

Dionne Bearden

From: CityClerk
Sent: Wednesday, October 16, 2019 10:41 AM
To: Dionne Bearden
Subject: FW: 19-084 PL LUE

FYI-

From: Kerrie Aley [REDACTED]
Sent: Tuesday, October 15, 2019 5:12 AM
To: CityClerk <CityClerk@longbeach.gov>
Subject: Fwd: 19-084 PL LUE

City Clerk-Please distribute to members of the Planning Commission prior to the hearing.

----- Forwarded message -----

From: Kerrie Aley [REDACTED] >
Date: Mon, Oct 14, 2019 at 1:32 PM
Subject: 19-084 PL LUE
To: <Alison.Spindler-Ruiz@longbeach.gov>, <district3@longbeach.gov>, district1 <district1@longbeach.gov>, district2 <district2@longbeach.gov>, district4 <district4@longbeach.gov>, district5 <district5@longbeach.gov>, district6 <district6@longbeach.gov>, district8 <district8@longbeach.gov>, district9 <district9@longbeach.gov>, Mayor Robert Garcia <mayor@longbeach.gov>, district7 <district7@longbeach.gov>

Long Beach Planning Commissioners and City Council-members

I object to the proposed LB Planning Commission's recommendation for certification of the revised FEIR and adoption of the updated Land Use Element;

"Recommendation to recommend that the City Council 1) certify the revised Final Environmental Impact Report (EIR 03-16) based on the final set of maps approved by the Long Beach City Council on March 6, 2018; 2) adopt the updated Land Use Element to the Long Beach General Plan; 3) adopt the new Urban Design Element to the Long Beach General Plan; and 4) repeal the existing Scenic Routes Element to the Long Beach General Plan. (Citywide)"

The FEIR and updated LUE were drafted without consideration of recent State of California legislation which override local land use planning including [SB 13](#), [AB 68](#), [AB 881](#) and others , planned changes to the SCAGG RHNA numbers, changes to CEQA transportation planning and mitigation, proposed higher densities downtown including an Elephant Lot sports park /housing, Queen Mary entertainment development and climate change seal level impacts.

The City of Long Beach's yearly Housing Element Updates 2017 and 2018 do not accurately reflect the recent permits and boom in the construction of thousands of new housing units. The City of Long Beach has mislead the public during the development of the LUE stating that the increase in housing density was needed to meet the 2021 RHNA housing goals. The fact is that the City of Long Beach RDA and Council approved millions of dollars in subsidies and land giveaways benefiting development (well above moderate housing units, high end hotels) at the expense of the development of affordable housing.

The LUE failed to consider the impact of climate change and seal level rise. Revisions to SEADP-SEASP and the Local Coastal Plan have not been submitted or approved by the CA Coastal Commission.

Due to recent state legislation, there are a number of changes that will be incorporated into the development and methodology for the 6th RHNA cycle

The next RHNA cycle, also known as the 6th cycle, will cover the planning period October 2021 through October 2029, and will be adopted at the latest by October 2020. The 2021-2029 RHNA housing numbers are unknown at this time.

The City has failed to adequately study or address the limitations (on infrastructure such as sewer, water, roadway capacity, electrical infrastructure, schools, social services) and the resultant taxpayer cost to meet demands of the proposed updated LUE, CA State mandated housing legislation and the 6th RHNA cycle.

In my opinion approval and certification will result in a sea change from the existing well thought out LUE growth ...to a future city that allows uncontrolled growth with no consideration for the consequential impact on our quality of life and taxes.

In particular I object to Mayor Garcia who has sought to turn an unfortunate tidal-wave of drug addicted and mentally ill homeless vagrancy/crime problems into a mandate for more housing than Long Beach needs or can handle.

I am aware of the City's recent outreach-- asking citizens *"What qualities would you like to see in the new City Manager?"* <https://www.surveymonkey.com/r/DB76BFBK>

I object to the City's survey which excludes honesty, integrity, and ethics as a quality necessary for selection of the City Manager.

Please do not approve the FEIR or the updated Land Use Element. I am hoping that our Council-members seize this opportunity and select a new City Manager whose qualities will reflect the values of all of its citizens over special interests and outside commerce.

Hold off on approving a new LUE until the new impacts are evident/studied and the public has a chance to review and comment.

