

## **Initial Study and Mitigated Negative Declaration Responses to Comments**

### **Pacific Place Project**

Prepared for | City of Long Beach  
411 West Ocean Boulevard, 3rd Floor  
Long Beach, California 90802  
Contact: Patricia Dienfenderfer, AICP  
562.570.6261

Prepared by | Psomas  
5 Hutton Centre Drive, Suite 300  
Santa Ana, California 92707  
Contact: Jennifer Marks  
714.751.7373

November 2020

**RESPONSES TO COMMENTS ON THE  
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR THE  
PACIFIC PLACE PROJECT**

Pursuant to the California Environmental Quality Act (CEQA), the potential environmental effects of the proposed Pacific Place Project (Project) have been analyzed in an Initial Study/Mitigated Negative Declaration (IS/MND) dated October 2020. The public review period extended for 30 days beginning October 19, 2020 and ending on November 16, 2020. The City distributed a Notice of Intent (NOI) to adopt an MND along with the IS.

Letters commenting on the information and analysis in the IS/MND were received during the public review period from the following agencies:

1. Miya Edmonson, California Department of Transportation District 7 (November 4, 2020)
2. Felicia Silva, California Department of Fish and Wildlife (November 17, 2020)

Letters commenting on the information and analysis in the IS/MND were received during the public review period from the following groups and/or individuals:

3. Michael Gardner (October 16, 2020)
4. Kimberly Walters (October 22, 2020)
5. Krishna Chaitanya (October 22, 2020)
6. Gloria Cuaxiloa de Shivers (October 22, 2020)
7. Charles Shivers (October 23, 2020)
8. Lissa Morales (October 29, 2020)
9. Amy Valenzuela-Mier (October 29, 2020)
10. Aaron Moore (October 29, 2020)
11. Karen Efthyvoulos (October 29, 2020)
12. Chris Campbell (October 30, 2020)
13. Lisa Ochsner (October 30, 2020)
14. Steven Marine (October 30, 2020)
15. Christopher Quint and Dr. Susan Rice (October 30, 2020)
16. Barbara and Leon Shoag (November 7, 2020)
17. Diana Lejins, Environmental Concerns of Greater Long Beach (November 10, 2020)
18. David Dingman (November 11, 2020)
19. Renee Lawler (November 11, 2020)
20. Renee Hannan (November 12, 2020)
21. Ray Pechardo (November 12, 2020)
22. Robert and Susan Brunelle (November 13, 2020)
23. Melinda Cotton (November 13, 2020)
24. Sharon Denham (November 13, 2020)
25. Yve Hart (November 13, 2020)

26. Heather Mansell (November 13, 2020)
27. Kelley Pierce (November 13, 2020)
28. Linda Scholl (November 13, 2020)
29. Kristin Snyder (November 13, 2020)
30. Mike Vaccaro (November 13, 2020)
31. Matt Leaver (November 13, 2020)
32. Robert A. Wherry Jr. (November 13, 2020)
33. Kim Worobec (November 13, 2020)
34. Amy York (November 13, 2020)
35. Rae Gabelich (November 14, 2020)
36. Maria Hall (November 14, 2020)
37. Bob Marsocci (November 14, 2020)
38. Johnnie Mae, Hank, and Corbin McFadzen (November 14, 2020)
39. Laura Isabel Serna, PhD (November 14, 2020)
40. Devon Trunnelle (November 14, 2020)
41. David Walker (November 14, 2020)
42. Kimberly Walters (November 14, 2020)
43. Kristen Pekril Dominguez (November 15, 2020)
44. Jan Wilcox (November 15, 2020)
45. Kate Martinez (November 15, 2020)
46. Natalie Meza (November 15, 2020)
47. Stephen Russo (November 15, 2020)
48. Loma Savella (November 15, 2020)
49. Ashely Baker Scotto (November 15, 2020)
50. Alex Tomko, Jason Goussak, and Kallan Zimmerman (November 15, 2020)
51. Gabrielle Weeks (November 15, 2020)
52. Hawk McFadzen (November 15, 2020)
53. Carol Bartels, MFT (November 16, 2020)
54. Ann Cantrell (November 16, 2020)
55. Tahesha Knapp-Christensen (November 16, 2020)
56. Elizabeth Cummings (November 16, 2020)
57. Terry Dadraas (November 16, 2020)
58. Glennis Dolce (November 16, 2020)
59. Lynette Ferenczy (November 16, 2020)
60. D. Fruta (November 16, 2020)
61. Cynthia Perez Gerhart (November 16, 2020)

62. Bob Gill, Los Cerritos Neighborhood Association (November 16, 2020)
63. Padric Gleason Gonzales (November 16, 2020)
64. Richard Gutmann (November 16, 2020)
65. Cynthia Kellman, Chatten-Brown, Carstens & Minteer LLP (November 16, 2020)
66. Sara Ladd (November 16, 2020)
67. Debby Lalonde (November 16, 2020)
68. Mike Laquatra (November 16, 2020)
69. Corliss Lee (November 16, 2020)
70. Krysta Lin (November 16, 2020)
71. Candace Mead and Brophy Dale (November 16, 2020)
72. Pat Querido (November 16, 2020)
73. Linda Scholl (November 16, 2020)
74. Carli Macrate Steers (November 16, 2020)
75. Amy Valenzuela (November 16, 2020)
76. Joseph M. Weinstein, PhD (November 16, 2020)
77. Roger Martin Holman (November 16, 2020)
78. Robert Fox (November 16, 2020)
79. Dr. Dave Gerhart (November 16, 2020)
80. Grace Orpilla (November 16, 2020)
81. Carlos S. Ovalle (November 16, 2020)
82. Christian Ovalle (November 16, 2020)
83. Juan E. Ovalle (November 16, 2020)
84. Juan Ovalle Jr. (November 16, 2020)
85. Rhina Ovalle (November 16, 2020)
86. Nelson Araujo (November 16, 2020)
87. Dora Araujo (November 16, 2020)
88. Carlos Turcios (November 16, 2020)
89. Susana Barreras (November 16, 2020)
90. Kenia Barreras (November 16, 2020)
91. David Pulitzer (November 16, 2020)
92. Miriam Pulitzer (November 16, 2020)
93. Long Beach Area Group, Sierra Club (November 16, 2020)
94. Harris Cohen (November 16, 2020)

CEQA Guidelines Section 15074(b) states that prior to approving a project, the lead agency must consider the proposed IS/MND together with any comments received during the public review process. Written responses to comments are not required; however, the City of Long Beach, as lead agency, has prepared written responses to agency comments received for consideration by

the Planning Commission. The comment letters followed by the City's responses are attached. The numbers provided in the right margin of the comment letters correspond to the responses to comments.

Based on the evaluation in the IS/MND and the comments received, the City has determined that all potential impacts associated with the proposed project are less than significant with incorporation of identified mitigation measures (MMs). A Mitigation Monitoring and Reporting Program has also been prepared and will be implemented for the proposed project. Therefore, the City of Long Beach has determined that an MND in accordance with CEQA is the appropriate environmental document for the proposed project.

---

## **Response to Comment Letter 1**

**Miya Edmonson, OGR/CEQA Chief**  
**California Department of Transportation (Caltrans) District 7**  
**November 4, 2020**

**Response 1.1.** The commenter has detailed use of Vehicle Miles Traveled (VMT) as the standard transportation analysis, which was used as a basis for the analysis in the Mitigated Negative Declaration (MND) as described in Section XVII. Transportation. No further response is required.

**Response 1.2** The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 1.3** As noted in the MND, Section XVII. Transportation, and as stated by the commenter, the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis or TIS is not required.

**Response 1.4** The Project will be subject to all applicable permits. Additionally, according to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant’s Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

*This page intentionally left blank*

---

## **Response to Comment Letter 2**

**Felicia Silva, Environmental Scientist**  
**California Department of Fish and Wildlife South Coast Region 5**  
**November 17, 2020**

**Response 2.1.** The comment does not raise a question regarding the CEQA process or MND. No additional response is required.

**Response 2.2.** All comments are acknowledged. As detailed in Attachment B, no new impacts were identified by the commenter. Because no new significant impacts are identified, there is no need for additional mitigation measures; however, the City will include the recommended measures identified in Attachment B as a condition of approval for the Project.

**Response 2.3.** All comments are acknowledged. As detailed in Attachment B, no new impacts were identified by the commenter. Because no new significant impacts are identified, there is no need for additional mitigation measures; however, the City will include the recommended measures identified in Attachment B as a condition of approval for the Project.

**Response 2.4.** All comments are acknowledged. As detailed in Attachment B, no new impacts were identified by the commenter. Because no new significant impacts are identified, there is no need for additional mitigation measures; however, the City will include the recommended measures identified in Attachment B as a condition of approval for the Project.

**Response 2.5.** All comments are acknowledged. As detailed in Attachment B, no new impacts were identified by the commenter. Because no new significant impacts are identified, there is no need for additional mitigation measures; however, the City will include the recommended measures identified in Attachment B as a condition of approval for the Project.

**Response 2.6.** All comments are acknowledged. As detailed in Attachment B, no new impacts were identified by the commenter. Because no new significant impacts are identified, there is no need for additional mitigation measures; however, the City will include the recommended measures identified in Attachment B as a condition of approval for the Project.

**Response 2.7.** All comments are acknowledged. As detailed in Attachment B, no new impacts were identified by the commenter. Because no new significant impacts are identified, there is no need for additional mitigation measures; however, the City will include the recommended measures identified in Attachment B as a condition of approval for the Project.

**Response 2.8.** All comments are acknowledged. As detailed in Attachment B, no new impacts were identified by the commenter. Because no new significant impacts are identified, there is no need for additional mitigation measures; however, the City will include the recommended measures identified in Attachment B as a condition of approval for the Project.

**Response 2.9.** All comments are acknowledged. As detailed in Attachment B, no new impacts were identified by the commenter. Because no new significant impacts are identified, there is no need for additional mitigation measures; however, the City will include the recommended measures identified in Attachment B as a condition of approval for the Project.

