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VIA Electronic Mail

City of Long Beach
333 W. Ocean Blvd.
Long Beach, CA 90802

Re: Agenda Item Number: 20; 3rd and Pacific; Ensemble Project; Compliance with California Environmental Quality Act ("CEQA")

Dear Honorable Mayor and City Council members:

This firm represents TAPS with respect to the City of Long Beach's ("City") consideration of the Ensemble Project ("Project") at Third Street and Pacific Avenue. Generally speaking, consists of 325 Condominium units and will be more than 19 stories. This letter is intended to inform the City that approval of the Project would violate both the California Environmental Quality Act ("CEQA") and the City's own parking regulations.

The Project

The Project consists of a mixed use residential and retail complex including 325 condominium units and 15,540 square feet of retail space totaling more than 19 stories; the retail space may also be inclusive of restaurants. The proposal fails to specify how many occupants each unit is to be expected or how many bedrooms each unit will provide; however, 3 floors will consist of 32 units, 1 floor will have 29 units, 12 floors will have 16 units and the penthouse level will have 8 units, totaling 252,093 square feet of net rentable residential area. The project seeks to provide 388 parking spaces, 120 of which will be tandem. No parking is designated for the retail space. To quote from section 7.1.2 of the design narrative, the Project intends to "...introduce hundreds of permanent residents, and daily retail visitor traffic to this district in downtown..."

Background

In 2012, the City adopted the so-called “Downtown Plan,” a specific plan that replaced the existing land use, zoning and planned development districts as the land use and design document for all future development in the Downtown area of Long Beach. The Downtown Plan was approved by the City Council and went into effect in February 2012. The Downtown Plan revised parking standards for both residential and commercial land uses, requiring one space per unit plus .25 spaces per unit for guest parking.

Non-compliance with CEQA and Parking Regulations

The Project would reduce available public parking for residents and compound the problem by creating retail/restaurant space with absolutely no parking whatsoever for the new uses. Section 7.3.5 states that the Project is “low in [...] current retail count”. However, the Project fails to provide any parking for retail; indeed, the project specifically seeks to rely on street and surface parking in the area for such purposes.

Further, the proposed Project claims that they provide 1.25 parking spaces per unit. This is factually incorrect as there are 388 proposed parking spaces with 325 units. This calculates to less than 1.2 parking spaces per unit for residential parking. This will further compound the parking dilemma faced by residents in the area, who often must drive around for long period of time looking for parking, causing traffic, air and noise pollution. The PEIR has not adequately addressed these issues.

The project fails to consider affects to traffic patterns, parking, air and water pollution as well as traffic congestion in and around the Project. Such consideration would be necessary as the Project seeks to “...introduce hundreds of permanent residents, and daily retail visitor traffic to this district in downtown...”

The Project exists in an already highly traffic congested area with restricted parking access available to the existing retail and residential units. The scale of this project in combination with existing dense commercial, retail and residential units creates a cumulative impact to local vehicular travel resulting in increased air, noise and water pollution.

Conclusion

For the reasons outlined above, TAPS opposes this project.

I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall