

## COMMENTS AND RESPONSES

The Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Holy Innocents Parish Church and School Project (proposed project) was circulated for a 30-day public review period that began on January 5, 2023, and ended on February 6, 2023. Three written comments letters were received on the IS/MND. The California Environmental Quality Act (CEQA) Guidelines Section 15074(b) requires the decision-making body of the lead agency to consider the IS/MND and comments received during the public review process. The comment letters and responses are provided in this document.

**Table 1** lists the public agency or individual that submitted written comments on the IS/MND, along with the page number on which the commenter's letter response appears. The body of the comment letter is separated into individual comments, which are numbered. This results in a tiered numbering system.

TABLE 1: LIST OF WRITTEN COMMENT LETTERS RECEIVED			
Letter No.	Agency/Individual	Date	Response Page No.
1	California Department of Transportation (Caltrans)	January 30, 2023	4
2	Department of Toxic Substances Control (DTSC)	January 20, 2023	8
3	Gabrielino Tongva Indians of California	January 6, 2023	13

# COMMENT LETTER NO. 1

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, Governor

## DEPARTMENT OF TRANSPORTATION

DISTRICT 7  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 505-5003  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life*

January 30, 2023

Cynthia de la Torre  
City of Long Beach  
411 W. Ocean Boulevard  
Long Beach, CA 90802

RE: Holy Innocents Parish Church & School  
Mitigated Negative Declaration (MND)  
SCH # 2023010063  
Vic. LA-001 /PM: 6.501  
GTS # 07-LA-2023-04146

Dear Cynthia de la Torre:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The proposed project consists of a three-phased development to expand the existing Holy Innocents Parish School to include instruction for 9th through 12th grades and the addition of church-related facilities. Each phase would be completed before the start of the subsequent phase. The three phased expansion would include a parish office, a two-story school building, a single-story gymnasium, a rectory, a convent, and a church. Project entitlements include a Vesting Tentative Parcel Map, a Long-Range Development Plan, Site Plan Review, and a Sign Program. The City of Long Beach is the Lead Agency under the California Environmental Quality Act (CEQA).

1-1

The project site is approximately a mile from State Route (SR-1). The initial Traffic and Parking Study indicates less than significant impact based on the screening criteria and further analysis is not required. The following information is included for your consideration.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, all future developments should incorporate multimodal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

1-2

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State Highways will need a Caltrans

1-3

*"Provide a safe and reliable transportation network that serves all people  
and respects the environment."*

transportation permit. Caltrans recommends that the Project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review.

1-3  
(cont.)

If you have any questions, please feel free to contact Karen Herrera, the project coordinator, at Karen.Herrera@dot.ca.gov and refer to GTS # 07-LA-2023-04146.

Sincerely,



MIYA EDMONSON  
LDR/CEQA Branch Chief

cc: State Clearinghouse

## **LETTER 1**

Miya Edmonson, LDR/CEQA Branch Chief  
State of California Department of Transportation, District 7  
100 South Main Street, MS 16  
Los Angeles, CA 90012

### **Response 1-1**

This comment includes introductory remarks and correctly describes the project proposed project. The comment does not address the contents of the IS/MND or raise any new significant environmental issues.

### **Response 1-2**

This comment acknowledges that the project site is located approximately a mile from State Route (SR-1), and that the Traffic and Parking Study concludes that impacts related to transportation would be less than significant, and no further analysis is required. The comment also provides information for the decision-makers consideration. Specifically, the comment recommends all developments incorporate multimodal and complete streets transportation elements to promote alternatives to car use and better manage existing parking assets.

This comment will be forwarded to decision makers for their consideration. While the comment does not address the contents of the IS/MND, it should be noted that the proposed project would not negatively affect the existing bus stops along Willow Street and Pacific Avenue or the sidewalks along Willow Street, Pacific Avenue, and Pine Avenue. In addition, all off-site improvements would provide a minimum of five feet clear dedicated right-of-way for pedestrian travel purposes.

### **Response 1-3**

This comment states that that transportation of construction equipment and/or materials, which requires use of oversized-transport vehicles on State Highways, will require a Caltrans permit. The comment further recommends that the construction traffic be limited to off-peak periods and that if construction traffic is expected to cause issues on any State facilities to submit a construction traffic control plan for Caltrans' review.

Pursuant to Section 8.80.202 of the Long Beach Municipal Code (LBMC), construction activities would be limited to the hours of 7:00 am to 7:00 pm during the weekdays and federal holidays and 9:00 am to 6:00 pm on Saturdays. Construction traffic is not expected to cause issues on any roadways, including State Highways.

