7-10-07 C/H 1

July 7, 2007

Larry G. Herrerra- City Clerk
City Of Long Beach
333 West Ocean Blvd.
Long Beach, CA 90802

Dear Sir:

I am an appellant on the Seaport Marina development which is currently scheduled for July 10 (07-0518 , 07-0520, 07-0562). After a 60 day delay it is my understanding that this hearing may be again rescheduled. Pertaining to this appeal, I am submitting the attached document The Long Beach East-West Traffic Conundrum into record.

Sincerely,

KA

Kerrie Aley
(562)212-0461

The Long Beach East-West Traffic Conundrum

1. A history of Long Beach's East-West Traffic Problems

2. Traffic Impact- Why the Seaport Marina Project should not be approved.

Seaport Marina Development Appellant -May 15 2007
Kerrie Aley

LONG BEACH

A Tradition of Public Participation

The LB Planning Commission is asking the Council to approve deviations from the SEADIP and Local Coastal Plan without adequate public participation in the decision making process and also without adequate traffic analysis or mitigation.

The City has repeatedly failed to comply with the California Public Records Act.

Many Long Beach residents feel that the City has left them out of the decision making process for Downtown Development, the Seaport Marina project, Home Depot, and the 2007 SEADIP revision. Now the SEADIP plan is being hurriedly revised behind closed doors. The 2007 SEADIP committee members were selected by the Councilman with many community groups and property stakeholders left out of the process. Public discussions at open SEADIP meetings have been kept short and individual input limited to a few comments. Committee proposals are made without traceable feedback to community concerns.

The original SEADIP and the LCP plans were carefully crafted documents, considered in a democratic manner, with citizen participation. The SEADIP plan has well served the City of LB for over 30 years.

<u>Why has this democratic process been circumvented?</u>

"This Local Coastal Program was developed largely through the energetic and selfless efforts of a group of citizens representing many organizations concerned about the future of coastal resources (their work is detailed in a later chapter). The result represents one of the most remarkable examples of citizen participation in planning in California."

Long Beach Coastal Plan 1980

1975 CITIZEN PARTICIPATION SEADIP/LCP

The participation of citizen groups in the Long Beach Local Coastal Program was vital to its development. At the inception of the program, it was agreed that a process similar to that which was used to create the SEADIP plan should be utilized for the LCP. From June 1976 to March 1977, the Citizens' SEADIP Review Committee, composed of citizens, land owners, and developers met some 30 times to work out the details of what was to become the SEADIP Specific Plan and Planned Development Ordinance. The results of this experiment in citizen participation were so encouraging that in May 1977 the City Planning Commission nominated 29 organizations throughout the City to serve on the LCP Advisory Committee. Each group appointed one member and one alternate to serve. Several of the groups had also been represented on the SEADIP Review Committee.

The status of the Committee was as an advisor to the City Planning Commission. Its charge was to make policy recommendations which would address the concerns of the Coastal Act. These policies were to be molded into the LCP format, primarily by staff, and the Program was brought before the Planning Commission for decisions. In cases where staff and Committee opinions might not coincide, both views were to be brought to the Commission for resolution, although every effort has been made to compromise differences between the citizens and the professional staff before the hearings began.

At its second meeting, the Committee adopted several rules of procedure which were to prove effective in holding the group together and in preventing vocal minorities from unduly influencing voting. The most important of these was the 2/3 rule. For a motion to pass, at least 2/3 of those groups present must vote affirmatively. (Although many groups often sent both the member and the alternate, each group was allowed only one vote.) This rule was carried over from the SEADIP Committee where it had proven effective.

The second rule of procedure was that no group could vote on a motion unless it had been represented in at least one of the three immediately preceding meetings. This helped to remove the problem of sporadic attendance and alleviated some fears that many groups would not attend until the final sessions where long work of the Committee might be overturned by those who had rarely participated. The third rule was that a minority of at least 20% of those voting may present a minority report for the record. Finally, on the subject of calling for reconsideration of motions which had been passed previously, this rule was adopted: that anyone may move for reconsideration whether his or her group had voted affirmatively or negatively on the original motion; that a majority of those present must then vote to reconsider; that a 2/3 vote of a quorum of ten groups is necessary to change the previously adopted policy. (This rule was adopted in 1979.) The purpose of this procedure was to allow a more democratic reconsideration process while discouraging its use as a delaying or destructive tactic. Upon the completion and certification of the Work Program, the method utilized by the Committee for generating, debating and approving policies evolved after experimentation with various approaches. Sub-committees were appointed to investigate specific areas of concern. The majority of the program was managed by two sub-committees: Land Use, and Beach Studies.

Generally, the approach used by these subcommittees entailed the following steps:

1. A preliminary meeting was held to identify broad concerns.

2. A walking tour was arranged during which members recorded their observations in notes and on film.

3. A second meeting produced a set of preliminary policies and questions to be discussed at a public meeting.

4. A "town hall" meeting was conducted by the Committee. These were advertised locally and drew from the general public. Questionnaires were distributed to elicit written comments on some issues.

5. A third meeting of the sub-committee produced a final set of policy recommendations to be presented to the full committee. Often, several meetings were needed to achieve this result.

6. Finally, the full committee received, debated, and acted upon the sub-committee recommendations. These actions often required several meetings. A number of other sub-committees also contributed to this process, especially earlier in the program. They were formed to study the following issues: downtown shoreline, hotels, parks, Ocean Boulevard, marinas, and parking.

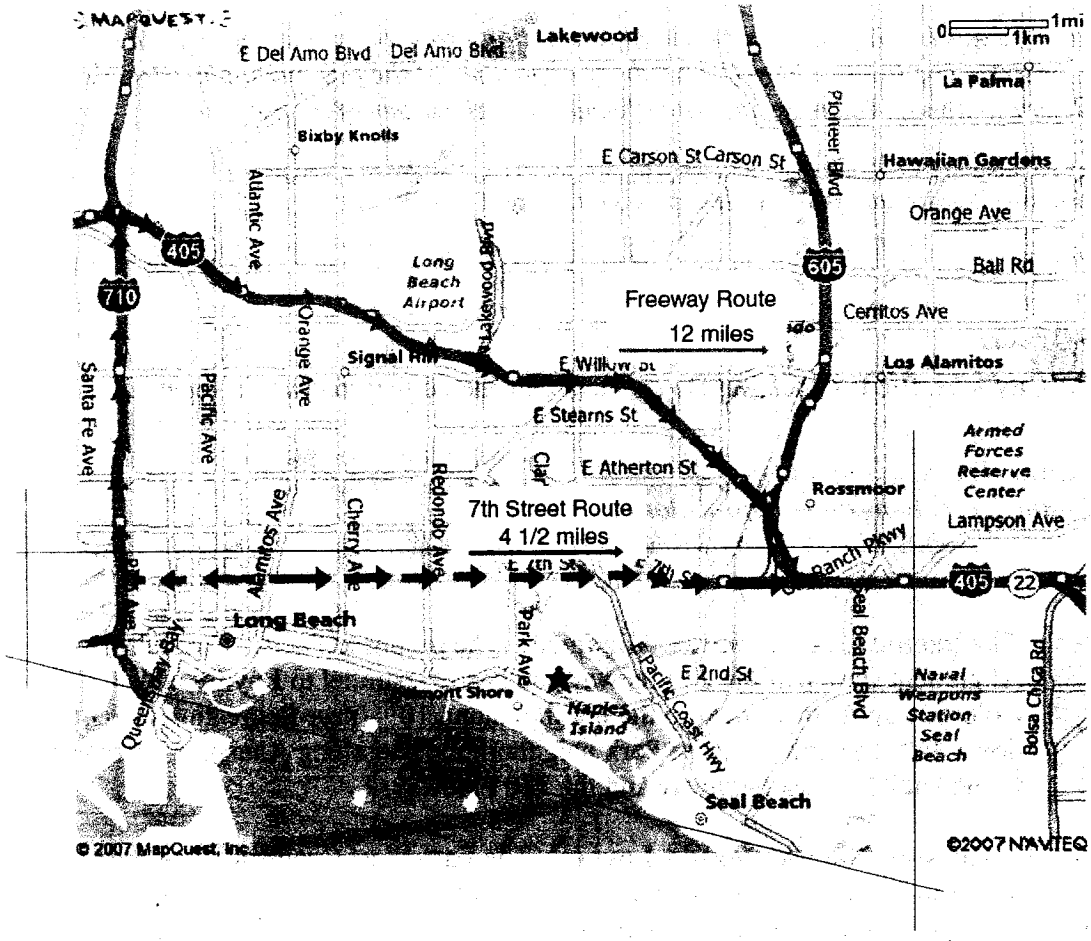
Mr. William Davidson was elected Chairman at the first LCP Committee meeting and has served throughout the program in that capacity. Mrs. Jan Hall was elected Vice Chairman. Upon her subsequent election as Councilwoman for the Third District, Mr. Ron Case was elected Vice Chairman.

Committee are listed below:

Alamitos Bay Beach Preservation Group
Alamitos Heights Improvement Association
Beach Area Concerned Citizens
Belmont Heights/Belmont Park United Citizens
Belmont Shore Business Association
Bixby Ranch Company
College Park Estates Homeowners Associates
Committee on Responsible Development
Downtown Long Beach Associates
Downtown Project Area Committee (PAC)
Homeowners Downtown Associates
League of Women Voters
Long Beach Area Board of Realtors
Long Beach Area Citizens Involved
Long Beach Area Chamber of Commerce
Naples Improvement Association
Sierra Club
Wrigley Business and Professional Association

A complete list of all of the representatives ca be found in the Appendix of the LCP.

1. A history of Long Beach's East-West Traffic Problems



Access to Coastal Long Beach

Traffic in coastal Long Beach is constrained by the Port of Long Beach, the Pacific Ocean, the Seal Beach Naval Weapons Station, and California State University Long Beach. Despite the high density of buildings in coastal Long Beach, few non-residential roads exist to funnel traffic out of the City. Surface streets such as 7th Street, Ocean Blvd., 2nd Street, Broadway, and 4th Street provide the most direct route from downtown (by 7 ½ miles) to the 22/405/605 freeways and Orange County.

In the 1960's many roadways in Long Beach reached their design capacities.

> ***"By 1962, traffic volumes had reached the possible capacity at numerous intersections on the major east-west arterials of Long Beach."***
>
> ***"Areas currently experiencing the most serious congestion problems are found near the westerly and easterly city limits where the roadway capacities of the few available arterials are not sufficient to handle the morning and afternoon peak surges of traffic."***
>
> A Study of Possible Traffic Control and Roadway Improvements on East-West Arterials
> 1963 Engineering Department Traffic Engineering Division City of Long Beach

In the 1970's The City's Traffic Engineering Department considered two roadway changes:

> ***The Pacific Coast Freeway Alignment***
> ***East-West Connector (Livingston-Nieto-Colorado-Loynes)***
> *Pacific Coast Freeway Study City of Long Beach 1971*

The Pacific Coast Freeway Alignment -The proposed Pacific Coast Freeway Alignment started at the 22 Freeway and headed parallel to Loynes and Colorado up Appian (next to the marina) along 10th (near Recreation Park), down 10th through the Rose Park neighborhood and along Anaheim westward to the Pacific Coast Highway and the 710 Freeway.

East-West Connector (Livingston-Nieto-Colorado-Loynes)- The East-West Connector directed traffic off of 2nd Street onto residential streets from Livingston to Nieto to Colorado to Loynes to the 405/22/605 freeway. The proposed traffic flow on Colorado (residential street) would have exceeded the peak hour traffic on 2nd street in Belmont Shore.

Both proposals were met with disapproval from Long Beach residents and the roadways were never built.

In the1980's both the South-East Area Plan (SEADIP) and the Local Coastal Plan (LCP) recommended limited development density because of traffic congestion on East-West arterials and the resulting increased traffic volume and speeding on nearby residential streets.