Kerrie Aley

Dionne Bearden

From: Christopher Koontz
Sent: Wednesday, October 16, 2019 11:05 AM
To: Dionne Bearden
Subject: FW: Planning Commission's review of the final version of the LUE and Urban Design Elements

From: Gretchen Swanson, DPT, MPH <[REDACTED]>
Sent: Wednesday, October 16, 2019 11:01 AM
To: Linda Tatum <Linda.Tatum@longbeach.gov>; Christopher Koontz <Christopher.Koontz@longbeach.gov>
Cc: Jeannine Pearce <Jeannine.Pearce@longbeach.gov>; Karla Estupinian <Karla.Estupinian@longbeach.gov>; Brooke Baker <[REDACTED]>; Danielle Potter <[REDACTED]>; Emily Stevens - RPNA <[REDACTED]>
Subject: Planning Commission's review of the final version of the LUE and Urban Design Elements

Please add this comment to tomorrow's meeting minutes:

The Rose Park Neighborhood Association remains supportive overall with a forward looking LUE and Urban Design Element that has the potential to create thriving areas in the city, especially neighborhoods. However, there are major weaknesses from our reading of these documents and those are:

1. No relationship between the plan and the city's commissions. For example, there are healthy community expectations but no direct link to the Health and Human Services Commission. How can the HHS Commission voice and reflect community based needs unless part of the city building effort.
2. No relationship to the neighborhood groups in the city. Neighborhood groups need to weigh in on how these elements are defined upfront as zoning is further defined and again when development of a certain size is being proposed. Without local voice we remain at the whim of changing staff, council members and others with little chance to effect change.

Without these governance strategies the document will be either a 'dust collector' or an instrument for developers that can afford to navigate the specifics.

Ask: Please request that planning staff provide a transparent and community inter-active process for the on-going implementation of the proposed LUE and Urban Design Element.

Gretchen Swanson
President, Rose Park Neighborhood Association

October 17, 2019

Planning Commission

LUE, EIR, UDE

I am opposed to approval of the Land Use Element and maps, certification of the Environmental Impact Report, and approval of the Urban Design Element as proposed. The LUE does not evenly distribute density thorough out the City forcing the vast majority of increased traffic, congestion, noise, and associated impacts of additional dwelling units into the downtown, where it is appropriate, but also disproportionally into the 6th council district while the east side and especially the 5th district accomodates almost no new opportunity for residential development (please review the LUE maps for verification). I understand some density is required along the Blue Line; however, significant increases are proposed sometimes more than 4 blocks and over ½ mile away from Blue Line stations with unlimited densities at heights that are not compatible with adjoining low density two story historic neighborhoods. The LUE maps also are in violation of the UDE strategies such as 14-2, 14-3, 14-4, and 19-3 addressing transitions in height, scale, massing, and open space between existing and new developments. The maps fail to address the privacy of adjoining properties such as two story low density residential units adjacent to or across the street from proposed five to seven story buildings with extremely small setbacks of 5-10 feet. Lastly, there is much inequity in the the treatment of the same Placetypes in different parts of the City.

Equity of Height in the same Placetypes - Please consider the following changes and ensure that all districts of the City are treated fairly. Similarly zoned properties with the same height and type of development shall be treated the same. Examples of similar small properties on the eastside with the same existing zone and similar general plan and with the same proposed Placetype shall have the same height. A CC Placetype with a 2-story height limit on a similar and larger classification of street and the same existing zoning designation of CNA (Neighborhood Automobile Oriented) should be treated the same. Residential uses are not permitted under the CC place type, so this change will not affect residential density or the EIR.

Please require equal treatment of the same Placetype in different parts of the city. Examples of proposed CC Placetypes with a 2-story height limit.

1. Intersection of Spring Street and Pacific Ave (NW corner)
 - Current zone: CNA, General Plan: 2 Mixed style homes
 - Street Classification: Minor Arterial & Collector Street
 - Proposed Place type: CC
 - Existing building Height: 1 story
 - Proposed Height: **3 stories**
 - Adjacent Uses: Residential single family, and duplexes one and two stories high. Additionally, this site is over ½ mile from a Blue Line station.
2. Intersection of Atherton and Palo Verde Drive (SW and NE corners)
 - Current zone: CNA, General Plan: 1 Single family district
 - Street Classification: Minor Arterial & Collector Street
 - Proposed Place type: CC
 - Existing building Height: 2 stories
 - Proposed Height: **2 stories**
 - Adjacent Uses: Residential single family and duplexes one and two stories high.

3. Intersection of Palo Verde Ave and Stearns (SW and NE corners)

- Current zone: CCA, General Plan: 1 Single family district
- Street Classification: Minor Arterial & Collector Street
- Proposed Place type: CC
- Existing building Height: 2 stories
- Proposed Height: **2 stories**
- Adjacent Uses: Residential single family and duplexes one and two stories high.

