing component (11 units)	Project Entitled
2	936 Pine Avenue (Former American Cancer Society Office)	Adaptive Reuse. Approved for conversion from office to residential in front with four units in the rear.	Project Entitled
3	425 E. 5th Street (Successor Agency)	Mixed Use . 5-story, 15-unit residential development.	Project Entitled
4	229 16th Street	Apartments. SPR for new construction of six townhomes on a narrow lot in Midtown SP.	Project Entitled
5	1400 Long Beach Boulevard	Mixed Use. 4 - Story with 65 residential units, 2,300 sq.ft. of floor retail.	Project Entitled
6	200-256 Long Beach Blvd - Broadway Block	Mixed Use. 392-unit and 32,000 sq.ft. commercial development (Acres of Books site). 21-story tower and 7-story mid-rise, retaining Acres of Books building	Project Entitled
7	500 W. Broadway - Broadway & Magnolia Apartments	Mixed Use. Seven-story, 142-unit residential project with 3,000 sq. ft. of retail and a three-level parking garage.	Project Entitled
8	320 Alamitos Ave	Mixed Use . 77-unit residential redevelopment on a vacant site	Project Entitled
9	495 The Promenade North	Mixed Use, 4-stories, 20 residential units, 5,200 sf retail	Project Entitled - Building Permits Issued
10	434 E. 4th St	Mixed Use, 49 residential units	Under Construction
11	1834 Harbor Ave	2-story industrial building (51,453 square feet)	Project Entitled
12	245 W. Broadway	Mixed Use high-rise w/ 222 residential & 8,500 sf retail	Under Construction
13	230 W. 3rd St (3rd and Pacific)	Residential High-Rise (163 units)	Under Construction
14	1235 Long Beach Blvd	Residential (160 residential units)	Under Construction
15	1795 Long Beach Blvd.	Mixed Use (101 residential units, 4,051 sf commercial)	Project Entitled
16	1570-1598 Long Beach Blvd	4-story mixed use (36 residential units, 10,000 sf commercial)	Under Construction
17	538 Golden Ave	Residential Development (3 residential units)	Project Entitled
18	944 Pacific Ave	Adaptive Reuse from office to residential	Project Entitled - Bldg plan review in progress
19	825 E. 7th St	Residential Building (19 residential units)	Project Entitled
20	442 Crystal Court	Single-Family Residential	Project Entitled
21	2136-2144 W. 16th St.	Two Office Buildings (8,000 sf)	Project Entitled
22	New Civic Center	Residential and Commercial	From Civic Center Staff Report: The specific future developments for the residential/commercial would come before the Planning Commission at a later date, with their own individual Site Plan Review once they are fully designed. Trip Generation from LL&G Traffic Study for Project dated July 2015 with prior use credits
	North of Ocean Bl, south of Broadway & between Magnolia Av & Pacific Av	270,000 sf City Hall, 93,500 sf Library, 232,000 sf Headquarters, with up to 580 residential units, 32,000 square feet of retail space, and 8,000 square feet of restaurant space. A high-rise, 200-room hotel is also a potential Center Block component. An underground parking structure containing up to 725 parking stalls would service these uses, and the existing Broadway Garage would remain in place, for use by City employees and visitors of the Civic Center.	

**Table 1 continued
Cumulative Project Summary**

#	Project Address	Description	Status
23	422 W. Ocean Blvd	Residential Development (94 units)	Under Construction
24	110 W. Ocean Blvd	Adaptive reuse of Ocean Center Building (74 units, 5,400 sf retail, 7,200 sf restaurant)	Under Construction
25	150 W. Ocean Blvd	5-Story Residential Building (216 units)	Under Construction
26	207 Seaside Way	5-Story Residential Building (112 units)	Under Construction
27	227 Elm Ave	Residential Development (40 units)	Under Construction
28	200 W. Ocean Blvd	Adaptive reuse of office building to residential (98 units)	Under Construction
29	107 Long Beach Blvd	5-Story Hotel (34 hotel rooms), with modification to allow for 8 car lifts	Under Construction,
30	100 Aquarium Way	Addition to Aquarium (22,642 sf)	Under Construction
31	101 Alamitos Ave	Mixed Use (136 units, 2,570 sf retail)	Under Construction
32	2010 E. Ocean Blvd	Hotel/Residential (56 units, 40 hotel rooms)	Project Entitled - In plan check
33	777 E. Ocean Blvd.	High rise residential, 315 units residential, 6711 sf retail	Project Entitled - In plan check
34	135 Linden Ave	7-Story mixed use building (82 units, 4,091 sf retail)	Project Entitled - In plan check
35	435 Cerritos Ave	Single-family residence	Project Entitled
36	1078, 1080-1090 Atlantic Ave	Medical Office Building (11,000 sf)	Project Entitled
37	1112 Locust Avenue	97 unit Apartment Building	Project Proposed
38	1628-1724 E. Ocean Blvd.	Add 51 units condo to 47 unit motel	In Construction
39	600 W. Broadway	694 Dwelling Units, appx. 3,200 sf of retail and a commercial, residential and retail parking structure	Pending
40	1101-1105, 1107, 1145 & 1157 Long Beach Blvd.	120 Unit Multi-Family Apartment and 4,997 sf retail	Approved
41	110 Pine Ave	Former Security Pacific National Bank Building is a 1925 designated historic landmark, a 13-story office building with basement, totaling 107,309 SF and is sited on a 11,255 SF parcel. The adaptive re-use project will consist of the design for a 189-room hotel, featuring the existing historic lobby as a "jump lobby", a Hotel Sky Lobby with the potential for a roof terrace. Building to be fully upgraded to current codes & safety standards.	Pending
42	100 E. Ocean Blvd.	429 room High Rise Hotel with ballroom, meeting rooms, pool deck and restaurants	Pending
43	1126 Queens Highway	Queen Mary Renovation Project: Six story 200 key hotel with 6 entertainment buildings to include 323,641 sf including 150,980 sf of restaurants, 38,254 sf of retail, 150,000 sf of theater, 17,000 sf of bowling alley, 52,120 sf of golf venue, 4,000 sf museum, 61,287 sf of childrens venue, education and aquatic center	Pending - Conceptual Review, No Phasing Plan yet, Speculative
44	Blue Line Renovations	Modernization of Transit Agency's oldest train line (1990). 4 new switches, new signals, new tracs and street level intersections.	Short Term Station Closures - No permanent impact.
45	507 Pacific Ave	4-story, 134-unit mixed use with 7,200 sf of retail/commercial/office space	Pending
46	700 W. 17th st.	29,733 sf industrial building	Pending
47	1468 14th St.	3-story, 22,000 sf warehouse with covered and uncovered parking	
48	469 Pacific Coast Hwy	4-story affordable housing, 39 units and 1 manager unit	Pending

**Table 1 continued
Cumulative Project Summary**

#	Project Address	Description	Status
49	245 W. Pacific Coast Hwy.	Mixed use building with 135 units and 25,000 sf of commercial space	
50	201 W. Pacific Coast Hwy.	147 unit mixed use project with 189,000 sf total	Pending
51	1900-1940 Long Beach Blvd.	5-story mixed use building with 95 apartment units and 12,400 sf of retail.	In Plan Check, not constructed
52	1836-1852 Locust Ave.	47 affordable units, 1 manager unit, 3600 sf of commercial space and 40 parking spaces	Not constructed, plan check approved
53	1901 W. Pacific Coast Hwy.	1 industrial building with 194,840 sf.	Under Construction
54	127-139 E. Broadway	189 apartments and 10,000 sf retail space mixed use building and 103,290 sf garage	
55	1675 Santa Fe	21,377 sf industrial building	Pending
56	2111 W. 14th st.	New 38,440 sf industrial manufacturing building.	Pending
57	1341 Long Beach Blvd.	24 unit, 4-story apartment building	Pending
58	1401 Long Beach Blvd.	142 unit apartment building	Pending
59	125 Long Beach Blvd.	Mixed use 218 units and 7300 sf of commercial space.	Pending
60	1 & 11 Golden Shore	Mixed use project with 750 dwelling units and 11,000 sf of commercial space.	Pending
61	1601 San Francisco Ave.	2 industrial buildings totaling 94,872 sf	Pending
62	810 Pine Ave.	78 assisted living units	Pending
63	131 W. 3rd St.	Mixed use development with 345 dwelling units and 16,000 sf ground floor retail.	Pending
64	231 Windsor Way	321,595 sf expansion to the existing parking structure.	Pending

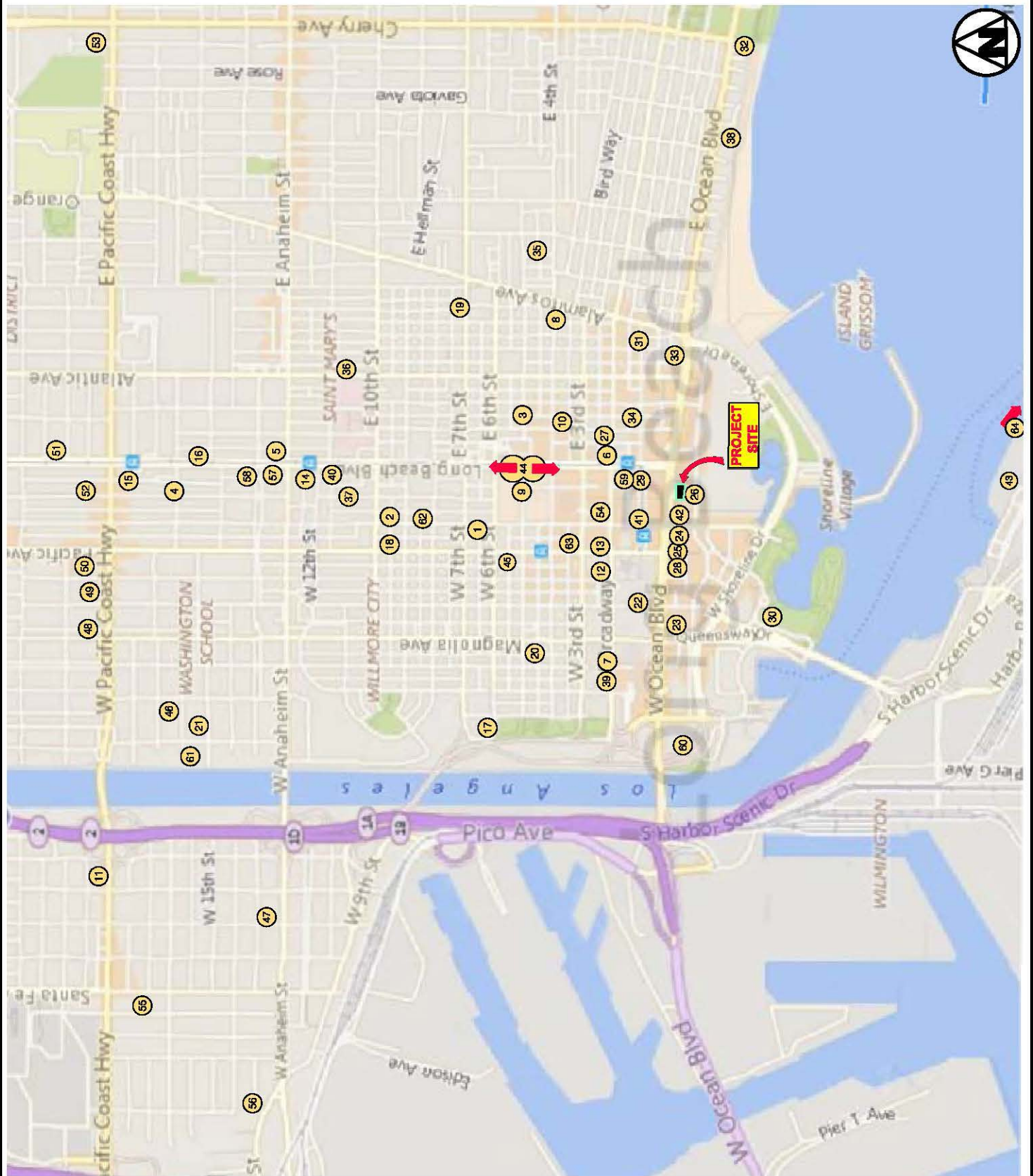


FIGURE 1

1/2019

CUMULATIVE PROJECT LOCATIONS



Overland Traffic Consultants, Inc.

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ANALYSIS PROCESS

Updated and expanded cumulative project trips have been incorporated into the future analysis at the ten study intersections. The Project trip distribution remains the same as the Approved TIS. Cumulative project trips were determined based on Institute of Transportation Engineers (ITE), Trip Generation Manual, 10th Edition. These trips were distributed through the study intersections based on type of development and proximity to the study intersections.

As with the Approved TIS, the City of Long Beach required Intersection Capacity Utilization (ICU) analysis was conducted at the intersections of West Ocean Boulevard & Queens Way/Magnolia Avenue, West Ocean Boulevard & Pacific Avenue, Broadway & Pine Avenue, Ocean Boulevard & Pine Avenue, Seaside Way & Pine Avenue, Shoreline Drive & Pine Avenue, East Ocean Boulevard & Locust Avenue, East 3rd Street & Long Beach Boulevard, and East Ocean Boulevard & Alamitos Avenue/Shoreline Drive.