**Response 2.10.** All comments are acknowledged. As detailed in Attachment B, no new impacts were identified by the commenter. Because no new significant impacts are identified, there is no need for additional mitigation measures; however, the City will include the recommended measures identified in Attachment B as a condition of approval for the Project.

**Response 2.11.** The comment does not raise a question regarding the CEQA process or MND. No additional response is required.

### **Response to Comment Letter 3**

**Michael Gardner**

**October 16, 2020**

**Response 3.1.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

*This page intentionally left blank*

---

## **Response to Comment Letter 4**

**Kimberly Walters**

**October 22, 2020**

**Response 4.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 4.2.** A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND.

Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

**Response 4.3.** As indicated in Section 3.1, Physical Characteristics, of the MND, the proposed Project would include landscaping consisting of trees, shrubs, and ground cover along the southern and eastern sides of the proposed building and along the margins of the proposed parking lot east of the building and in the southeasterly extension of the Project site.

**Response 4.4** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

---

## **Response to Comment Letter 5**

**Krishna Chaitanya**  
October 22, 2020

**Response 5.1.** A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

**Response 5.2** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the

SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 5.3.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

## **Response to Comment Letter 6**

**Gloria Cuaxiloa de Shivers**

**October 22, 2020**

**Response 6.1.** A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

**Response 6.2.** Proposed uses include a self-storage facility, recreational storage area, and a warehouse space with limited office space. These uses would not attract vectors and there would be adequate on-site drainage to reduce the potential for standing water. Additionally, there all exterior trash areas will be contained within an enclosure that will be regularly emptied and cleaned pursuant to Sections 8.08.190, 8.08.200 and 8.08.201 of the City of Long Beach Municipal Code<sup>1</sup>. All interior trash collection areas will be located in common areas within the buildings and will be regularly emptied and cleaned pursuant to Sections 8.08.200 and 8.08.201 of the City of Long Beach Municipal Code<sup>1</sup>. Further, the Applicant for the Artesia Parcels has will maintain a regular pest control service. The service would also be available for additional service calls on an as-needed basis.

---

<sup>1</sup> Long Beach, 2020 (November 11). Long Beach Municipal Code.  
[https://library.municode.com/ca/long\\_beach/codes/municipal\\_code?nodeId=TIT8HESA\\_CH8.08CODI\\_8.08.200](https://library.municode.com/ca/long_beach/codes/municipal_code?nodeId=TIT8HESA_CH8.08CODI_8.08.200)  
RACOCCRE

*This page intentionally left blank*

---

## **Response to Comment Letter 7**

**Charles Shivers**

**October 23, 2020**

**Response 7.1.** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

**Response 7.2.** The Project site is privately owned and is not permitted for use by any school, college, or university under existing conditions.

**Response 7.3.** As discussed in Section III. Air Quality, of the MND, the proposed dump station would be designed to connect directly to the City's sewer system and would meet all sanitation requirements to protect against spills and odors. Additionally, as discussed in Section X. Hydrology and Water Quality, of the MND, the Project would implement best management practices for managing and capturing stormwater runoff, which would include any unanticipated spills.

**Response 7.4.** As detailed in Section IX, Hazards and Hazardous Materials, of the MND, the specific type of warehousing use that would occupy the proposed warehouse building is unknown; however, both the warehouse and storage uses would restrict storage and transport of hazardous materials as part of the rental agreements with the exception of common materials associated with vehicles and vehicle maintenance (i.e., fuel and oil).

Further, all onsite workers would be trained on containment and cleanup of small spills of hazardous materials, including gasoline or oil from vehicles, pursuant State guidelines contained in the Cal/OSHA Title 8 regulations. In the event of a hazardous materials release of an amount and/or a toxicity that workers could not safely contain and clean up, the site operator or manager would contact Long Beach Environmental Health, the Certified Unified Program Agency for the City of Long Beach, immediately.

**Response 7.5.** As detailed in Section X, Hydrology and Water Quality, of the MND, the Project would include construction of an on-site storm drain system, including proposed detention systems, storm drainpipes, and a biofiltration system. The locations and diameters of the storm drains, and the capacity of the detention system, would comply with requirements of the City of Long Beach Department of Public Works and the City's low impact development (LID) Manual. All existing and proposed storm drainpipes would be subject to inspection, and lining if necessary, to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

**Response 7.6.** As detailed in Section X. Hydrology and Water Quality, all runoff would be subject to treatment consistent with the City's LID Manual, Los Angeles Regional Water Quality Control Board (LARWQB) Order No. R4-2014-0024, Waste Discharge Requirement for Municipal Separate Storm Sewer System Discharges from the City of Long Beach (MS4 Permit), prior to discharge into the storm drain facilities. As discussed in the MND, the Project would develop and implement a Storm Water Pollution Prevention Plan (SWPPP), including best management practices, to be implemented during construction. Additionally, the Project would include

biofiltration techniques and stormwater detention during Project operation to ensure compliance with the MS4 Permit.

**Response 7.7.** Proposed uses include a self-storage facility, recreational storage area, and a warehouse space with limited office space. These uses would not attract vectors and there would be adequate on-site drainage to reduce the potential for standing water. Additionally, there all exterior trash areas will be contained within an enclosure that will be regularly emptied and cleaned pursuant to Sections 8.08.190, 8.08.200 and 8.08.201 of the City of Long Beach Municipal Code<sup>2</sup>. All interior trash collection areas will be located in common areas within the buildings and will be regularly emptied and cleaned pursuant to Sections 8.08.200 and 8.08.201 of the City of Long Beach Municipal Code<sup>i</sup>. Further, the Applicant for the Artesia Parcels has will maintain a regular pest control service. The service would also be available for additional service calls on an as-needed basis.

**Response 7.8.** A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

**Response 7.9.** As detailed in Section I, Aesthetics, of the MND, the proposed Project would involve installation of security lighting including parking lot lighting over the surface RV storage spaces on the Artesia parcels, and exterior building lighting on both the Artesia and McDonald Trust parcels. All Project-related lighting would comply with the Long Beach Municipal Code requirements related to preventing light and glare from intruding onto adjacent sites (Section 21.41.259 of the Long Beach Municipal Code<sup>i</sup>). The Project site is in an urbanized area with vehicle lights, streetlights, billboard lights, and exterior building lights. As such, the Project would not cause a substantial increase in lighting in the area, including within the surrounding residential community.

**Response 7.10.** As detailed in Section I, Aesthetics, of the MND, a full analysis addressed the Project's potential to degrade the existing visual condition of the site. Although the Project would modify the site's visual appearance from the surrounding community, no significant impacts were identified.

**Response 7.11.** The MND includes impacts to surrounding uses, including impacts specific to Los Cerritos School, which was specifically included as part of the air quality, hazards and hazardous materials, land use, and noise analyses. The school was considered as a sensitive receptor and the Long Beach Unified School District has been notified of the Project.

**Response 7.12.** Proposed uses include a self-storage facility, recreational storage area, and a warehouse space with limited office space. These uses would not attract vectors and there would be adequate on-site drainage to reduce the potential for standing water. Additionally, there all exterior trash areas will be contained within an enclosure that will be regularly emptied and cleaned pursuant to Sections 8.08.190, 8.08.200 and 8.08.201 of the City of Long Beach Municipal Code<sup>i</sup>. All interior trash collection areas will be located in common areas within the buildings and will be regularly emptied and cleaned pursuant to Sections 8.08.200 and 8.08.201 of the City of Long Beach Municipal Code<sup>i</sup>. Further, the Applicant for the Artesia Parcels has will

---

<sup>2</sup> Long Beach, 2020 (November 11). Long Beach Municipal Code.  
[https://library.municode.com/ca/long\\_beach/codes/municipal\\_code?nodeId=TIT8HESA\\_CH8.08CODI\\_8.08.200](https://library.municode.com/ca/long_beach/codes/municipal_code?nodeId=TIT8HESA_CH8.08CODI_8.08.200)  
RACOCCRE

maintain a regular pest control service. The service would also be available for additional service calls on an as-needed basis.

**Response 7.13.** The MND includes impacts to surrounding uses, including impacts specific to Los Cerritos School, which was specifically included as part of the air quality, hazards and hazardous materials, land use, and noise analyses.

**Response 7.14.** As detailed in Section I, Aesthetics, of the MND, the proposed Project would involve installation of security lighting including parking lot lighting over the surface RV storage spaces on the Artesia parcels, and exterior building lighting on both the Artesia and McDonald Trust parcels. All Project-related lighting would comply with the Long Beach Municipal Code requirements related to preventing light and glare from intruding onto adjacent sites (Section 21.41.259 of the Long Beach Municipal Code<sup>i</sup>). The Project site is in an urbanized area with vehicle lights, streetlights, billboard lights, and exterior building lights. As such, the Project would not cause a substantial increase in lighting in the area, including within the surrounding residential community, including Los Cerritos School.

**Response 7.15.** As detailed in Section I, Aesthetics, of the MND, a full analysis was prepared which addressed the Project's potential to degrade the existing visual condition of the site. Although the Project would modify the site's visual appearance from the surrounding community including Los Cerritos School, no significant impacts were identified.

**Response 7.16.** The City released the MND for a 30-day public review period, including notification in compliance with Section 15073 of the State CEQA Guidelines. Links to the full document were sent via email to including:

California Department of Conservation, South Coast Air Quality Management District, Southern California Edison, LA Metro, 7 Surrounding cities, County of Los Angeles, 9 Tribal Representatives, 9 contacts at Department of Toxic Substances Control, 4 contacts at Long Beach Unified School District, Los Cerritos Elementary School, 2 Council Members (Districts 7 and 8), 13 community members and neighborhood associations.

The document was also uploaded to the State Clearinghouse site which was subsequently distributed to: California Air Resources Board, California Department of Conservation, California Department of Parks and Recreation, California Department of Transportation, Division of Aeronautics California Department of Water Resources, California Highway Patrol, California Native American Heritage Commission, California Natural Resources Agency, California Public Utilities Commission, California Regional Water Quality Control Board, Los Angeles Region 4, California State Lands Commission, Department of Toxic Substances Control, Office of Historic Preservation, San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy, State Water Resources Control Board, Division of Water Quality, California Department of Transportation, District 7, and California Department Fish and Wildlife, South Coast Region 5.