4. Intersection of Clark and Atherton Carson Street (SE corner)

- Current zone: CNA, General Plan: 8N Shopping Nodes
- Street Classification: Major Arterial and Minor Arterial
- Proposed Place type: CC
- Existing building Height: 1 story
- Proposed Height: **2 stories**
- Adjacent Uses: Residential single family and duplexes one and two stories high.

In addition, large shopping centers such as Target on Stearns and Bellflower Blvd in Los Altos located on a Major Arterial has a 2-story height limit while a small 7-11 located on a Minor Arterial with adjacent residential uses has a 3-story height limit. The Kmart and Lowes shopping center and the Long Beach Towne Center on Carson Street, all over 20 acres, have a proposed CC Placetype with a two-story height limit. Please see the attached pictures of the small shopping centers and have planning staff explain the reason for a 3 story height limit in the CC Placetype in CD #6 with a one-story building, but a 2 story height limit for the remainder of the City.

Request: Change the height from 3 to 2 stories at the NW and NE corners of Spring and Pacific Avenue improved with 1 and 2 story buildings in the CC Placetype to be consistent with the rest of the CC Placetypes throughout the City.



All sites shown below have a proposed Placetype of CC with a height limit of **2** stories.



Northeast corner of Atherton St and Palo Verde Ave. - existing two-story building



Northwest corner of Stearns and Palo Verde Ave – existing 2 story building.



Southeast corner of Clark and Atherton Street - existing 1 story building



Spring and Pacific Ave – existing 1 story building. Proposed height **3** stories

Protection of height adjacent to Veterans Park and Correction of the Midtown Plan Maximum Building Height for Veterans Park Figure 3-4 from 5 stories to 3 and 30 feet.

Veterans Park is the only large open space on the west side of council district 6. When the Midtown Plan was updated the council office did not notify the community of the proposed map changes to the height and density. When this occurred in June 2016, the community wasn't made aware of the changes to the area around Veterans Park until the LUE map changes were presented in the fall of 2016. The LUE proposes 10 stories on the south side of Veterans Park with 5 stories to the east across an approximately 20-foot wide alley. The current LUE also proposes 5 stories to the east across the blue line tracks with 3 stories to the north. The 24 lots along the east side of Pacific Avenue and west of the park from 28th to Spring Street are all one story except for 4 two story properties. The density is low from single family to two 6-8-unit apartment buildings. There is a one-story commercial building at the SE corner of Pacific and Spring Street. The LUE proposal of 5 stories with minimal setbacks of approximately 0-6 feet and a height of 65 feet will completely block views of the park from Pacific Avenue and the cross streets of 28th and 29th. No trees in the park will be visible over a 65-foot-tall building.

The community has repeatedly asked council person Andrews to change the height to three stories in hopes of maintaining some openness to and views of the park. The community was told by the council person that the Midtown Plan could not be altered. However, the PC and CC, including a vote by council person Andrews, supported an amendment to the Midtown Plan in 2018 for the Salvation Army project just down the street at Long Beach Blvd. and Spring St. so obviously it can be amended. In addition, the councilman for CD # 6 proposed a change to the LUE for the lots at the NW corner of PCH and Pacific Ave from 5 stories to 7 TOD-L to allow for a very incompatible project up to 7 stories in height in an area now zoned for 2 stories. The proposed project at 201 W PCH which is owned by Kay Mendoza will also require an amendment to the Midtown Plan as the current height is 5 stories. Over the past three years I have attended at least a dozen public meetings and not one person spoke in favor of increased heights at 201 W PCH or the two blocks next to Veterans Park. Residents have only requested a lower height, so this height of 5 stories is not the desire of the residents but only of the council office.

In June 2016 the Midtown Specific Plan was approved by City Council. This document changed the zoning to the two blocks east of Pacific Avenue adjacent to Veterans Park to Corridor District allowing 3 stories/36 feet for lot less than 200 feet deep. SP-1 CDR (1) These lots in question in this two blocks area are 130 feet deep and 50 feet wide. This zone allows unlimited density with minimal setbacks of no more than 6 feet and TOD minimal parking which is less than the zoning code per chapter 21.41. However, there is a 5 story/65 foot overlay on these lots in the Midtown Plan with a footnote allowing the Site Plan Review Committee to approve increased heights for lots over 20,000 sq. ft. consistent with the design guidelines in Chapter 5.

