



November 10, 2015

City of Long Beach  
Honorable Mayor and Members of the City Council  
333 W. Ocean Boulevard  
Long Beach, CA 90802

**Subject: Riverwalk – Rebuttal to “Urgent Advisory” Being Circulated in Connection to the Riverwalk Project**

Honorable Mayor and Members of the City Council:

Fehr & Peers completed the transportation impact assessment for the proposed Riverwalk project in Long Beach, California. The information is summarized in *The Riverwalk Transportation Impact Analysis Final Report*, dated March 26, 2015. Our role in the project was to evaluate transportation impacts associated with the project. After completion of the study, the City hired LLG Consultants to complete a neighborhood traffic impact assessment and a construction traffic impact assessment through the City’s on-call traffic engineering bench of consultants.

At the request of City Staff, the transportation impact analysis (TIA) was updated to incorporate the LLG information so that it was all in one location.

It has come to our attention that some residents of the surrounding neighborhood have circulated an “Urgent Advisory” flyer that may misrepresent construction related information that was documented by the City’s consultant. As such, please accept this letter which provides clarifying information related to construction traffic associated with the project.

1. Construction Traffic Impacts
  - A. Before Construction

The flyer represents construction activities as having the following impacts associated with the project:

- 2,300 trucks lining the streets for 2 ½ - 3 years
- No parking



However, these facts are misrepresented within the flyer and therefore the flyer is not accurate. When completing an impact assessment, particularly for evaluating construction impacts, a “worst case” assumption is applied to make sure that impacts are not underestimated. This was the case here, where the City endeavored to ensure that the possible “worst case” impacts of the Riverwalk Project were analyzed and disclosed to the public. The facts that are represented within the impact assessment (which are also included in and documented in the EIR) are summarized below:

- A **maximum** of 37 haul trucks per day are anticipated
- Another one delivery truck per day is anticipated for other miscellaneous items
- Pre-construction activities are anticipated to last a total of 80 days
- Construction parking will be completely provided for on-site

The above referenced information can be found in Chapter 8 of the TIA (Page 32-35) and Page 4.13-17 of the DEIR.

As noted above, in the TIA, and in the EIR assessment, the total 38 truck trips over 80 days (with all parking provided on-site) is representative of the maximum anticipated activities at the site; not the 2,300 trucks lining the streets over 2 ½ - 3 years (with no on-site parking).

#### B. During Construction

The flyer represents construction activities during this phase as follows:

- Thousands of more trucks bringing materials
- No parking

As noted in the TIA and the EIR, these facts are misrepresented within the flyer. The “worst case” assumptions identify the following during this phase of construction:

- A **maximum** of 24 trucks per day (some days will likely have none or very few deliveries – this represents the maximum number of trucks that could occur)
- Construction phase would last approximately 680 days
- All parking would be provided for on-site

As noted above, in the TIA, and in the EIR assessment, the maximum 24 truck trips (with all parking provided on-site) is representative of the maximum anticipated activities at the site, not the “thousands of trucks” (with no on-site parking) as noted in the flyer.



C. After Construction

The flyer represents construction activities during this phase as follows:

- 300 additional cars parked in the neighborhood
- Traffic congestion

As noted in the TIA and the EIR, these facts are also misrepresented within the flyer. The facts upon completion of the project are noted below:

- The project **exceeds** the City's parking requirements. Specifically, the City's code requires 295 on-site parking spaces; and the project is providing a total of 302 on-site parking spaces. Additionally, the home owner's association (HOA) will provide parking restrictions and enforcement related to parking at the site.
- The City's neighborhood transportation impact assessment noted that all roadways within the neighborhood will be within "acceptable" traffic volumes for neighborhood streets. As such, congestion is not anticipated to be an issue.

Although congestion is not expected in the neighborhood, the project will increase traffic volumes on neighborhood streets. As such, the developer is providing \$100,000 to the City of Long Beach so that the City can work with the neighborhood to implement a neighborhood-developed traffic calming plan to manage traffic in the neighborhood.