**Response 7.17.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 7.18** The Long Beach Unified School District was notified of the Project as part of the public review process via email notification and no comments were received.

*This page intentionally left blank*

---

## **Response to Comment Letter 8**

**Lissa Morales**

**October 29, 2020**

**Response 8.1.** A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

Additionally, the MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately-owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

---

## **Response to Comment Letter 9**

**Amy Valenzuela-Mier**

**October 29, 2020**

**Response 9.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 9.2.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 9.3.** A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND.

Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

---

## **Response to Comment Letter 10**

**Aaron Moore**  
October 29, 2020

**Response 10.1.** A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

As detailed in Section XI, Land Use and Planning, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately-owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

## **Response to Comment Letter 11**

**Karen Efthyvoulos**  
October 29, 2020

**Response 11.1.** The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately-owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

*This page intentionally left blank*

**Response to Comment Letter 12**

**Chris Campbell**  
**October 30, 2020**

**Response 12.1.** As detailed in Section IX, Hazards and Hazardous Materials, of the MND, the Project would not result in hazardous emissions and the handling or storage of hazardous materials would be limited to common materials associated with vehicles and vehicle maintenance (i.e., fuel and oil). Further, all remediation and construction-related activities on the site would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements. As such, the school occupants and park users would not be exposed to substantial health risks.

*This page intentionally left blank*

## **Response to Comment Letter 13**

**Lisa Ochsner**  
**October 30, 2020**

**Response 13.1.** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations. The MND discloses the Conditional Use Permit (CUP) as a project action and all uses associated with the CUP are evaluated throughout the MND; should the project be approved approval would include all requested actions including the CUP and the zone change.

*This page intentionally left blank*

## **Response to Comment Letter 14**

**Steven Marine**  
**October 30, 2020**

**Response 14.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

*This page intentionally left blank*

**Response to Comment Letter 15**

**Christopher Quint and Dr. Susan Rice**  
**October 30, 2020**

**Response 15.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

*This page intentionally left blank*

---

## **Response to Comment Letter 16**

**Barbara and Leon Shoag**

**November 7, 2020**

**Response 16.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately-owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work

with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

## **Response to Comment Letter 17**

**Diana Lejins, Environmental Concerns of Greater Long Beach**  
**November 10, 2020**

**Response 17.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 17.2.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 17.3.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 17.4.** Refer to Response 17.3.

**Response 17.5.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 17.6.** Section XVII. Transportation, of the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required. Further, a full air quality analysis was performed for the Project. The analysis, which is summarized in Section III of the MND, includes both construction- and operation-related impacts.

**Response 17.7.** As detailed in Section X. Hydrology and Water Quality, all runoff would be subject to treatment consistent with the City's LID Manual, Los Angeles Regional Water Quality Control Board (LARWQB) Order No. R4-2014-0024, Waste Discharge Requirement for Municipal Separate Storm Sewer System Discharges from the City of Long Beach (MS4 Permit), prior to discharge into the storm drain facilities. As discussed in the MND, the Project would develop and implement a Storm Water Pollution Prevention Plan (SWPPP), including best management practices, to be implemented during construction. Additionally, the Project would include biofiltration techniques and stormwater detention during Project operation to ensure compliance with the MS4 Permit.

**Response 17.8** The comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

---

## **Response to Comment Letter 18**

**David Dingman**  
**November 11, 2020**

**Response 18.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City’s Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. As detailed on page 5-11 in Section III. Air Quality of the MND, the Project

site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

As detailed in Section I, Aesthetics, of the MND, a full analysis was prepared which addressed the Project's potential to degrade the existing visual condition of the site. Although the Project would modify the site's visual appearance from the surrounding community including Los Cerritos School and Park, no significant impacts were identified.

**Response 18.2.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines.

**Response 18.3.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the

SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Prior to initiation of the soil surcharge work, a qualified biologist conducted a survey for special status plants species, delineated the locations of southern tarplant, making the locations visible to avoid disturbance (MM BIO-1), made notes of potential areas to be used as habitat for bats (MM BIO-5), and conduct a visual survey for the Crotch bumble bee and found no nests within the survey area (MM BIO-3). The qualified biologist collected seeds and prepared them for future translocation pursuant to MM BIO-1 of the MND as detailed in Attachment D. Please refer to Attachment C for the public notice issued by DTSC.

**Response 18.4.** Refer to Response 18.3.

**Response 18.5.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment which meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 18.6.** Section XVII. Transportation, of the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required. Further, a full air quality analysis was performed for the Project. The analysis, which is summarized in Section III of the MND, includes both construction- and operation-related impacts.

**Response 18.7.** As detailed in Section X. Hydrology and Water Quality, all runoff would be subject to treatment consistent with the City's LID Manual, Los Angeles Regional Water Quality Control Board (LARWQB) Order No. R4-2014-0024, Waste Discharge Requirement for Municipal

Separate Storm Sewer System Discharges from the City of Long Beach (MS4 Permit), prior to discharge into the storm drain facilities. As discussed in the MND, the Project would develop and implement a Storm Water Pollution Prevention Plan (SWPPP), including best management practices, to be implemented during construction. Additionally, the Project would include biofiltration techniques and stormwater detention during Project operation to ensure compliance with the MS4 Permit.

**Response 18.8** The comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

---

## **Response to Comment Letter 19**

**Renee Lawler**

**November 11, 2020**

**Response 19.1.** At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately-owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 19.2.** As detailed in Section X, Hydrology and Water Quality, of the MND, Project development would not increase the rate or amount of surface runoff. The Project would include construction of an on-site storm drain system, including proposed detention systems, storm drainpipes, and a biofiltration system. The locations and diameters of the storm drains, and the capacity of the detention system, would comply with requirements of the City of Long Beach Department of Public Works and the City’s LID Manual. All existing and proposed storm drainpipes would be subject to inspection, and lining if necessary, to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

**Response 19.3.** Refer to Response 19.1.

**Response 19.4.** Refer to Response 19.1.

**Response 19.5.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the

Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project. The MND provides a comprehensive analysis of the Project's impacts on the site and surrounding uses, including biological and cultural resources, as detailed in Section IV. Biological Resources and Section V. Cultural Resources of the MND.

**Response 19.6.** The MND provides a comprehensive analysis of the Project's impacts on the site and surrounding uses, including cultural resources, as detailed in Section V. Cultural Resources of the MND. Further, the City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations. As the commenter notes, no equestrian overlay exists on the Project site, thus the comment does not raise a question regarding the CEQA process or MND.

**Response 19.7.** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map and is not intended for residential uses. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

**Response 19.8.** The comment does not raise a question regarding this current CEQA process or MND. The MND prepared for the proposed Project was subject to community input as part of the public circulation process. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 19.9.** As detailed in Section X, Hydrology and Water Quality, of the MND, Project development would not increase the rate or amount of surface runoff. The Project would include construction of an on-site storm drain system, including proposed detention systems, storm drainpipes, and a biofiltration system. The locations and diameters of the storm drains, and the capacity of the detention system, would comply with requirements of the City of Long Beach Department of Public Works and the City's LID Manual. All existing and proposed storm drainpipes would be subject to inspection, and lining if necessary, to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

**Response 19.10.** As detailed in Section X. Hydrology and Water Quality, all runoff would be subject to treatment consistent with the City's LID Manual, Los Angeles Regional Water Quality Control Board (LARWQB) Order No. R4-2014-0024, Waste Discharge Requirement for Municipal Separate Storm Sewer System Discharges from the City of Long Beach (MS4 Permit), prior to discharge into the storm drain facilities. As discussed in the MND, the Project would develop and implement a Storm Water Pollution Prevention Plan (SWPPP), including best management practices, to be implemented during construction. Additionally, the Project would include

biofiltration techniques and stormwater detention during Project operation to ensure compliance with the MS4 Permit.

**Response 19.11.** The MND provides a comprehensive analysis of the Project's impacts on the site and surrounding uses. All applicable plans and regulatory documents were included as part of the analysis. It is noted that the Project site, which exists as private property, is located over 200 feet from the top of the river. The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately-owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

*This page intentionally left blank*

## **Response to Comment Letter 20**

**Renee Hannan**

**November 12, 2020**

**Response 20.1.** The MND does address local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations. Potential impacts to the surrounding neighborhood, including residential uses, Los Cerritos School, and Los Cerritos Park were evaluated throughout the MND, with specific analyses related to aesthetics in Section III. Aesthetics of the MND, and evaluation of the Project's potential air quality and noise impacts to these uses which are considered to be sensitive receptors. All impacts were found to be less than significant with implementation of recommended mitigation measures. Additionally, a full biological analysis was performed for the Project, which is summarized in Section IV. Biological Resources of the MND. As part of the analysis, the Artesia parcels and McDonald Trust parcels were both surveyed for waters or wetlands potentially jurisdictional to the United States Army Corps of Engineers (Corps), Los Angeles Regional Water Quality Control Board (LARWQCB), or California Department of Fish and Wildlife (CDFW); no jurisdictional areas were identified.

It is noted that the proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

*This page intentionally left blank*

---

## **Response to Comment Letter 21**

**Ray Pechado**

**November 12, 2020**

**Response 21.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or

construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

As detailed in Section I, Aesthetics, of the MND, a full analysis was prepared which addressed the Project's potential to degrade the existing visual condition of the site. Although the Project would modify the site's visual appearance from the surrounding community including residential uses, Los Cerritos School, and Los Cerritos Park, no significant impacts were identified.