The Zoning code, chapter 21.35 states the following-

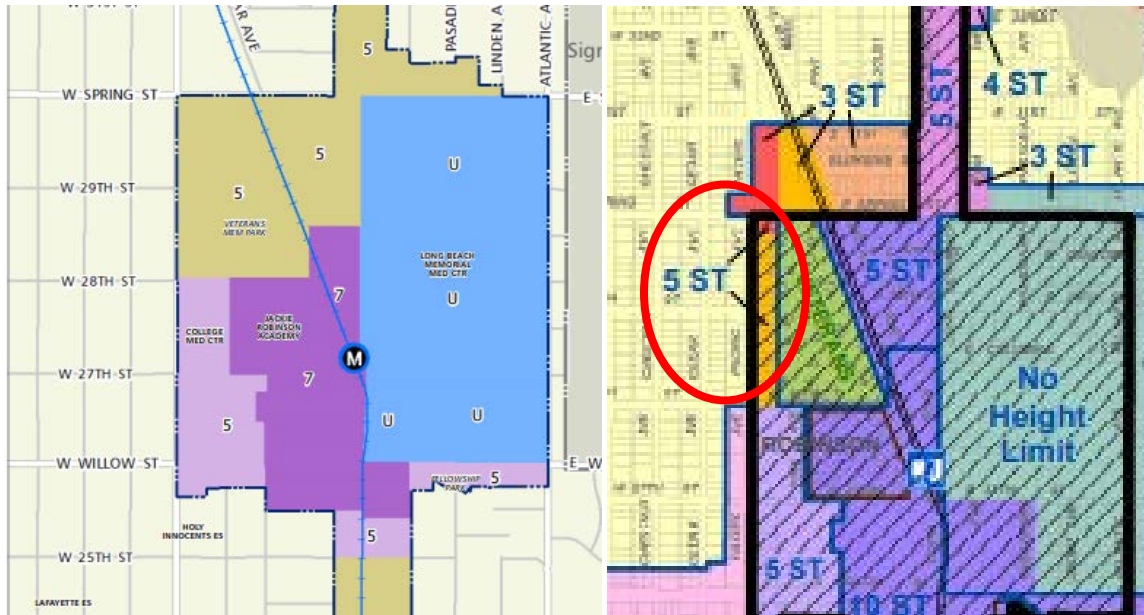
- The height for the Park Zone throughout the entire City is 30 feet per the Zoning Code

21.35.215 - Building height.

The maximum height of all buildings shall be thirty feet (30').(Ord. C-7826 § 3, 2002)

By changing the LUE from 5 to 3 stories for the lots adjacent to Veterans Park and amending the Midtown Plan height map for Veterans Park from 5 to 3 stories the Midtown Plan will encourage increased use of the park by residents and visitors to the area. If the park is boxed in and hidden from view by a wall of buildings 65 feet high with narrow 0-6 side setbacks between the buildings all views of the park will be lost and overall use of the park will decrease in an area

with limited park space. What is likely to increase are criminal and illicit activities leading to more public safety calls for service.



Request: Please reduce the height from 5 to 3 stories for the two blocks east of Pacific Avenue from 28th Street to Spring Street and amend the Midtown Plan height map for the entire area of Veterans Park to 3 stories.

Spot General Plan Amendment to accommodate a proposed development of 7 stories at 201 W PCH (Pacific/PCH)

At the March 2018 Councilman Andrews changed the staff recommended height at the NW corner of PCH and Pacific Avenue. The motion was as follows:

On the north side of Pacific Coast Highway, between Pacific Avenue and the east side of Cedar Avenue, expand the TOD-L Placetype and increase the height limit for that Placetype from 5 to 7 stories.

I believe this change was made to accommodate a proposed development. In November of 2018 approximately eight months later an application was submitted to the City at this same location for a 5 story 147-unit mixed use development on 1.50 acres with 189,000 sq. ft. of building area.

The previous map had 5 stories and TOD-L on both sides of Pacific Avenue to 20th Street. The one parcel on the east side of Cedar Ave at PCH at the NE corner was Placetype NSC-M. The remaining lots on Cedar Avenue, which include a one-story grocery store are zoned Founding and Contemporary Neighborhoods (Residential). The motion does not state the rezoning should extend to 19th Street, an entire additional entire City block. The east side of Cedar Avenue is currently one-story buildings with only two 2 story apartment buildings. This street is now TOD-L with a 7-story height, an increase of 5 stories. Cedar Avenue is a 60-foot wide collector street with no more than 2 story high buildings and now has an allowed height greater than Long Beach Blvd, a 100 foot wide Major Arterial with a light rail system. Cedar Avenue does not have a bus line or other public transit. It is also approximately ½ mile from the Blue Line station on Long Beach Blvd. Also, the motion did not include the east side of Pacific Ave. Does this make sense? Is this good planning that is compatible with the neighborhood development pattern in density, height, and massing? Does 7 stories with unlimited density respect the neighborhood character? This violates all the Urban Design Element strategies. Even Pacific Avenue between PCH and 19th Street has a proposed height of 7 stories from the existing 2 story height limit with the exception of two lots that are currently 5 stories due to the last Midtown Plan expansion in 2016.