"Besides constraints imposed by the natural environment, there are a number of planning constraints which also must be addressed. Traffic considerations are prime among these. The highway-access advantages cited above also have the distinct disadvantages of forcing large volumes of traffic through the area, primarily between Orange County residential commuters and Long Beach employment and educational centers.
Traffic congestion thus imposes a constraint on development density."
South-East Area Development And Improvement Plan (SEADIP) 1977

*"A primary objective is the **prevention of traffic intrusion into residential neighborhoods** and the elimination of east/west corridors, while improving access to the downtown area and the coastline."*

"Increased auto circulation in the coastal zone is discouraged by this program because (1) it would not provide increased access to coastal resources; (2) it would have an adverse impact on the fragile coastal neighborhoods; and (3) there is little unused capacity available in the street system."

Local Coastal Program (LCP)
Adopted by the Long Beach Planning Commission-December 20, 1979
Adopted by the Long Beach City Council-February 12, 1980
Certified by the California Coastal Commission-July 22, 1980

In the 1990's the City approved an updated Transportation Plan which included the following policies-

*"Policy 1- **Keep through traffic out of neighborhoods** by creating incentives for directing such traffic onto regional corridors and major arterial streets, and disincentives for use of local and collector streets.*
Policy 2- Make major capital improvements to the preferred routes. State routes should be given first priority for carrying increasing traffic. Specifically, Pacific Coast highway and the 405 Freeway should be emphasized over Ocean Blvd., 7th and Anaheim Streets for carrying East-West traffic.

Transportation Element City of Long Beach 1991

Major proposed improvements included grade separation at the PCH Traffic Circle and also at Ocean and Alamitos.

In 1995 The Neighborhood Traffic and Parking Mitigation Program was initiated by Mayor O'Neil and the City Council in response to public comments on the Transportation Element of the City of Long Beach General Plan.

The City developed a Neighborhood Traffic and Parking Mitigation Program for the Belmont Heights Neighborhoods. The City commissioned a traffic study to identify street design, speeding, and volume problems on Belmont Heights residential streets. 9,300 written surveys were sent out to Belmont Heights households and 56% of the respondents answered that there were serious traffic problems on their street. Common complaints were high speeds, volume, traffic noise, reckless drivers, and cross-town cut-through traffic.

The Traffic Consultant recommended numerous roadway improvements such as speed humps and four way stop signs. Some of the traffic calming measures planned were:

Speed Humps-

- *3rd Street between Prospect & Quincy Avenue, and Saint Joseph and Argonne (Not Installed)*
- *Colorado Street between Prospect and Roycroft Avenue (Not Installed)*
- *3rd Street between Euclid and Grand Avenues, and Bennett and Ximeno Avenues (Not Installed)*
- *3rd Street between Belmont and Rosswell Avenues (Not Installed)*
- *Park Avenue between 5th and 6th Streets (Not Installed)*
- *Termino Avenue between 5th & 6h Streets (Not Installed)*

Four-way Stop Signs-

- *A. Termino Avenue at Vista Street (Installed)*
- *B. Grand at 6th (Installed ?)*
- *C. Ximeno Avenue at Vista Street (Not Installed)*
- *D. 3rd Street at Roswell Avenue (Installed)*

Neighborhood Traffic & Parking Mitigation Program for the Belmont Heights Neighborhood
City of LB Planning & Engineering Departments 1996

In 1995 the Mayor launched the Long Beach Traffic Safety Initiative.

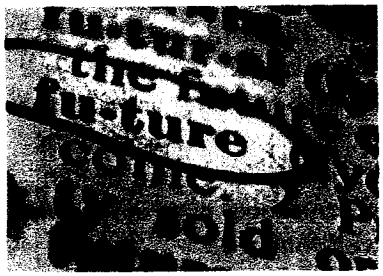
"*Long Beach's traffic safety initiative is reflective of our ongoing efforts to streamline internal processes, improve efficiencies and productivity and, most importantly, respond to the needs of our community.*" Mayor O'Neill

At that time the City's Traffic Engineering Department was handling increasing resident complaints about traffic problems with a staff level of 30-50% of comparable departments in other cities. To handle the work load the Transportation Planning Staff was combined with Traffic Engineering.

As of result of the reorganization of the Traffic Department and the City's real estate downturn in the 1990's, the City's Traffic Model was not kept up to date.

Most residential traffic calming projects were abandoned.

In 2007 The City's Traffic Engineering Department is still understaffed by more than 50%. The City has not fulfilled the roadway improvement goals of the 1991 Transportation Plan, the traffic calming plans from the late 90's were not completed, and as a result speeding and congestion on residential streets has worsened.



The number of accidents on many older residential streets is three to four times the expected statewide accident rate. Vehicle speeds on numerous residential streets exceed nearby arterial roads. The traffic volumes on residential streets such as Cherry, Junipero, Ximeno, and Park Avenue are 60% above the maximum design capacity standard used by other urban cities.

Despite the obvious public safety problems on Long Beach's residential streets, the City has no traffic calming program or allocated budget to solve these problems.

In recent years Long Beach has approved or is in the process of finalizing approval of projects in Downtown, at the Douglas Aircraft site, and in the South-East Area (SEADIP) that greatly increase the density of this congested coastal area.

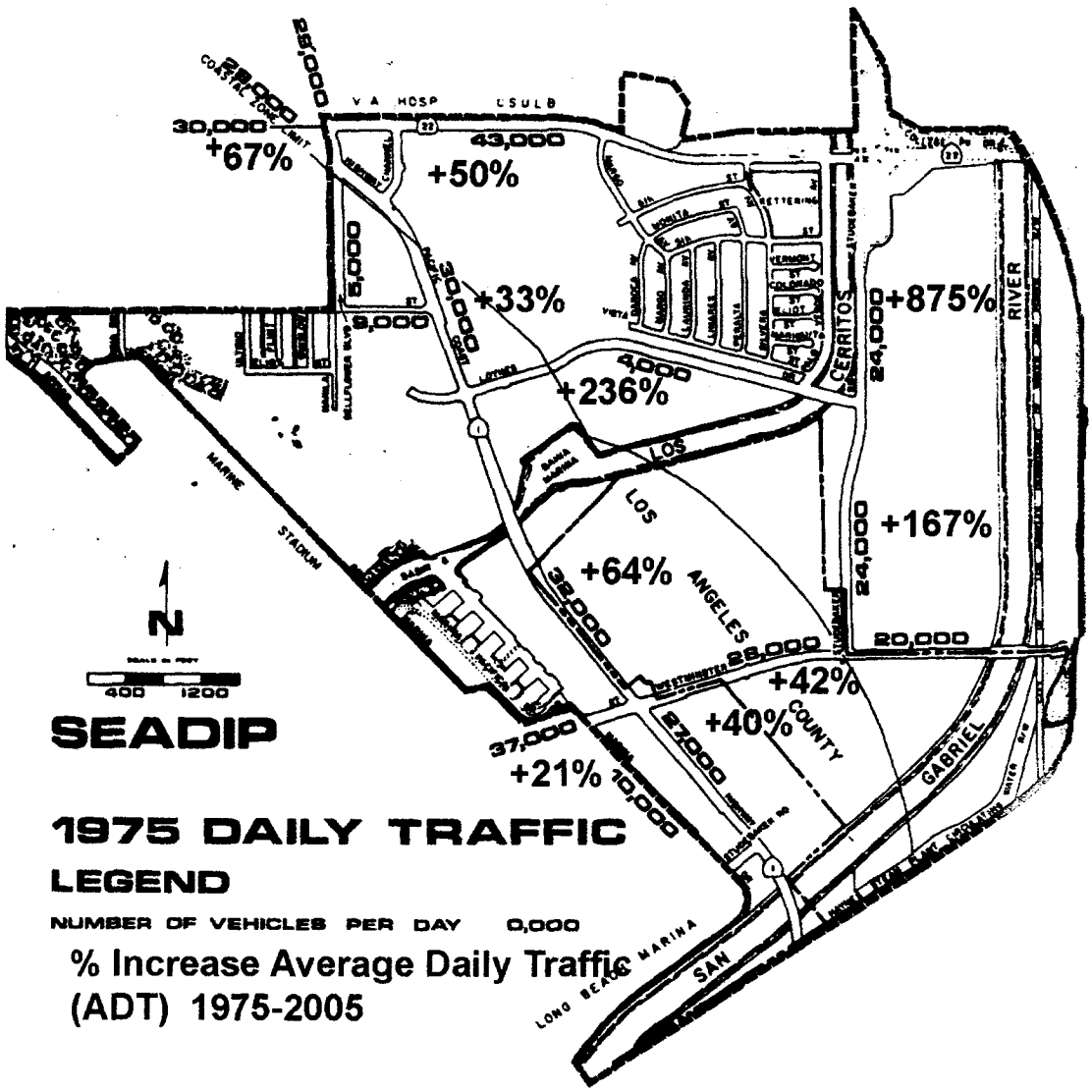
These new developments are concentrated at either end of the Long Beach East-West arterial roadway network. Long Beach traffic volumes exceeded the design of most East-West arterial roads decades ago and the congestion continues to increase.

The City does not have a comprehensive transportation plan which can show that Long Beach's existing roadway network can accommodate near term and future traffic demand without having a devastating impact on neighborhood traffic safety and quality of life for the residents.

2. Why the Seaport Marina Project should not be approved.

Traffic! The Seaport Marina project approval requires amendments to Long Beach's Local Coast Program (LCP), the General Plan, and South-East Area Development Improvement Plan (SEADIP). The project proposes to replace a small hotel with 425 residential condominiums and 170,000 square feet of retail space. As stated earlier in this document, both the SEADIP and LCP plans recommended limited development density because of traffic congestion on East-West arterials and the resulting increased traffic volume and speeding on nearby residential streets.

Has traffic congestion in the SEADIP area improved so much over the last 30 years that high density development can now be accommodated? The Average Daily Traffic on roads in the SEADIP area has grown 40% over the last 30 years. The traffic volume increases on major arterials are shown below on the original 1975 SEADIP map with 2005 traffic volume increases shown overlaid in red. Roads which were determined by the City's Traffic Engineering Department to be at their design capacity in 1963 have become **severely congested in 2007.** Resident's concerns about congestion, pollution, noise, traffic safety and a decline in the area's quality of life are well founded.



