

## Correspondence - K. Aley

From: KerrieAley <kerriealey@verizon.net>  
To: "cityclerk@longbeach.gov" <cityclerk@longbeach.gov>,  
Date: 10/15/2013 01:29 PM  
Subject: EComment: Today-Agenda Item 13-0895 Mobility Plan

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Please submit into public record. I am unable to attend the council meeting today. Thank You Kerrie Aley

Long Beach Council,

Please vote reject the ND and resolution to send to the CC. Delay vote on the Mobility Plan for the following reasons:

The city's new Mobility Plan for the next 20 years is slated for approval today by the City Council along with a Negative Declaration (in lieu of an Environmental Impact Report), and a resolution that this plan be submitted to the California Coastal Commission for approval.

The last time the city's transportation plan was updated was in 1991, but in the meantime Long Beach has sought/approved immense increases in development densities in downtown, Douglas Park, and in the coastal areas controlled by SEADIP and the Local Coastal Program (LCP).

The city states that this plan is about improving the quality of life for today's generation, as well as generations to come. The Mobility element calls for the city to establish a network of complete streets that complement the related land uses.

New policies had been added which encourage increased traffic congestion and decreased parking requirements for new development.

Increased Congestion

The city new policy is to allow future developments to increase congestion (lower level of service LOS to worse than D) by an unspecified degree in exchange for pedestrian, bicycle and/or transit improvements where "automobile travel is not empathized, or where intersection or roadway widening is not practical".

This increased congestion will be allowed even though the plan's own regional traffic growth numbers predict that 88 intersections will eventually operate at levels of E or F during peak p.m. peak hours. Included in the plan is a broad description of how the city may for instance weigh the trade-off between increased travel time/congestion and a new bicycle lane but at this time no established standards for a new development's traffic mitigation.

Managed Parking

Another stated goal of the plan is to "Manage the supply of parking." The city's new policy would be to "Consider reducing parking requirements for mixed-use developments, for developments providing shared parking or a comprehensive Transportation Demand Management (TDM) Program, or developments located near major transit hubs." The city may allow the construction of residential units with no parking

provided. Rather than parking which is provided automatically with a building space parking would be rented or sold separately. The mobility plan does not include details on what the established parking standards will be for new developments.

The city has chosen not to prepare an Environmental Impact Report (EIR) which would carefully analysis the negative impacts of increased congestion and decreased parking requirements. The city has instead prepared a "Negative Declaration" stating there will be no significant negative environment impacts.

The cities of Los Angeles, San Diego, San Jose, Fresno, Sacramento, Oakland, Bakersfield, Anaheim, Santa Ana, Riverside, Stockton, Chula Vista, Fremont, Irvine, San Bernardino, Modesto, Oxnard, Fontana, Huntington Beach, Santa Clarita, Garden Grove, Santa Rosa, Oceanside, Rancho Cucamonga, Santa Barbara, Orange, Berkeley, Pasadena, Burbank, Newport Beach and Santa Monica all determined that environment analysis and an EIR was required and have all certified their General Plan, Land Use Element & Mobility Plan with either a combined EIR or a separate Mobility EIR (Los Angeles).

Long Beach has also chosen not to complete an EIR for their Master Bike Plan or for a street closure/loss of parking for the new Armory Park. By state law a Mobility Element and General Plan Land Use element are closely linked. The Land Use identifies existing uses and planned land uses and the Mobility Element should identify the proposed transportation network and strategies which have been designed to meet the future transportation needs generated by the planned land uses.

The city claims that the Mobility Plan is being approved as consistent with the existing General Plan Land Use Element not future land use. The city is in the process of updating both SEADP and the Local Coast Program (LCP) The Mobility plan and Negative Declaration uses regional SCAG traffic projects and ignores significant projected traffic growth for both downtown and the airport area. More accurate traffic analysis is available from both the Downtown Master Plan and Douglas Park but this information is ignored.

The Negative Declaration (ND) reject the necessity of an EIR by stating that "*element does not propose to add any new rights of way, significantly widen any existing rights of way, or close any existing streets*" yet the Mobility Plan includes a list of 52 proposed Capital Improvement Projects at a cost of nearly 42 billion. CIP project includes street widening, narrowing, and closure such as construction of a grade separation at 7<sup>th</sup>/PCH and closure of Bellflower (Iron Triangle), new freeway accesses and expansion of the 710 freeway.

When questioned about the proposed CIP project Dave Roseman the City's Traffic Engineer stated that " I think Commissioner Christoffels said it best that the projects listed are not being approved for implementation . . . . They are really a wish list of projects that we would like to pursue to address current and future transportation needs if funding becomes available either through development, grants, or City funds. I know that Ira Brown is planning on making edits to the document to make it clearer that the document isn't mandating or approving projects. . . . but that those projects, if they become funded, would have to go through the normal environmental review and approval path as all projects do today. "

The state guideline for General Plan updates states that "The court decision in Concerned Citizens of Calaveras County v. Board of Supervisors (1985) 166 Cal.App.3d 90 illustrates this point. In that case, the county land use element contained proposals expected to result in increased population. The circulation element, however, failed to provide feasible remedies for the predicted traffic congestion that would follow. The county simply stated that it would lobby for funds to solve the future traffic problems" .(ref [http://opr.ca.gov/docs/General\\_Plan\\_Guidelines\\_2003.pdf](http://opr.ca.gov/docs/General_Plan_Guidelines_2003.pdf))

Today the council is being asked to approve a new Mobility Plan tied to the existing land use plan while it is in the process of updating the SEADIP and the LCP (in an area with the worst traffic and parking problems in the city). The Mobility Plan proposes increased levels of congestion and reduced parking

but does not specify exactly what will be allowed or how negative development environmental impacts will be mitigated.

The city has failed to prepare an Environmental Impact report which would better predict future traffic congestion. If the projects included in the CIP list are proposed to meet current and future mobility needs why is there no environmental analysis to show their negative impacts or benefits?

The city plans in the future to prepare individual CIP project CEQA reviews (after funding has been obtained) to justify "overriding considerations" and allow predictable significant negative environmental impacts like air quality, noise and wildlife degradation as result of the new Mobility Plan.

The council is being asked to approve a Negative Declaration that states that there will be "no significant impact" despite encouraging increased traffic congestion/parking problems, a construction project wish list that includes road closures, grade separations and new bike lanes all to encourage high density development under the guise of improving our quality of life.

As a minimum the public deserves to know exactly how the new complete street Level of Service (LOS) which includes vehicle/bicycles/pedestrian/transit and parking standards will be applied to their neighborhoods. What developer mitigation will be allowed for increased traffic congestion? The city's SEADIP/LCP update and updated citywide land use plans have not been finalized or been made available to the public. You will notice that there are no public input letters attached to the council's package on the Negative Declaration. If an EIR were to be completed for the Mobility Plan full disclosure of all public and government agencies would be included.

The Negative Declaration and Resolution for the Coastal Commission approval should be rejected.

A vote on the Mobility Plan should be delayed until the city's Land Use Element has been updated to include SEADIP/LCP changes. The new LOS traffic and parking standards correlated with updated land use plans should be provided to the public. Prior to approval of the Mobility Plan an EIR should be written that accurately predicts the environmental impacts of the new traffic/parking standards and CIP projects included in the Mobility Plan.

Regards, Kerrie Aley