Pacific Avenue is classified as a 100-foot wide Minor Arterial street at this location and now has a taller allowed building height than Long Beach Blvd., a Major Arterial. The Planning Commission previously did not allow spot rezoning. The application submitted for entitlements includes a new General Plan of TOD Low with 7 stories, a new zoning, Midtown Plan TN Low with 7 stories. The existing zoning is CHW, CCA, and R-2-N. All these zones have a 2-story height limit.

Pacific Avenue, the gateway to Wrigley Village, is a low scale neighborhood. On Pacific Avenue from PCH to Willow Street there is not one 3 story building, the street is split fairly equally between 1 and 2 story buildings. The same applies along PCH for a few blocks in each direction. Approval of a 7 story is completely incompatible with the existing development pattern of 1 and 2 story buildings. Please do not allow a height than on a major arterial. Reduce the height back to 5 stories as the developer told the community the proposed building is 5 stories so there is no need for the 7-story height plus it is simply inappropriate at this location considered the existing low scale profile of the neighborhood. A 7-story building will never be compatible at this location.

With the exception of the four lots on Cedar north of PCH where a one story market is located where 4-5 stories may be appropriate fronting on PCH, please do not allow the entire block of Cedar Avenue to be TOD-L and 7 stories, but change back to the Founding and Contemporary Neighborhood Placetype (N) with a 2 story height limit. This is a completely residential street.

The Wrigley neighborhood has already seen many large developments in our area so the density is already increasing. We have more than our fair share of new housing. These projects include:

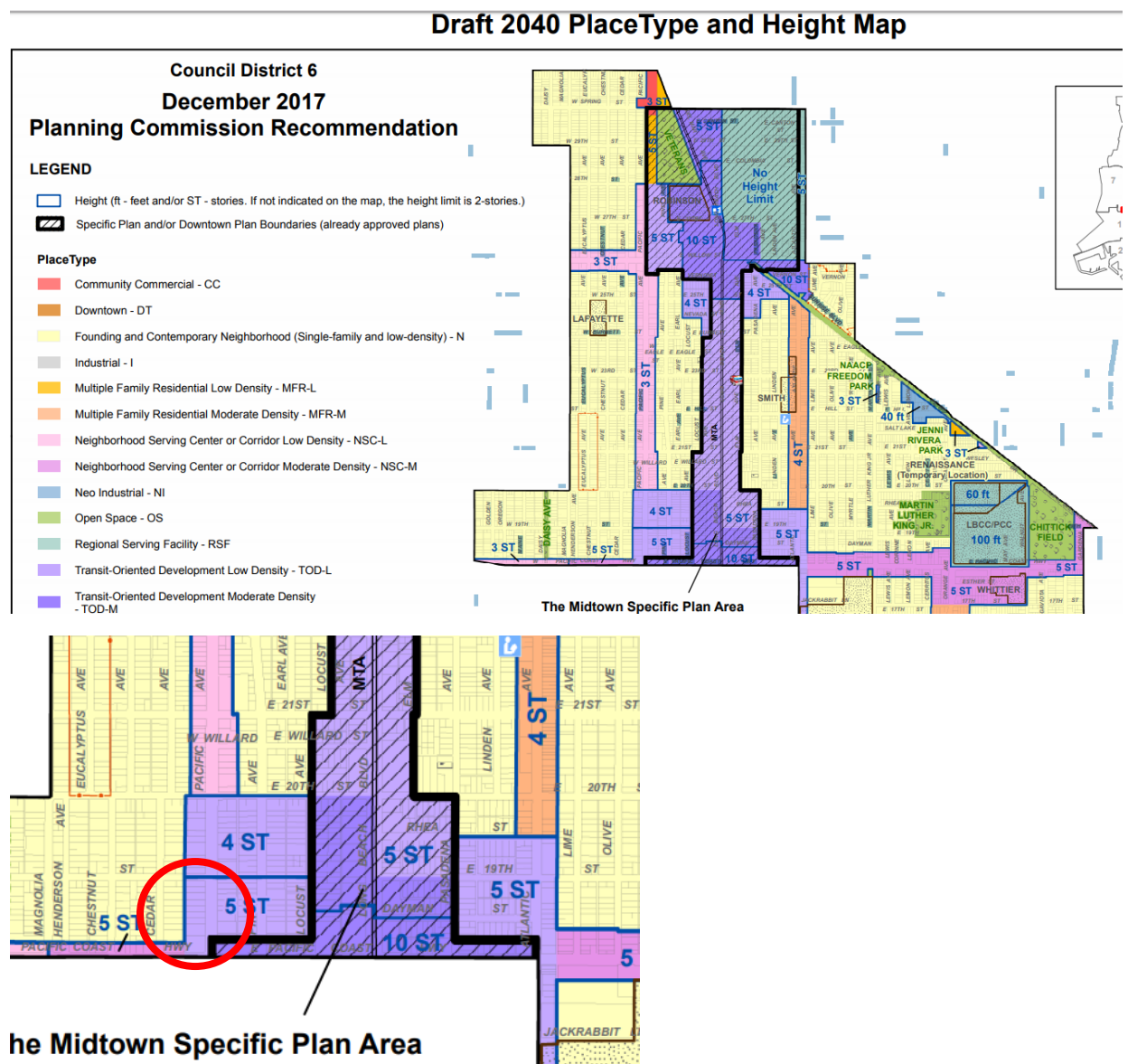
102 units with 77 parking spaces 25 new units with no parking at 1795 Long Beach Blvd