Peak Volumes See Table Below For Traffic Volume Sources

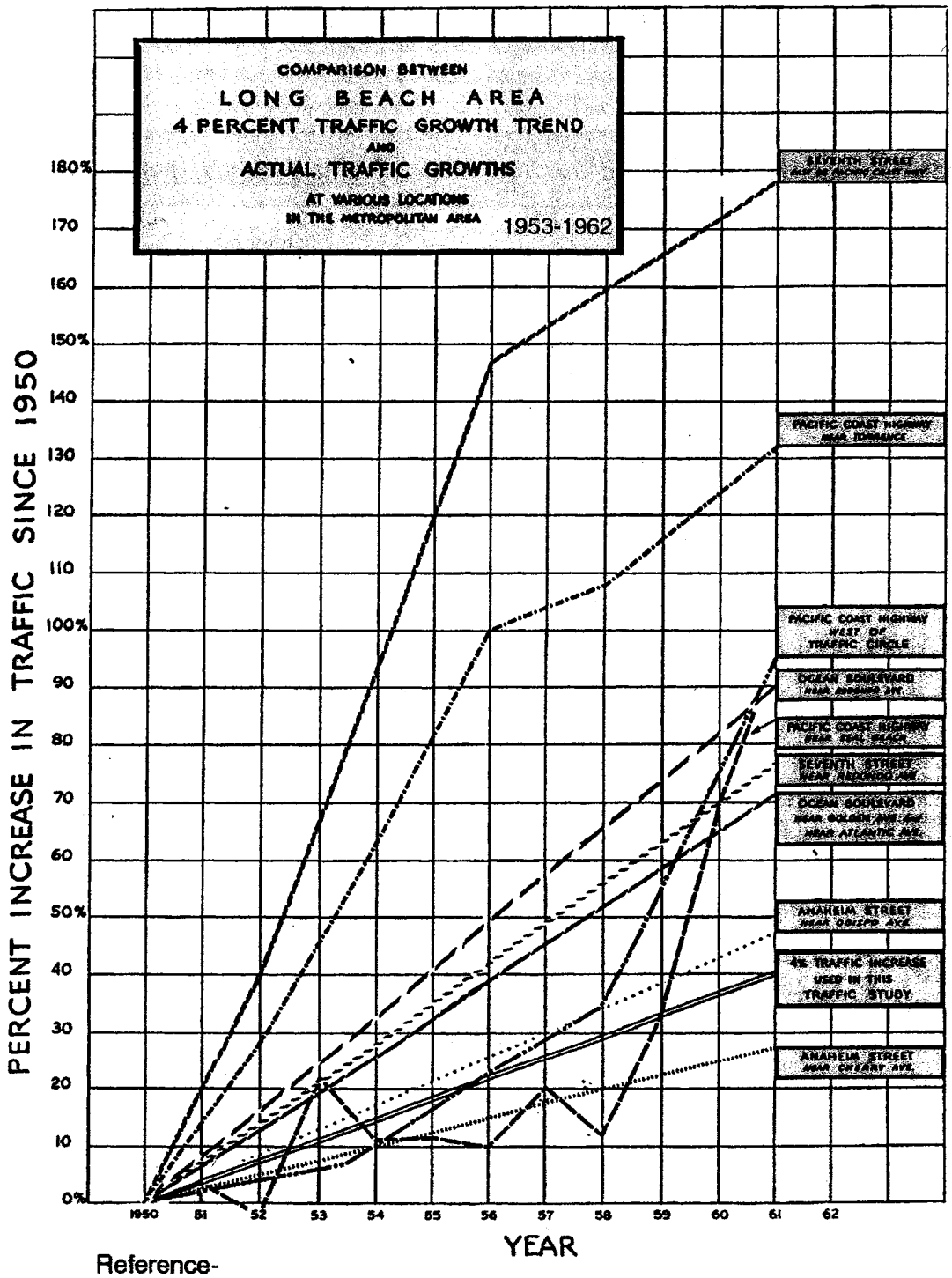
Cumulative City Growth

The Seaport Marina EIR traffic analysis uses a constant 1% growth factor for all study intersections. Over the last 30 years the Average Daily Traffic on the SEADIP roads has grown at +1.33% per year. The City has stated that the 1% growth factor is intended to represent a conservative cumulative growth estimate from future or planned developments near the project site. Below are the average daily traffic volumes between 1975 and 2005 for 7th street, Bellflower, PCH, 2nd Street, Westminster, Marina Drive, Loynes, and Studebaker Road. The table below shows that a single 1% growth factor is neither conservative nor accurate.

Long Beach Area Daily Traffic (ADT)					Traffic Yearly % Increases	
Area-SEADIP	**1975**	**1997**	**2001**	**2005**	ADT %Change per year 1975-2005 (30yrs)	**ADT** %Change Per year 1997-2005 (8 yrs)
7th West of PCH	30,000[1]		47,800[3]	50,000[4]	**+2.2%**	**+1.2%**
7th East of PCH	40,000[1]		57,800[3],59,620[6]	60,000[4]	**+1.6%**	**0**
Bellflower North of 7th	29,000[1]	20,000[5]	23,300[3]	25,000[4]	**-0.1%**	**+3%**
Bellflower South of 7th	5,000[1]	5,204[5]			**0**	**NA**
PCH North of Loynes	30,000[1]	30,612[5]	40,600[3]	40,000[4]	**+1.1%**	**+3.8%**
PCH North of 2nd	32,000[1]	44,518[5]		45,000[5]	**+1.4%**	**0%**
PCH South of 2nd	27,000[1]	37,820 Tues[2] 44,564 Fri[2] 39,321 Sat[2] 34,581 Sun[2] Average 39,071	44,500[3]	41,000[5]	**+2.5%**	**+4.4%**
2nd West of PCH	37,000[1]	39,250[2] 45,874[5] 41,385[5]	40,100[3]	45,000[4]	**+0.7%**	**+1.7%-+2.4%**
2nd East of PCH (Westminister)	28,000[1]	33,350[2]	29,800[3]	40,000[4]	**+1.4%**	**+8.6%-+2.5%**
2nd East of Studebaker	20,000[1]		19,700[3]		**0**	**0**
Marina South of 2nd	10,000[1]	9,000[2]		11,000[4]	**0**	**0**
Loynes (PCH-Studebaker)	4,000[1]	11,380[5]	8,000[3]	9,440[8]	**+12.3%-+7.8%**	**-2.6%**
Loynes (Bellflower-PCH)			5,922[7]	7,367[8]		**+6%**
Studebaker North of 2nd	24,000[1]		36,400[3]	40,000[4]	**+2.6%**	**NA**
Studebaker North of Loynes	4,000[1]		30,500[3]	35,000[4]	**+35%**	**NA**

Source-
[1]-1975 SEADIP, [2]-1997 Market Center (Wild Oats), [3]-2001 City of LB Flow Map, [4]-2005 Seaport Marina EIR, [5]-1998/1997 Traffic Count, [6]-2003 Traffic Count, [7]-2000 Traffic Count, [8]-2005 Traffic Count

Traffic Bottlenecks- In 1963 the City's Traffic Engineering Dept. recognized the traffic funneling effect on East-West arterial roads including 7th Street, PCH, Ocean Boulevard, and Anaheim. The figure below shows the City's 1964 cumulative 4% growth trend and the actual percentage growth on these roads. It is reasonable to expect that new high density growth downtown will similarly effect these roads.



Reference-
A Study of Possible Traffic Control & Roadway Improvements on East-West Arterial-Engineering Dept.. Traffic Engineering City of LB 1963

The Seaport Marina traffic analysis is inadequate.

Traffic counts from the Seaport Marina (2005), Home Depot (2004), and the Market Center (Wild Oats 1997) EIR traffic analyses were used to calculate an estimate of the cumulative traffic growth at the intersection of PCH & 2nd
at peak hours.

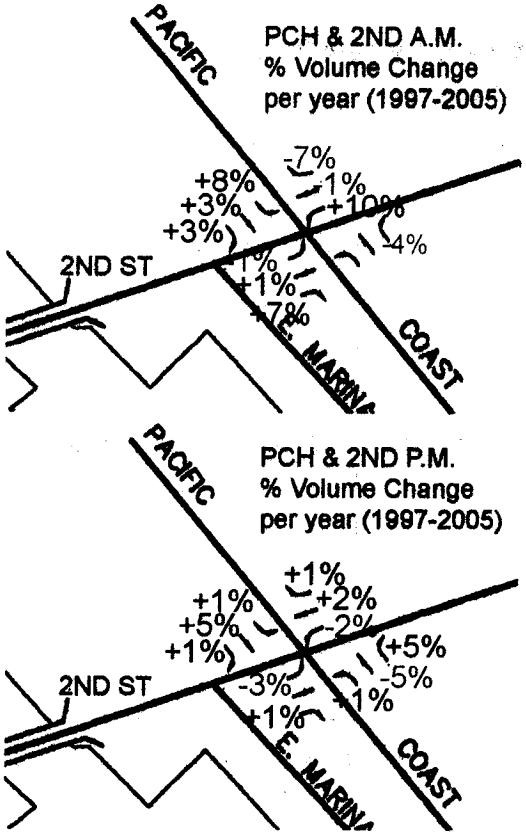
As you can see from table below, a 1% factor does not accurately estimate future intersection conditions. Even more concerning is that if one looks at the intersection counts between year 2004 and 2005 the numbers increase by as much as 82% or drop by as much as 24%. The wide swings in traffic counts make any analysis using a growth factor of +1% and two decimal fractional LOS/mitigation evaluations meaningless.

	2nd EB Through	2nd EB Turn N	2nd EB Turn S	2nd WB Through	2nd WB TurnN	2nd WB Turn S	PCH NB Through	PCHNB Turn W	PCHNB Turn E	PCHSB Through	PCHSB Turn W	PCHSB Turn E
Seaport Marina FEIR Existing Oct. 2005	1328/1281	243/377	371/379	910/1325	168/215	333/330	1229/1037	433/366	410/359	980/1331	185/543	208/299
Predicted growth 1%												
Home Depot FEIR Existing Jan. 2004	1117/1311	183/496	299/438	549/920	168/271	251/321	1150/.1024	497/338	406/361	668/1328	179/482	114/222
Predicted growth 1.3%												
% Change 1 year Seaport Marina/ Home Depot	+19% am -2% pm	+33% am -24% pm	0 am -13%pm	+65% am +44% pm	0 am -1% pm	+32% am + 3% pm	+33% am +13%pm	-13%am +8% pm	+1%am 0 pm	+47% am +47% pm	+4%am +13%pm	+82%am +35%pm
Wild Oats 1997 (Existing) Market Center	1240/1239	260/477	237/350	976/1132	378/231	184/389	1700/749	448/343	421/261	524/1464	148/383	129/271
2000 with project predicted (1.67% Growth)	1302/1301	273/368	307/575	1025/1169	397/243	214/437	1831/851	518/427	461/300	606/1609	155/403	135/285
Actual Growth 2005/1997 % per year Existing no project	+1% am 0% pm	-1% am -3% pm	+7% am +1% pm	-1% am +2% pm	-7% am +1% pm	+10 % am -2% pm	-5% am -5% pm	0% am +1% pm	0% am +5% pm	+11% am -1% am	+3% am +5% pm	+8% am +1% pm

Source- Seaport Marin EIR 2006, Home Depot EIR 2005, Market Center EIR 1997

The average yearly percentage peak hour traffic intersection movements was calculated using the 1997 and 2005 traffic counts. Using the Seaport Marina Traffic analysis methodology, all of intersection's movement % growth should have been 1% instead of the % growth numbers shown below.