A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

---

## **Response to Comment Letter 22**

**Robert and Susan Brunelle**

**November 13, 2020**

**Response 22.1.** A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled and specifically accounted for sensitive receptors, including residential uses, Los Cerritos School, and Los Cerritos Park. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

**Response 22.2.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 22.3.** The comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

**Response 22.4.** The MND does address local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

---

## **Response to Comment Letter 23**

**Melinda Cotton**

**November 13, 2020**

**Response 23.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 23.2.** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

**Response 23.3.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

*This page intentionally left blank*

---

## **Response to Comment Letter 24**

**Sharon Denham**

**November 13, 2020**

**Response 24.1.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 24.2.** The MND includes impacts to surrounding uses, including impacts specific to Los Cerritos School and Los Cerritos Park as well as the adjacent residential community, all of which were specifically included as part of the air quality, hazards and hazardous materials, land use, and noise analyses. Further, Section XVII. Transportation, of the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required.

**Response 24.3.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

*This page intentionally left blank*

---

## **Response to Comment Letter 25**

**Yve Hart**

**November 13, 2020**

**Response 25.1.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 25.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 25.3.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the

Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

---

## **Response to Comment Letter 26**

**Heather Mansell**

**November 13, 2020**

**Response 26.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related

activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

As detailed in Section I, Aesthetics, of the MND, a full analysis was prepared which addressed the Project's potential to degrade the existing visual condition of the site. Although the Project would modify the site's visual appearance and alter views of the Los Angeles River area from the surrounding community, no significant impacts were identified. The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

---

## **Response to Comment Letter 27**

**Kelley Pierce**  
November 13, 2020

**Response 27.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

A full biological analysis was performed for the Project, which is summarized in Section IV. Biological Resources of the MND. As part of the analysis, the Artesia parcels and McDonald Trust parcels were both surveyed for wildlife, including potential impacts to birds. It was identified that, with implementation of recommended mitigation measure related to nesting birds and in compliance with Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Section 3503, impacts would be less than significant.

The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

As noted in the MND, Section XVII. Transportation, the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required and the amount of trips would not generate a significant impact.

**Response to Comment Letter 28**

**Linda Scholl**

**November 13, 2020**

**Response 28.1.** No comments were attached; therefore, no response can be provided. Comment was resent on November 16, 2020 and is included as Comment Letter 73. Please refer to Responses 73.1 through 73.5.

*This page intentionally left blank*

---

## **Response to Comment Letter 29**

**Kristin Snyder**

**November 13, 2020**

**Response 29.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

**Response 29.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

## **Response to Comment Letter 30**

**Mike Vaccaro**

**November 13, 2020**

**Response 30.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

*This page intentionally left blank*

## **Response to Comment Letter 31**

**Matt Leaver**  
**November 13, 2020**

**Response 31.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The comment regarding the prior zone change is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

*This page intentionally left blank*

---

## **Response to Comment Letter 32**

**Robert A. Wherry Jr.**  
November 13, 2020

**Response 32.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor

Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

---

## **Response to Comment Letter 33**

**Kim Worobec**

**November 13, 2020**

**Response 33.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

**Response 33.2.** Refer to Response 33.1.

---

## **Response to Comment Letter 34**

**Amy York**  
**November 13, 2020**

**Response 34.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 34.2.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

*This page intentionally left blank*

---

## **Response to Comment Letter 35**

**Rae Gabelich**

**November 14, 2020**

**Response 35.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 35.2.** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels (approximately 1.03 acre), APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map and is not intended for preservation as open space. Further, the MND was prepared in accordance with the State CEQA Guidelines, included a full analysis based on the State's Environmental Checklist, included as Appendix G to the State CEQA Guidelines, including a full analysis of air quality impacts in Section III. Air Quality of the MND, which is addressed in more detail below.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related

activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

**Response 35.3.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to

ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

*This page intentionally left blank*

---

## **Response to Comment Letter 36**

**Maria Hall**  
**November 14, 2020**

**Response 36.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines.

A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and

the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

---

## **Response to Comment Letter 37**

**Bob Marsocci**

**November 14, 2020**

**Response 37.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 37.2.** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The comment on the zone change is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

**Response 37.3.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received,

and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

## **Response to Comment Letter 38**

**Johnnie Mae, Hank, and Corbin McFadzen**  
**November 14, 2020**

**Response 38.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

*This page intentionally left blank*

---

## **Response to Comment Letter 39**

**Laura Isabel Serna, PhD**

**November 14, 2020**

**Response 39.1.** A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

As noted in the MND, Section XVII. Transportation, the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required and the amount of trips would not generate a significant impact.

*This page intentionally left blank*

---

## **Response to Comment Letter 40**

**Devon Trunnelle**

**November 14, 2020**

**Response 40.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of

particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

---

## **Response to Comment Letter 41**

**David Walker**

**November 14, 2020**

**Response 41.1.** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 41.2.** A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region’s ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of

particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

**Response 41.3** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

---

## **Response to Comment Letter 42**

**Kimberly Walters**

**November 14, 2020**

**Response 43.1.** At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 43.2.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the

Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 43.3.** Section VIII. Greenhouse Gases provides a full analysis of the Project's contributions to climate change, which includes the concept of trapping heat in the atmosphere. As noted in the MND, combined greenhouse gas emissions would not exceed the SCAQMD recommended threshold. Further, as noted in Section 2.2, Existing Conditions of the MND, the majority of the site exists as bare land with limited vegetation and the Project would include installation of landscaping along the Project site perimeter (refer to Section 3.1, Physical Characteristics of the MND).

**Response 43.4.**

The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map and is not intended for preservation as open space. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

**Response 43.5.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 43.6.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

The zone change comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

## **Response to Comment Letter 43**

**Kristen Pekril Dominguez**

**November 15, 2020**

**Response 43.1.** The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

The zone change comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

*This page intentionally left blank*

---

**Response to Comment Letter 44**

**Jan Wilcox**  
**November 15, 2020**

**Response 44.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related

activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

**Response 44.2.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 44.3.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any

commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 44.4.** Refer to Response 44.3.

**Response 44.5.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 44.6.** Section XVII. Transportation, of the MND includes a trip generation analysis which identifies the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required and the amount of trips would not generate a significant impact. Further, a full air quality analysis was performed for the Project, which is summarized in Section III of the MND and analyzes both construction- and operation-related impacts.

**Response 44.7.** As detailed in Section X. Hydrology and Water Quality, all runoff would be subject to treatment consistent with the City's LID Manual, Los Angeles Regional Water Quality Control Board (LARWQB) Order No. R4-2014-0024, Waste Discharge Requirement for Municipal Separate Storm Sewer System Discharges from the City of Long Beach (MS4 Permit), prior to

discharge into the storm drain facilities. As discussed in the MND, the Project would develop and implement a Storm Water Pollution Prevention Plan (SWPPP), including best management practices, to be implemented during construction. Additionally, the Project would include biofiltration techniques and stormwater detention during Project operation to ensure compliance with the MS4 Permit.

**Response 44.8** The comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the City's previous process followed regarding the change in land use designation.

---

## **Response to Comment Letter 45**

**Kate Martinez**

**November 15, 2020**

**Response 45.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 45.2.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

Further, the MND was prepared in accordance with the State CEQA Guidelines, included a full analysis based on the State's Environmental Checklist, included as Appendix G to the State CEQA Guidelines, including a full analysis of air quality impacts in Section III. Air Quality of the MND.

**Response 45.3.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other

site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

---

## **Response to Comment Letter 46**

**Natalie Meza**

**November 15, 2020**

**Response 46.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 46.2.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

Further, the MND was prepared in accordance with the State CEQA Guidelines, included a full analysis based on the State's Environmental Checklist, included as Appendix G to the State CEQA Guidelines, including a full analysis of air quality impacts in Section III. Air Quality of the MND.

**Response 46.3.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other

site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

---

## **Response to Comment Letter 47**

**Stephen Russo**

**November 15, 2020**

**Response 47.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

*This page intentionally left blank*

## **Response to Comment Letter 48**

**Loma Savella**

**November 15, 2020**

**Response 48.1.** The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

*This page intentionally left blank*

---

## **Response to Comment Letter 49**

**Ashley Baker Scotto**  
November 15, 2020

**Response 49.1.** The comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E to addresses the prior change in land use designation.

**Response 49.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 49.3.** A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

**Response 49.4.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of

the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 49.5.** A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

Section XVII. Transportation, of the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required. Further, a full air quality analysis was performed for the Project. The analysis, which is summarized in Section III of the MND, includes both construction- and operation-related impacts.

**Response 49.6.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

---

## **Response to Comment Letter 50**

**Alex Tomko, Jason Goussak, and Kallan Zimmerman**  
**November 15, 2020**

**Response 50.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

*This page intentionally left blank*

---

## **Response to Comment Letter 51**

**Gabrielle Weeks**

**November 15, 2020**

**Response 51.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

**Response 51.2.** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map and is not intended for equestrian use.

At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur

within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 51.3.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

---

## **Response to Comment Letter 52**

**Hawk McFadzen**

**November 15, 2020**

**Response 52.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 52.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 52.3.** A full biological analysis was performed for the Project, which is summarized in Section IV. Biological Resources of the MND. As part of the analysis, the Artesia parcels and McDonald Trust parcels were both surveyed for waters or wetlands potentially jurisdictional to the Corps, LARWQCB, or CDFW; no jurisdictional areas were identified. The Artesia parcels and McDonald Trust parcels were both surveyed for wildlife, including potential impacts to birds. It was identified that, with implementation of recommended mitigation measure BIO-4 related to nesting birds and in compliance with Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Section 3503, impacts would be less than significant. In addition to BIO-4 related to nesting birds, MM BIO-5 was identified in Section IV. Biological Resources, of the MND to reduce the potential for man-made impacts, including noise and dust associated with construction activities on bats.

**Response 52.4.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the

Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

---

## **Response to Comment Letter 53**

**Carol Bartels, MFT**  
**November 16, 2020**

**Response 53.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

**Response 53.2.** The MND does address local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-

going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 53.3.** The comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

**Response 53.4.** Section XVII. Transportation, of the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required and the amount of trips would not generate a significant impact.