48 units with 40 parking spaces at 1836-1852 Locust Ave

Pending approval at 201 W. PCH: approximately 147 residential units with commercial at grade and 215 parking spaces. Current zoning allows 4 units.

In November of 2018 a developement application was submitted for this site. After this submissionin November the community repeatedly asked the council perosn and planning department for a community meeting which did not take place until July 2019, eight months after the project was submitted. This was after the project twice went to staff for site plan review.

Request: Change the east side of Cedar Avenue, except for the first four lots north of PCH, back to Founding and Contempoary Neighborhoods (N) as it was shown on the 2017 LUE map (below), change the height from 7 to 5 stories along the rest of Pacific Avenue on both sides of the street from PCH to 19th Street.



Comply with the height map for the Midtown plan figure 3-4 building and street wall height standards approved in 2016.

Please follow the height shown in the Midtown Plan along PCH between Locust and Pacific Avenue. This plan was approved only 3 years ago. The Long Beach Boulevard Planned Development District (PD-29) (2007) plan ended at the north/south alley west of Long Beach Blvd. and had a height limit of 50 feet. The Midtown Plan approved in 2016 changed this 50 foot height limit to 10 stories and expanded the plan boundary from Locust Avenue to Pacific Avenue (east side of Pacific Avenue only with a 5-story height limit). The Midtown Plan expanded the plan boundary by two full blocks and changed it from 2 to 5 stories. The current proposal is to extend the 10 story height from Locust Avenue to Pacific Ave (east side of the street). The 2016 Midtown Plan expanded the area (Previously PD-29) by 42 acres into the surrounding neighborhood. Now once again there is a proposed further encroachment into the neighborhood adding more density and height that is not compatible in any manner. The proposed height increase from 2 stories at PCH west of Pacific to 7 stories and 5 stories east of Pacific Avenue to 10 stories. That is an 5 story increase west of Pacific Avenue and a 5 story increase east of Pacific. Can you imagine an 8 story increase over 12 years on the east side? Residents there were upset over a 1 story increase at Palo Verde and Spring so that was reduced back down to 2 stories except for an existing 3 story building. This area now has a height taller than Long Beach Blvd outside of the metro stations. There are currently one story buildings on all four corners. So at the gateway to Wrigley there will be a ten story building on one side and 7 stories on the other side of Pacific Avenue. This encroachment is way to far into the neighborhood. The ten story height should stop at Locust Avenue as it does in the Midtown Plan, which was approved 3 years ago. The plan encroaches two more city blocks into the neighborhood. If you are familiar with Galaxy Towers in Bluff Park this will be similar to that development. A 10 story structure next to 2 story buildings is completely incompatible and will result in a huge loss of privacy for homeowners within at least a 7 to 8 block area.

Expansion of the height and density north side of street at PCH & Pacific Avenue from 2007 to present (CD #6).