PCH & 2nd Peak Hour Traffic
% Growth 1997-2005



% Growth for each lane movement at PCH @2n Street

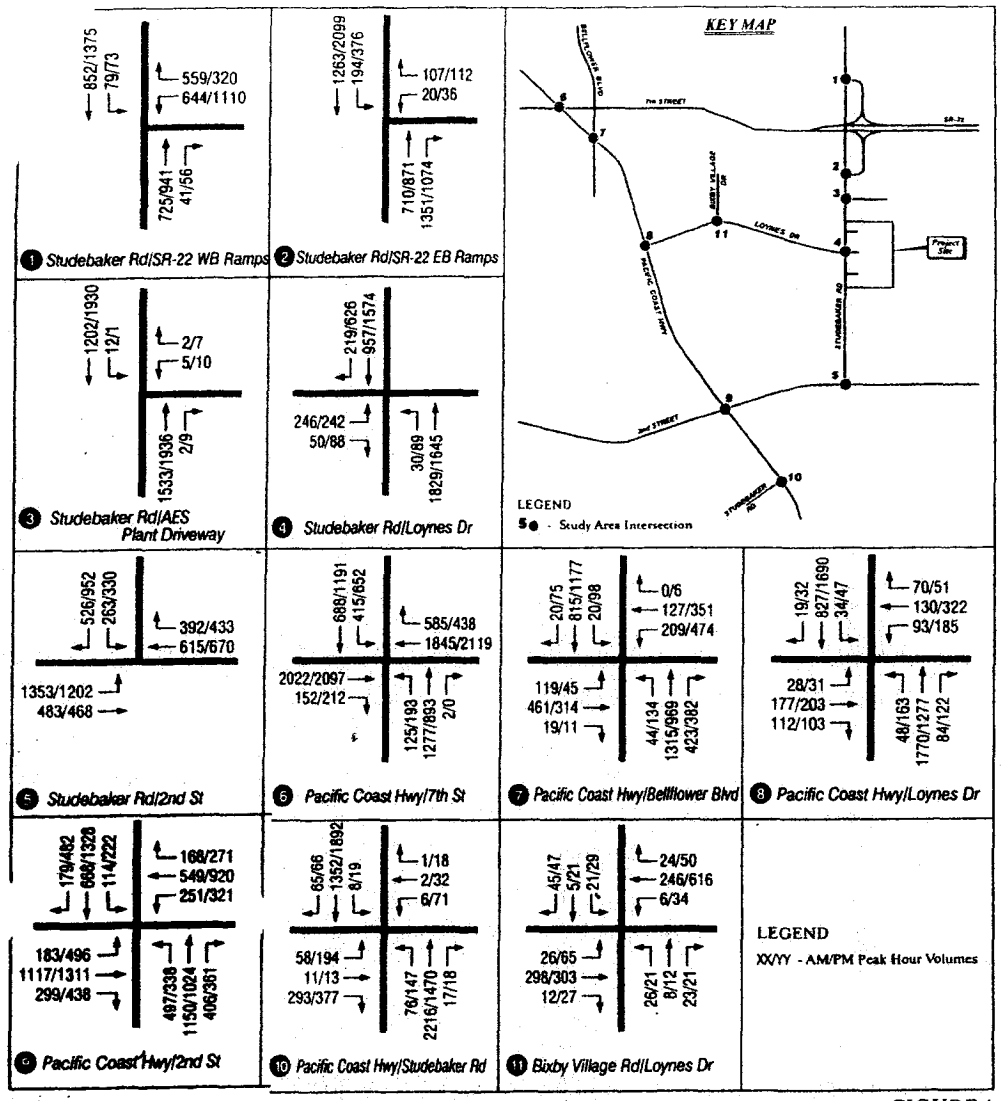


FIGURE 4

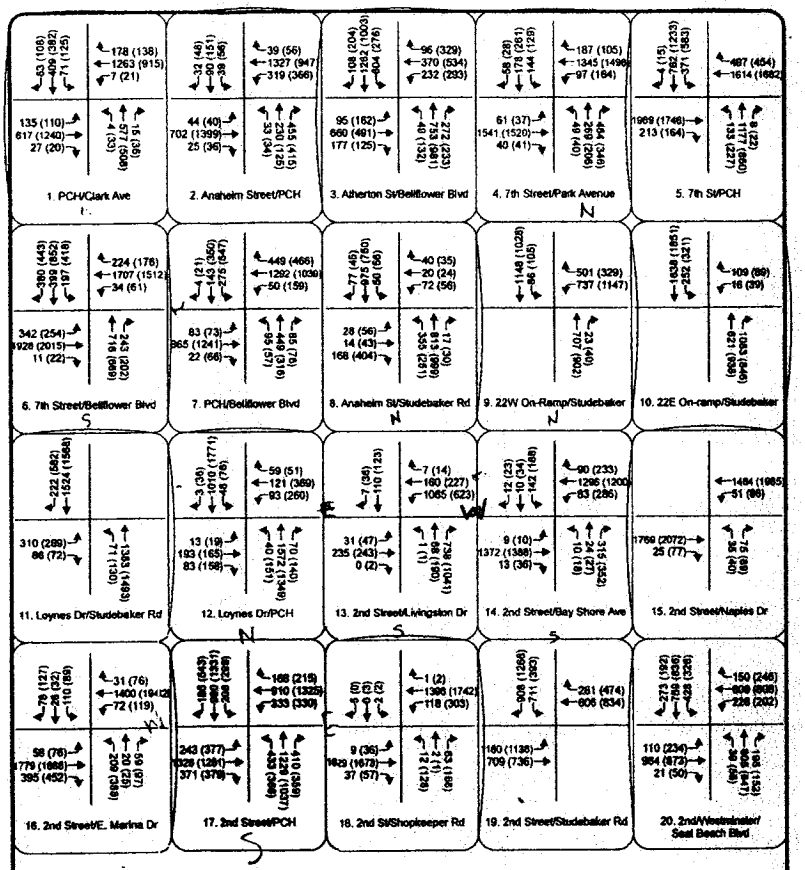
LSA

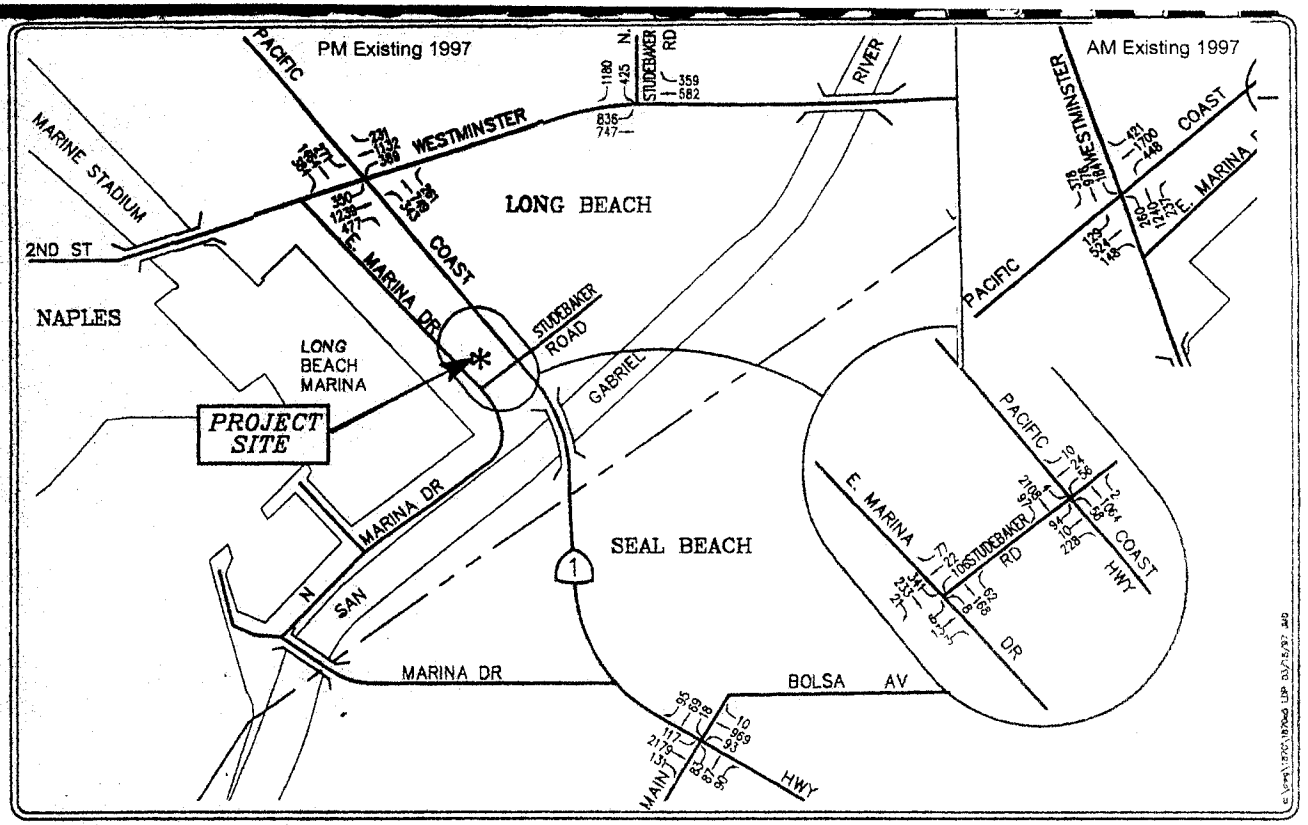
SCHEMATIC - NOT TO SCALE

Long Beach Home Depot

Existing A.M. and P.M. Peak Hour Traffic Volumes

I:\CLB430\G\Traffic\Ex Vols.cdr (4/22/04)


1. PCH/Clark Ave
2. Anaheim Street/PCH
3. Atherton St/Bellflower Blvd
4. 7th Street/Park Avenue
5. 7th St/PCH
6. 7th Street/Bellflower Blvd
7. PCH/Bellflower Blvd
8. Anaheim St/Studebaker Rd
9. 22W On-Ramp/Studebaker
10. 22E On-ramp/Studebaker
11. Loynes Dr/Studebaker Rd
12. Loynes Dr/PCH
13. 2nd Street/Livingston Dr
14. 2nd Street/Bay Shore Ave
15. 2nd Street/Naples Dr
16. 2nd Street/E. Marina Dr
17. 2nd Street/PCH
18. 2nd St/Shopkeeper Rd
19. 2nd Street/Studebaker Rd
20. 2nd/Westminster/ Seal Beach Blvd
Legend
Study Intersection
XXX(XXX) AM(PM) Peak Hour Volume
NOT TO SCALE
Meyer, Mohaddes Associates
a business unit of Iteris, Inc.
Seaport Marina Project
FIGURE 4A
Existing AM and PM Peak Hour Traffic Volumes