RESULTS OF ANALYSIS

A comparison of existing conditions was not repeated in this supplemental analysis but is presented as shown in the Approved TIS. The Existing and Exiting + Project traffic conditions would not change with an expanded cumulative project evaluation. A comparison of the Future (2022) Without Project conditions, with an expanded and updated cumulative project list, and Future (2022) With Project conditions was conducted based on the City of Long Beach Impact Criteria as provided in Table 2.

Table 2
Significant Impact Criteria
City of Long Beach

- Project traffic causes an intersection to deteriorate from LOS D or better to LOS E or F; or
- Project traffic causes an increase in volume to capacity ration of 0.02 or more when the intersection is operating at LOS E or F in baseline conditions.

No significant traffic impacts were identified with the Breakers Hotel Renovation and Expansion Project and the updated and expanded cumulative projects. Table 3 displays the results of the analysis. Attachment B provides the ICU analysis worksheets.

Table 3
ICU Summary with
Updated and Expanded Cumulative Projects

No.	Intersection	Peak Hour	Existing (2018)		Existing +Project			Significant Impact	Future (2021) + Cumulative Projects		Future (2021) + Cumulative Projects + Project			Significant Impact
			ICU	LOS	ICU	LOS	Impact		ICU	LOS	ICU	LOS	IMPACT	
1	W Ocean Boulevard & Queens Way/Magnolia Av	AM	0.546	A	0.548	A	+ 0.002	NO	0.619	B	0.620	B	+ 0.001	NO
		PM	0.630	B	0.635	A	+ 0.005	NO	0.756	C	0.761	C	+ 0.005	NO
2	W Ocean Boulevard & Pacific Avenue	AM	0.580	A	0.582	A	+ 0.002	NO	0.629	B	0.631	B	+ 0.002	NO
		PM	0.521	A	0.524	A	+ 0.003	NO	0.662	B	0.667	B	+ 0.005	NO
3	Broadway & Pine Avenue	AM	0.375	A	0.380	A	+ 0.005	NO	0.424	A	0.430	A	+ 0.006	NO
		PM	0.615	B	0.625	B	+ 0.010	NO	0.695	B	0.705	C	+ 0.010	NO
4	Ocean Boulevard & Pine Avenue	AM	0.494	A	0.496	A	+ 0.002	NO	0.553	A	0.561	A	+ 0.008	NO
		PM	0.623	B	0.637	B	+ 0.014	NO	0.720	C	0.733	C	+ 0.013	NO
5	Seaside Way & Pine Avenue	AM	0.202	A	0.202	A	+ 0.000	NO	0.234	A	0.234	A	+ 0.000	NO
		PM	0.255	A	0.255	A	+ 0.000	NO	0.297	A	0.297	A	+ 0.000	NO
6	Shoreline Drive & Pine Avenue	AM	0.323	A	0.325	A	+ 0.002	NO	0.366	A	0.368	A	+ 0.002	NO
		PM	0.450	A	0.452	A	+ 0.002	NO	0.504	A	0.505	A	+ 0.001	NO
7A	E Ocean Boulevard & Locust Avenue	AM	0.484	A	0.511	A	+ 0.027	NO	0.568	A	0.594	A	+ 0.026	NO
		PM	0.468	A	0.545	A	+ 0.077	NO	0.574	A	0.652	B	+ 0.078	NO
7B	E Ocean Boulevard & Locust Avenue	AM	0.484	A	0.523	A	+ 0.039	NO	0.569	A	0.608	B	+ 0.039	NO
		PM	0.468	A	0.504	A	+ 0.036	NO	0.563	A	0.634	B	+ 0.071	NO
8	E 3rd Street & Long Beach Boulevard	AM	0.535	A	0.538	A	+ 0.003	NO	0.607	B	0.610	B	+ 0.003	NO
		PM	0.393	A	0.399	A	+ 0.006	NO	0.479	A	0.484	A	+ 0.005	NO
9	E Ocean Boulevard & Long Beach Boulevard	AM	0.571	A	0.582	A	+ 0.011	NO	0.673	B	0.684	B	+ 0.011	NO
		PM	0.518	A	0.527	A	+ 0.009	NO	0.603	B	0.612	B	+ 0.009	NO
10	E Ocean Boulevard & Alamitos Av/Shoreline Dr	AM	0.735	C	0.742	C	+ 0.007	NO	0.831	D	0.838	D	+ 0.007	NO
		PM	0.815	D	0.817	D	+ 0.002	NO	0.944	E	0.945	E	+ 0.001	NO

UPDATED ACCESS OPERATION AND QUEUE EVALUATION

Consideration on how the additional and updated cumulative projects may affect the driveway operations and access timing for the Breakers Hotel Project has been conducted.

- The vehicular entry onto the site will be conducted from the eastbound East Ocean Boulevard curb lane to the westerly entry driveway. The additional trips along Ocean Boulevard created by the additional cumulative projects may create minor additional delay on Ocean Boulevard which are evaluated in the ICU analysis but will not create additional delays turning into the Project driveway.
- The Breakers Hotel vehicular exit is to Collins Way south of Ocean Boulevard. The on-site queue lengths were evaluated in the November 2018 Parking Demand & Access Study. The additional cumulative project trips along Ocean Boulevard will not affect the exiting traffic. Collins Way and Ocean Boulevard were evaluated as part of the ICU analysis.
- Valet operations could be affected by additional traffic on Collins Way. Additional delays may be experienced in driving from off-site parking to and from the front of the hotel. The arrival rate would remain the same, but the service rate could be longer. The component of the service rate that could increase is the time for the valet to bring the vehicles back from the Convention Center or to use the off-site parking at 211 E. Ocean Boulevard because East Ocean Boulevard, Long Beach Boulevard, East 1st Street and Elm Street are traversed to perform this operation. An average of 2.83% increase in the operating conditions was determined between the prior future without project analysis and this updated and expanded cumulative analysis' future without project analysis. This difference is demonstrated in Attachment C.

The Project's queueing analysis incorporated conservative estimates of the valet services with up to 1.5 minutes (90 seconds) for non-event days and 2.1 minutes (125 seconds) for event days. The valet services timing was increased by 2.57% for the additional cumulative projects. This increased the 90 seconds valet service time during non-events to 92.3 seconds and the 125 seconds valet service time during events to 128.2 seconds. This increase in valet service time changed the total service time from 163 seconds per vehicle to 165.3 seconds per vehicle (60 seconds for person to enter or exit vehicle + 92.3 seconds valet service time + 13 seconds for pedestrians in drive path) on non-event days and from 198 seconds per vehicle to 201.2 seconds per vehicle (60 seconds for person to enter or exit vehicle + 128.2 seconds valet service time + 13 seconds for pedestrians in drive path) on event days. The service rate for the queue analysis was then determined by dividing a one-hour peak time period by the time it

takes for a vehicle to be turned over to the valet or for valet services to return the vehicle to the owner and passengers. Accordingly, the service rate changed from 22.1 vehicles per hour in the prior analysis to 21.8 vehicles per hour (3600 seconds / 165.3 seconds) on non-event days and from 18.2 vehicles per hour in the prior analysis to 17.9 vehicles per hour (3600 seconds / 201.2 seconds) on event days. The prior queue analysis used an estimate of 22 vehicles per hour service rate on non-event days and 18 vehicles per hour service rate on event days. This estimate does not change with the updated and expanded cumulative analysis. The findings in the prior Parking Demand & Access Analysis – Valet Queue Analysis does not change with the added cumulative projects.

SUMMARY & CONCLUSIONS

Analysis of the proposed Breakers Hotel Project has been updated to include additional and updated cumulative projects. Using City of Long Beach approved ICU analysis process and significant traffic impact criteria no significant traffic impacts are identified. The analysis at the ten study intersections in the Breakers Hotel area most likely affected by the renovation and expansion indicates no expected significant traffic impacts, no decrease in driveway operations and no extended queues at driveways with the proposed project at 210 E Ocean Boulevard.

ATTACHMENT A

Cumulative Project Details

#	Project Address	Description	Status	Daily Traffic	AM Peak Hour			PM Peak Hour		
					IN	OUT	TOTAL	IN	OUT	TOTAL
1	635 Pine Avenue and 636 Pacific Avenue	Mixed Use. Two 8-story buildings connected by a breezeway containing 271 residential units with an affordable housing component (11 units)	Project Entitled	2037	30	96	126	99	59	158
2	936 Pine Avenue (Former American Cancer Society Office)	Adaptive Reuse. Approved for conversion from office to residential in front with four units in the rear.	Project Entitled	29	2	0	2	1	1	2
3	425 E. 5th Street (Successor Agency)	Mixed Use . 5-story, 15-unit residential development.	Project Entitled	110	2	5	7	6	3	9
4	229 16th Street	Apartments. SPR for new construction of six townhomes on a narrow lot in Midtown SP.	Project Entitled	44	1	2	3	2	1	3
5	1400 Long Beach Boulevard	Mixed Use. 4 - Story with 65 residential units, 2,300 sq.ft. of floor retail.	Project Entitled	547	8	23	31	27	17	44
6	200-256 Long Beach Blvd - Broadway Block	Mixed Use. 392-unit and 32,000 sq.ft. commercial development (Acres of Books site). 21-story tower and 7-story mid-rise, retaining Acres of Books building	Project Entitled	3740	55	14	202	181	128	309
7	500 W. Broadway - Broadway & Magnolia Apartments	Mixed Use. Seven-story, 142-unit residential project with 3,000 sq. ft. of retail and a three-level parking garage.	Project Entitled	1171	17	51	68	57	37	94
8	320 Alamitos Ave	Mixed Use . 77-unit residential redevelopment on a vacant site	Project Entitled	564	8	27	35	27	16	43
9	495 The Promenade North	Mixed Use, 4-stories, 20 residential units, 5,200 sf retail	Project Entitled - Building Permits Issued	288	9	4	13	7	8	15
10	434 E. 4th St	Mixed Use, 49 residential units	Under Construction	548	8	19	27	27	20	47
11	1834 Harbor Ave	2-story industrial building (51,453 square feet)	Project Entitled	255	32	4	36	3	20	23
12	245 W. Broadway	Mixed Use high-rise w/ 222 residential & 8,500 sf retail	Under Construction	1857	27	81	108	89	57	146
13	230 W. 3rd St (3rd and Pacific)	Residential High-Rise (163 units)	Under Construction	1193	17	57	75	57	34	91
14	1235 Long Beach Blvd	Residential (160 residential units)	Under Construction	576	12	22	34	24	19	43
15	1795 Long Beach Blvd.	Mixed Use (101 residential units, 4,051 sf commercial)	Project Entitled	892	13	36	49	44	29	73
16	1570-1598 Long Beach Blvd	4-story mixed use (36 residential units, 10,000 sf commercial)	Under Construction	537	24	8	16	26	22	48
17	538 Golden Ave	Residential Development (3 residential units)	Project Entitled	22	0	1	1	1	1	2
18	944 Pacific Ave	Adaptive Reuse from office to residential	Project Entitled - Bldg plan review in progress	51	4	5	9	13	13	26
19	825 E. 7th St	Residential Building (19 residential units)	Project Entitled	139	3	6	9	7	4	11
20	442 Crystal Court	Single-Family Residential	Project Entitled	10	0	1	1	1	0	1
21	2136-2144 W. 16th St.	Two Office Buildings (8,000 sf)	Project Entitled	78	8	1	9	1	8	9
22	New Civic Center	Residential and Commercial	From Civic Center Staff Report: The specific future developments for the residential/commercial would come before the Planning Commission at a later date, with their own individual Site Plan Review once they are fully designed. Trip Generation from LL&G Traffic Study for Project dated July 2015 with prior use credits	10923	377	294	671	247	305	552
	North of Ocean Bl, south of Broadway & between Magnolia Av & Pacific Av	270,000 sf City Hall, 93,500 sf Library, 232,000 sf Headquarters, with up to 580 residential units, 32,000 square feet of retail space, and 8,000 square feet of restaurant space. A high-rise, 200-room hotel is also a potential Center Block component. An underground parking structure containing up to 725 parking stalls would service these uses, and the existing Broadway Garage would remain in place, for use by City employees and visitors of the Civic Center.								
23	422 W. Ocean Blvd	Residential Development (94 units)	Under Construction	688	10	33	43	33	20	53
24	110 W. Ocean Blvd	Adaptive reuse of Ocean Center Building (74 units, 5,400 df retail, 7,200 sf restaurant)	Under Construction	1395	49	61	110	115	72	43
25	150 W. Ocean Blvd	5-Story Residential Building (216 units)	Under Construction	1581	23	76	99	77	45	122