A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

---

## **Response to Comment Letter 54**

**Ann Cantrell**  
**November 16, 2020**

**Response 54.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 54.2.** As noted by the Commenter, the MND contained a typo on page 1-1, incorrectly noting that the Project would have no impact or less than significant impacts related to air quality. However, the following sentence in the MND correctly identified that the Project has the potential to have significant impacts related to air quality unless the recommended mitigation measures are incorporated. That conclusion was based on a full air quality analysis which was performed for the Project and is summarized in Section III. Air Quality of the MND.

The following text has been modified on page 1-1, Section 1.2, Summary of Findings:

Based on the environmental checklist form prepared for the Project (Section 4.0) and supporting environmental analysis (Section 5.0), the Project would have no impact or less than significant impacts in the following environmental areas: aesthetics, agriculture and forest resources, **air quality**, greenhouse gases, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, utilities and services systems, and wildfire.

**Response 54.3.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 54.4.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project. The analysis included aesthetics (Section I),

greenhouse gases (Section VIII), hydrology and water quality (Section X), land use and planning (Section XI), noise (Section XIII), transportation/traffic (Section XVII), and recreation (Section XVI).

**Response 54.5.** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). As discussed in the MND, the Project site exists as vacant property is privately owned, and access to the site is restricted. The Project site does not currently exist as open space or parkland and the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations. In accordance with zoning and the General Plan designation, the site is not intended for preservation as recreation or open space.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 54.6.** Refer to Response 54.3 related to the soil surcharge work. Prior to initiation of the soil surcharge work, a qualified biologist conducted a survey for special status plants species, delineated the locations of southern tarplant, making the locations visible to avoid disturbance (MM BIO-1), made notes of potential areas to be used as habitat for bats (MM BIO-5), and conduct a visual survey for the Crotch bumble bee and found no nests within the survey area (MM BIO-3). The qualified biologist collected seeds and prepared them for future translocation pursuant to MM BIO-1 of the MND as detailed in Attachment D.

---

## **Response to Comment Letter 55**

**Tahesha Knapp-Christensen**

**November 16, 2020**

**Response 55.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 55.2.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. This determination is made irrespective of the size of a Project site. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines.

The City released the MND for a 30-day public review period, including notification in compliance with Section 15073 of the State CEQA Guidelines. Links to the full document were sent via email to including:

California Department of Conservation, South Coast Air Quality Management District, Southern California Edison, LA Metro, 7 Surrounding cities, County of Los Angeles, 9 Tribal Representatives, 9 contacts at Department of Toxic Substances Control, 4 contacts at Long

Beach Unified School District, Los Cerritos Elementary School, 2 Council Members (Districts 7 and 8), 13 community members and neighborhood associations.

The document was also uploaded to the State Clearinghouse site which was subsequently distributed to: California Air Resources Board, California Department of Conservation, California Department of Parks and Recreation, California Department of Transportation, Division of Aeronautics California Department of Water Resources, California Highway Patrol, California Native American Heritage Commission, California Natural Resources Agency, California Public Utilities Commission, California Regional Water Quality Control Board, Los Angeles Region 4, California State Lands Commission, Department of Toxic Substances Control, Office of Historic Preservation, San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy, State Water Resources Control Board, Division of Water Quality, California Department of Transportation, District 7, and California Department Fish and Wildlife, South Coast Region 5.

**Response 55.3.** As detailed in Sections V, Cultural Resources, and XVIII, Tribal Cultural Resources, of the MND, a full analysis was prepared, which addressed the Project's potential to impact archaeological and tribal cultural resources. This analysis also included compliance with Assembly Bill 52 and Senate Bill 18 and involved government-to-government consultation between the City and tribal representatives. The consultation effort was conducted pursuant to AB 52 and SB 18 requirements, and involved tribes who have indicated interest in receiving notification regarding projects in the City for AB 52 and tribal representatives identified by the California Native American Heritage Commission for SB 18. Mitigation measures TRIB CULT-1 through 5 were drafted based on this consultation, implementation of which would reduce any potentially significant impacts to less than significant levels. MMs TRIB CULT-1 through 5 require presence of a Tribal monitor to be present and monitor all Project-related, ground-disturbing activities as well as specific steps to be followed upon discovery of a tribal or archaeological resource.

---

## **Response to Comment Letter 56**

**Elizabeth Cummings**  
November 16, 2020

**Response 56.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 56.2.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 56.3.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property

line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

**Response 56.4.** The comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

---

## **Response to Comment Letter 57**

**Terry Dadras**

**November 16, 2020**

**Response 57.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 57.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 57.3.** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

*This page intentionally left blank*

## **Response to Comment Letter 58**

**Glennis Dolce**

**November 16, 2020**

**Response 58.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

*This page intentionally left blank*

---

## **Response to Comment Letter 59**

**Lynette Ferenczy**

**November 16, 2020**

**Response 59.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 59.2.** As noted in the MND, Section XVII. Transportation, the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required and the amount of trips would not generate a significant impact.

As part of this analysis in the response to Threshold XVII(d), the MND addressed the potential for increased hazards due to Project design. Further, the Project's design has been subject to review and approval by the City's Public Works department as part of the City's plan review process.

**Response 59.3.** As detailed in Section I, Aesthetics, of the MND, the proposed Project would involve installation of security lighting including parking lot lighting over the surface RV storage spaces on the Artesia parcels, and exterior building lighting on both the Artesia and McDonald Trust parcels. All Project-related lighting would comply with the Long Beach Municipal Code requirements related to preventing light and glare from intruding onto adjacent sites (Section 21.41.259 of the Long Beach Municipal Code<sup>1</sup>). The Project site is in an urbanized area with vehicle lights, streetlights, billboard lights, and exterior building lights. As such, lighting that would be installed by the Project would not be a substantial increase in lighting in the area including the surrounding residential community. Additionally, the Commenter correctly states that the proposed Project would exceed the allowable maximum height of 28 feet; as discussed in Section 3.3 of the MND, the Project includes a request for a Standards Variance to permit building height of 40 feet in the proposed Commercial Storage zone. The proposed increase in height was also evaluated in Section I. Aesthetics, of the MND and it was determined that the height of the proposed building combined with the setback from public viewpoints substantially detract from scenic vistas of the San Gabriel Mountains.

A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impacts after implementation of recommended mitigation.

**Response 59.4.** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels (approximately 1.03 acre), APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map and is not intended for preservation as open space.

According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 59.5.** At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-

---

going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 59.6.** As detailed in Section X. Hydrology and Water Quality, all runoff would be subject to treatment consistent with the City's LID Manual, Los Angeles Regional Water Quality Control Board (LARWQB) Order No. R4-2014-0024, Waste Discharge Requirement for Municipal Separate Storm Sewer System Discharges from the City of Long Beach (MS4 Permit), prior to discharge into the storm drain facilities. As discussed in the MND, the Project would develop and implement a Storm Water Pollution Prevention Plan (SWPPP), including best management practices, to be implemented during construction including erosion- and sediment-control BMPs that meet or exceed measures required by the NPDES Construction General Permit, as well as BMPs that control the other potential construction-related pollutants. Additionally, the Project would include biofiltration techniques and stormwater detention during Project operation to ensure compliance with the MS4 Permit.

Compliance with the NPDES Construction General Permit and the preparation of a SWPPP would ensure that any impacts to downstream waters resulting from construction activities on the Project site would be less than significant. Erosion-control and treatment-control BMPs would be implemented per NPDES requirements.

Section VIII. Greenhouse Gases provides a full analysis of the Project's contributions to climate change, which includes the concept of trapping heat in the atmosphere. As noted in the MND, combined greenhouse gas emissions would not exceed the SCAQMD recommended threshold. Further, as noted in Section 2.2, Existing Conditions of the MND, the majority of the site exists as bare land with limited vegetation and the Project would include installation of landscaping along the Project site perimeter (refer to Section 3.1, Physical Characteristics of the MND). According to the Biological Resources Assessment for the Industrial-Self Storage/RV Parking at 3701 Pacific Place, Long Beach, California and the Results of a Biological Constraints Analysis for 3701 Pacific Place Project in the City of Long Beach, Los Angeles County, California (refer to Appendices C1 and C2 of the MND, respectively), the Project site contains limited trees and vegetation. According to Appendix C1, the 16.59-acre survey area contained 13.5 acres of disturbed area, 1.43 acres is ornamental landscape, and 1.66 acres is urban/commercial land or paved roadways and parking areas. The remainder of the site was characterized in Appendix C2 as disturbed areas including disturbed, non-native vegetation, bare ground, and asphalt paving.

**Response 59.7.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 59.8.** As noted in the MND, Section XVII. Transportation, the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required and the amount of trips would not generate a Project-specific or cumulatively significant impact.

**Response 59.9.** A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or

construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

**Response 59.10.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

*This page intentionally left blank*

---

## **Response to Comment Letter 60**

**D. Fruta**

**November 16, 2020**

**Response 60.1.** Section XVII. Transportation, of the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required. Further, a full air quality analysis was performed for the Project. The analysis, which is summarized in Section III of the MND, includes both construction- and operation-related impacts.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other

site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

## **Response to Comment Letter 61**

**Cynthia Perez Gerhart**  
**November 16, 2020**

**Response 61.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

*This page intentionally left blank*

---

## **Response to Comment Letter 62**

**Bob Gill, Los Cerritos Neighborhood Association**  
**November 16, 2020**

**Response 62.1.** The trip generation memoranda (refer to Appendices I1 and I2 of the MND) were completed before the new City guidelines were published. Before work on the memoranda began, the City agreed that the CMP guidelines for analysis were most appropriate. Further, given the size and location of the project, it was agreed that a full study would not be needed.

**Response 62.2.** It is correct that the transportation project discussion of the California Technical Advisory is not applicable. However, based on the June 2020 City of Long Beach guidelines concerning VMT, any project which generates fewer than 500 daily trips is considered to have less-than-significant transportation impact. This project is expected to generate 134 daily trips and is therefore exempt from VMT analysis.