## COMMENT LETTER NO. 2



**Yana Garcia**  
Secretary for  
Environmental Protection



### Department of Toxic Substances Control

Meredith Williams, Ph.D., Director  
5796 Corporate Avenue  
Cypress, California 90630



**Gavin Newsom**  
Governor

January 20, 2023

**SENT VIA ELECTRONIC MAIL**

Ms. Cynthia de la Torre  
Planner IV  
Planning Bureau  
City of Long Beach  
411 West Ocean Boulevard, 3rd Floor  
Long Beach, California 90806  
[cynthia.delatorre@longbeach.gov](mailto:cynthia.delatorre@longbeach.gov)

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR THE HOLY  
INNOCENTS PARISH CHURCH AND SCHOOL PROJECT (SCH #2023010063)

Dear Ms. de la Torre:

The Department of Toxic Substances Control (DTSC) has received your Initial Study/Mitigated Negative Declaration (IS/MND) for the Holy Innocents Parish Church and School Project (Project). The Project site is located at 2500 Pacific Avenue, Long Beach, California. The site is comprised of five parcels (Assessor's Parcel Numbers: 7205-005-021, -024, -025, -026, and -027) that total 2.31 acres (100,623 square feet). The Project site also contains a commercial office building that houses a doctor's office, a classroom, and a storage area for one of the parish ministries located to the northeast of the school across an existing alley.

The proposed project consists of a three-phased development to expand the existing Holy Innocents Parish School to include instruction for 9th through 12th grades and the addition of church-related facilities. Each phase would be completed before the start of the subsequent phase. The three phased expansion would include a parish office, a two-story school building, a single-story gymnasium, a rectory, a convent, and a church. Project entitlements include a Vesting Tentative Parcel Map, a Long-Range Development Plan, Site Plan Review, and a Sign Program.

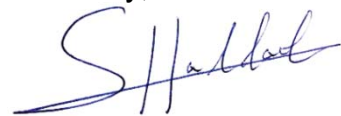
2-1

DTSC recommends the following items be addressed in the IS/MND:

- |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| 1. The ND should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment is necessary to identify any recognized environmental conditions.                                                                                                                                                                                                   | 2-2 |
| 2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.                                                                                                                                                                                                               | 2-3 |
| 3. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the IS/MND should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight. | 2-4 |
| 4. Discuss whether project may require soil excavation or filling in certain areas. If the project proposes to import soil to backfill the areas excavated, DTSC recommends sampling be conducted in accordance with DTSC's Information Advisory Clean Imported Fill Material ( <a href="https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMP_FS_Cleanfill-Schools.pdf">https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMP_FS_Cleanfill-Schools.pdf</a> ) | 2-5 |

If you have any questions regarding this letter, please contact Mr. Johnson P. Abraham, Project Manager, at (714) 484-5380 or [Johnson.Abraham@dtsc.ca.gov](mailto:Johnson.Abraham@dtsc.ca.gov) or me at (714) 484-5368 or [Shahir.Haddad@dtsc.ca.gov](mailto:Shahir.Haddad@dtsc.ca.gov).

Sincerely,



Shahir Haddad, P.E.  
Supervising Engineer  
Brownfields Restoration and School Evaluation Branch  
Site Mitigation and Restoration Program

mm/ja/sh

cc: See next page

Ms. Cynthia de la Torre

January 20, 2023

Page 3

cc: (via e-mail)

Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044  
[State.clearinghouse@opr.ca.gov](mailto:State.clearinghouse@opr.ca.gov)

Mr. Dave Kereazis  
Office of Planning & Environmental Analysis  
Department of Toxic Substances Control – Sacramento Office  
[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

Ms. Katherine Gould  
Hazardous Substances Engineer  
Site Mitigation and Restoration Program - Cypress Office  
[Katherine.Gould@dtsc.ca.gov](mailto:Katherine.Gould@dtsc.ca.gov)

Mr. Johnson Abraham  
Project Manager  
DTSC/Brownfields Restoration and School Evaluation Branch – Cypress Office  
[Johnson.Abraham@dtsc.ca.gov](mailto:Johnson.Abraham@dtsc.ca.gov)

Brownfields Restoration and School Evaluation Branch Reading File – Cypress

## **LETTER 2**

Department of Toxic Substances Control  
Shahir Haddad, Supervising Engineer  
5796 Corporate Avenue  
Cypress, CA 90630

### **Response 2-1**

This comment includes introductory remarks and correctly describes the project proposed, its location and the existing structures on-site. The comment does not address the contents of the IS/MND or raise any new significant environmental issues.