#	Project Address	Description	Status	Daily Traffic	AM Peak Hour			PM Peak Hour		
					IN	OUT	TOTAL	IN	OUT	TOTAL
26	207 Seaside Way	5-Story Residential Building (112 units)	Under Construction	820	12	40	52	40	23	63
27	227 Elm Ave	Residential Development (40 units)	Under Construction	293	4	14	18	148	22	8
28	200 W. Ocean Blvd	Adaptive reuse of office building to residential (98 units)	Under Construction	717	10	35	45	35	20	55
29	107 Long Beach Blvd	5-Story Hotel (34 hotel rooms), with modification to allow for 8 car lifts	Under Construction,	284	9	7	16	10	10	20
30	100 Aquarium Way	Addition to Aquarium (22,642 sf)	Under Construction	50	5	1	6	4	0	4
31	101 Alamitos Ave	Mixed Use (136 units, 2,570 sf retail)	Under Construction	1067	16	49	65	51	32	84
32	2010 E. Ocean Blvd	Hotel/Residential (56 units, 40 hotel rooms)	Project Entitled - In plan check	497	13	17	30	22	15	37
33	777 E. Ocean Blvd.	High rise residential, 315 units residential, 6711 sf retail	Project Entitled - In plan check	1280	21	64	85	65	40	105
34	135 Linden Ave	7-Story mixed use building (82 units, 4,091 sf retail)	Project Entitled - In plan check	754	11	31	42	37	25	62
35	435 Cerritos Ave	Single-family residence	Project Entitled	10	0	1	1	1	0	1
36	1078, 1080-1090 Atlantic Ave	Medical Office Building (11,000 sf)	Project Entitled	383	24	7	31	11	27	38
37	1112 Locust Avenue	97 unit Apartment Building	Project Proposed	528	9	26	35	26	17	43
38	1628-1724 E. Ocean Blvd.	Add 51 units condo to 47 unit motel	In Construction	277	5	14	19	14	9	23
39	600 W. Broadway	694 Dwelling Units, appx. 3,200 sf of retail and a commercial, residential and retail parking structure	Pending	5168	75	246	321	250	148	398
40	1101-1105, 1107, 1145 & 1157 Long Beach Blvd.	120 Unit Multi-Family Apartment and 4,997 sf retail	Approved	1015	15	44	59	49	32	81
41	110 Pine Ave	Former Security Pacific National Bank Building is a 1925 designated historic landmark, a 13-story office building with basement, totaling 107,309 SF and is sited on a 11,255 SF parcel. The adaptive re-use project will consist of the design for a 189-room hotel, featuring the existing historic lobby as a "jump lobby", a Hotel Sky Lobby with the potential for a roof terrace. Building to be fully upgraded to current codes & safety standards.	Pending	1581	53	36	89	58	55	113
42	100 E. Ocean Blvd.	429 room High Rise Hotel with ballroom, meeting rooms, pool deck and restaurants	Pending	3587	119	83	202	132	126	258
43	1126 Queens Highway	Queen Mary Renovation Project: Six story 200 key hotel with 6 entertainment buildings to include 323,641 sf including 150,980 sf of restaurants, 38,254 sf of retail, 150,000 sf of theater, 17,000 sf of bowling alley, 52,120 sf of golf venue, 4,000 sf museum, 61,287 sf of childrens venue, education and aquatic center	Pending - Conceptual Review, No Phasing Plan yet, Speculative	6071	123	80	203	275	289	564
44	Blue Line Renovations	Modernization of Trransit Agencys oldest train line (1990). 4 new switches, new signals, new tracs and street level intesections.	Short Term Station Closures - No permanent impact.	0	0	0	0	0	0	0
45	507 Pacific Ave	4-story, 134-unit mixed use with 7,200 sf of retail/commercial/office space	Pending	1178	17	49	66	57	38	95
46	700 W. 17th st.	29,733 sf industrial building	Pending	147	18	2	20	2	16	18
47	1468 14th St.	3-story, 22,000 sf warehouse with covered and uncovered parking		38	3	1	4	1	3	4
48	469 Pacific Coast Hwy	4-story affordable housing, 39 units and 1 manager unit	Pending	293	4	13	17	14	8	22
49	245 W. Pacific Coast Hwy.	Mixed use building with 135 units and 25,000 sf of commercial space		1669	25	54	79	81	64	145
50	201 W. Pacific Coast Hwy.	147 unit mixed use project with 189,000 sf total	Pending	2164	32	62	94	105	87	192
51	1900-1940 Long Beach Blvd.	5-story mixed use building with 95 apartment units and 12,400 sf of retail.	In Plan Check, not constructed	1033	15	37	52	50	37	87
52	1836-1852 Locust Ave.	47 affordable units, 1 manager unit, 3600 sf of commercial space and 40 parking spaces	Not constructed, plan check approved	450	7	17	24	22	15	37
53	1901 W. Pacific Coast Hwy.	1 industrial building with 194,840 sf.	Under Construction	966	120	16	136	16	107	123
54	127-139 E. Broadway	189 apartments and 10,000 sf retail space mixed use building and 103,290 sf garage		1656	24	70	94	80	53	133
55	1675 Santa Fe	21,377 sf industrial building	Pending	106	13	1	14	2	12	14
56	2111 W. 14th st.	New 38,440 sf industrial manufacturing building.	Pending	117	14	4	18	5	14	20

#	Project Address	Description	Status	Daily Traffic	AM Peak Hour			PM Peak Hour		
					IN	OUT	TOTAL	IN	OUT	TOTAL
57	1341 Long Beach Blvd.	24 unit, 4-story apartment building	Pending	176	3	8	11	9	5	14
58	1401 Long Beach Blvd.	142 unit apartment building	Pending	1039	15	50	65	50	30	80
59	125 Long Beach Blvd.	Mixed use 218 units and 7300 sf of commercial space.	Pending	1794	26	78	104	86	56	142
60	1 & 11 Golden Shore	Mixed use project with 750 dwelling units and 11,000 sf of commercial space.	Pending	5756	83	268	351	277	169	446
61	1601 San Francisco Ave.	2 industrial buildings totaling 94,872 sf	Pending	471	58	7	65	8	52	60
62	810 Pine Ave.	78 assisted living units	Pending	203	9	6	15	9	20	29
63	131 W. 3rd St.	Mixed use development with 345 dwelling units and 16,000 sf ground floor retail.	Pending	2912	43	126	169	140	92	232
64	231 Windsor Way	321,595 sf expansion to the existing parking structure.	Pending	0	0	0	0	0	0	0

ATTACHMENT B

ICU Worksheets



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 1: W OCEAN BL & QUEENS WAY
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR
			Traffic VOLUMES	V/C	CRITICAL PAIR	Traffic VOLUMES	V/C		
NB LEFT	1	1,600	15	0.009	0.112	55	0.034	0.190	
NB THRU	2	3,200	21	0.007		84	0.026		
NB RIGHT	1	1,600	29	0.000		79	0.025		
SB LEFT	1	1,600	150	0.094	0.334	200	0.125	0.340	
SB THRU	2	3,200	108	0.034		63	0.020		
SB RIGHT	1	1,600	165	0.103		250	0.156		
EB LEFT	1	1,600	69	0.043	0.334	121	0.076	0.340	
EB THRU	3	4,800	454	0.099		1375	0.291		
EB RIGHT	0	0	22	0.000		23	0.000		
WB LEFT	1	1,600	133	0.083	0.334	78	0.049	0.340	
WB THRU	3	4,800	1398	0.291		841	0.175		
WB RIGHT	1	1,600	130	0.034		98	0		
		RTOR		NORTH/SOUTH CRITICAL SUM		NORTH/SOUTH CRITICAL SUM		0.190	
		am	pm	EAST/WEST CRITICAL SUM		EAST/WEST CRITICAL SUM		0.340	
NB	67	39	CLEARANCE INTERVAL		CLEARANCE INTERVAL		0.100		
SB	0	0							
EB	15	55	INTERSECTION ICU VALUE		INTERSECTION ICU VALUE		0.630		
WB	75	100							
AM INTERSECTION LOS					A	PM INTERSECTION LOS			
						B			

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 1: W OCEAN BL & QUEENS WAY EXISTING + PROJECT

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 1: W OCEAN BL & QUEENS WAY
EXISTING + AMBIENT+ CUMULATIVE PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT RELATED			AM PEAK HOUR			PM PEAK HOUR			CRITICAL		
				GROWTH	PROJECT	TOTAL	V/C	*	PAIR	EXISTING	GROWTH	PROJECT	TOTAL	V/C	*
NB LEFT	1	1,600	15	1	0	16	0.010	*	0.138	55	3	0	58	0.036	*
NB THRU	2	3,200	21	1	84	106	0.033	*		84	4	79	167	0.052	
NB RIGHT	1	1600	29	1	13	43	0.000			79	4	31	114	0.037	
SB LEFT	1	1,600	150	8	11	169	0.105	*	0.381	200	10	21	231	0.145	
SB THRU	2	3,200	108	6	40	154	0.048			63	3	88	154	0.048	
SB RIGHT	1	1,600	165	8	32	205	0.128	*		250	13	73	336	0.210	*
EB LEFT	1	1,600	69	4	9	82	0.051	*	0.381	121	6	22	149	0.093	
EB THRU	3	4,800	454	23	125	602	0.131			1375	70	172	1617	0.342	*
EB RIGHT	0	0	22	1	4	27	0.000			23	1	2	26	0.000	
WB LEFT	1	1,600	133	7	23	163	0.102		0.381	78	4	27	109	0.068	*
WB THRU	3	4800	1398	71	114	1583	0.330	*		841	43	155	1039	0.216	
WB RIGHT	1	1,600	130	7	85	222	0.086			98	5	70	173	0.036	
RTOR				NORTH/SOUTH CRITICAL SUM					0.138	NORTH/SOUTH CRITICAL SUM					0.246
				EAST/WEST CRITICAL SUM					0.381	EAST/WEST CRITICAL SUM					0.410
				CLEARANCE INTERVAL					0.100	CLEARANCE INTERVAL					0.100
				INTERSECTION ICU VALUE					0.619	INTERSECTION ICU VALUE					0.756
				AM INTERSECTION LOS					B	PM INTERSECTION LOS					C
				AM IMPACT					0.073	PM IMPACT					0.126

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 1: W OCEAN BL & QUEENS WAY
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 2: W OCEAN BL & PACIFIC AV
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR		
			Traffic VOLUMES	V/C		Traffic VOLUMES	V/C				
NB LEFT	0	0	3	0.000	* 0.101	10	0.000	* 0.084			
NB THRU	1	1600	2	0.004		4	0.012				
NB RIGHT	0	0	2	0.000		5	0.000				
SB LEFT	1.5	2,400	60	0.025	* 0.379	113	0.047	* 0.337			
SB THRU	0.5	800	2	0.000		1	0.000				
SB RIGHT	1	1,600	162	0.101		135	0.084				
EB LEFT	1	1,600	118	0.074	* 0.379	176	0.110	* 0.337			
EB THRU	3	4,800	547	0.114		1571	0.328				
EB RIGHT	0	0	1	0.000		2	0.000				
WB LEFT	1	1,600	4	0.003	* 0.379	14	0.009	* 0.337			
WB THRU	3	4,800	1466	0.305		890	0.185				
WB RIGHT	1	1,600	147	0.073		142	0.053				
RTOR			NORTH/SOUTH CRITICAL SUM			0.101	NORTH/SOUTH CRITICAL SUM			0.084	
am pm			EAST/WEST CRITICAL SUM			0.379	EAST/WEST CRITICAL SUM			0.337	
NB	2	7	CLEARANCE INTERVAL			0.100	CLEARANCE INTERVAL			0.100	
SB	0	0									
EB	3	10	INTERSECTION ICU VALUE			0.580	INTERSECTION ICU VALUE			0.521	
WB	30	57									
AM INTERSECTION LOS						A	PM INTERSECTION LOS				A

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 2: W OCEAN BL & PACIFIC AV EXISTING + PROJECT

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 2: W OCEAN BL & PACIFIC AV
EXISTING + AMBIENT+ CUMULATIVE PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AM PEAK HOUR				PM PEAK HOUR									
				AMBIENT GROWTH	RELATED PROJECT	TOTAL	V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL	V/C	CRITICAL PAIR			
NB LEFT	0	0	3	0	13	16	0.000	*		10	1	13	24	0.000	*		
NB THRU	1	1600	2	0	38	40	0.060			4	0	39	43	0.069			
NB RIGHT	0	0	2	0	38	40	0.000			5	0	39	44	0.000			
								0.107							0.119		
SB LEFT	1.5	2,400	60	3	1	64	0.027			113	6	2	121	0.050	*		
SB THRU	0.5	800	2	0	30	32	0.000			1	0	54	55	0.000			
SB RIGHT	1	1,600	162	8	1	171	0.107	*		135	7	3	145	0.091			
EB LEFT	1	1,600	118	6	0	124	0.078	*		176	9	0	185	0.116	*		
EB THRU	3	4,800	547	28	103	678	0.144			1571	80	161	1812	0.382			
EB RIGHT	0	0	1	0	10	11	0.000			2	0	18	20	0.000			
								0.422							0.443		
WB LEFT	1	1,600	4	0	39	43	0.027			14	1	83	98	0.061	*		
WB THRU	3	4800	1466	75	109	1650	0.344	*		890	45	132	1067	0.222			
WB RIGHT	1	1,600	147	7	6	160	0.080			142	7	5	154	0.059			
RTOR				NORTH/SOUTH CRITICAL SUM					0.107	NORTH/SOUTH CRITICAL SUM					0.119		
am pm				EAST/WEST CRITICAL SUM					0.422	EAST/WEST CRITICAL SUM					0.443		
NB	22	49	CLEARANCE INTERVAL					0.100	CLEARANCE INTERVAL					0.100			
SB	0	0															
EB	16	24	INTERSECTION ICU VALUE					0.629	INTERSECTION ICU VALUE					0.662			
WB	32	60															
AM INTERSECTION LOS								B	PM INTERSECTION LOS								B
AM IMPACT								0.049	PM IMPACT								0.147