**Response 62.3.** While it is understood that there are existing operational concerns at the intersection of Wardlow Road and Pacific Place, this is an existing issue related primarily to the Metro crossing. Access into and out of the neighborhood would continue similar to existing conditions via Pacific Avenue and/or Long Beach Boulevard given the small contribution of vehicle trips related to the Project. Further, Project-related traffic would not exclusively use the identified intersection given the availability of other routes and the likelihood of traffic coming from multiple directions. In any case, the City is not responsible for the Metro line schedule.

**Response 62.4.** As detailed in Section I, Aesthetics, of the MND, a full analysis was prepared which addressed the Project's potential to degrade the existing visual condition of the site and from public viewsheds. According to CEQA, impacts are analyzed from public viewsheds and are not analyzed from private viewsheds. The site photographs (refer to Exhibit 4a and ab of the MND) are taken directly adjacent to the Project site and provide a closer, but representative view of the Project site from surrounding land uses, including residential uses to the northeast and southeast, Los Cerritos School, and Los Cerritos Park. As discussed in Section I, Aesthetics, of the MND, although the Project would modify the site's visual appearance from the surrounding community's public spaces, no significant impacts were identified.

**Response 62.5.** A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise were modeled and included all aspects of the proposed Project, including the impacts of new structures. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

As noted by the commenter, the Project site will include a retaining wall. The proposed wall will be surfaced with sound absorptive vegetation along the railroad corridor. The retention wall surface will be configured with a grid pattern of soil, vegetation and a concrete matrix. The height of the retaining wall will be at-grade or slightly above grade and will vary in height depending on topographic conditions at the site. No solid wall is proposed beyond the necessary height requirements for the retaining wall. Extending above the retaining wall will be metal fence pickets with substantial gaps which do not effectively reflect noise to the existing residential uses along Del Mar Avenue.

**Response 62.6.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect

on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

---

## **Response to Comment Letter 63**

**Padric Gleason Gonzales**

**November 16, 2020**

**Response 63.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

**Response 63.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to

ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 63.3.** A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

The air quality analysis accounted for the presence of sensitive receptors, including residential neighborhoods, schools, and parks. The nearest offsite residential receptors were evaluated within the localized air quality analysis. The closest residential sensitive receptor occurs at 50 meters from construction activities. The LA River trail is also located at approximately 50 meters from construction activities. Based on methodologies established by the South Coast Air Quality Management District (SCAQMD) for the assessment of localized air quality impacts, there would be less than significant impacts at nearby sensitive receptors related to project construction activities.

As detailed in Section X. Hydrology and Water Quality, all runoff would be subject to treatment consistent with the City's LID Manual, Los Angeles Regional Water Quality Control Board

(LARWQB) Order No. R4-2014-0024, Waste Discharge Requirement for Municipal Separate Storm Sewer System Discharges from the City of Long Beach (MS4 Permit), prior to discharge into the storm drain facilities. As discussed in the MND, the Project would develop and implement a Storm Water Pollution Prevention Plan (SWPPP), including best management practices, to be implemented during construction. Additionally, the Project would include biofiltration techniques and stormwater detention during Project operation to ensure compliance with the MS4 Permit.

**Response 63.4.** As noted above, a full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation. The air quality analysis accounted for the presence of sensitive receptors, including residential neighborhoods, schools, and parks.

**Response 63.5.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

*This page intentionally left blank*

---

## **Response to Comment Letter 64**

**Richard Gutmann**

**November 16, 2020**

**Response 64.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines.

As detailed in Section IX, Hazards and Hazardous Materials, of the MND, the specific type of warehousing use that would occupy the proposed warehouse building is unknown; however, both the warehouse and storage uses would restrict storage and transport of hazardous materials as part of the rental agreements with the exception of common materials associated with vehicles and vehicle maintenance (i.e., fuel and oil).

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

As noted in Section 3.3 of the MND, DTSC is a responsible agency for the Project, and approvals would be required prior to initiation of construction to ensure the site is suitable and safe for

development, as noted above. This includes consideration of the proposed Project features such as the structural load of the proposed structures and anticipated loads in the RV storage area.

**Response 64.2 and Attachment.** Section XVII. Transportation, of the MND includes a trip generation analysis which identifies the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required. The Commenter provided a memorandum related to development of a 500-space park-and-ride facility, stating that the proposed Project would also exacerbate conditions at the Wardlow Road and Pacific Place intersection. While it is understood that there are existing operational concerns at the intersection of Wardlow Road and Pacific Place, this is an existing issue related primarily to the Metro crossing. Access into and out of the neighborhood would continue similar to existing conditions via Pacific Avenue and/or Long Beach Boulevard given the small contribution of vehicle trips related to the Project. Further, Project-related traffic would not exclusively use the identified intersection given the availability of other routes and the likelihood of traffic coming from multiple directions. Additionally, the trip generation related to a park-and-ride facility would be greater than what is expected with the proposed Project. According to the ITE Trip Generation Manual for a park-and-ride lot with bus and light rail service (land use code 090), a 500-space facility would generate 1,405 daily trips which exceeds the proposed Project's expected 134 daily trips<sup>3</sup>.

---

<sup>3</sup> *Trip Generation Manual, 10<sup>th</sup> Edition.* Institute of Transportation Engineers (ITE), 2017

---

## **Response to Comment Letter 65**

**Cynthia Kellman, Chatten-Brown, Carstens & Minteer LLP**  
**November 16, 2020**

**Response 65.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 65.2.** A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

The MND (page 5-6) explains that the South Coast Air Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and is in "nonattainment" for certain pollutants listed in MND Table 3: Criteria Pollutant Designations in The South Coast Air Basin (MND, p. 5-7). The MND (page 5-10) concludes that the Project would not, pursuant to established CEQA standards, cause an increase the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards.

The comment that the South Coast Air Basin has a high asthma score is acknowledged. The MND (page 5-7) explains that certain populations are more susceptible to respiratory complications, including young children, the elderly, and persons with existing health problems. The MND (page 5-8) also includes information about sensitive receptors, as defined under CEQA, which include residences, schools, childcare centers, athletic facilities, playgrounds, retirement homes, and convalescent homes (SCAQMD 1993).

SB 535 (De León, 2012) allocates a certain percentage of cap-and-trade Greenhouse Gas Reduction Funds to benefit disadvantaged communities. The comment that the Project site is located within a disadvantaged community is acknowledged. That does not change the conclusions in the MND. See below regarding environmental justice claims.

The comment that West Long Beach is divided by freeways that carry truck routes to and from major ports, warehouses, and commercial distribution centers is acknowledged. The comment that diesel-powered ships, trains, cargo handling equipment and other machinery involved in freight movement may increase diesel particulate pollution is acknowledged as irrelevant to the Project.

Potential pollution caused by diesel-powered trucks is addressed in the MND under Construction Emissions (page 5-13) and Operational Emissions (page 5-15). As explained in the MND (page 5-15), there would be approximately 18 truck parking spots on the McDonald Trust Parcels, if developed as a warehouse, and the 134 daily vehicle trips assumed for the McDonald Trust Parcels would not result in a significant impact under CEQA. See MND Table 13 and the Project trip generation memorandum (Psomas 2020b). The SCAQMD has developed significance thresholds for proposed development projects that would indicate whether a project would result in significant or substantial amounts of air pollution to the region or to the local area proximate to a Project site. These regional emissions thresholds shown in the SCAQMD's CEQA Air Quality Handbook (1993) were developed at a time when air quality conditions were substantially worse than they are today and were developed to determine whether a project would impair the region's progress toward attainment of health protective State and National ambient air quality standards. The proposed project was found to result in emissions that are below these regional significance thresholds and consequently do not contribute significantly to the region's air pollution burden. Subsequent to the publication of the CEQA Air Quality Handbook, the SCAQMD adopted Localized Significance Thresholds (LST) to assess the potential for air quality impacts of proposed projects to the local communities proximate to the project site. The LST was developed specific to the air quality and meteorological conditions of each city within the South Coast Air Basin. The LST used for the assessment of impacts of the Pacific Place Project to the local community was specifically selected for area for which the Project site is located. Project air pollutant emissions occurring at the Project site were quantified based on methodologies developed by the SCAQMD and were found to be below the LSTs. Consequently, the development of the Proposed Project is not considered by the SCAQMD to result in air quality related impacts that would significantly affect the health of communities proximate to the Project site. Because the Project would result in emissions which are below both the SCAQMD's CEQA significance thresholds for both regional and localized air quality, the Project would not result in significant air quality impacts to the region and those air quality sensitive residential uses proximate to the project site.

Furthermore, as explained in the MND (page 5-16), the combined long-term operational emissions for the entire Project (Artesia Parcels and McDonald Trust Parcels) would be less than the applicable SCAQMD thresholds and the impact would be less than significant under CEQA. Therefore, no mitigation measures are required. Even so, as noted by the commenter, truck idling would be regulated pursuant to Noise Mitigation Measure NOI-4 (MND p. 5-73).

The comment that the Project site is in proximity to bike routes, equestrian pathways and river overlooks is acknowledged. The MND includes the required analysis of potential impacts on

sensitive receptors as defined under CEQA (see above), which does not include recreational areas separate from those facilities. However, the nearest offsite residential receptors were evaluated within the localized air quality analysis. The closest residential sensitive receptor occurs at 50 meters from construction activities. The LA River trail is also located at approximately 50 meters from construction activities. Based on methodologies established by the South Coast Air Quality Management District (SCAQMD) for the assessment of localized air quality impacts, there would be less than significant impacts at nearby sensitive receptors related to project construction activities.

The MND concludes that Project air quality impacts would be mitigated to less-than-significant; therefore, there would be no significant unavoidable air quality impact that could in turn cause an environmental justice impact, as claimed by the commenter, and no evidence, let alone substantial evidence, has been provided to the contrary.

**Response 65.3.** Determining potential recreational impacts under CEQA requires an analysis of whether the project would: (1) increase the use of existing neighborhood and regional parks or other recreational facilities such that a substantial deterioration of the facility would occur or be accelerated and/or (2) include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. CEQA Guidelines Appendix G: Environmental Checklist Form. The MND (page 5-76) concludes that there would be no impact because the Project does not propose any residential uses (or recreational facilities) and therefore, would not trigger either criteria.