### **Response 2-2**

This comment recommends that the IS/MND identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. The comment further implies that a Phase I Environmental Site Assessment (ESA) is necessary to identify recognized environmental conditions. As discussed in the IS/MND, a Phase I ESA was prepared for the project site. According to the Phase I ESA, no hazardous substances were observed, and no evidence of aboveground storage tanks (ASTs) or underground storage tanks (USTs) were observed during the site reconnaissance. A monitoring well associated with an adjacent ARCO station release was noted in the northwest parking lot. However, based on the recent groundwater monitoring reports, fuel impacted groundwater caused by the release at the ARCO station is no longer present beneath the project site and does not represent a recognized environmental condition. Assuming that this well is no longer needed for monitoring at ARCO, the Phase I recommends the abandonment of this monitoring well prior to new construction activities. Therefore, Mitigation Measure **HAZ-1** included in the IS/MND calls for the abandonment of this well prior to demolition or renovation activities. Also, to reduce the potential for impacts associated with the demolition and renovation of the existing buildings, Mitigation Measures **HAZ-2** and **HAZ-3** are included for handling Asbestos-Containing Materials (ACM) and Lead-Containing Materials (LCM).

### **Response 2-3**

This comment states that if there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction. As noted in the IS/MND and Response 2-2 above, mitigation measures have been included in the IS/MND to address recognized environmental conditions.

### **Response 2-4**

This comment states that if during construction activities, soil and/or groundwater contamination is suspected, construction activities in the area should cease and appropriate health and safety procedures should be implemented. As noted in the IS/MND and Response 2-2 above, contaminated soil and/or groundwater is not expected to be encountered. Nonetheless, if encountered, the appropriate government agency to provide regulatory oversight would be notified.

**Response 2-5**

This comment recommends the IS/MND discuss whether project would require soil excavation or filling in certain areas. The comment further states that if the project proposes to import soil to backfill the areas excavated, DTSC recommends sampling be conducted in accordance with DTSC's Information Advisory Clean Imported Fill Material. As discussed in the IS/MND, construction activities will include grading; however, soil will not be exported or import to the project site.

## COMMENT LETTER NO. 3



---

**From:** Cynthia de la Torre  
**Sent:** Monday, January 9, 2023 7:25 AM  
**To:** Christina Marsden Conley <[christina.marsden@alumni.usc.edu](mailto:christina.marsden@alumni.usc.edu)>  
**Cc:** Robert Dorame <[gtongva@gmail.com](mailto:gtongva@gmail.com)>; Amy Harbin <[Amy.Harbin@longbeach.gov](mailto:Amy.Harbin@longbeach.gov)>  
**Subject:** RE: 2500 Pacific Avenue Holy Innocents Project - Initial Study Mitigated Negative Declaration (ISMND)

Hi Christina,

Hope you are well and safe. To clarify: we had received the attached letter from the Gabrieleno Tongva Indians of California when we first mailed the AB52 letters for this project that indicated you withdrew from consultation. However, you may still comment on the IS/MND through the usual public comment process, which we are now in.

Thanks,

**Cynthia de la Torre**  
*Planner IV*  
Pronouns: She, Her, Hers, Ella

**Long Beach Development Services | Planning Bureau**  
411 W. Ocean Blvd., 3<sup>rd</sup> Fl. | Long Beach, CA 90802  
Office: 562-570-6559



---

**From:** Christina Marsden Conley <[christina.marsden@alumni.usc.edu](mailto:christina.marsden@alumni.usc.edu)>  
**Sent:** Friday, January 6, 2023 1:32 PM  
**To:** Cynthia de la Torre <[Cynthia.DeLaTorre@longbeach.gov](mailto:Cynthia.DeLaTorre@longbeach.gov)>  
**Cc:** Robert Dorame <[gtongva@gmail.com](mailto:gtongva@gmail.com)>  
**Subject:** Re: 2500 Pacific Avenue Holy Innocents Project - Initial Study Mitigated Negative Declaration (ISMND)

**-EXTERNAL-**

Good afternoon,  
We are in receipt of your project and are concerned with the ground disturbances which will occur on the APE as the project is on our village site.

3-1

The Gabrielino Tongva Indians of California will need to provide Native American monitoring for all ground disturbances.

Please keep us informed on the progress.

Take care,  
Christina

**tehoovet taamet**

CHRISTINA CONLEY

- Native American Monitor - Caretaker of our Ancestral Land and Water
- Cultural Resource Administrator Under Tribal Chair, Robert Dorame (Most Likely Descendant) of Pimugna (Catalina Island)
- Native American Heritage Commission Contact
- Fully qualified as a California State Recognized Native American Tribe fulfilling SB18, AB52 Compliance Regulations
- HAZWOPER Certified
- 626.407.8761

3-1  
(cont.)