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 2: W OCEAN BL & PACIFIC AV
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	AM PEAK HOUR				PM PEAK HOUR						
									CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	CRITICAL PAIR			
NB LEFT	0	0	3	0	13	0	16	0.000	*		10	1	13	0	24	0.000			
NB THRU	1	1600	2	0	38	0	40	0.060			4	0	39	0	43	0.069	*		
NB RIGHT	0	0	2	0	38	0	40	0.000			5	0	39	0	44	0.000			
										0.107							0.121		
SB LEFT	1.5	2,400	60	3	1	2	66	0.028			113	6	2	4	125	0.052	*		
SB THRU	0.5	800	2	0	30	0	32	0.000			1	0	54	0	55	0.000			
SB RIGHT	1	1,600	162	8	1	0	171	0.107	*		135	7	3	0	145	0.091			
EB LEFT	1	1,600	118	6	0	0	124	0.078	*		176	9	0	0	185	0.116			
EB THRU	3	4,800	547	28	103	12	690	0.146			1571	80	161	18	1830	0.385	*		
EB RIGHT	0	0	1	0	10	0	11	0.000			2	0	18	0	20	0.000			
										0.424							0.446		
WB LEFT	1	1,600	4	0	39	0	43	0.027			14	1	83	0	98	0.061	*		
WB THRU	3	4800	1466	75	109	9	1659	0.346	*		890	45	132	15	1082	0.225			
WB RIGHT	1	1,600	147	7	6	2	162	0.081			142	7	5	3	157	0.059			
RTOR				NORTH/SOUTH CRITICAL SUM						0.107		NORTH/SOUTH CRITICAL SUM						0.121	
am				EAST/WEST CRITICAL SUM						0.424		EAST/WEST CRITICAL SUM						0.446	
pm				CLEARANCE INTERVAL						0.100		CLEARANCE INTERVAL						0.100	
NB	22	49																	
SB	0	0																	
EB	16	24	INTERSECTION ICU VALUE						0.631		INTERSECTION ICU VALUE						0.667		
WB	33	62																	
								AM INTERSECTION LOS		B		PM INTERSECTION LOS						B	
								AM IMPACT		0.002		PM IMPACT						0.000	



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 3: BROADWAY & PINE AVENUE
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR		
			Traffic VOLUMES	V/C		Traffic VOLUMES	V/C				
NB LEFT	0	0	0	0.000	* 0.109	0	0.000	* 0.197			
NB THRU	1	1600	78	0.071		160	0.158				
NB RIGHT	0	0	35	0.000		93	0.000				
SB LEFT	1	1,600	61	0.038	* 0.166	62	0.039	* 0.318			
SB THRU	1	1600	139	0.087		129	0.081				
SB RIGHT	0	0	0	0.000		0	0.000				
<hr/>											
EB LEFT	1	1,600	23	0.014	* 0.166	29	0.018	* 0.318			
EB THRU	2	3,200	450	0.166		946	0.318				
EB RIGHT	0	0	82	0.000		72	0.000				
WB LEFT	0	0	0	0.000	* 0.166	0	0.000	* 0.318			
WB THRU	0	0	0	0.000		0	0.000				
WB RIGHT	0	0	0	0.000		0	0.000				
<hr/>											
RTOR			NORTH/SOUTH CRITICAL SUM			0.109	NORTH/SOUTH CRITICAL SUM			0.197	
am pm			EAST/WEST CRITICAL SUM			0.166	EAST/WEST CRITICAL SUM			0.318	
NB	0	0	CLEARANCE INTERVAL			0.100	CLEARANCE INTERVAL			0.100	
SB	0	0									
EB	0	0	INTERSECTION ICU VALUE			0.375	INTERSECTION ICU VALUE			0.615	
WB	31	31									
AM INTERSECTION LOS						A	PM INTERSECTION LOS				B

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 3: BROADWAY & PINE AVENUE EXISTING + PROJECT

RTOR = Right turn on red reduction = $0.5 \cdot$ corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 3: BROADWAY & PINE AVENUE
EXISTING + AMBIENT+ CUMULATIVE PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL	AM PEAK HOUR				PM PEAK HOUR				
							V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	0	0	0	0	0	0	0.000	*		0	0	0	0.000		
NB THRU	1	1600	78	4	4	86	0.078			160	8	6	174	0.175	*
NB RIGHT	0	0	35	2	2	39	0.000			93	5	8	106	0.000	
								0.118						0.216	
SB LEFT	1	1,600	61	3	0	64	0.040	*		62	3	0	65	0.041	*
SB THRU	1	1,600	139	7	10	156	0.098			129	7	12	148	0.092	
SB RIGHT	0	0	0	0	0	0	0.000			0	0	0	0	0.000	
EB LEFT	1	1,600	23	1	26	50	0.031			29	1	18	48	0.030	
EB THRU	2	3,200	450	23	79	552	0.206	*		946	48	117	1111	0.379	*
EB RIGHT	0	0	82	4	22	108	0.000			72	4	27	103	0.000	
								0.206						0.379	
WB LEFT	0	0	0	0	0	0	0.000	*		0	0	0	0	0.000	*
WB THRU	0	0	0	0	0	0	0.000			0	0	0	0	0.000	
WB RIGHT	0	0	0	0	0	0	0.000			0	0	0	0	0.000	
RTOR				NORTH/SOUTH CRITICAL SUM					0.118	NORTH/SOUTH CRITICAL SUM					0.216
am				EAST/WEST CRITICAL SUM					0.206	EAST/WEST CRITICAL SUM					0.379
pm				CLEARANCE INTERVAL					0.100	CLEARANCE INTERVAL					0.100
NB	0	0													
SB	0	0													
EB	0	0													
WB	32	33													
				AM INTERSECTION LOS					A	PM INTERSECTION LOS					B
				AM IMPACT					0.049	PM IMPACT					0.080



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 3: BROADWAY & PINE AVENUE
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	AM PEAK HOUR			EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	PM PEAK HOUR	
									CRITICAL PAIR									CRITICAL PAIR	
NB LEFT	0	0	0	0	0	0	0	0.000	0.122		0	0	0	0	0	0.000	0.223		
NB THRU	1	1600	78	4	4	3	89	0.082		*		160	8	6	6	180		0.182	*
NB RIGHT	0	0	35	2	2	3	42	0.000				93	5	8	6	112		0.000	
SB LEFT	1	1,600	61	3	0	0	64	0.040	0.208		62	3	0	0	65	0.041	0.382		
SB THRU	1	1,600	139	7	10	5	161	0.101		*		129	7	12	7	155		0.097	*
SB RIGHT	0	0	0	0	0	0	0	0.000				0	0	0	0	0		0.000	
EB LEFT	1	1,600	23	1	26	0	50	0.031	0.208		29	1	18	0	48	0.030	0.382		
EB THRU	2	3,200	450	23	79	0	552	0.208		*		946	48	117	0	1111		0.382	*
EB RIGHT	0	0	82	4	22	5	113	0.000				72	4	27	7	110		0.000	
WB LEFT	0	0	0	0	0	0	0	0.000	0.100		0	0	0	0	0	0.000	0.705		
WB THRU	0	0	0	0	0	0	0	0.000		*		0	0	0	0	0		0.000	*
WB RIGHT	0	0	0	0	0	0	0	0.000				0	0	0	0	0		0.000	
RTOR				NORTH/SOUTH CRITICAL SUM						0.122	NORTH/SOUTH CRITICAL SUM						0.223		
				EAST/WEST CRITICAL SUM						0.208	EAST/WEST CRITICAL SUM						0.382		
				CLEARANCE INTERVAL						0.100	CLEARANCE INTERVAL						0.100		
				INTERSECTION ICU VALUE						0.430	INTERSECTION ICU VALUE						0.705		
											</								



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 4: OCEAN BL & PINE AV
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR
			Traffic VOLUMES	V/C		Traffic VOLUMES	V/C		
NB LEFT	1	1,600	23	0.014	*	61	0.038	*	
NB THRU	1	1600	17	0.011		73	0.046		
NB RIGHT	1	1,600	36	-0.007		115	0.047		
									0.054
SB LEFT	0	0	11	0.000		88	0.000		0.132
SB THRU	1	1600	33	0.028		63	0.094	*	
SB RIGHT	1	1,600	64	0.040	*	111	0.069		
<hr/>									
EB LEFT	1	1,600	35	0.022	*	51	0.032		
EB THRU	3	4,800	484	0.115		1544	0.342	*	
EB RIGHT	0	0	69	0.000		99	0.000		
									0.340
WB LEFT	1	1,600	95	0.059		79	0.049	*	0.391
WB THRU	3	4,800	1525	0.318	*	853	0.178		
WB RIGHT	1	1,600	138	0.083		78	0.021		
<hr/>									
	RTOR		NORTH/SOUTH CRITICAL SUM			NORTH/SOUTH CRITICAL SUM			
	am	pm	EAST/WEST CRITICAL SUM			EAST/WEST CRITICAL SUM			
NB	48	40	CLEARANCE INTERVAL			CLEARANCE INTERVAL			
SB	0	0							
EB	23	61	INTERSECTION ICU VALUE			INTERSECTION ICU VALUE			
WB	6	44							
			AM INTERSECTION LOS			PM INTERSECTION LOS			

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 4: OCEAN BL & PINE AV
EXISTING + PROJECT

MOVEMENT	AM PEAK HOUR						PM PEAK HOUR							
	NO. OF LANES	CAPACITY	EXISTING	Project	TOTAL	CRITICAL		Project	TOTAL	V/C	CRITICAL			
						V/C	PAIR					PAIR		
NB LEFT	1	1,600	23	0	23	0.014	*	61	0	61	0.038	*		
NB THRU	1	1600	17	7	24	0.015		73	12	85	0.053			
NB RIGHT	1	1600	36	2	38	-0.006		115	4	119	0.050			
							0.054					0.141		
SB LEFT	0	0	11	10	21	0.000		88	14	102	0.000			
SB THRU	1	1,600	33	0	33	0.034		63	0	63	0.103	*		
SB RIGHT	1	1,600	64	0	64	0.040	*	111	0	111	0.069			
<hr/>														
EB LEFT	1	1,600	35	0	35	0.022	*	51	0	51	0.032			
EB THRU	3	4,800	484	15	499	0.118		1544	22	1566	0.347			
EB RIGHT	0	0	69	0	69	0.000		99	0	99	0.000			
							0.342					0.396		
WB LEFT	1	1,600	95	0	95	0.059		79	0	79	0.049	*		
WB THRU	3	4800	1525	10	1535	0.320	*	853	18	871	0.181			
WB RIGHT	1	1,600	138	0	138	0.080		78	0	78	0.017			
<hr/>														
	RTOR			NORTH/SOUTH CRITICAL SUM				0.054	NORTH/SOUTH CRITICAL SUM				0.141	
	am	pm	EAST/WEST CRITICAL SUM				0.342	EAST/WEST CRITICAL SUM				0.396		
NB	48	40	CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100		
SB	0	0												
EB	23	61	INTERSECTION ICU VALUE				0.496	INTERSECTION ICU VALUE				0.637		
WB	11	51												
	AM INTERSECTION LOS						A	PM INTERSECTION LOS						B
	AM IMPACT						0.002	PM IMPACT						0.014

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 4: OCEAN BL & PINE AV
EXISTING + AMBIENT+ CUMULATIVE PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL	AM PEAK HOUR			PM PEAK HOUR					
							V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	1	1,600	23	1	0	24	0.015	*	61	3	0	64	0.040	*	
NB THRU	1	1600	17	1	11	29	0.018		73	4	21	98	0.061		
NB RIGHT	1	1600	36	2	1	39	-0.008		115	6	2	123	0.051		
								0.060						0.159	
SB LEFT	0	0	11	1	8	20	0.000		88	4	14	106	0.000		
SB THRU	1	1,600	33	2	17	52	0.045	*	63	3	17	83	0.119	*	
SB RIGHT	1	1,600	64	3	2	69	0.043		111	6	2	119	0.074		
<hr/>															
EB LEFT	1	1,600	35	2	4	41	0.025	*	51	3	7	61	0.038		
EB THRU	3	4,800	484	25	192	701	0.161		1544	79	233	1856	0.408	*	
EB RIGHT	0	0	69	4	0	73	0.000		99	5	0	104	0.000		
								0.393						0.461	
WB LEFT	1	1,600	95	5	3	103	0.064		79	4	1	84	0.053	*	
WB THRU	3	4800	1525	78	163	1766	0.368	*	853	44	256	1153	0.240		
WB RIGHT	1	1,600	138	7	9	154	0.090		78	4	8	90	0.023		
<hr/>															
RTOR				NORTH/SOUTH CRITICAL SUM				0.060		NORTH/SOUTH CRITICAL SUM				0.159	
am pm				EAST/WEST CRITICAL SUM				0.393		EAST/WEST CRITICAL SUM				0.461	
				CLEARANCE INTERVAL				0.100		CLEARANCE INTERVAL				0.100	
NB	51	42													
SB	0	0													
EB	24	64	INTERSECTION ICU VALUE				0.553		INTERSECTION ICU VALUE				0.720		
WB	10	53													
AM INTERSECTION LOS							A		PM INTERSECTION LOS						
AM IMPACT							0.059		PM IMPACT						
							0.097								