The comment that West Long Beach residents have one acre of parkland per 1,000 residents is acknowledged.

The comment that West Long Beach has a need for more parks and open space is acknowledged.

The comment that West Long Beach is included in the RiverLink plan is acknowledged.

The comment that the Project would result in a significant recreational impact under CEQA because the City's RiverLink document assumed that the Artesia Parcels portion of the Project site would remain in its current use (private driving range) is acknowledged. See the appropriate criteria under CEQA, above.

The comment that the Project would result in a significant recreational impact under CEQA because the Project site would not be developed as a park or other open space is acknowledged. See the appropriate criteria under CEQA, above.

The comment that the now-extant Redevelopment Agency acquired a former brownfield in 2001 and converted that property into a park is acknowledged. The Project site is privately owned.

The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). As discussed in the MND, the Project site exists as vacant property is privately owned, and access to the site is restricted. The Project site does not currently exist as open space or parkland and the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations. In accordance with zoning and the General Plan designation, the site is not intended for preservation as recreation or open space.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 65.4.** The comment that the Project will increase VMT to and from the Project site is acknowledged. The MND (page 5-80) concludes that VMT-related transportation impacts would be less than significant under CEQA.

The comment that emissions from diesel buses, trains and ships results in air contamination is acknowledged as irrelevant to the Project. Potential pollution caused by diesel-powered trucks is addressed under Response 65.2.

The comment that West Long Beach has a higher cancer risk from airborne toxics because of its proximity to diesel truck routes is acknowledged. Again, the MND (page 5-10) concludes that the Project would not, pursuant to established CEQA standards, cause an increase the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards.

The comments related to risks associated with exposure to Nitrogen oxides (Nox) and ozone are acknowledged. As explained under Response 65.2 above, the MND (page 5-10) concludes that the Project would not, pursuant to established CEQA standards, cause an increase the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards.

The comment that the Air Quality section of the MND does not consider diesel PM impacts from the operation of the McDonald Trust Parcels is acknowledged as unfounded. See the Response 65.2.

The comment that the MND does not analyze refrigeration is acknowledged as unfounded. As noted by the commenter, the MND does recognize that some of the trucks driving to and from the warehouse on the McDonald Trust Parcels could be refrigerated trucks (MND, page 5-73). The less-than-significant air quality impact conclusion discussed under Response 65.2 would remain the same in the unlikely event that all 134 daily vehicle trips would be by refrigerated trucks because of the high threshold under the applicable SCAQMD standards.

The comment that the MND hides the fact that the South Coast Air Quality Basin is designated as a non-attainment area is acknowledged as unfounded. The MND (page 5-6) explains that the South Coast Air Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and is in “nonattainment” for certain pollutants listed in MND Table 3: Criteria Pollutant Designations in The South Coast Air Basin (MND, p. 5-7), including ozone, which is specifically mentioned by the commenter. It is also clearly stated in MND Table 3 that the South Coast Air Quality Basin is in “nonattainment” for lead, but only in Los Angeles County. As noted by the commenter, lead is also addressed on MND page 5-17 where it is clarified that lead emissions are only a concern for certain industrial sources, such as battery manufacturing and reprocessing facilities, which are not proposed as part of the Project.

The comment regarding MND Table 4: Air Quality Levels Measured at The Long Beach Monitoring Stations (MND page 5-8) is acknowledged. The purpose of that table is to provide information about local air quality attainment status (in addition to data for the entire South Coast Air Basin under Table 3). It is explained in the MND that the monitoring data in Table 4 includes maximum pollutant levels for the years 2017-2019 pursuant to the existing monitoring station located approximately two miles from the Project site. It is clear that no standards were exceeded during that timeframe, with the exception of state standards for PM10 (approximately 25.8 days in 2018 and three days in 2019) and national standards for PM2.5 (approximately four days in 2017 and six days in 2018). Project-related impacts are analyzed separately taking baseline conditions into consideration, and, as explained under Response 65.2, would be less-than-significant under CEQA.

The comment regarding construction-related emissions is acknowledged. The MND (page 5-7) does acknowledge that persons with existing health problems (e.g., asthma) are most susceptible to respiratory complications. Also, as explained on MND page 5-17, the proposed Project would generate certain pollutants during construction that pertain to the South Coast Air Quality Basin's current nonattainment status (for O<sub>3</sub>, PM10 and PM2.5); however, construction emissions would be below the SCAQMD regional and localized significance thresholds.

The comment regarding VOC and NOx emissions is acknowledged, although the referenced MND page pertains to GHG emissions. The MND does analyze whether Project-related VOC and NOx emissions would result in project-specific or cumulative air quality impacts and concludes that both would be less than significant. See above and Response 65.2.

The comment regarding visitors to the Project site during and after construction is acknowledged. Visitors (i.e., customers) have been accounted for under operational impacts and visitors expected during the construction phase would be minimal (e.g., for City inspections).

The comment regarding fugitive dust is acknowledged. As explained in the MND (page 5-11), SCAQMD Rule 403: Fugitive Dust, requires that fugitive dust be controlled with best available control measures. Construction contractors must also comply with Rule 401: Visible Emissions and 402: Nuisance. All remediation and construction-related activities would also be subject to Rule 1466, which requires the implementation of dust control measures. See Response 65.11 regarding potentially contaminated soils.

The comment regarding the failure to provide "feasible mitigation" or "project alternatives" to prevent exposure to "significant construction or air quality impacts" is acknowledged. The MND does include feasible mitigation measures where such mitigation is required under CEQA (i.e., where mitigation is required to reduce a potentially significant impact to less than significant). Project alternatives are not required for a MND since there is no significant unavoidable impact to address. Again, the MND concludes that air quality impacts would be less than significant so no mitigation measures or project alternatives are required under CEQA. See above and Response 65.2.

**Response 65.5.** The comments regarding construction light and noise are acknowledged.

The MND (page 5-66) acknowledges that local residents would be subject to elevated noise levels during construction. The relevant standards are those established in the local general plan or noise ordinance (or applicable standards of other agencies). See CEQA Guidelines Appendix G: Environmental Checklist Form. The MND concludes (page 5-67) that because construction noise would be audible at nearby sensitive receptors (residents), Mitigation Measure NOI-1 (MND page 5-72) would be implemented, which requires a variety of measures to limit noise from construction activities to reduce noise impacts to less than significant (e.g., limited noisy construction hours, use of mufflers, etc.). Therefore, even though the aforementioned standards do not include

standards related to wildlife or park users, as claimed, Mitigation Measure NOI-1 would also benefit those receptors.

The MND does not fail to propose noise-related mitigation measures. See above for information about Mitigation Measure NOI-1. Additional mitigation measures (NOI-2 and NOI-3) are also required for the Artesia Parcels related to HVAC units and the proposed carwash and mechanical room to ensure that the noise levels comply with the Long Beach Municipal Code. See MND page 5-72.

The commenter suggests that construction lighting could result in a significant impact. The MND does analyze whether the Project would create a new source of substantial light and glare which would adversely affect day or nighttime view in the area, pursuant to CEQA Guidelines Appendix G: Environmental Checklist Form. The MND (page 5-3) concludes that related impacts would be less than significant because of the building materials proposed and the fact that the Project site is in an urbanized area with existing vehicle lights, streetlights, billboard lights, and exterior building lights. The conclusion would be the same for any construction-related lighting, which would be temporary.

Operational impacts are also addressed in the MND (page 5-68). The MND does account for such impacts, including from the ten truck dock doors contemplated for the McDonald Trust Parcels, which, as explained, would be addressed through required compliance with the City Noise Ordinance (Municipal Code Section 8.80.200E), which regulates noise associated with loading and unloading activities; therefore, no mitigation is required. The MND also accounts for potential truck idling and associated impacts on sensitive receptors and requires implementation of Mitigation Measure NOI-4 (MND page 5-73) to reduce truck idling. Additionally, according to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Parking lot noise associated with the Project involves noise generated from onsite vehicle travel, engine starts, car door slams, tire squeals, and people talking. The Project involves a total of 36 peak hour morning vehicle trips and 48 evening peak hour vehicle trips over an approximate 20 acre Project site. Most of the parking lot spaces are associated with the proposed Self-Storage facility which is located at the southern portion of the site away from existing residential uses to the north by over 750 feet. Vehicles generally park closer to commercial buildings, so it can be assumed that the majority of spaces and noise generation from parking lot activities will occur on the southern portion of the Project site away from existing residential uses. Using the peak hourly evening of 48 trips (47 cars and 1 RV assumed) for every hour of the daytime, the FTA Noise Impact Assessment Spreadsheet calculates that parking lot noise levels would be 39 dBA (at a worst case distance of 200 feet) over the course of the day. As shown in Table 23 of the IS/MND, existing monitored noise levels would range from 63 to 67 dBA at the Project site boundaries. Because noise from parking lot activities would be substantially less than existing conditions, noise from Project related parking lot activities would not result a significant noise impact to local noise sensitive uses.

**Response 65.6.** The comment claiming that the Project sponsor has violated City ordinances related to a surcharge test is acknowledged. The commenter later acknowledges that DTSC is aware of surcharge program activities.