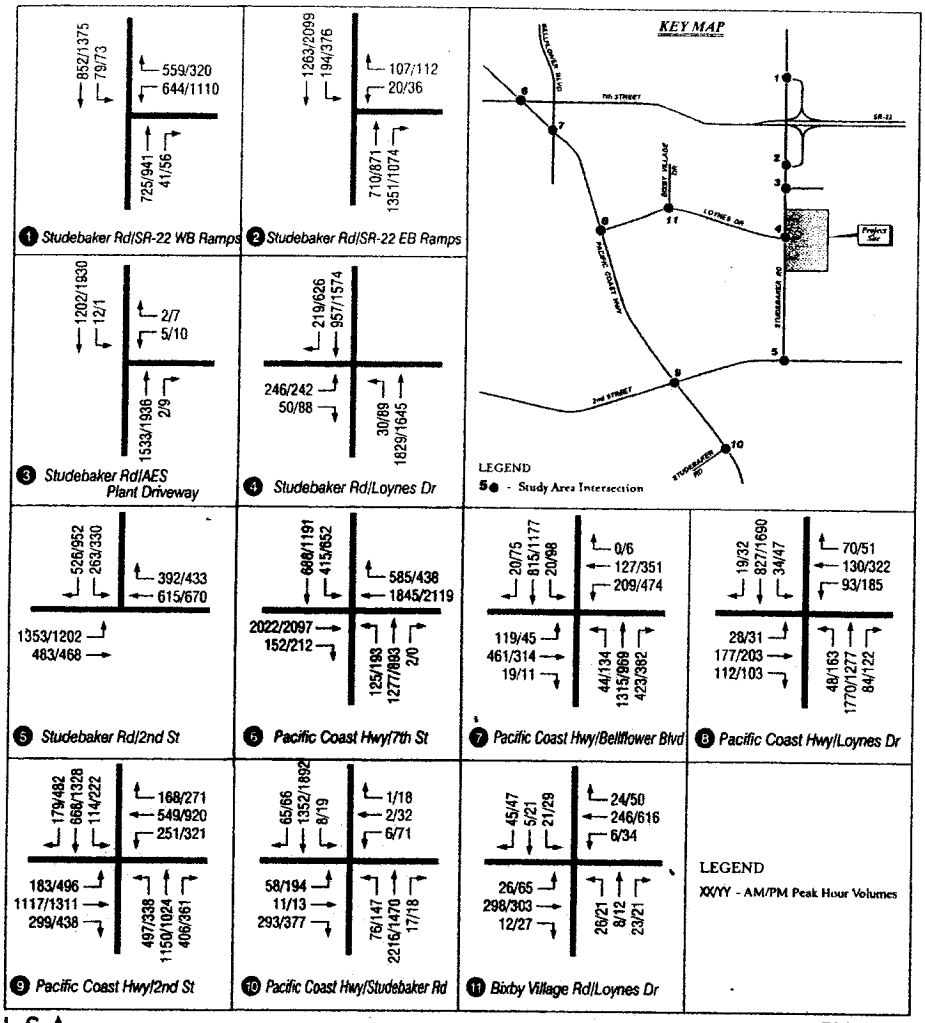
N NO SCALE

LINSCOTT LAW & GREENSPAN ENGINEERS

5

EXISTING PM PEAK HOUR TRAFFIC VOLUMES

PCH @ STUDEBAKER MARKET CENTER, LONG BEACH



LSA

FIGURE 4

2004

N

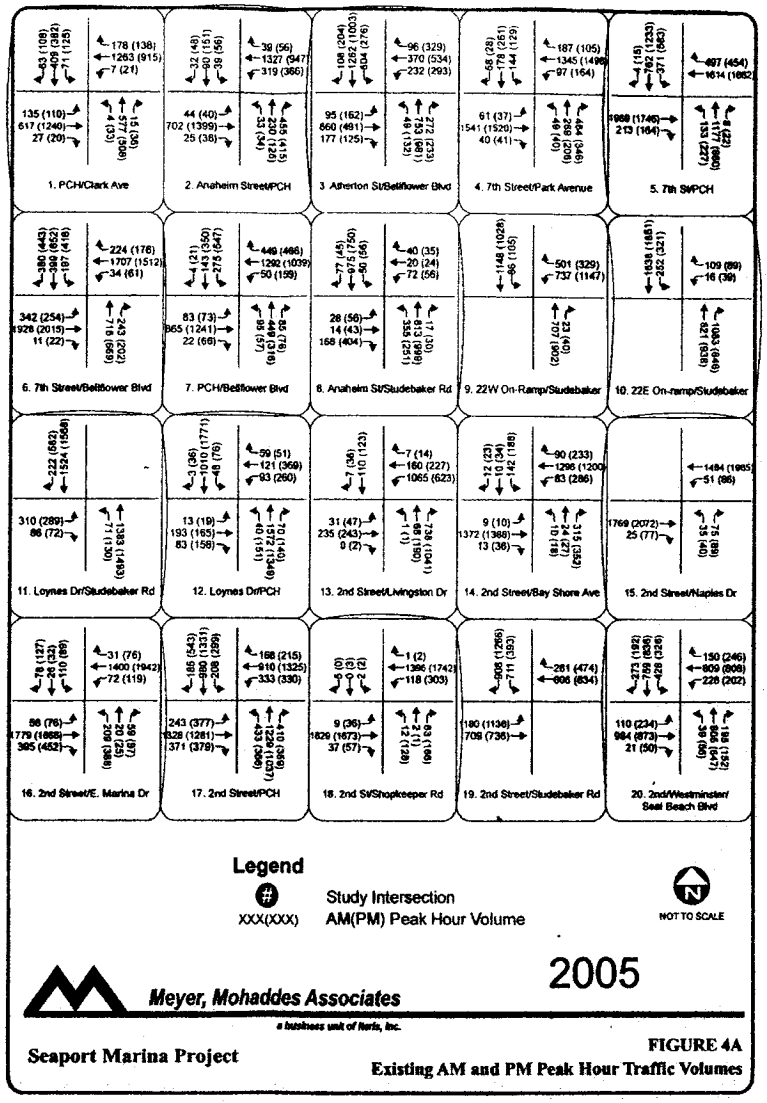
SCHEMATIC - NOT TO SCALE

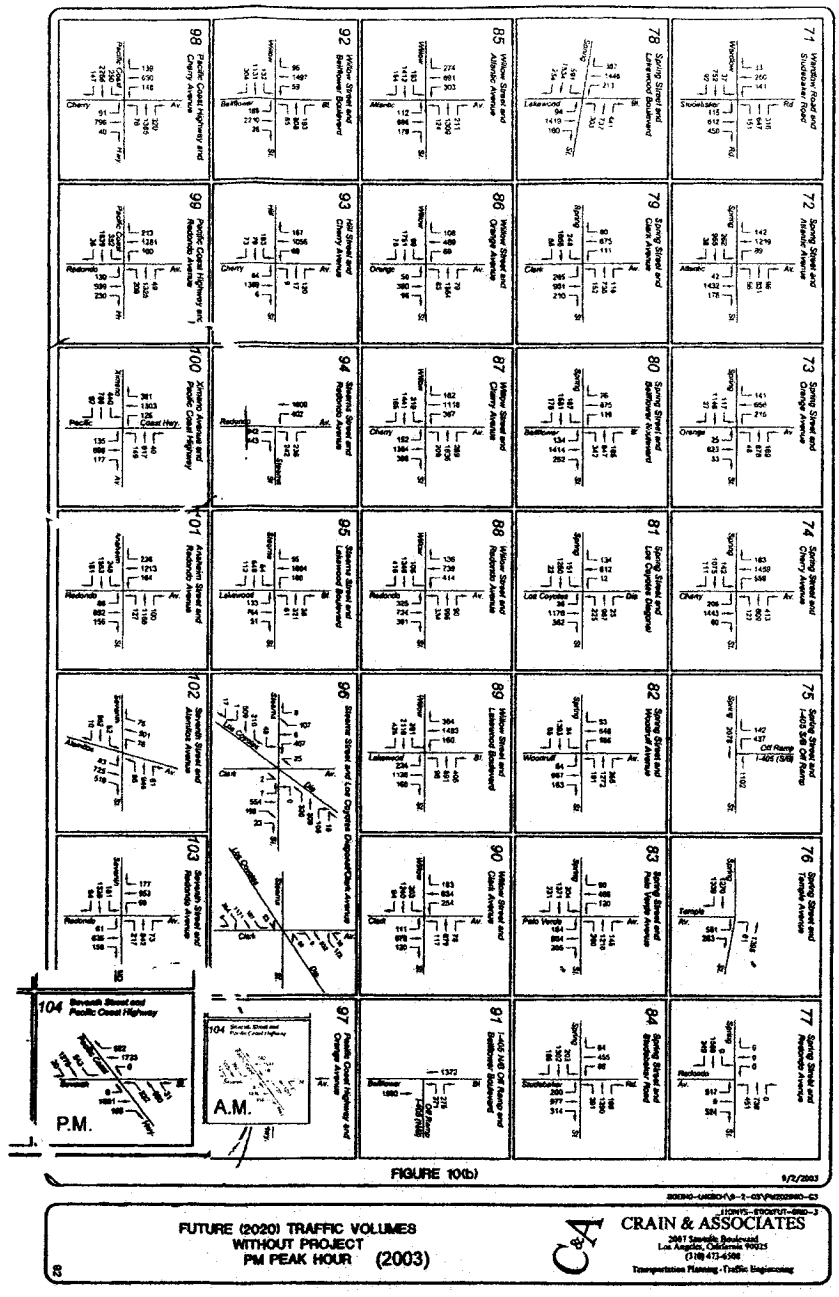
Long Beach Home Depot

Existing A.M. and P.M. Peak Hour Traffic Volumes

I:\CLB430\G\Traffic\Ex Vols.cdr (4/22/04)

Home Depot


1. PCH/Clark Ave
2. Anaheim Street/PCH
3. Atherton St/Bellflower Blvd
4. 7th Street/Park Avenue
5. 7th St/PCH
6. 7th Street/Bellflower Blvd
7. PCH/Bellflower Blvd
8. Anaheim St/Studebaker Rd
9. 22W On-Ramp/Studebaker
10. 22E On-ramp/Studebaker
11. Loynes Dr/Studebaker Rd
12. Loynes Dr/PCH
13. 2nd Street/Livingston Dr
14. 2nd Street/Bay Shore Ave
15. 2nd Street/Naples Dr
16. 2nd Street/E. Marina Dr
17. 2nd Street/PCH
18. 2nd St/Shopkeeper Rd
19. 2nd Street/Studebaker Rd
20. 2nd/Westminster/ Seal Beach Blvd
Legend
Study Intersection
XXX(XXX) AM(PM) Peak Hour Volume
NOT TO SCALE
2005
Meyer, Mohaddes Associates
a business unit of Iteris, Inc.
Seaport Marina Project
FIGURE 4A
Existing AM and PM Peak Hour Traffic Volumes



Douglas Park

To determine the growth at PCH/7th the Douglas Park EIR traffic analysis peak traffic volumes were used. The same methodology was used to determine what the existing & projected peak traffic volumes % increases are at PCH & 7th. The Seaport Marina (2005), Home Depot (2004) and Douglas Park (2003) EIR peak intersection volumes are tabulated below. The spread on the intersection movements was so large that it became obvious that the existing traffic counts in no way followed a steady 1% per year growth trend.

PCH/7th AM/PM Peak Hour Traffic 2003-2020

	7th EB Through	7th EB Turn N	7th EB Turn S	7th WB Through	7th WB Turn N	7th WB Turn S	PCH NB Through	PCHSB Turn W	PCHSB Turn E	PCHSB Through	PCHSB Turn W	PCHSB Turn E
Seaport Marina FEIR Existing Oct. 2005	1969/1746	0	213/164	1614/1682	497/454	0	1177/860	8/22	8/22	133/227	4/15	371/583
Home Depot FEIR Jan. 2004	2022/2097	0	152/212	1845/211	585/438	0	1297/893	20/0	125/193	688/1191	0	415/652
Pacific (Douglas Park) Center 2002	1278/1629	0	1801/144	1460/1629	542/490	0	1281/709	12/20	346/543	689/1199	12/20	346/543
Douglas Park FEIR 2020 Projected Based on (Existing 2003)	1436/1881	0	118/188	1531/1723	542/522	0	1281/960	12/20	350/543	1025/1279	12/20	350/543
Douglas Park 2020 with project	1531/1723	0	118/188	1531/1723	542/522	0	1378/1011	12/20	350/543	1063/1380	12/20	350/543

The Seaport Marina EIR states that the traffic analysis conservatively uses October 2005 counts which were 14% (A.M.) and 2% (P.M.) higher than the July 2005 counts? If these numbers are conservative why does the Home Depot FEIR (January 2004) show higher peak counts at the same intersection?

Why has the existing traffic at PCH/7th lessened in 1 year rather than gone up 1.3% as predicted in the Home Depot EIR? Why does the Douglas Park EIR predict year 2020 traffic at PCH & 7th which is much lower than the current volumes in the year 2005? The City uses a single % growth factor that has been changing [1.67% (1997), 1.3% (2004), and 1 % (2005)] depending on the project. The City's amended SCAG traffic modeling for Douglas Park does not even make sense. According to the Douglas Park EIR traffic analysis- Does the City really believe that traffic is going to decrease by 25% in 15 years?

Planned Projects-Downtown, Douglas Park & SEADIP 2007

The Seaport Marina EIR traffic analysis states that the cumulative impact of city growth will be 1% and ignores the addition of **175,500** new vehicles that will be added to coastal Long Beach roadways from planned or proposed developments.

The current Long Beach Transportation Plan clearly states the following:
"All streets within the City form a network which is a system. Any changes being made to one street, either by increasing or reducing its traffic capacity, will have an impact on the level of traffic on nearby streets. Sometimes, such an effect can even be measured on streets which are located miles away."

The City's use of spot traffic mitigation such as additional lanes or proposed "go- arounds" to offload intersection volume/capacity ratios (LOS) fails to address the obvious cumulative traffic impact. The 175,500 additional vehicles added to our city streets do not just disappear at the edge of the project's traffic analysis. The traffic stream from all these projects will funnel down to know bottlenecks like PCH/7th and PCH/2nd or take a path of lesser resistance through older residential neighborhoods.

All traffic impacts from the Downtown Developments, Douglas Park, and the SEADIP 2007 revisions are not included in the Seaport Marina EIR.

Downtown Developments- +72,722 Vehicles per Day

2195 Apartments, 4062 condominiums, 475, 600 square ft. of Retail space, and 24,000 square ft of restaurant space have been built or approved for Downtown Long Beach. The new developments will result in the addition of 72,722 vehicle
trips per day. Using the SCAG 2030 regional model assignment included in the Shoreline EIR, 10% of vehicles will use Ocean Blvd, 2% will use Broadway, 2% will use 4th Street, and 10% will use 7th Street.

The increase in traffic volume on nearby streets from downtown developments are as follows:

7th Street (East-West) - 7272 vehicles per day or a **+25% in total volume at 7th/Alamitos. At 7th/PCH (50,000 vehicles a day) traffic would increase by 15%.**

The impact on East-West residential streets is as follows:
Ocean Blvd. - 7272 Vehicles per day or a **+21% increase in total volume**
Broadway - 1454 Vehicles per day or a **+ 10% increase in total volume**
4th Street - 1454 Vehicles per day or a **+12% increase in total volume.**

If one assumes that all vehicles traveling on Broadway/Ocean are going to the freeway or to the shore this would result in an increase at PCH/2nd (40,000 ADT) of **+22% on 2nd street through Belmont Shore.**

Increases in Downtown cross-town traffic on Ocean/2nd , Broadway and 4th street will flow out to North-South residential streets such as Cherry, Orange, Junipero, Ximeno and Park Avenue. It is disconcerting given the known congestion, speeds, and high accident rates on nearby residential streets that the City has not done any traffic analysis or planned mitigation on any streets east of Alamitos.