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 4: OCEAN BL & PINE AV
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	AM PEAK HOUR				PM PEAK HOUR							
								V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	CRITICAL PAIR			
NB LEFT	1	1,600	23	1	0	0	24	0.015	*		61	3	0	0	64	0.040	*		
NB THRU	1	1600	17	1	11	7	36	0.022			73	4	21	12	110	0.069			
NB RIGHT	1	1600	36	2	1	2	41	-0.007			115	6	2	4	127	0.053			
										0.066							0.167		
SB LEFT	0	0	11	1	8	10	30	0.000			88	4	14	14	120	0.000			
SB THRU	1	1,600	33	2	17	0	52	0.051	*		63	3	17	0	83	0.127	*		
SB RIGHT	1	1,600	64	3	2	0	69	0.043			111	6	2	0	119	0.074			
<hr/>																			
EB LEFT	1	1,600	35	2	4	0	41	0.025	*		51	3	7	0	61	0.038			
EB THRU	3	4,800	484	25	192	15	716	0.164			1544	79	233	22	1878	0.413	*		
EB RIGHT	0	0	69	4	0	0	73	0.000			99	5	0	0	104	0.000			
										0.395							0.466		
WB LEFT	1	1,600	95	5	3	0	103	0.064			79	4	1	0	84	0.053	*		
WB THRU	3	4800	1525	78	163	10	1776	0.370	*		853	44	256	18	1171	0.244			
WB RIGHT	1	1,600	138	7	9	0	154	0.087			78	4	8	0	90	0.019			
<hr/>																			
RTOR				NORTH/SOUTH CRITICAL SUM						0.066		NORTH/SOUTH CRITICAL SUM						0.167	
				EAST/WEST CRITICAL SUM						0.395		EAST/WEST CRITICAL SUM						0.466	
				CLEARANCE INTERVAL						0.100		CLEARANCE INTERVAL						0.100	
										<hr/>								<hr/>	
				INTERSECTION ICU VALUE						0.561		INTERSECTION ICU VALUE						0.733	



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 5: SEASIDE WAY & PINE AVENUE
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR		
			Traffic VOLUMES	V/C	CRITICAL PAIR	Traffic VOLUMES	V/C				
NB LEFT	1	1,600	7	0.004	0.067	6	0.004	*	0.074		
NB THRU	2	3,200	38	0.012		132	0.041				
NB RIGHT	1	1,600	45	0.023		20	0.008				
SB LEFT	1	1,600	70	0.044	*	8	0.005				
SB THRU	2	3,200	70	0.038		170	0.070	*			
SB RIGHT	0	0	51	0.000		53	0.000				
EB LEFT	1	1,600	18	0.011	*	68	0.043	*			
EB THRU	2	3,200	48	0.020		89	0.034				
EB RIGHT	0	0	16	0.000		19	0.000				
					0.035				0.081		
WB LEFT	1	1,600	17	0.011		14	0.009				
WB THRU	1	1,600	39	0.024	*	60	0.038	*			
WB RIGHT	1	1,600	24	0.000		47	0.027				
		RTOR	NORTH/SOUTH CRITICAL SUM			0.067	NORTH/SOUTH CRITICAL SUM			0.074	
	am	pm	EAST/WEST CRITICAL SUM			0.035	EAST/WEST CRITICAL SUM			0.081	
NB	9	7	CLEARANCE INTERVAL			0.100	CLEARANCE INTERVAL			0.100	
SB	0	0									
EB	7	6	INTERSECTION ICU VALUE			0.202	INTERSECTION ICU VALUE			0.255	
WB	35	4									
AM INTERSECTION LOS					A	PM INTERSECTION LOS					A

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 5: SEASIDE WAY & PINE AVENUE EXISTING + PROJECT

						AM PEAK HOUR			PM PEAK HOUR			
MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	Project	TOTAL	V/C	CRITICAL PAIR	EXISTING	Project	TOTAL	V/C	CRITICAL PAIR
NB LEFT	1	1,600	7	0	7	0.004		6	0	6	0.004	*
NB THRU	2	3,200	38	2	40	0.013		132	4	136	0.043	
NB RIGHT	1	1600	45	0	45	0.022	*	20	0	20	0.007	
							0.066					0.074
SB LEFT	1	1,600	70	0	70	0.044	*	8	0	8	0.005	
SB THRU	2	3,200	70	0	70	0.038		170	0	170	0.070	*
SB RIGHT	0	0	51	0	51	0.000		53	0	53	0.000	

EB LEFT	1	1,600	18	0	18	0.011	*	68	0	68	0.043	*
EB THRU	2	3,200	48	0	48	0.020		89	0	89	0.034	
EB RIGHT	0	0	16	0	16	0.000		19	0	19	0.000	
							0.036					0.081
WB LEFT	1	1,600	17	2	19	0.012		14	3	17	0.011	
WB THRU	1	1600	39	0	39	0.025	*	60	0	60	0.038	*
WB RIGHT	1	1,600	24	7	31	0.000		47	12	59	0.034	

RTOR						NORTH/SOUTH CRITICAL SUM			NORTH/SOUTH CRITICAL SUM			0.074
am pm						EAST/WEST CRITICAL SUM			EAST/WEST CRITICAL SUM			0.081
NB	10	9				CLEARANCE INTERVAL			CLEARANCE INTERVAL			0.100
SB	0	0										
EB	7	6				INTERSECTION ICU VALUE			INTERSECTION ICU VALUE			0.255
WB	35	4										
						AM INTERSECTION LOS			PM INTERSECTION LOS			A
						AM IMPACT			PM IMPACT			0.000

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 5: SEASIDE WAY & PINE AVENUE
EXISTING + AMBIENT+ CUMULATIVE PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR		
							V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL		V/C	
NB LEFT	1	1,600	7	0	0	7	0.005		6	0	0	6	0.004	*	
NB THRU	2	3,200	38	2	32	72	0.022		132	7	59	198	0.062		
NB RIGHT	1	1600	45	2	0	47	0.024	*	20	1	0	21	0.009		
								0.070						0.091	
SB LEFT	1	1,600	70	4	0	74	0.046	*	8	0	0	8	0.005		
SB THRU	2	3,200	70	4	46	120	0.054		170	9	44	223	0.087	*	
SB RIGHT	0	0	51	3	0	54	0.000		53	3	0	56	0.000		
<hr/>															
EB LEFT	1	1,600	18	1	0	19	0.012	*	68	3	0	71	0.045	*	
EB THRU	2	3,200	48	2	31	81	0.031		89	5	42	136	0.049		
EB RIGHT	0	0	16	1	0	17	0.000		19	1	0	20	0.000		
								0.064						0.106	
WB LEFT	1	1,600	17	1	0	18	0.011		14	1	0	15	0.009		
WB THRU	1	1600	39	2	42	83	0.052	*	60	3	35	98	0.061	*	
WB RIGHT	1	1,600	24	1	0	25	-0.007		47	2	0	49	0.028		
<hr/>															
RTOR				NORTH/SOUTH CRITICAL SUM				0.070	NORTH/SOUTH CRITICAL SUM				0.091		
am pm				EAST/WEST CRITICAL SUM				0.064	EAST/WEST CRITICAL SUM				0.106		
				CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100		
NB	9	7													
SB	0	0													
EB	7	6	INTERSECTION ICU VALUE				0.234	INTERSECTION ICU VALUE				0.297			
WB	37	4													
AM INTERSECTION LOS							A	PM INTERSECTION LOS							A
AM IMPACT							0.032	PM IMPACT							0.042

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 5: SEASIDE WAY & PINE AVENUE
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR					
								V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT		TOTAL	V/C			
NB LEFT	1	1,600	7	0	0	0	7	0.005	*		6	0	0	0	6	0.004	*		
NB THRU	2	3,200	38	2	32	2	74	0.023			132	7	59	4	202	0.063			
NB RIGHT	1	1600	45	2	0	0	47	0.023	*		20	1	0	0	21	0.008			
										0.069							0.091		
SB LEFT	1	1,600	70	4	0	0	74	0.046	*		8	0	0	0	8	0.005			
SB THRU	2	3,200	70	4	46	0	120	0.054			170	9	44	0	223	0.087	*		
SB RIGHT	0	0	51	3	0	0	54	0.000			53	3	0	0	56	0.000			
<hr/>																			
EB LEFT	1	1,600	18	1	0	0	19	0.012	*		68	3	0	0	71	0.045	*		
EB THRU	2	3,200	48	2	31	0	81	0.031			89	5	42	0	136	0.049			
EB RIGHT	0	0	16	1	0	0	17	0.000			19	1	0	0	20	0.000			
										0.065							0.106		
WB LEFT	1	1,600	17	1	0	2	20	0.012			14	1	0	3	18	0.011			
WB THRU	1	1600	39	2	42	0	83	0.053	*		60	3	35	0	98	0.061	*		
WB RIGHT	1	1,600	24	1	0	7	32	0.000			47	2	0	12	61	0.036			
<hr/>																			
RTOR				NORTH/SOUTH CRITICAL SUM						0.069		NORTH/SOUTH CRITICAL SUM						0.091	
				EAST/WEST CRITICAL SUM						0.065		EAST/WEST CRITICAL SUM						0.106	
				CLEARANCE INTERVAL						0.100		CLEARANCE INTERVAL						0.100	
										<hr/>								<hr/>	
				INTERSECTION ICU VALUE						0.234		INTERSECTION ICU VALUE						0.297	



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 7A: E OCEAN BL & LOCUST AV
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR	
			Traffic VOLUMES	V/C	CRITICAL PAIR	Traffic VOLUMES	V/C			
NB LEFT	0	0	0	0.000	*	0	0.000	*	0.000	
NB THRU	1	1600	0	0.000	*	0	0.000	*		
NB RIGHT	0	0	0	0.000	*	0	0.000	*		
SB LEFT	0	0	0	0.000	*	0	0.000	*		
SB THRU	0	0	0	0.000	*	0	0.000	*		
SB RIGHT	0	0	0	0.000	*	0	0.000	*		

EB LEFT	0	0	0	0.000	*	0	0.000		0.368	
EB THRU	3	4,800	550	0.115		1764	0.368	*		
EB RIGHT	0	0	0	0.000		0	0.000			
WB LEFT	1	1,600	0	0.000		0	0.000	*		
WB THRU	3	4,800	1841	0.384	*	1000	0.208			
WB RIGHT	0	0	0	0.000		0	0.000			

	RTOR		NORTH/SOUTH CRITICAL SUM			0.000	NORTH/SOUTH CRITICAL SUM		0.000	
	am	pm	EAST/WEST CRITICAL SUM			0.384	EAST/WEST CRITICAL SUM		0.368	
NB	0	0	CLEARANCE INTERVAL			0.100	CLEARANCE INTERVAL		0.100	
SB	0	0								
EB	0	0	INTERSECTION ICU VALUE			0.484	INTERSECTION ICU VALUE		0.468	
WB	0	0								
AM INTERSECTION LOS					A	PM INTERSECTION LOS				A

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 7A: E OCEAN BL & LOCUST AV EXISTING + PROJECT

							AM PEAK HOUR			PM PEAK HOUR					
MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	Project	TOTAL	V/C	CRITICAL			Project	TOTAL	V/C	CRITICAL PAIR		
							PAIR	EXISTING							
NB LEFT	0	0	0	10	10	0.000	*		0	18	18	0.000	*		
NB THRU	1	1600	0	0	0	0.027			0	0	0	0.048			
NB RIGHT	0	0	0	33	33	0.000			0	58	58	0.000			
								0.027					0.048		
SB LEFT	0	0	0	0	0	0.000	*		0	0	0	0.000	*		
SB THRU	0	0	0	0	0	0.000			0	0	0	0.000			
SB RIGHT	0	0	0	0	0	0.000			0	0	0	0.000			

EB LEFT	0	0	0	0	0	0.000	*		0	0	0	0.000			
EB THRU	3	4,800	550	25	575	0.120			1764	36	1800	0.376			
EB RIGHT	0	0	0	2	2	0.000			0	4	4	0.000			
								0.384					0.397		
WB LEFT	1	1,600	0	22	22	0.014			0	33	33	0.021	*		
WB THRU	3	4800	1841	0	1841	0.384	*		1000	0	1000	0.208			
WB RIGHT	0	0	0	0	0	0.000			0	0	0	0.000			

RTOR				NORTH/SOUTH CRITICAL SUM				0.027		NORTH/SOUTH CRITICAL SUM				0.048	
				EAST/WEST CRITICAL SUM				0.384		EAST/WEST CRITICAL SUM				0.397	
				CLEARANCE INTERVAL				0.100		CLEARANCE INTERVAL				0.100	
NB	11	17													
SB	0	0													
EB	10	18													
WB	0	0													
				INTERSECTION ICU VALUE				0.511		INTERSECTION ICU VALUE				0.545	
				AM INTERSECTION LOS				A		PM INTERSECTION LOS				A	
				AM IMPACT				0.027		PM IMPACT				0.077	