As noted above, in the TIA, and in the EIR assessment, the project has more than sufficient on-site parking (based on City code requirements) and the neighborhood roadways are anticipated to have sufficient capacity to handle the anticipated traffic volumes. As such, the items listed in the flyer misrepresent the information contained in the assessment completed for the project.

The Flyer also states that dust and noise impacts will occur. Although Fehr & Peers is not an expert in Air Quality or noise assessment, a review of the FEIR demonstrates that these assertions are not correct, as noted below.

2. Air Quality (Dust) Impacts

The Flyer states that implementation of the Project will create dust and noise impacts. The Flyer is incorrect and misleading in this respect.



A. All Potential Air Quality Impacts, Including Dust, Have Been Addressed Through Mitigation Measures

The Project is required to comply with rules identified by the South Coast Air Quality Management District ("SCAQMD") to reduce potential air quality impacts during construction. Those rules include the "Fugitive Dust" rule, i.e., SCAQMD Rule 403, which specifies measures to reduce fugitive dust. Among other things, Rule 403 requires that soil be regularly watered down and that grading not be conducted during high winds. (See FEIR, Pages. 4.2-10 to 4.2-11.) Compliance with Rule 403 will thus limit the amount of dust generated by the Project.

In order to evaluate potential construction-related air quality impacts, the EIR calculated the maximum daily emissions for each year of construction, and compared them to significance thresholds recommended by the SCAQMD, including thresholds associated with dust (PM10 and PM2.5). As demonstrated by EIR Table 4.2-4, that analysis showed emissions would be well under the applicable thresholds in most cases, even without any mitigation. (FEIR, Page 4.2-12.) In just three instances, all during the initial year of construction, potentially significant impacts related to NOx and PM emissions were identified. In order to mitigate those impacts to less than significant, the Draft EIR included restrictions on the use of construction equipment. With those restrictions (designated Mitigation Measure AQ-1(a)) in place, maximum daily emissions are well below all significance thresholds. (FEIR, Page 4.2-12, Table 4.2-4.)

In its comments on the Draft EIR, the SCAQMD acknowledged the proposed mitigation would reduce NOx, PM10, and PM2.5 to less than significant levels, but recommended additional mitigation measures that could be used to further reduce PM and NOx emissions. (FEIR, Pages 8-3, 8-5.) All of the additional mitigation recommended by the SCAQMD was voluntarily added as Mitigation Measure AQ-1(b), which requires, among other things, that equipment be outfitted with emissions control devices. (FEIR, pp. 4.2-13, 8-6.) Accordingly, the mitigation included in the Project to address dust and other potential air quality impacts is above and beyond that required by CEQA, and will ensure emissions are reduced to a level well below the applicable thresholds of significance.

B. The Construction of the Project Will Not Result in Significant Noise Impacts

Temporary noise impacts related to construction were thoroughly analyzed in the EIR. (See FEIR, Pages 4.10-11 to 4.10-13.) As explained, while nearby residences will experience a temporary increase in noise during construction, the impact of such noise will be less than significant.



Although the Project site is adjacent to an existing residential neighborhood, it is surrounded by a five to six-foot solid wall, which will attenuate construction noise considerably. (FEIR, Page 4.10-11.) Additionally, most construction equipment will be located near the center of the project site, away from nearby residences, which will further reduce the amount of noise at those receptors. (FEIR, Page 4.10-11.)

Most importantly, the Project will be required to comply with the Long Beach Noise Ordinance, which restricts construction to specified daytime hours. (See FEIR, Pages 4.10-4, 4.10-12.) All construction activities will be prohibited during hours when people normally sleep, minimizing impacts to surrounding residences. Accordingly, construction-related noise impacts were appropriately determined to be less than significant.

For these reasons, the flyer is incorrect and misleading in this regard.

In summary, the flyer generally misrepresents transportation activities in the study area. As such, we hope you find the information contained in this letter helpful. If you have any questions or need additional information, please do not hesitate to contact me directly at 714-941-8773.

Sincerely,

FEHR & PEERS

A handwritten signature in black ink, appearing to read 'Jason D. Pack'. The signature is fluid and cursive, with a long horizontal stroke at the end.

Jason D. Pack, P.E.  
Principal