After years of transportation planning/traffic calming studies and Council promises, the City has chosen to ignore the obvious negative impact downtown traffic will have on residential neighborhoods.

> "A primary objective is the ***prevention of traffic intrusion into residential neighborhoods*** and the elimination of east/west corridors, while improving access to the downtown area and the coastline."
>
> **"Increased auto circulation in the coastal zone is discouraged by this program because (1) it would not provide increased access to coastal resources; (2) it would have an adverse impact on the fragile coastal neighborhoods; and (3) there is little unused capacity available in the street system."**
>
> Local Coastal Program (LCP).Adopted by the Long Beach Planning Commission-December 20, 1979
> Adopted by the Long Beach City Council-February 12, 1980.
> Certified by the California Coastal Commission-July 22, 1980

The City's downtown traffic analysis projects that 17,452 additional vehicles from downtown will be added daily to East-West streets, yet the added congestion on project intersections such as PCH/7th or PCH/2nd have not been accounted for in the Seaport Marina EIR Traffic analysis.

Douglas Park- +56,000 Vehicles per day
This development project's plans consist of 3 million square feet of industrial work space, 255 single family residential homes, 1220 apartments, 1025 condominiums, 150,000 square feet of retail space and a 400 room hotel.

The 56,000 vehicles per day created by the Douglas Park project also assume an overly optimistic 20% peak hour trip reduction factor, assuming 20% of workers will carpool or use public transportation. None of the Douglas Park peak hour trips were added to the Seaport Marina EIR traffic analysis.

SEADIP 2007 Revisions- 47,000 Vehicles per day

The SEADIP 2007 revision task force has so far avoided any discussion as to the traffic impact of the proposed density and use changes in their recommendations.

An estimate of the traffic impact was made using the SEADIP map provided at the April 2007 Planning Commission meeting and standard distribution factors. This estimate shows that the revised SEADIP plan will increase traffic by 47,000 Vehicles per day.

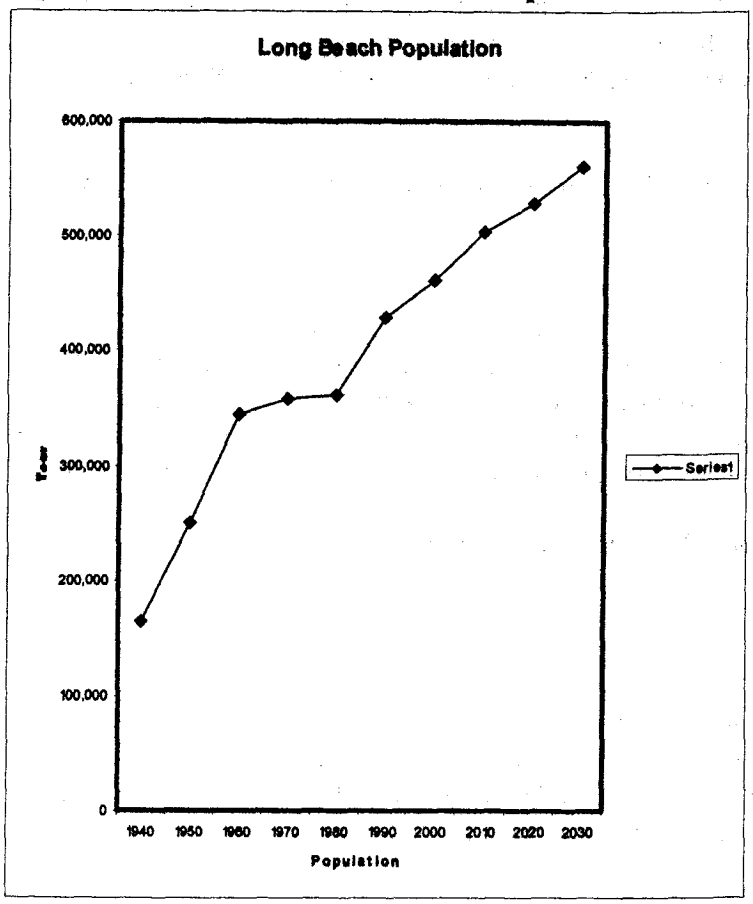
The SEADIP 2007 Revision traffic impact was made using the following assumptions:

Area 1 (Studebaker/Lones) 3-6 Story Small Lot Homes
4,000 squ. Ft lots = 55 homes (assumes 5 acres)
Trip Generation 10 per home x 55 = 550 VPH
Area 2 (PCH/Loynes) 3-6 Story Condos
1,000 units/acre=1670 condos (16.7 acres)
1670 condos x Trip Generation 6 per condo= 10,000 VPD
Area 3 (Marina Pacifica) 3-6 Story Mixed Use Condos
Used same ratio as Seaport marina Project minus existing Shopping Center Usage
21.3 acres/10.0 (Seaport Marina Acre) x 10,000 BPD (Seaport Marina VPD) = 20,000 VPD
20,000 – 10,000 (Existing Shopping Center Usage)= 10,000 VPD
Area 4 Albertson/Hoff's Hut (No Change)
Area 5 3-6 Story Hotel
11 Acres x Trip Generation 100 per acre=1100
1100-100 (Existing Seaport Hotel Use) = 1000 VPD
Area 6 3 Story Retail
6.1 acres x Trip Generation 320 per acre= 1952 VPD
Area 7- 3-6 Story Entertainment Retail Shopping Center
28 acres x 720 Trips per acre=2272 VPD
Area 8 Office of Retail (assume Retails)
7.1 acres x 320 Trips per acre= 2272 VPD
Area 9 TPB Not Included
Area 10 1 Story Retail
2.3 acres x 320 Trips per acre = 1472 VPD
Area 11 Not Included
Area 12 Not Included
Area 13 Light Industrial
10 acres (assumed) x Trip Generation 120 per acre = 1200 VPD

Estimated Impact from SEADIP Revision if actualized would an increase of 47,000 Vehicles per dai!y

The Seaport Marina traffic analysis did not include *any* adjustment for growth due to the SEADIP 2007 increases in densities and changes to land usage.

Population Increases From New Developments



Long Beach's population is expected to grow 25,280 between 2010 and 2020. Douglas Park, Downtown Developments, and the April SEADIP 2007 revision would add as many as 11, 300 new homes to the area. Assuming that only 1.5 people will reside at each new dwelling, 17,000 people (65% of Long Beach's total population increase) will be added to already congested coastal South-Eastern Long Beach roadways. Again no accounting has been made in the Seaport Marina traffic analysis of the cumulative traffic impact of Douglas Park, Downtown Developments, or the proposed SEADIP 2007 revisions and associated growth in population.

Employment Growth- SCAG predicts that there 12,000 new jobs will be created between 2010 to 2025. (2010-2075,000, 2015-213,900, 2020-225,900). Douglas Park is expected to bring 11,000 new jobs to the project site. These Douglas Park jobs will account for 92% of all job growth in Long Beach. The Seaport Marina project does not address the additional 33,000 additional trips brought into the South-Eastern area of Long Beach by workers at Douglas Park.

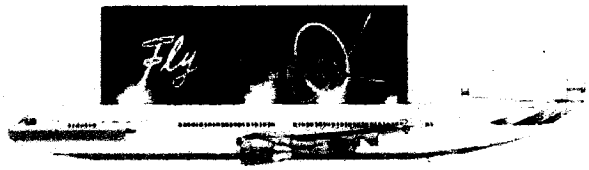
Boom & Bust Transportation Planning

Traffic growth in Long Beach has been driven by a combination of Long Beach/Los Angeles population growth, increasing enrollment at Cal State Long Beach, and boom and bust employment at the Naval Station/Shipyards, Douglas Aircraft, and Rockwell Space. The majority of Long Beach's employers, education centers , and the City's high density housing are located along the City's East-West City corridors.

In 1977 the SEADIP plan emphasized roadway limitations for growth on the South-East side of Long Beach.

> *"Besides constraints imposed by the natural environment, there are a number of planning constraints which also must be addressed. Traffic considerations are prime among these. The highway-access advantages cited above also have the distinct disadvantages of forcing large volumes of traffic through the area, primarily between Orange County residential commuters and Long Beach employment and educational centers.* ***Traffic congestion thus imposes a constraint on development density.***"
>
> South-East Area Development And Improvement Plan (SEADIP) 1977

In the 1940's the waterfront created thousands of WWII jobs at the Naval Shipyards and Naval Station at the port. In the 1960's an aerospace boom at both Douglas Aircraft and Rockwell brought 1,000s of jobs into Long Beach.



The war effort and the aerospace industry created temporary booms in employment followed by sudden deep layoffs. In the early 1990's Douglas Aircraft employment peaked at approximately 52,000 workers with the majority located at the Lakewood Blvd. plant. By 1995 Long Beach had lost 4000 jobs at the Naval Shipyard, 27,500 jobs at the Naval Station, 1,000 jobs from the LA riots, and another 25,000 jobs at Douglas Aircraft. Since 1995 Douglas Aircraft has lost another 23,000 jobs and employment at the C17 facility currently is about 3800 employees.

Enrollment at Cal State Long Beach was 20,000 in the 1960's, grew to about 30,000 in 1973, and in 2003 enrollment peaked at 35,000 but is expected to grow to 40,000 over the next 10 years.

When jobs and real estate growth numbers were booming, plans were made for roadway infrastructure improvements. But by the time the studies and plans were finished, the jobs vanished along with the urgency and funding to plan for Long Beach's future.

The Seaport Marina EIR traffic analysis does not account for changes in directional distributions as jobs move back into Douglas Park or as downtown residents head to jobs in Orange County.

Orange County Jobs- In the 1990's peak hour job traffic was heading east leaving the City at the same time residents on the South-East side were returning westward through PCH/2nd and PCH/7th. The Seaport Marina EIR does not consider that when Downtown is fully built out with 2195 new apartments and 4062 new condominiums that many of these new Long Beach residents will be also heading eastward to jobs in Orange County and adding to existing South-Eastside traffic going to the 405/22/605 freeways in the morning and evenings.

Douglas Park Jobs- The Seaport Marina EIR traffic analysis does not account for any traffic impact of the 11,000 new jobs at Douglas Park.

Cal State Long Beach- The Seaport Marina EIR traffic analysis does not account for any planned growth in enrollment (+10,000) at the University.

Congestion and Residential Street Cut-Through Traffic

For the last 40 years Long Beach Planning documents mentioned the problem of cross-town traffic using older residential streets as alternate routes through the City.

> "A primary objective is the ***prevention of traffic intrusion into residential neighborhoods*** and the elimination of east/west corridors, while improving access to the downtown area and the coastline."
>
> Long Beach Coastal Program

The current Transportation Plan (1992) states that

> "The City has a grid pattern that is typical of the greater Los Angeles Region.....The grid system is quite efficient in its inherent capability to move vehicular traffic, and is conductive to systematic progression of traffic signals in many directions. **However such a system also allows traffic to utilize local neighborhood streets in lieu of congested arterials.** This is especially true in areas of the City where arterial streets are inadequate or ill-defined, as in the areas south of Anaheim Street."
>
> "This plan seeks to accommodate future traffic demand without affecting residential neighborhoods. This is to be accomplished by a two-fold strategy which: (1) moves traffic to major streets and highways by making physical and operation improvements which will allow them to carry more traffic without bottlenecks; and (2) **diverts traffic from local residential streets through traffic mitigation and parking program developed in cooperation with the neighborhood groups.**"

The Planning Commission approved the Seaport Marina project with unmitigated significant impacts (congestion) at 7th Street & Park Avenue, 7th Street & Pacific Coast Highway, 2nd Street & Bay Shore Avenue, Pacific Coast Highway & Loynes Drive and at 2nd Street & Pacific Coast Highway.