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 7A: E OCEAN BL & LOCUST AV
EXISTING + AMBIENT+ CUMULATIVE PROJECT

	AM PEAK HOUR							PM PEAK HOUR							
MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL	V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	0	0	0	0	18	18	0.000	0.033	0	0	10	10	0.000	0.028	
NB THRU	1	1600	0	0	0	0	0.033		0	0	0	0	0.028		
NB RIGHT	0	0	0	0	34	34	0.000		0	0	35	35	0.000		
SB LEFT	0	0	0	0	0	0	0.000	0.033	0	0	0	0	0.000	0.028	
SB THRU	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
SB RIGHT	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
EB LEFT	0	0	0	0	0	0	0.000	0.435	0	0	0	0	0.000	0.446	
EB THRU	3	4,800	550	28	175	753	0.158		1764	90	214	2068	0.435		
EB RIGHT	0	0	0	0	7	7	0.000		0	0	22	22	0.000		
WB LEFT	1	1,600	0	0	5	5	0.003	0.435	0	0	18	18	0.011	0.446	
WB THRU	3	4800	1841	94	151	2086	0.435		1000	51	249	1300	0.271		
WB RIGHT	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
RTOR				NORTH/SOUTH CRITICAL SUM				0.033	NORTH/SOUTH CRITICAL SUM				0.028		
<u>am</u>				EAST/WEST CRITICAL SUM				0.435	EAST/WEST CRITICAL SUM				0.446		
<u>pm</u>				CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100		
NB	3	9													
SB	0	0													
EB	18	10	INTERSECTION ICU VALUE				0.568	INTERSECTION ICU VALUE				0.574			
WB	0	0													
AM INTERSECTION LOS							A	PM INTERSECTION LOS							A
AM IMPACT							0.084	PM IMPACT							0.100

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 7A: E OCEAN BL & LOCUST AV
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 7B: E OCEAN BL & LOCUST AV (LOCUST MODIFIED TO ONE-WAY)
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR		
			Traffic VOLUMES	V/C		Traffic VOLUMES	V/C				
NB LEFT	0	0	0	0.000	*	0.000	0	0.000	*		
NB THRU	1	1600	0	0.000	*		0	0.000	*		
NB RIGHT	0	0	0	0.000	*		0	0.000	*		
SB LEFT	0	0	0	0.000	*		0	0.000	*		
SB THRU	0	0	0	0.000	*		0	0.000	*		
SB RIGHT	0	0	0	0.000	*		0	0.000	*		
<hr/>											
EB LEFT	0	0	0	0.000	*	0.384	0	0.000			
EB THRU	3	4,800	550	0.115			1764	0.368	*		
EB RIGHT	0	0	0	0.000			0	0.000			
WB LEFT	1	1,600	0	0.000			0	0.000	*		
WB THRU	3	4,800	1841	0.384	*		1000	0.208			
WB RIGHT	0	0	0	0.000			0	0.000			
<hr/>											
		RTOR	NORTH/SOUTH CRITICAL SUM			0.000	NORTH/SOUTH CRITICAL SUM			0.000	
		am pm	EAST/WEST CRITICAL SUM			0.384	EAST/WEST CRITICAL SUM			0.368	
NB	0	0	CLEARANCE INTERVAL			0.100	CLEARANCE INTERVAL			0.100	
SB	0	0									
EB	0	0	INTERSECTION ICU VALUE			0.484	INTERSECTION ICU VALUE			0.468	
WB	0	0									
AM INTERSECTION LOS						A	PM INTERSECTION LOS				A

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 7B: E OCEAN BL & LOCUST AV (LOCUST MODIFIED TO ONE-WAY)
EXISTING + PROJECT

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 7B: E OCEAN BL & LOCUST AV (LOCUST MODIFIED TO ONE-WAY)
EXISTING + AMBIENT+ CUMULATIVE PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR		
							V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL		V/C	
NB LEFT	0	0	0	0	18	18	0.000	0.033	0	0	10	10	0.000	*	
NB THRU	1	1600	0	0	0	0	0.033		0	0	0	0	0.028		
NB RIGHT	0	0	0	0	34	34	0.000		0	0	34	34	0.000		
SB LEFT	0	0	0	0	0	0	0.000	0.033	0	0	0	0	0.000	*	
SB THRU	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
SB RIGHT	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
EB LEFT	0	0	0	0	0	0	0.000	0.436	0	0	0	0	0.000	*	
EB THRU	3	4,800	550	28	182	760	0.158		1764	90	236	2090	0.435		
EB RIGHT	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
WB LEFT	1	1,600	0	0	0	0	0.000	0.436	0	0	0	0	0.000	*	
WB THRU	3	4800	1841	94	156	2091	0.436		1000	51	258	1309	0.273		
WB RIGHT	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
RTOR				NORTH/SOUTH CRITICAL SUM				0.033	NORTH/SOUTH CRITICAL SUM				0.028		
am				EAST/WEST CRITICAL SUM				0.436	EAST/WEST CRITICAL SUM				0.435		
pm				CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100		
NB	0	0													
SB	0	0													
EB	18	10	INTERSECTION ICU VALUE				0.569	INTERSECTION ICU VALUE				0.563			
WB	0	0													
AM INTERSECTION LOS							A	PM INTERSECTION LOS							A
AM IMPACT							0.085	PM IMPACT							0.095



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 7B: E OCEAN BL & LOCUST AV (LOCUST MODIFIED TO ONE-WAY)
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	AM PEAK HOUR				PM PEAK HOUR					
								V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	0	0	0	0	18	10	28	0.000	0.068	0	0	10	18	28	0.000	*	
NB THRU	1	1600	0	0	0	0	0	0.068		0	0	0	0	0	0.090		
NB RIGHT	0	0	0	0	34	46	80	0.000		0	0	34	82	116	0.000		
SB LEFT	0	0	0	0	0	0	0	0.000	0.090	0	0	0	0	0	0.000	*	
SB THRU	0	0	0	0	0	0	0	0.000		0	0	0	0	0	0.000		
SB RIGHT	0	0	0	0	0	0	0	0.000		0	0	0	0	0	0.000		
EB LEFT	0	0	0	0	0	0	0	0.000	0.440	0	0	0	0	0	0.000	*	
EB THRU	3	4,800	550	28	182	27	787	0.164		1764	90	236	40	2130	0.444		
EB RIGHT	0	0	0	0	0	0	0	0.000		0	0	0	0	0	0.000		
WB LEFT	0	0	0	0	0	22	22	0.000	0.444	0	0	0	33	33	0.000	*	
WB THRU	3	4800	1841	94	156	0	2091	0.440		1000	51	258	0	1309	0.280		
WB RIGHT	0	0	0	0	0	0	0	0.000		0	0	0	0	0	0.000		
RTOR				NORTH/SOUTH CRITICAL SUM				0.068				NORTH/SOUTH CRITICAL SUM				0.090	
am				EAST/WEST CRITICAL SUM				0.440				EAST/WEST CRITICAL SUM				0.444	
pm				CLEARANCE INTERVAL				0.100				CLEARANCE INTERVAL				0.100	
NB	11	17															
SB	0	0															
EB	28	28	INTERSECTION ICU VALUE				0.608				INTERSECTION ICU VALUE				0.634		
WB	0	0															
AM INTERSECTION LOS								B				PM INTERSECTION LOS				B	
AM IMPACT								0.039				PM IMPACT				0.071	



BREAKERS HOTEL - LONG BEACH
ICU CALCULATIONS

INTERSECTION 8: 3RD ST & LONG BEACH BL
EXISTING CONDITION (2018)

		AM PEAK HOUR				PM PEAK HOUR			
MOVEMENT	NO. OF LANES	CAPACITY	Traffic VOLUMES	V/C	CRITICAL PAIR	Traffic VOLUMES	V/C	CRITICAL PAIR	
NB LEFT	1	1,600	83	0.052	0.123	103	0.064	0.145	
NB THRU	2	3,200	156	0.049		301	0.094		
NB RIGHT	0	0	0	0.000		0	0.000		
SB LEFT	0	0	0	0.000		0	0.000		
SB THRU	2	3,200	226	0.071	0.312	258	0.081	0.148	
SB RIGHT	1	1,600	55	0.034		71	0.044		
EB LEFT	0	0	0	0.000		0	0.000		
EB THRU	0	0	0	0.000		0	0.000		
EB RIGHT	0	0	0	0.000	0.535	0	0.000	0.393	
WB LEFT	1	1,600	46	0.029		39	0.024		
WB THRU	2	3,200	926	0.312		371	0.148		
WB RIGHT	0	0	72	0.000		102	0.000		
RTOR		NORTH/SOUTH CRITICAL SUM			0.123	NORTH/SOUTH CRITICAL SUM		0.145	
am pm		EAST/WEST CRITICAL SUM			0.312	EAST/WEST CRITICAL SUM		0.148	
NB	23	20	CLEARANCE INTERVAL			0.100	CLEARANCE INTERVAL		0.100
SB	0	0							
EB	83	103	INTERSECTION ICU VALUE			0.535	INTERSECTION ICU VALUE		0.393
WB	0	0							
AM INTERSECTION LOS					A	PM INTERSECTION LOS			A

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 8: 3RD ST & LONG BEACH BL EXISTING + PROJECT

						AM PEAK HOUR		PM PEAK HOUR						
MOVEMENT	NO. OF		EXISTING	Project	TOTAL	V/C	*	CRITICAL		Project	TOTAL	V/C	*	CRITICAL
	LANES	CAPACITY						PAIR	EXISTING					
NB LEFT	1	1,600	83	3	86	0.054	*		103	6	109	0.068	*	
NB THRU	2	3,200	156	3	159	0.050			301	6	307	0.096		
NB RIGHT	0	0	0	0	0	0.000			0	0	0	0.000		
								0.126						0.151
SB LEFT	0	0	0	0	0	0.000			0	0	0	0.000		
SB THRU	2	3,200	226	5	231	0.072	*		258	7	265	0.083	*	
SB RIGHT	1	1,600	55	0	55	0.034			71	0	71	0.044		

EB LEFT	0	0	0	0	0	0.000	*		0	0	0	0.000	*	
EB THRU	0	0	0	0	0	0.000			0	0	0	0.000		
EB RIGHT	0	0	0	0	0	0.000			0	0	0	0.000		
								0.312						0.148
WB LEFT	1	1,600	46	5	51	0.032			39	7	46	0.029		
WB THRU	2	3,200	926	0	926	0.312	*		371	0	371	0.148	*	
WB RIGHT	0	0	72	0	72	0.000			102	0	102	0.000		

RTOR				NORTH/SOUTH CRITICAL SUM				0.126	NORTH/SOUTH CRITICAL SUM				0.151	
am pm				EAST/WEST CRITICAL SUM				0.312	EAST/WEST CRITICAL SUM				0.148	
NB	26	23	CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100		
SB	0	0												
EB	86	109	INTERSECTION ICU VALUE				0.538	INTERSECTION ICU VALUE				0.399		
WB	0	0												
				AM INTERSECTION LOS				A	PM INTERSECTION LOS				A	
				AM IMPACT				0.003	PM IMPACT				0.000	

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 8: 3RD ST & LONG BEACH BL
EXISTING + AMBIENT+ CUMULATIVE PROJECT

MOVEMENT	NO. OF		EXISTING	AMBIENT RELATED		TOTAL	AM PEAK HOUR		CRITICAL PAIR	AMBIENT RELATED		TOTAL	PM PEAK HOUR		CRITICAL PAIR
	LANES	CAPACITY		GROWTH	PROJECT		V/C	V/C		GROWTH	PROJECT		V/C		
NB LEFT	1	1,600	83	4	16	103	0.065	*	0.145	103	5	24	132	0.083	*
NB THRU	2	3,200	156	8	4	168	0.052			301	15	2	318	0.099	
NB RIGHT	0	0	0	0	0	0	0.000			0	0	0	0	0.000	
SB LEFT	0	0	0	0	0	0	0.000			0	0	0	0	0.000	
SB THRU	2	3,200	226	12	19	257	0.080	*		258	13	23	294	0.092	*
SB RIGHT	1	1,600	55	3	9	67	0.042			71	4	29	104	0.065	

EB LEFT	0	0	0	0	0	0	0.000	*	0.362	0	0	0	0	0.000	*
EB THRU	0	0	0	0	0	0	0.000			0	0	0	0	0.000	
EB RIGHT	0	0	0	0	0	0	0.000			0	0	0	0	0.000	
WB LEFT	1	1,600	46	2	1	49	0.031			39	2	4	45	0.028	
WB THRU	2	3,200	926	47	110	1083	0.362	*		371	19	157	547	0.204	*
WB RIGHT	0	0	72	4	0	76	0.000			102	5	0	107	0.000	

RTOR				NORTH/SOUTH CRITICAL SUM					0.145	NORTH/SOUTH CRITICAL SUM					0.175
am pm				EAST/WEST CRITICAL SUM					0.362	EAST/WEST CRITICAL SUM					0.204
NB	25	22	CLEARANCE INTERVAL					0.100	CLEARANCE INTERVAL					0.100	
SB	0	0													
EB	103	132	INTERSECTION ICU VALUE					0.607	INTERSECTION ICU VALUE					0.479	
WB	0	0													
AM INTERSECTION LOS							B	PM INTERSECTION LOS							A
AM IMPACT							0.072	PM IMPACT							0.080

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 8: 3RD ST & LONG BEACH BL
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