**GABRIELINO TONGVA INDIANS OF CALIFORNIA**

*The Gabrielino Tongva Indians of California are recognized in the State of California Bill AJR96 as the aboriginal tribe to encompass the entire Los Angeles Basin area and the Channel Islands of Santa Catalina, San Nicholas and San Clemente*



NAHC recognizes GTIOC Tribal Territory

On Jan 5, 2023, at 8:02 AM, Cynthia de la Torre <[Cynthia.DeLaTorre@longbeach.gov](mailto:Cynthia.DeLaTorre@longbeach.gov)> wrote:

Hello,

Hope you had a nice New Year's holiday. Please see the City's Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration for the Holy Innocents Parish Church and School project attached. As indicated in the Notice, the Initial Study, the proposed Mitigated Negative Declaration, and supporting materials are available for review on the City's environmental reports webpage: [Environmental Reports \(longbeach.gov\)](http://longbeach.gov/EnvironmentalReports). The public review period is from January 5, 2023 to February 3, 2023.

Pursuant to CEQA Guidelines Section 15087, responsible and trustee agencies and other interested parties, including members of the public, must submit any comments in response to this notice no later than February 3, 2023 at 4:30pm. The City will accept written comments only during the aforementioned public review period. Comments must be submitted via letter or email to the contact below. Comments made via other means, including social media, or delivered to other recipients, will not be accepted or considered. Please indicate a contact person for your agency or organization and send your written

comments to Cynthia de la Torre, Planner, Development Services Department, of the City of Long Beach at the below address, or by e-mail at: [LBDS-EIR-Comments@longbeach.gov](mailto:LBDS-EIR-Comments@longbeach.gov)

City of Long Beach, Department of Development Services, Planning Bureau  
ATTN: Cynthia de la Torre, Holy Innocents MND Comments  
411 W. Ocean Blvd., 3rd Floor  
Long Beach, CA 90802

Please let me know if you have any questions,

**Cynthia de la Torre**

*Planner IV*

Pronouns: She, Her, Hers, Ella

**Long Beach Development Services | Planning Bureau**

411 W. Ocean Blvd., 3<sup>rd</sup> Fl. | Long Beach, CA 90802

Office: 562-570-6559

<image001.png>

<image002.png> <image003.png> <image004.png>

<NOI.pdf>

## Cynthia de la Torre

---

**From:** Cynthia de la Torre  
**Sent:** Monday, March 14, 2022 7:09 AM  
**To:** CHRISTINA CONLEY-HADDOCK  
**Cc:** Amy Harbin; Robert Dorame  
**Subject:** RE: NAM: 2500 Pacific Avenue Holy Innocents Expansion Project

Thank you, Christina for the update.

Best,

**Cynthia de la Torre**  
Planner IV  
Pronouns: She, Her, Hers, Ella

**Long Beach Development Services | Planning Bureau**  
411 W. Ocean Blvd., 3<sup>rd</sup> Fl. | Long Beach, CA 90802  
Office: 562-570-6559



---

**From:** CHRISTINA CONLEY-HADDOCK <christina.marsden@alumni.usc.edu>  
**Sent:** Monday, March 14, 2022 6:20 AM  
**To:** Cynthia de la Torre <Cynthia.DeLaTorre@longbeach.gov>  
**Cc:** Amy Harbin <Amy.Harbin@longbeach.gov>; Robert Dorame <gtongva@gmail.com>  
**Subject:** Re: NAM: 2500 Pacific Avenue Holy Innocents Expansion Project

3-2

**-EXTERNAL-**

Good morning Cynthia,  
After reconvening in discussion of 2500 Pacific Avenue and cultural resources, we will withdraw our concerns on the project.

Take care,  
Christina

Christina Conley  
626.407.8761  
Native American Cultural Resource Monitor  
Gabrielino Tongva Indians of California

\*\*\*\*I am presently on a field site, please excuse any typos.\*\*\*\*

### **LETTER 3**

Christina Conley, Native American Cultural Resource Monitor  
Gabrielino Tongva Indians of California

#### **Response 3-1**

This email comment states that the Gabrielino Tongva Indians of California will need to provide Native American monitoring for all ground disturbances. As indicated in the response to this email comment, the commenter was reminded that the Gabrielino Tongva Indians of California had withdrawn their concerns about the proposed project during the Native American Consultation process conducted in compliance with Assembly Bill 52 (AB 52). No further response correspondence was received from the Gabrielino Tongva Indians of California.

Mitigation Measure **TCR-1** included in the IS/MND requires a Native American Monitor from, or approved, by the Gabrieleño Band of Mission Indians – Kizh Nation to be retained prior to the commencement of any ground-disturbing activity. This mitigation measure was the result of the AB 52 Native American Consultation process.

#### **Response 3-2**

This is the email comment stating that the Gabrieleno Tongva Indians of California are withdrawing their concerns regarding the proposed project that is mentioned in Response 3-1 above. This email comment was received on March 14, 2022 during the AB 52 Native American Consultation process.