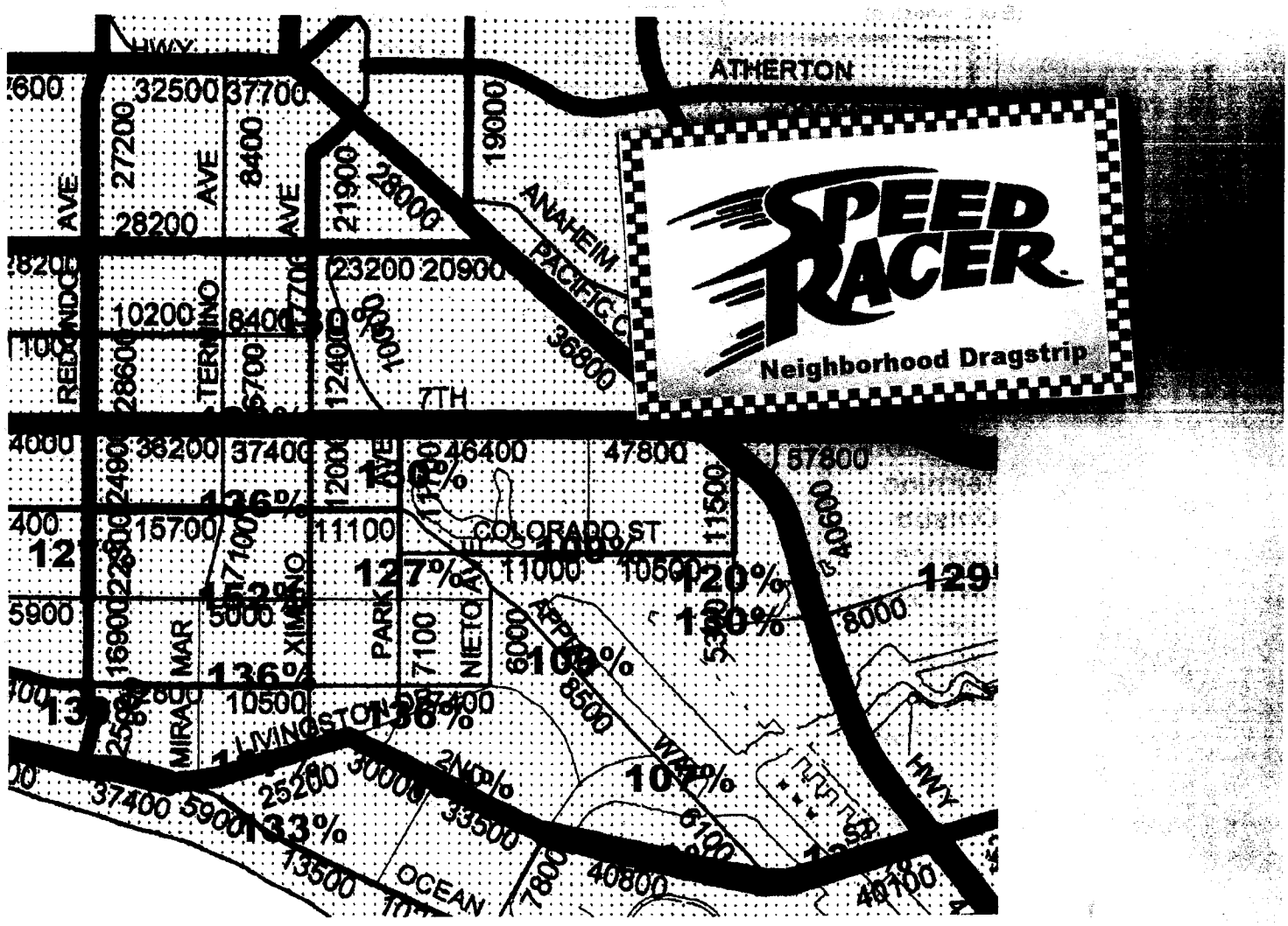
While the Seaport Marina EIR acknowledges significant project congestion at all nearby arterial intersections, the EIR avoids having to provide residential street traffic mitigation by simply denying the traffic impact on the Belmont Heights, Alamitos Heights, and Belmont Shores neighborhoods.

Adding to neighborhood traffic congestion, the City has not planned any downtown traffic mitigation for residential streets east of Alamitos and is allowing traffic to flow unimpeded east to west through our neighborhoods using Ocean, Broadway and 4th street.

Both the Home Depot and Seaport Marina EIR traffic analyses fail to provide any estimates of residential street impact from these projects. A detailed list of concerns about Park Avenue & Belmont Heights was included in a letter in the Seaport Marina appeal to the City Council.

The Seaport Marina EIR claims that there will be no cross-town cut through traffic on Belmont Heights/Belmont Shore residential streets even though there is little mileage difference between the arterial road route (7th@Park-PCH-2nd Street) and the residential street route (Park@7th-Broadway-Bayshore-2nd –PCH). A timed study of the two routes at today's rush hour traffic shows that there is little difference in travel time or mileage. Given the increased congestion at the unmitigated intersections it is very likely that more drivers would choose to use Belmont Heights/Belmont Shore residential streets as a cut-through to the project site.

Neighborhood Speeding- As you can see from the map below nearly all drivers are exceeding the speed limit by a large margin. As arterial roadways become more congested and wait times at lights become longer, residential streets become the fastest route for cross-town traffic. Traffic speeds on some residential streets are now higher than adjacent arterials.

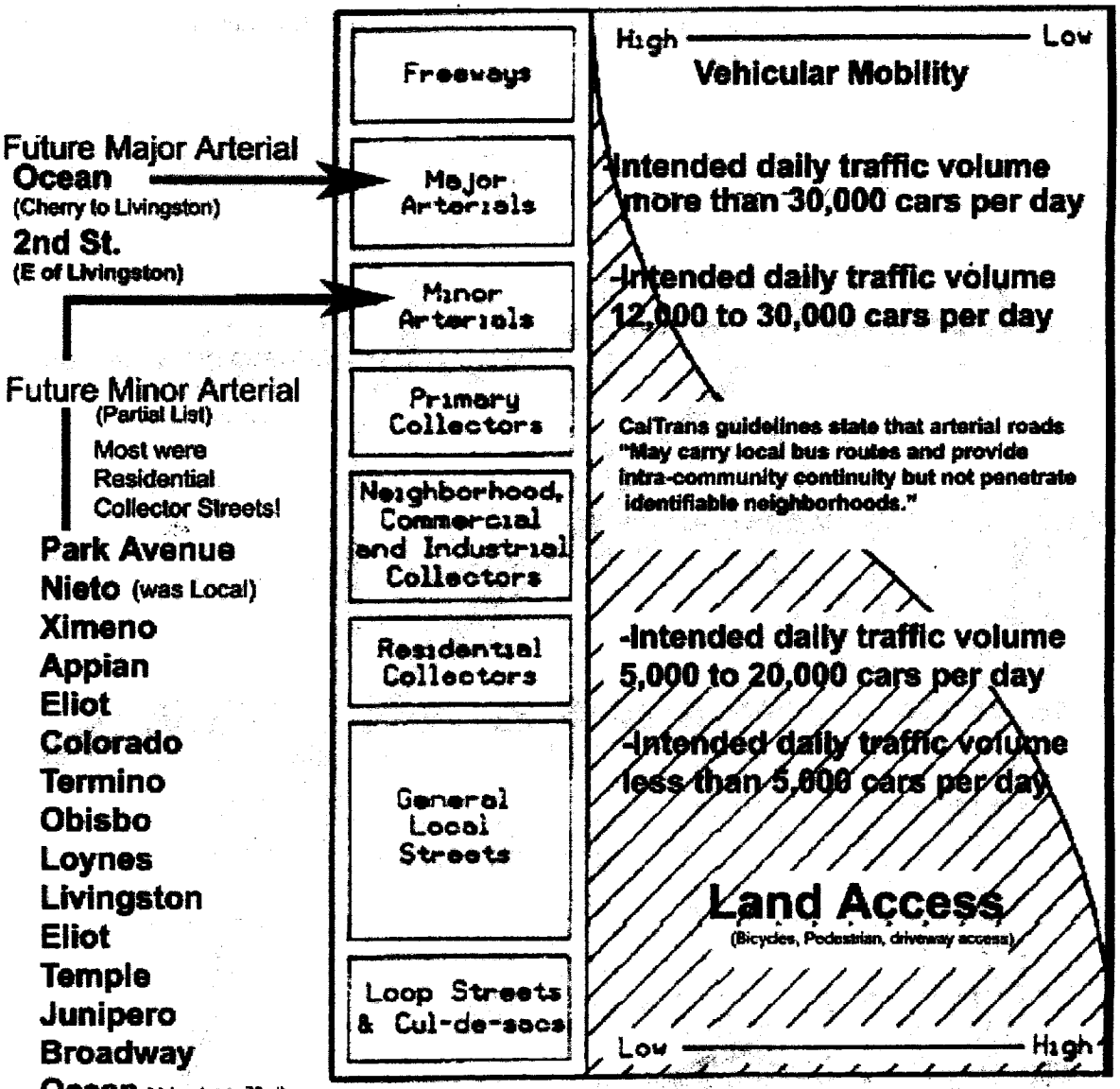


Neighborhood Speeding

% Over Speed Limit

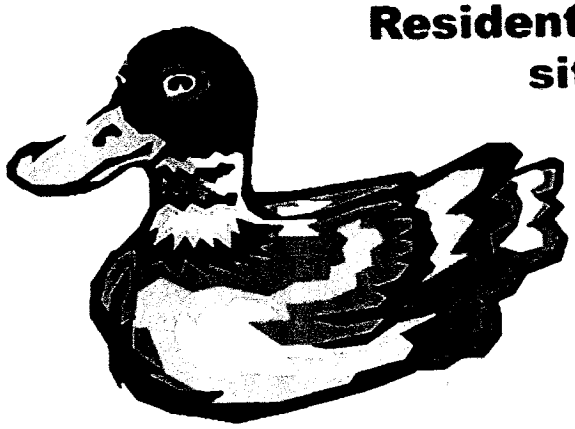
Used peak 85% speed from Traffic Surveys

Land Access and Traffic Volumes- Traffic volumes on residential streets in Belmont Heights/Alamitos Heights/Belmont Shores have exceed their design capacities. The chart below shows land access versus traffic volume & speed.



Land Access Versus Street Classification
Source: Curve adapted from AASHTO-Geometric Design of Highway & Street
Traffic Volumes from 1991 LB Transportation Plan

Residents are sitting duck



Increased tra
exposes resi
to more acci

Home Owner Land Access

Park Avenue- The average daily volume on Park Avenue (between 4th & 7th) is 13,722 vehicles per day. 1131 cars per hour travel past homes during morning rush hour. There are 19.4 cars per minute traveling at an average speed of 39 mph. 1 car passes every 3.09 seconds. A car needs 186 feet to stop if the driver is paying attention. How does the City expect residents to safely back out of their driveways?

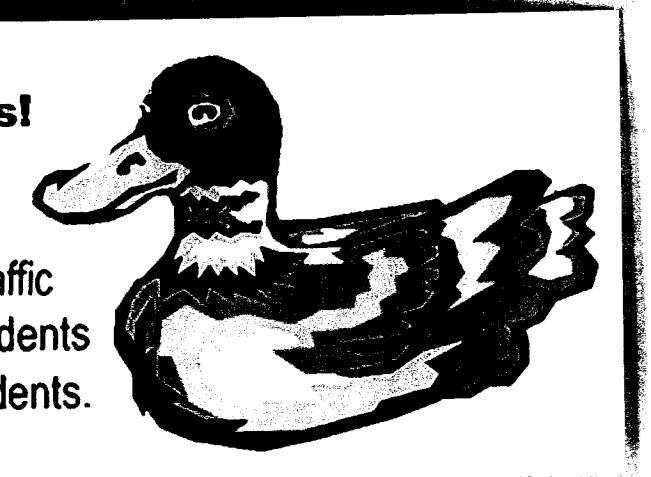
The City of Long Beach has no volume limits as to how much traffic can be driven through two lane residential streets. The only requirement is that a traffic study may be required if the project adds 50 peak trips in an hour or 500 daily trips or if there is a "safety issue".