									AM PEAK HOUR				PM PEAK HOUR				
MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	1	1,600	83	4	16	3	106	0.066	0.148	103	5	24	6	138	0.086	0.180	
NB THRU	2	3,200	156	8	4	3	171	0.053		301	15	2	6	324	0.101		
NB RIGHT	0	0	0	0	0	0	0	0.000		0	0	0	0	0	0.000		
SB LEFT	0	0	0	0	0	0	0	0.000	0.362	0	0	0	0	0	0.000	0.204	
SB THRU	2	3,200	226	12	19	5	262	0.082		258	13	23	7	301	0.094		
SB RIGHT	1	1,600	55	3	9	0	67	0.042		71	4	29	0	104	0.065		
EB LEFT	0	0	0	0	0	0	0	0.000	0.362	0	0	0	0	0	0.000	0.204	
EB THRU	0	0	0	0	0	0	0	0.000		0	0	0	0	0	0.000		
EB RIGHT	0	0	0	0	0	0	0	0.000		0	0	0	0	0	0.000		
WB LEFT	1	1,600	46	2	1	5	54	0.034	0.100	39	2	4	7	52	0.032	0.100	
WB THRU	2	3,200	926	47	110	0	1083	0.362		371	19	157	0	547	0.204		
WB RIGHT	0	0	72	4	0	0	76	0.000		102	5	0	0	107	0.000		
RTOR				NORTH/SOUTH CRITICAL SUM						0.148	NORTH/SOUTH CRITICAL SUM						0.180
				EAST/WEST CRITICAL SUM						0.362	EAST/WEST CRITICAL SUM						0.204
				CLEARANCE INTERVAL						0.100	CLEARANCE INTERVAL						0.100
				INTERSECTION ICU VALUE						0.610	INTERSECTION ICU VALUE						0.484
				AM INTERSECTION LOS						B	PM INTERSECTION LOS						A
				AM IMPACT						0.003	PM IMPACT						0.000

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONG BEACH
ICU CALCULATIONS

INTERSECTION 9: LONG BEACH BL & E OCEAN BL
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR		
			Traffic VOLUMES	V/C		Traffic VOLUMES	V/C				
NB LEFT	0	0	0	0.000	*	0	0.000	*			
NB THRU	0	0	0	0.000		0	0.000				
NB RIGHT	0	0	0	0.000		0	0.000				
									0.064		
SB LEFT	1.5	2,400	52	0.022		141	0.059				
SB THRU	0	0	0	0.000		0	0.000				
SB RIGHT	1.5	2,400	153	0.064	*	153	0.064	*			
EB LEFT	1	1,600	75	0.047	*	141	0.088				
EB THRU	3	4,800	425	0.089		1699	0.354	*			
EB RIGHT	0	0	0	0.000		0	0.000				
									0.407		
WB LEFT	0	0	0	0.000		0	0.000	*			
WB THRU	3	4,800	1729	0.360	*	822	0.171				
WB RIGHT	1	1,600	101	0.047		95	0.015				
	RTOR		NORTH/SOUTH CRITICAL SUM			0.064	NORTH/SOUTH CRITICAL SUM			0.064	
	am	pm	EAST/WEST CRITICAL SUM			0.407	EAST/WEST CRITICAL SUM			0.354	
NB	0	0	CLEARANCE INTERVAL			0.100	CLEARANCE INTERVAL			0.100	
SB	0	0									
EB	0	0	INTERSECTION ICU VALUE			0.571	INTERSECTION ICU VALUE			0.518	
WB	26	71									
AM INTERSECTION LOS					A	PM INTERSECTION LOS					A

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 9: LONG BEACH BL & E OCEAN BL EXISTING + PROJECT

RTOR = Right turn on red reduction = $0.5 \cdot$ corresponding Left



INTERSECTION 9: LONG BEACH BL & E OCEAN BL
EXISTING + AMBIENT+ CUMULATIVE PROJECT

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 9: LONG BEACH BL & E OCEAN BL
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 10: SHORELINEDR/ALAMITOS AV & E OCEAN BL
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR	
			Traffic VOLUMES	V/C	CRITICAL PAIR	Traffic VOLUMES	V/C			
NB LEFT	1	1,200	33	0.028	*	71	0.059	0.206	0.243	
NB THRU	2	2,400	89	0.037		320	0.133			
NB RIGHT	1	1,600	109	0.000		264	0.165			*
SB LEFT	1	1,200	59	0.049		93	0.078			*
SB THRU	3	3600	290	0.178	*	118	0.081			
SB RIGHT	0	0	349	0.000		174	0.000			
EB LEFT	1	1,200	124	0.103	*	279	0.233	0.429	0.472	
EB THRU	3	3600	411	0.114		1474	0.409			*
EB RIGHT	1	1200	17	0.000		75	0.000			
WB LEFT	2	2,160	247	0.114		137	0.063			*
WB THRU	3	3600	1120	0.326	*	591	0.190			
WB RIGHT	0	0	55	0.000		92	0.000			
NORTH/SOUTH CRITICAL SUM					0.206	NORTH/SOUTH CRITICAL SUM			0.243	
EAST/WEST CRITICAL SUM					0.429	EAST/WEST CRITICAL SUM			0.472	
CLEARANCE INTERVAL					0.100	CLEARANCE INTERVAL			0.100	
INTERSECTION ICU VALUE					0.735	INTERSECTION ICU VALUE			0.815	
AM INTERSECTION LOS					C	PM INTERSECTION LOS			D	

Capacity conservatively reduced to 1,200 vehicles per hour per lane due to historical high LOS



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 10: SHORELINEDR/ALAMITOS AV & E OCEAN BL
EXISTING + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	Project	TOTAL	AM PEAK HOUR			PM PEAK HOUR				
						V/C	CRITICAL PAIR	EXISTING	Project	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	1	1,200	33	2	35	0.029	*	71	4	75	0.063		
NB THRU	2	2,400	89	0	89	0.037		320	0	320	0.133		
NB RIGHT	1	1,600	109	0	109	0.068		264	0	264	0.165	*	
							0.208					0.243	
SB LEFT	1	1,200	59	0	59	0.049		93	0	93	0.078	*	
SB THRU	3	3600	290	0	290	0.179	*	118	0	118	0.083		
SB RIGHT	0	0	349	5	354	0.000		174	7	181	0.000		

EB LEFT	1	1,200	124	3	127	0.106	*	279	6	285	0.238		
EB THRU	3	3600	411	3	414	0.115		1474	6	1480	0.411		
EB RIGHT	1	1200	17	2	19	0.016		75	3	78	0.000		
							0.434					0.474	
WB LEFT	2	2,160	247	0	247	0.114		137	0	137	0.063	*	
WB THRU	3	3600	1120	5	1125	0.328	*	591	7	598	0.192		
WB RIGHT	0	0	55	0	55	0.000		92	0	92	0.000		

NORTH/SOUTH CRITICAL SUM								0.208	NORTH/SOUTH CRITICAL SUM				0.243
EAST/WEST CRITICAL SUM								0.434	EAST/WEST CRITICAL SUM				0.474
CLEARANCE INTERVAL								0.100	CLEARANCE INTERVAL				0.100
								-----					-----
INTERSECTION ICU VALUE								0.742	INTERSECTION ICU VALUE				0.817
AM INTERSECTION LOS								C	PM INTERSECTION LOS				D
AM IMPACT								0.007	PM IMPACT				0.002

Capacity conservatively reduced to 1,200 vehicles per hour per lane due to historical high LOS



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 10: SHORELINEDR/ALAMITOS AV & E OCEAN BL
EXISTING + AMBIENT+ CUMULATIVE PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT RELATED			AM PEAK HOUR			PM PEAK HOUR			CRITICAL		
				GROWTH	PROJECT	TOTAL	V/C	PAIR	EXISTING	GROWTH	PROJECT	TOTAL	V/C	PAIR	
NB LEFT	1	1,200	33	2	1	36	0.030	*	71	4	3	78	0.065		
NB THRU	2	2,400	89	5	13	107	0.044		320	16	39	375	0.156		
NB RIGHT	1	1,600	109	6	8	123	0.077		264	13	29	306	0.192		
								0.232						0.291	
SB LEFT	1	1,200	59	3	22	84	0.070	*	93	5	21	119	0.099	*	
SB THRU	3	3600	290	15	22	327	0.202		118	6	36	160	0.109		
SB RIGHT	0	0	349	18	35	402	0.000		174	9	49	232	0.000		
EB LEFT	1	1,200	124	6	40	170	0.142	*	279	14	46	339	0.283		
EB THRU	3	3600	411	21	139	571	0.159		1474	75	152	1701	0.473		
EB RIGHT	1	1200	17	1	2	20	0.017		75	4	1	80	0.000		
								0.499						0.553	
WB LEFT	2	2,160	247	13	12	272	0.126	*	137	7	28	172	0.080	*	
WB THRU	3	3600	1120	57	43	1220	0.357		591	30	89	710	0.230		
WB RIGHT	0	0	55	3	9	67	0.000		92	5	21	118	0.000		
				NORTH/SOUTH CRITICAL SUM					0.232	NORTH/SOUTH CRITICAL SUM					0.291
				EAST/WEST CRITICAL SUM					0.499	EAST/WEST CRITICAL SUM					0.553
				CLEARANCE INTERVAL					0.100	CLEARANCE INTERVAL					0.100
				INTERSECTION ICU VALUE					0.831	INTERSECTION ICU VALUE					0.944
				AM INTERSECTION LOS					D	PM INTERSECTION LOS					E
				AM IMPACT					0.096	PM IMPACT					0.129

Capacity conservatively reduced to 1,200 vehicles per hour per lane due to historical high LOS



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 10: SHORELINEDR/ALAMITOS AV & E OCEAN BL
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	AM PEAK HOUR					PM PEAK HOUR				
										CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	1	1,200	33	2	1	2	38	0.031	*		71	4	3	4	82	0.068		
NB THRU	2	2,400	89	5	13	0	107	0.044			320	16	39	0	375	0.156		
NB RIGHT	1	1,600	109	6	8	0	123	0.077			264	13	29	0	306	0.192	*	
										0.235							0.291	
SB LEFT	1	1,200	59	3	22	0	84	0.070			93	5	21	0	119	0.099	*	
SB THRU	3	3600	290	15	22	0	327	0.204	*		118	6	36	0	160	0.111		
SB RIGHT	0	0	349	18	35	5	407	0.000			174	9	49	7	239	0.000		
EB LEFT	1	1,200	124	6	40	3	173	0.144	*		279	14	46	6	345	0.288		
EB THRU	3	3600	411	21	139	3	574	0.159			1474	75	152	6	1707	0.474	*	
EB RIGHT	1	1200	17	1	2	2	22	0.018			75	4	1	3	83	0.000		
										0.503							0.554	
WB LEFT	2	2,160	247	13	12	0	272	0.126			137	7	28	0	172	0.080	*	
WB THRU	3	3600	1120	57	43	5	1225	0.359	*		591	30	89	7	717	0.232		
WB RIGHT	0	0	55	3	9	0	67	0.000			92	5	21	0	118	0.000		
NORTH/SOUTH CRITICAL SUM											0.235	NORTH/SOUTH CRITICAL SUM						0.291
EAST/WEST CRITICAL SUM											0.503	EAST/WEST CRITICAL SUM						0.554
CLEARANCE INTERVAL											0.100	CLEARANCE INTERVAL						0.100
INTERSECTION ICU VALUE											0.838	INTERSECTION ICU VALUE						0.945
AM INTERSECTION LOS										D		PM INTERSECTION LOS						E
AM IMPACT										0.007		PM IMPACT						0.001

Capacity conservatively reduced to 1,200 vehicles per hour per lane due to historical high LOS

ATTACHMENT C

Without Project ICU Summary Difference

No.	Intersection	Peak Hour	FUTURE Prior Cumulative Projects		FUTURE Revised Cumulative Projects		DIFFERENCE
			ICU	LOS	ICU	LOS	
1	W Ocean Boulevard & Queens Way/Magnolia Av	AM	0.592	A	0.619	B	0.027
		PM	0.694	B	0.756	C	0.062
2	W Ocean Boulevard & Pacific Avenue	AM	0.624	B	0.629	B	0.005
		PM	0.604	B	0.662	B	0.058
3	Broadway & Pine Avenue	AM	0.401	A	0.424	A	0.023
		PM	0.660	B	0.695	B	0.035
4	Ocean Boulevard & Pine Avenue	AM	0.536	A	0.553	A	0.017
		PM	0.692	B	0.720	C	0.028
5	Seaside Way & Pine Avenue	AM	0.227	A	0.234	A	0.007
		PM	0.282	A	0.297	A	0.015
6	Shoreline Drive & Pine Avenue	AM	0.353	A	0.366	A	0.013
		PM	0.483	A	0.504	A	0.021
7A	E Ocean Boulevard & Locust Avenue	AM	0.550	A	0.568	A	0.018
		PM	0.553	A	0.574	A	0.021
7B	E Ocean Boulevard & Locust Avenue	AM	0.552	A	0.569	A	0.017
		PM	0.542	A	0.563	A	0.021
8	E 3rd Street & Long Beach Boulevard	AM	0.581	A	0.607	B	0.026
		PM	0.442	A	0.479	A	0.037
9	E Ocean Boulevard & Long Beach Boulevard	AM	0.645	B	0.673	B	0.028
		PM	0.582	A	0.603	B	0.021
10	E Ocean Boulevard & Alamitos Av/Shoreline Dr	AM	0.815	D	0.831	D	0.016
		PM	0.894	D	0.944	E	0.050

0.566 Sum of Differences

0.025727273 Average Difference
2.57% % average difference



February 5, 2019

Attachment J
Additional Supplemental Materials
The Breakers Hotel Appeal Hearing

**A SCANNED IMAGE OF THE AGENDA ITEM
ATTACHMENTS ARE AVAILABLE IN LEGISTAR INSITE 2.0 AT
<http://longbeach.legistar.com/Calendar.aspx>**

OR

PLEASE CONTACT

THE LONG BEACH CITY CLERK DEPARTMENT AT

**(562) 570-6101
(562) 570-6789 (FAX)
cityclerk@longbeach.gov**



NOTICE of EXEMPTION from CEQA

CITY OF LONG BEACH | DEPARTMENT OF DEVELOPMENT SERVICES
 333 W. OCEAN BLVD., 5TH FLOOR, LONG BEACH, CA 90802
 (562) 570-6194 FAX: (562) 570-6068
 llds.longbeach.gov

TO: ☐ Office of Planning & Research
 1400 Tenth Street, Room 121
 Sacramento, CA 95814

FROM: Department of Development Services
 333 W. Ocean Blvd, 5th Floor
 Long Beach, CA 90802

☒ L.A. County Clerk
 Environmental Filings
 12400 E. Imperial Hwy., Room 1201
 Norwalk, CA 90650

Project Title: CE- 18-152

Project Location/Address: 210 E OCEAN BLVD LONG BEACH, CA 90802

Project Activity/Description: RENOVATION OF AN EXISTING HISTORIC BUILDING INTO A BOUTIQUE HOTEL.