2007 – 2 story

2016 - 2 and 5 story

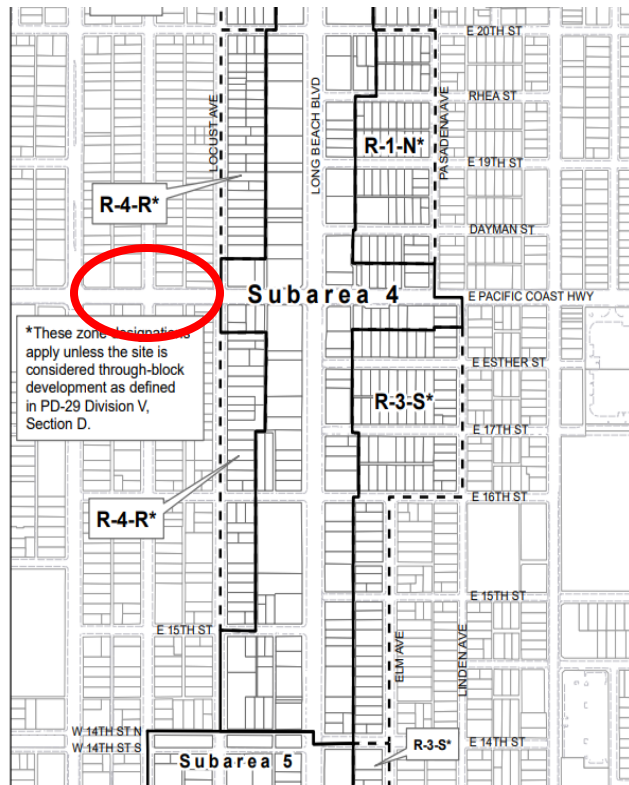
2019 – Proposed 7 and 10 stories

Developers have the support of the council person, but the residents have no one to represent their concerns. Please consider the fairness of the distribution of density.

Request: Comply with the Midtown Plan Height Map as approved in 2016 for PCH west of Locust Avenue. Maintain the 5-story height limit on PCH between Locust Avenue and Pacific Avenue as shown on Figure 3-4 page 63 of the Midtown Plan. (Shown below).

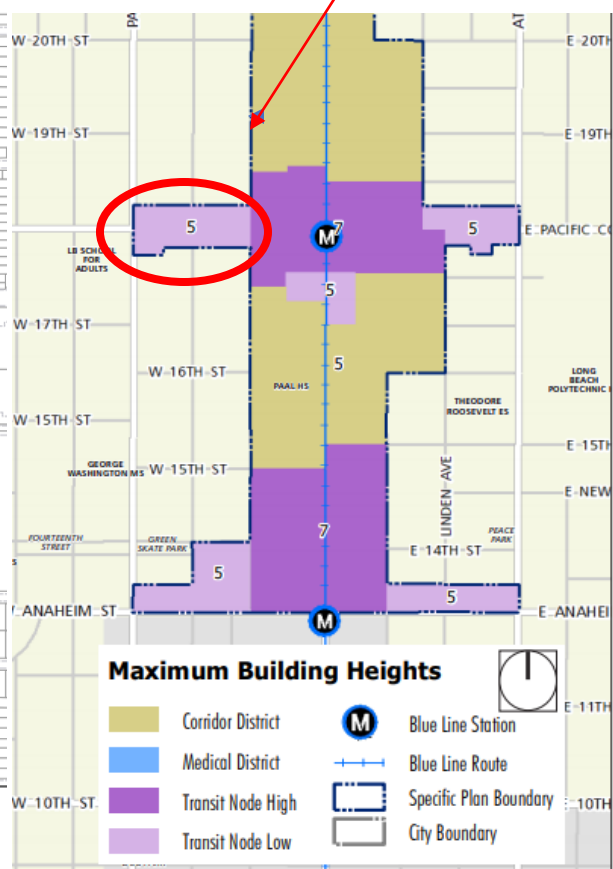
Subarea 4 has a height limit of 50 feet (2007)

Midtown Plan Maximum Building Height
Figure 3-4 (2016) **Locust Avenue**

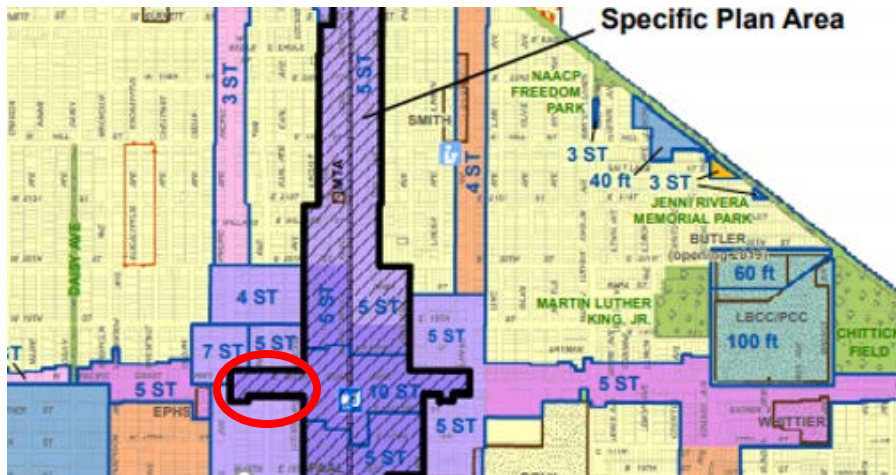


Map 4 of 5
Revised 9/27/07

Long Beach Boulevard
Planned Development District (PD-29)