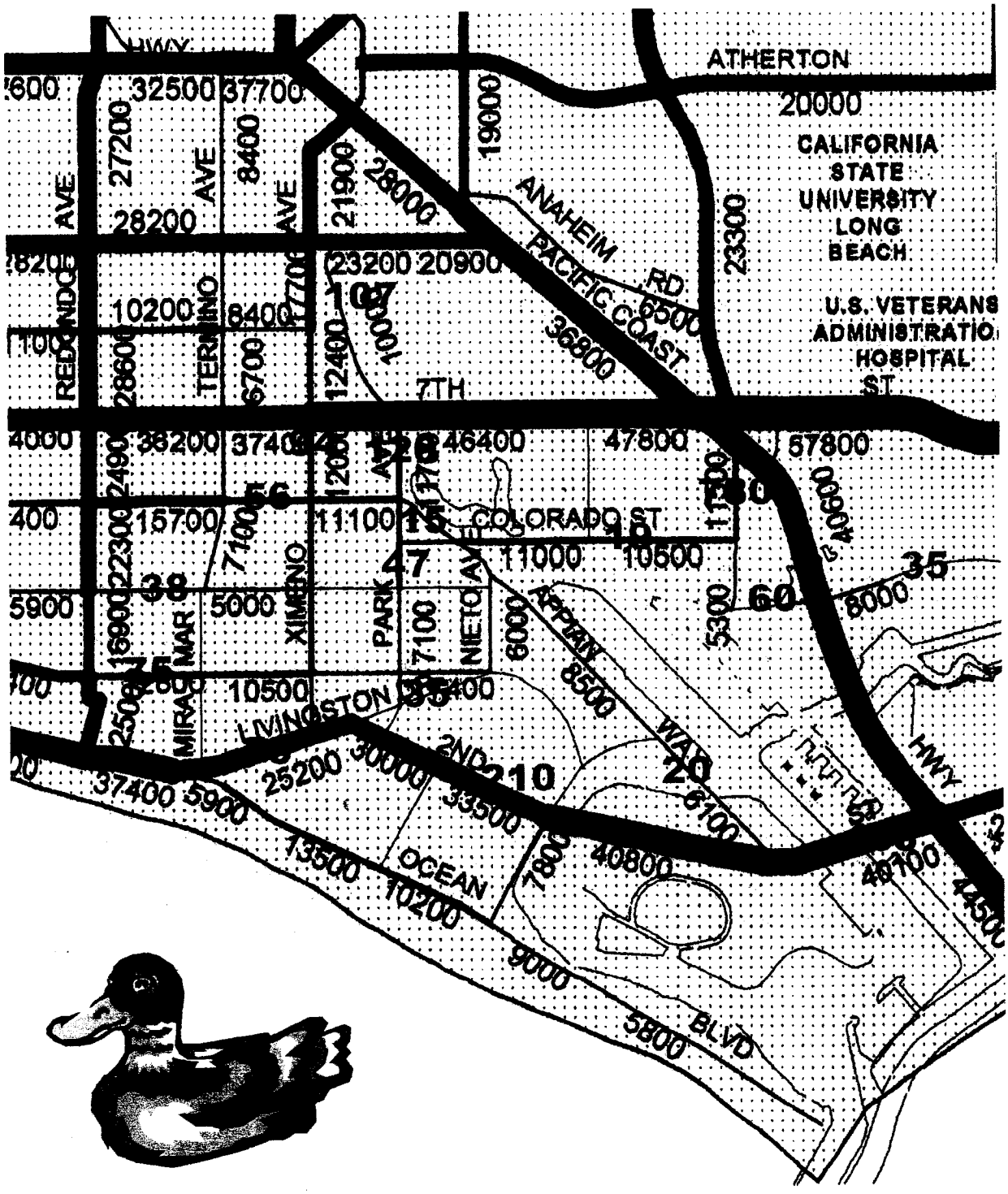
Traffic on Park Avenue (between 4th & 7th) has increased 17% in the last 6 years (1995-2001) at a rate of 4.88% per year between 1999 and 2001. The City recently installed a left hand turn arrow onto Park off of 7th street which is now allowing 4 or 5 additional cars south-bound onto Park at every light cycle. It appears that off loading arterials and enhancing traffic flow on 7th street is more important than a homeowner's safety in accessing their property.

Accident Rates-As more traffic moves through residential streets the accident danger to residents increases.

The City prefers to use a measure of accidents per million miles traveled to compare the number of accidents to a statewide expected rate. While this is a good measure for an arterial road, the danger to residents should be measured by the number of accidents per mile. As traffic volumes increase the number of accidents can increase without changing the actual accident rate ratio. This ratio underestimates the impact on residents' safety when the residential street traffic volume is increased.

Residents are sitting ducks and are exposed to more danger statistically than through traffic. Given the high volume of traffic on 2nd near Naples, an estimate of 138 accidents per mile (69 Total Accidents per year) may be OK as it is 18% below the expected accident rate. At Park near 7th residents are exposed to 120 accidents per mile (36 per year) or 361% higher than the statewide expected accident rate--all in a 3 block long roadway in front of their homes.





Accidents per mile (1 year)

Peak Year Total Accidents/Segment Length

Street Design Capacities- The City of Long Beach has no standards for level of service for residential streets. San Diego uses the following standards and if we use their stand for Long Beach we get a very poor report card.

ROADWAY CLASSIFICATIONS, LEVELS OF SERVICE (LOS) AND AVERAGE DAILY TRAFFIC (ADT)

			LEVEL OF SERVICE W/ADT**				
STREET CLASSIFICATION	LANES	CROSS SECTIONS* (APPROX.)	A	B	C	D	E
Expressway	6 lanes	102-160/122-200	30,000	42,000	60,000	70,000	80,000
Prime Arterial	6 lanes	102-108/122-128	25,000	35,000	50,000	55,000	60,000
Major Arterial	6 lanes	102/122	20,000	28,000	40,000	45,000	50,000
Major Arterial	4 lanes	78-82/98-102	15,000	21,000	30,000	35,000	40,000
Secondary Arterial/ Collector	4 lanes	64-72/84-92	10,000	14,000	20,000	25,000	30,000
Collector (no center lane) (continuous left-turn lane)	4 lanes 2 lanes	64/84 50/70	5,000	7,000	10,000	13,000	15,000
Collector (no fronting property)	2 lanes	40/60	4,000	5,500	7,500	9,000	10,000
Collector (commercial-industrial fronting)	2 lanes	50/70	2,500	3,500	5,000	6,500	8,000
Collector (multi-family)	2 lanes	40/60	2,500	3,500	5,000	6,500	8,000
Sub-Collector (single-family)	2 lanes	36/56	---	---	2,200	---	---

LEGEND:

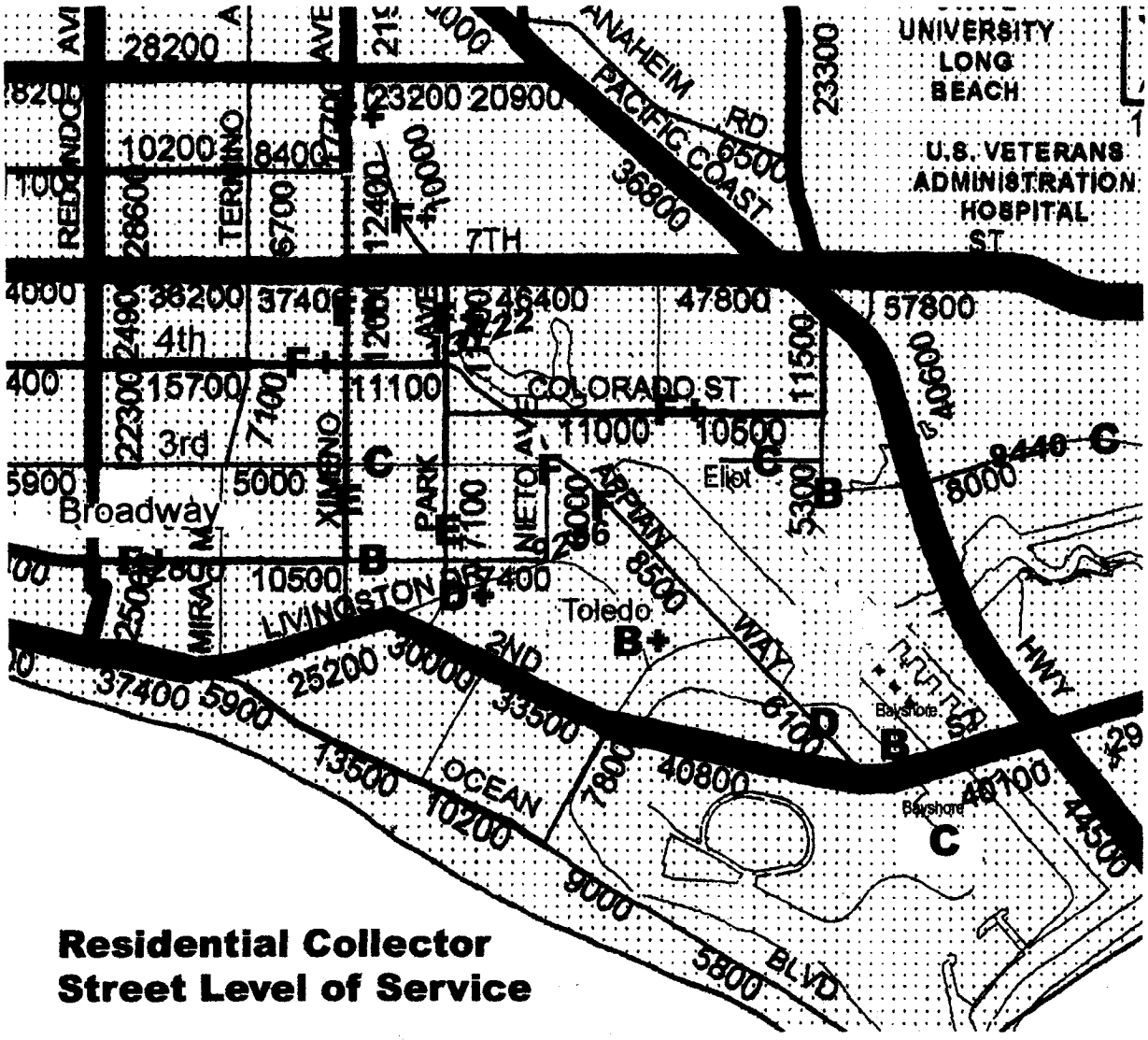
* Curb to curb width (feet)/right of way width (feet): based upon the City of San Diego Street Design Manual and other jurisdictions within the San Diego region.

** Approximate recommended ADT based upon the City of San Diego Street Design Manual.

NOTES:

1. The volumes and the average daily level of service listed above are only intended as a general planning guideline.
2. Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.

Long Beach's residential streets are handing traffic volumes which exceed their maximum design capacity by over 60%.



Summary:

I want the City to reject the Seaport Marina Development because:

- The Seaport Marina EIR traffic analysis is woefully inadequate.
- The City needs to develop a comprehensive traffic model for the entire city which takes into account ALL proposed and or/planned developments. Approving each project independently without looking at the ACTUAL cumulative effects of these projects but instead plugging in what this study shows to be a wildly inaccurate 1% growth factor is a recipe for disaster.
- The City's use of spot traffic mitigation such as additional lanes or proposed "go-arounds" to off-load intersection volume/capacity ratios (LOS) fails to address the obvious cumulative increase in traffic on nearby streets. Long Beach residents deserve better.
- The City needs a comprehensive plan for development that includes a plan and funding for traffic mitigation in residential neighborhoods. The City never fulfilled their promise from the early 1990's to improve safety, lower speeds and to find a way to keep cut through traffic out of our residential neighborhoods. And now developers are asking the City to allow several new projects that will severely impact these same neighborhoods without even a mention of this potentially devastating impact.
- The City has left our citizens out of the decision making process for Downtown development, the Seaport Marina project, Home Depot and more recently the SEADIP plan which is being hurriedly revised behind closed doors with little input from residents. The SEADIP committee members who meet behind these closed doors have limited their discussions with residents to a few minutes with little or no dialogue.. This is why traffic impact was not even CONSIDERED. When asked where the 47,000 additional cars would go, one of the SEADIP committee members stated that "mitigation will be left up to the developers." Again, this is a recipe for disaster!
- City planning should not be left in the hands of developers whose interest may be short term and profit motivated. The City Council and the Planning Department should look out for the long-term well being of our citizens.

Please vote NO on the Seaport Marina development!