Public Agency Approving Project: City of Long Beach, Los Angeles County, California

Applicant Name: PATRICK ENRICH

Mailing Address: 900 N. ROCK HILL RD ST LOUIS, MO 63119

Phone Number: 314-963-0715 Applicant Signature: [Signature]

BELOW THIS LINE FOR STAFF USE ONLY

Application Number: 1806-19 Planner's Initials: MC

Required Permits: Site Plan Review, Conditional Use Permit, Local Coastal Development Permit

THE ABOVE PROJECT HAS BEEN FOUND TO BE EXEMPT FROM CEQA IN ACCORDANCE WITH STATE GUIDELINES SECTION 15301, 15303, 15301, 15332

Statement of support for this finding: The project entails the conversion of an existing landmark building to a hotel use. The addition of a stairwell and service elevator are necessary life safety improvements that do not expand the gross floor area of the building. There would be negligible or no expansion of the existing building. All modifications to the building would be consistent with the Secretary of the Interior's standards for Rehabilitation.

Contact Person: Maryanne Cronin Contact Phone: 562-570-5683

Signature: Maryanne Cronin Date: 10-26-18

**CALIFORNIA ENVIRONMENTAL QUALITY ACT
STATEMENT OF SUPPORT
CLASS 32 (INFILL DEVELOPMENT) EXEMPTION DETERMINATION
210 East Ocean Boulevard
Application No. 1806-19
November 15, 2018**

Section 15300 through 15333 of the California Environmental Quality Act (CEQA) establishes certain classes of projects as categorically exempt from the provisions of CEQA because they do not ordinarily result in a significant effect on the environment. The Project proposes to renovate and convert The Breakers Hotel (City-designated Historic Landmark) into a 185-room hotel with food and beverage venues (with on-site alcohol), banquet/meeting areas, and amenity uses in the Coastal Zone at 210 East Ocean Boulevard in the Downtown Shoreline Planned Development District (PD-6). (District 2).

CEQA Section 15300.2 provides specific instance where exceptions to the established Classes of Exemptions included Class 32 -Infill Exemption are superseded; none of those conditions were found to apply to this project. The following analysis provides substantial evidence to support a conclusion that the proposed project qualifies for an exemption under CEQA Guidelines Section 15332 as a Class 32 urban infill development, and would not have a significant effect on the environment.

A. THE PROJECT IS CONSISTENT WITH THE APPLICABLE GENERAL PLAN DESIGNATION AND ALL APPLICABLE GENERAL PLAN POLICIES AS WELL AS WITH APPLICABLE ZONING DESIGNATION AND REGULATIONS.

The project site is in Subarea 7 of the Downtown Shoreline Planned Development District (PD-6); a designation that permits residential, hotel, and office with hotel or residential uses. This Zoning designation is consistent with the General Plan Land Use Designation (LUD) of LUD #7 Mixed Uses. The project would comply with all development standards and implements the General Plan objectives to provide adequate off-site parking, design standards for the new stairwell addition, and Victory Park landscaping improvements.

B. THE PROPOSED DEVELOPMENT OCCURS WITHIN CITY LIMITS ON A PROJECT SITE OF NO MORE THAN FIVE ACRES SUBSTANTIALLY SURROUNDED BY URBAN USES.

The project site is entirely within the city limits of Long beach, on a site that is 0.49-acre in size, which is less than maximum five acres specified. The project site is bounded by Locust Avenue to the west, Collins Way to the east, and the vacated Marine Way (former alley) to the south. Victory Park buffers the site from Ocean Boulevard to the north.

The project site was developed with a hotel in 1925, including restaurant and banquet uses. The building and was thereafter converted to a congregate care facility with restaurant and banquet facilities. The existing structure would remain and be expanded to the east to incorporate life-safety elements. The surrounding streets and public park separate the project site from a range of urban uses including both commercial and residential land uses.

C. THE PROJECT SITE HAS NO VALUE AS HABITAT FOR ENDANGERED, RARE OR THREATNED SPECIES.

The project site is a developed site and linear park that that has no value as, a habitat for endangered rare or threatened species.

Victory Park is a linear park in an urban setting. All modifications to vegetation in Victory Park shall comply with the Migratory Bird Treaty Act (MBTA).

D. APPROVAL OF THE PROJECT WOULD NOT RESULT IN ANY SIGNIFICANT EFFECTS REALTING TO TRAFFIC, NOISE, AIR QUALITY, OR WATER QUALITY.

The project will not result in any significant effects relating to traffic within the area or on the local streets as detailed in the Traffic Impact Analysis prepared by Overland Traffic Consultants, Inc. and dated October 2018 and is incorporated by reference here.¹

The added building area would include a stairwell and service elevator for a necessary life safety improvements for the building. No grading or earthwork would be required for the expansion of the building. This building expansion would not create additional gross floor area for the expansion or intensification of uses in the existing City-designated landmark building. Additional floor plan configurations were reviewed for potential impacts, but the reuse of the existing structure and addition of ancillary roof areas would not constitute an expansion of use that would result in significant impacts related to traffic. Therefore, due to the reuse of an existing building and the general construction scope, no significant effects relating to traffic and air quality are anticipated.

The ambient noise environment of the Project site consists primarily of traffic noise from the adjacent streets. Short-term noise levels associated with construction will comply with the City's Noise ordinance. Operational noise associated with the hotel and ancillary uses would be generated by vehicles, doors, car alarms, music, and peoples talking as is typical of hotel, restaurant, and banquet uses. At the time of operation, the hotel and ancillary uses will not

¹ Referenced documents are available for review at City Hall, Planning Bureau, 333 W. Ocean Blvd., 5th Floor, Long Beach, CA 90802.

introduce a substantial new noise source relative to existing conditions and the project will operate within the standards of the adopted Noise Ordinance.

Furthermore, the project has been condition to prohibit noise levels from the project to exceed the noise standards specified in the Long Beach Municipal Code.

The site is not identified as a contaminated or spill site, according to the Department of Toxic Substance Control's database EnviroStor. However, there are three sites located approximately 350 feet east of the project site that are listed under a tiered permit or military evaluation.

The proposed stairwell addition would be an extension of the existing building beginning on the 3rd floor of the existing structure. No grading or excavation are required for construction of the proposed addition. Due to the nature of construction, there is no potential for exposure due to contamination. The proposed project will comply with all requirements of the Long Beach Municipal Code Chapter 18.74 pertaining to low impact development standards and practices for stormwater pollution mitigation.

E. THE SITE CAN BE ADEQUATELY SERVED BY ALL REQUIRED UTILITIES AND PUBLIC SERVICES.

The existing building was previously occupies and served by utilities and public services. The Project can adequately be served by utilities and public by reestablishing connections for water, sewer, electricity, and natural gas, which would be undertaken as part of the building permitting process.

DRAFT

of a proposed letter to the Grunion Gazette, City Council - and if necessary, the California Coastal Commission. 1-1-19. Suggestions welcome...

Dear

Re: Proposed Breakers' Hotel - Victory Park compromise

Pursuant to Local Coastal Development Permit 18-022 and the Victory Park Design Guidelines, I want the Long Beach City Council to overturn the Nov. 15, 2018 Planning Commission's decision to reduce Victory Park in size. And instead approve a compromise between the Breakers' developer and park advocates.

This small, beleaguered section of Victory Park at 210 E. Ocean Blvd., in Downtown has already been reduced in size by the widening of Ocean Blvd. (Over 20 years ago, park benches were removed.)

John Molina and his development team want to expand an existing driveway through OUR PARK as part of the conversion of the adjacent Breakers' building to a 4-star hotel. In a Nov. 20 email, Development Services' Christopher Koontz indicated that "1398" square feet would be removed from the park, "related to required safety realignment of the driveway."

But, the Certified LCP (Local Coastal Plan) states: "Require that any conversion of parkland be replaced amenity - for - amenity and acre - for -acre at a 2:1 ratio. One acre of replacement land shall be located in a park service area where the land was converted and an additional acre of replacement land shall be located in a park service area

needing parkland as determined by the Recreation Commission.” That could put the developer and the City in a bind.

For starters: Pursuant to the Victory Park Design Guidelines, I want the following: Removal of the proposed dog-park area as mentioned in the developer’s landscape plan (this is a passive park); real grass, not plastic; on the lawn place comfortable wood and steel benches, not concrete benches; and locate a drinking fountain next to the Ocean Blvd. sidewalk. Also place a park identification sign next to that sidewalk, that can be easily read by people passing by; monument style, 5 feet long and 2 feet high; that states:

VICTORY PARK
Est. 1889 - City of Long Beach

The larger context: Most of it dating from 1889, Victory Park, along with the connected Santa Cruz Park to the west, is a grassy linear park located on the south side of Ocean Blvd. between Shoreline Dr. and Golden Shore. These parks were created for “ornamentation and recreation”. The parks “reinforce the character of Ocean Boulevard as a grand boulevard.” The name Victory Park honors WWI veterans.

Unfortunately, the two parks have been reduced in size by Ocean Blvd. widening, and in some places, excessive paving that benefits adjacent property owners-not the general public. Without benches and park identification signage, some swaths of park lawn have been turned into de facto front yards for bordering property owners; such as the Union Bank building at Ocean and Golden Shore. Part of the bank actually sits on a former section of Santa Cruz Park.

More recently, park benches were removed from Santa Cruz park in front of Molina Center, located next to Union Bank.

This is in violation of the original development agreement with the City! A 12 - foot long Santa Cruz Park sign is still there. put there in 1983, after a guard from the then called Arco Towers ejected me from the park - saying "This is not a park. I have orders to run people out."

Public pressure: Starting in 1977, when 3 majestic trees in Santa Cruz Park were threatened by redevelopment, citizens successfully pushed City officials to preserve, enlarge and enhance Santa Cruz and Victory parks. The trees were saved. In 1980, the two parks were dedicated in perpetuity. In 1989, the Victory Park Design Guidelines were certified. The guidelines support the mandate of the LCP to preserve and enlarge these parks, and add amenities. Now, as each new building along the park strip is approved by the City, an 80-foot deep park setback is required (as measured from the Ocean Blvd.curb). Now, citizens, if they testify at public hearings, have the legal clout to demand that developers include park signage and amenities - and keep the two parks from being over-paved for non - park purposes!

Proposed compromise: With City Council approval and City enforcement, the Breakers' developer would get the realigned driveway - that would displace precious parkland. In exchange the developer, per specifications in the design guidelines, would pay for and install the following:

- 1. Return OUR park benches to the lawn in front of Molina Center. Add a drinking fountain next to the Ocean Blvd. sidewalk.**
- 2. In front of the Ocean Center Building, place a wood and steel park bench. etc.**
- 3. Reclaim as a public park Union Bank's de facto front yard - with park identification signage, benches, trash receptacle; and a drinking fountain next to the city sidewalk.**

4. Reclaim all other de facto front yards elsewhere in the two parks - with park signage, benches, trash receptacles and drinking fountains.
5. Remove the "180 East Ocean Boulevard" private address signage from Victory Park, and replace with a plaque telling the history of Victory Park and its connection to the WWI veterans; size 18 inches by 18 inches.
6. Replace missing plaque that marked the boundary (and terminus) of the historic ranchos Los Cerritos and Los Alamitos. The plaque had been affixed to a boulder in Victory Park near Golden Shore

THIS COMPROMISE WOULD RESULT IN A SIGNIFICANT NET GAIN OF RECOGNIZABLE AND PUBLIC ACCESSIBLE PARK!

There is a population boom in the heart of downtown! We need more green, public space there, not less!

Sincerely,

**David P. Denevan
4322 Charlemagne Ave.
Long Beach, CA 90808-1409
(562)425-9910**

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