MIDTOWN SPECIFIC PL



2019 Proposed LUE map

Lynette Ferenczy

Dionne Bearden

To: Alison Spindler-Ruiz
Subject: RE: LUE Comment for PC- Andy Kerr

----- Forwarded message -----

From: **Andy Kerr** <>
Date: Thu, Oct 17, 2019 at 10:11 AM
Subject: October 17 Planning Commission Meeting
To: <lbs@longbeach.gov>

Please forward to members of the Planning Commission. Thank you.

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Dear Chair Lewis and Honorable Members of the Planning Commission:

I am writing this morning in support of Item 2 on today's meeting agenda: the recommendation by staff to certify and adopt the final EIR, the updated Land Use Element, and the Urban Design Element to the citywide General Plan. As you know it has taken a lot of effort, time and persistence to arrive at this point of final approval, and I am very supportive of these efforts finally guiding the future of our great city. The adoption of these changes will shape the city we leave for our children and grandchildren and help Long Beach continue to be one of the greatest cities in the world for generations to come.

While I have learned over the years there is no "silver bullet" to solving many of the challenges and crisis we face, I believe the updates to our general plan make a significant down-payment on the direction we need to go to make Long Beach a more livable city, and one that is forward thinking in how we respond to a growing economy, job creation, and most importantly, the ability to create the housing and businesses needed to sustain all of these things we value as a community.

While there is going to be more critical work to come to become a fully sustainable city, region, and state, I firmly believe the updates before you today take a big step in the right direction to help our city leaders and planners guide our growth and maturity as the city we are and that we need to become, not that city we used to be.

As always, I thank you for your vision, your integrity and your dedication to our community and for all of your efforts representing us.

Sincerely yours,

--

Andy Kerr

akerr.ca@gmail.com

(562) 361-1349 office direct line

(323) 816-2408 cell

Proud to be serving on the LA County Measure H Citizens' Oversight Advisory Board

and the City of Long Beach Transactions & Use Tax Citizens' Advisory Commission

#EndHomelessness

<http://homeless.lacounty.gov/oversight/>

https://medium.com/@andrewkerr_27265



Los Cerritos Wetlands Land Trust
for Long Beach and Seal Beach

**PO Box 30165
Long Beach, CA 90853**

www.lcwtlandtrust.org

October 17, 2019

Christopher Koontz, AICP
Planning Bureau Manager
411 W. Ocean Blvd., 3rd Fl.
Long Beach, CA 90802

RE: Comments by LCWLT on General Plan Land Use Element

Dear Mr. Koontz,

The Los Cerritos Wetlands Land Trust (LCWLT) is pleased to submit these brief comments on the Land Use Element of the City of Long Beach General Plan, June 2019. In submitting these comments, the LCWLT commends the City for its hard work on an Element that balances many competing interests and provides the policy guidance needed to preserve and restore the City's abundant natural resources, including water, wetlands and natural areas for future generations.

Recognizing the importance of the General Plan as a guiding instrument for all future development in the City, the LCWLT submitted detailed suggestions for inclusion in the draft element in July 2017. LCWLT suggestions focused on clarifying and strengthening the Element with respect to the preservation and restoration of the City's wetlands and related watersheds. Virtually all of the LCWLT suggestions were incorporated into the Land Use Element either as verbatim additions to policies and strategies or in some other appropriate manner. Here are some of the examples of the LCWLT specific suggestions with references to policies and strategies in the Element that incorporate each suggestion:

- The benefits of protecting wetlands to advance the city's goal of resilience and co-benefits for carbon sequestration, and open space. See e.g., LU Policy 1-8, Strategy No. 2, LU Policy 20-1, LU Policy 20-8.
- Supplying the City's water supply through use of reclaimed and recharged groundwater sources. See e.g., LU-10.
- Adequate infrastructure, including transportation and alternative modes of travel, to support planned development with conversion of buffer areas adjacent to wetlands for improvements discouraged. See e.g., Policy LU-1-9.

Thank you for this opportunity to comment.

John Fries, President

Los Cerritos Wetlands Land Trust