The commenter suggests that there would be a significant unavoidable impact related to surcharge tests. As explained in the MND (page 5-69), there are no applicable City standards for vibration-induced structural damage and Caltrans standards only pertain to buildings, residential structures and historic ruins and ancient monuments. See MND Table 25: Vibration Damage Threshold Criteria (MND, page 5-70). As explained in the MND (page 5-71), pile driving and

blasting are typically the sources of the most severe vibration during construction; however, those activities are not proposed for the Project. As shown in MND Table 28: Vibration Levels at Sensitive Uses (MND p. 5-71), vibration levels would not exceed damage or annoyance thresholds and therefore, impacts would be less than significant. Contrary to the claim made by the commenter, potential impacts related to damage to subterranean structures such as sanitary sewer lines would not occur. As discussed on page 10 of the Phase I Environmental Site Assessment (refer to Appendix G1 of the MND), two pipelines cross the southeastern corner of the Artesia Parcels and two additional pipelines are located approximately 1,000 feet from the Project site to the southeast. The two on-site pipelines are both active crude pipelines operated by Crimson Pipeline L.P. and do not pass beneath the proposed building footprint. For the storm drain pipe that does pass beneath the proposed building (identified by the commenter as a sanitary sewer line), as detailed in Section X, Hydrology and Water Quality, of the MND, all existing and proposed storm drainpipes would be subject to inspection, and lining if necessary, to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

**Response 65.7.** The comment claiming that the Project sponsor has violated CEQA by performing a surcharge test is acknowledged.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

The commenter notes that Department of Toxic Substance Control (DTSC) review is required for certain activities. As explained in the MND (page 5-52) an RP for the Artesia Parcels has been prepared and submitted to the DTSC for review and approval, which proposes mitigation and administrative measures for the Artesia Parcels, as well as long-term Operation and Maintenance (O&M) activities that will reduce potential risks to future construction workers, future users of the site, and the general public. The MND includes specific requirements under the RP and acknowledges that during grading and earthmoving activities, any potentially impacted soils handled per the protocols and procedures of the SMP must be reported and discussed with DTSC. As explained in the MND, these actions fall within Mitigation Measure HAZ-1 and would ensure that impacts related to hazardous materials would be remediated to the satisfaction of the DTSC. Therefore, the MND concludes that impacts on the Artesia Parcels would be less than significant, with implementation of that mitigation measure.

See Response 65.6 regarding concerns raised in the comment letter related to subterranean structures.

The comment claiming that the Project sponsor has violated CEQA by removing southern tarplant species from the Artesia Parcels is acknowledged. The MND (page 5-24) requires implementation of Mitigation Measure BIO-1 to ensure that the impact on special status plant species would be less than significant, including the potential payment of an in-lieu fee for the preservation and conservation of the southern tarplant. Prior to initiation of the soil surcharge work, a qualified biologist conducted a survey for special status plants species, delineated the locations of southern

tarplant, making the locations visible to avoid disturbance (MM BIO-1. The qualified biologist collected seeds and prepared them for future translocation pursuant to MM BIO-1 of the MND.

**Response 65.8.** The commenter questions whether the Native American Heritage Commission (NAHC) has been informed about the nature of the Project, citing AB 52 consultation requirements. As explained on page 5-27 of the MND, the NAHC conducted a sacred lands file search to determine the possibility of Native American cultural resources and/or sacred places in the Project vicinity that are not documented in other databases. That search concluded that there are no identified sacred places or objects with cultural value to a California native American tribe on the Project site. The MND acknowledges that the absence of that specific information does not necessarily indicate the absence of potential cultural resources; hence, the required implementation of Mitigation Measure CULT-1 (see below).

The comment that the Project area is eligible to be designated as a Tribal Traditional Landscape is acknowledged. The comments related to the Diary of Father Pedro Font and the book Adobe Days by Sarah Bixby Smith are also acknowledged. However, no evidence of eligibility or a related significant impact under CEQA has been provided.

The comments related to Mitigation Measure CULT-1 (MND page 5-28) are acknowledged. That mitigation measure is a standard and legally sufficient archeology mitigation measure under CEQA that addresses a situation where cultural (archeological) resources are discovered during construction activities. Under that circumstance, the mitigation measure requires that all earth-disturbing activities within a 100-foot radius must be ceased. The mitigation measure requires that a professional archeological consultant be hired (subject to City approval) to evaluate the significance of the find. If the find is determined to be an archeological resource then it must be appropriately avoided. If that is not feasible, the archeological resource must be salvaged pursuant to Section 15064.5 of the CEQA Guidelines, which in turn includes specific steps that must be taken if human remains are discovered, including but not limited to the requirement to contact the NAHC.

The comment related to Rancho Los Cerritos is acknowledged; however, that site is not part of the Project site.

**Response 65.9.** The comments related to surface runoff and the existing stormwater system are acknowledged. The Project would include stormwater detention systems and biofiltration systems. As explained in more detail on pages 5-58 and 5-88 of the MND, the biofiltration systems would address the “typical” urban runoff mentioned in the comment letter by removing pollutants from contaminated stormwater before the water is discharged to a proposed storm drain pipe, which would discharge to an existing municipal storm drain with sufficient capacity. There is no evidence that runoff (toxic or otherwise) would be directed to the equestrian trail or Los Angeles River.

The comment regarding the location of the 100-year flood zone is acknowledged. The MND (page 5-61) explains that the Project site is outside of the 100-year flood hazard zone (FEMA 2020), meaning that the Project would not impede or redirect flood flows.

The comment regarding impermeable surfaces is acknowledged. Again, the Project would include biofiltration and stormwater detention systems, which would sufficiently address the stormwater concerns raised by the commenter. No evidence has been provided to support the commenter’s claim that the LA River would be contaminated by the Project.

**Response 65.10.** See Response 65.9. The commenter provides no evidence that the Project would contribute to increased flooding due to the location of an off-site flood hazard zone. Again,

the Project site is outside of the 100-year flood hazard zone (FEMA 2020) and the Project would sufficiently capture and treat runoff. See Response 65.9.

**Response 65.11.** See Response 65.2 regarding potential air quality impacts.

The comments related to high traffic density are acknowledged. As explained in the MND, transportation impacts under CEQA are now analyzed pursuant to the VMT methodology rather than the extant traffic density (LOS) methodology.

The comments related to the VMT analysis are acknowledged. Again, the MND (page 5-80) concludes that VMT-related transportation impacts would be less than significant under CEQA. The VMT discussion cited by the commenter pertains to GHG impacts, not VMT impacts, and the assumption that many of the self-storage units would be used by residents that are closer to the Artesia Parcels as compared to other self-storage locations, thereby reducing VMT, is not determinative to any of the less-than-significant conclusions in the MND.

The comment related to children walking to a park is acknowledged. No evidence has been provided to demonstrate that the Project would result in a related significant hazardous condition under CEQA.

**Response 65.12.** The appropriate standard under CEQA is whether the project would substantially degrade existing visual character or quality of public views of the site and its surroundings and if the project is in an urbanized area, whether the project would conflict with applicable zoning and other regulations governing scenic quality. CEQA Guidelines Appendix G: Environmental Checklist Form. As explained in the MND (page 5-3), the Project would include landscaping around the perimeter of the Artesia Parcels and on the McDonald Trust Parcels, along the southern and eastern sides of the warehouse building and along the margins of the proposed parking lots to the east and in the southeasterly extension. The MND concludes that the visual quality of the Project site would be an improvement compared to existing conditions (a dilapidated driving range) and no evidence has been provided to the contrary.

As explained in the MND (page 5-1), the Project would also not result in a significant impact on a scenic vista (views of the San Gabriel and Santa Ana Mountains), due in part to the proposed height of the warehouse building and setback from the Metro A Line tracks.

Potential cultural resources impacts are discussed under Response 65.8.

Potential open space impacts are discussed under Response 65.3.

The commenter provides no evidence that the Project would contribute to increased flooding due to the location of an off-site flood hazard zone. Again, the Project site is outside of the 100-year flood hazard zone (FEMA 2020) and the Project would sufficiently capture and treat runoff. See Response 65.9.

Potential impacts related to light and glare are discussed under Response 65.5.

**Response 65.13.** The comment related to Mitigation Measure HAZ-5 (MND page 5-56) is acknowledged. That mitigation measure requires agency sign-off on the implementation of the RAP, RAW or RP for the Project, as appropriate, prior to issuance of a Certificate of Occupancy for development on the McDonald Trust Parcels. In other words, the mitigation measure requires proof of compliance with any required RAP, RAW or RP before the warehouse building may be occupied.

Mitigation Measure HAZ-4 (MND page 5-55) (not addressed by the commenter) in turn requires a RAP, RAW or RP if the Phase II ESA identifies soil contaminants and/or soil vapor exceeding environmental screening levels for commercial uses. The RAP, RAW or RP must specify site remediation, engineering controls, future operation and monitoring (O&M) activities, and/or administrative controls to allow for commercial/industrial development of the site. For each contaminant the RAP, RAW or RP must specify how some combination of hazardous materials remediation, engineering controls, O&M activities, and/or administrative controls would reduce exposure to Project construction workers and Project operational workers to below concentrations specified in regulatory action levels for each respective contaminant.

As explained in the MND, a RP has been prepared and submitted to DTSC for review and approval. The specific contents of the RP are set forth on page 5-52 of the MND.

These foregoing mitigation measures are legally adequate and no evidence has been provided to the contrary.

The comments related to the prior use of the Artesia Parcels and subsurface investigations are acknowledged. The MND (page 5-49) acknowledges that the Phase I ESA for the Artesia Parcels identified various Recognized Environmental Conditions (REC) including oil sums, former oil wells and nearby off-site historical oil development.

Subsurface investigations have been substantial. As explained on pages 5-50 and 5-52 of the MND, a Final Site Assessment approved by DTSC in March 2020 included soil samples from 41 borings and soil vapor samples from 24 probes, and numerous other environmental investigations conducted by various environmental consultants have collectively included collection of soil samples from over 150 locations, soil vapor samples from over 50 locations, and multiple rounds of groundwater investigations.

See Response 65.4 regarding fugitive dust.

The comments related to soil vapors are acknowledged. The commenter claims that a vapor-proof membrane and explosion-proof ventilation system with alarms is required, without providing any related evidence. The MND sufficiently addresses potential impacts related to soil vapors. Again, a RP has been prepared and submitted to DTSC for review and approval and the specific contents of the RP are set forth on page 5-52 of the MND, including but not limited to a vapor intrusion mitigation system with a vapor barrier and vapor probes with a gas containment system to capture, treat (as necessary), and vent any volatile COPCs that may accumulate beneath hardscape surfaces, buildings, or other areas across the site.

Also, as explained in the comment letter, SCAQMD Rule 1166 requires real-time monitoring of soil gases during soil movement and import.

**Response 65.14.** The comments related to purported inconsistencies and discrepancies between the Project and current land use plans and policies are acknowledged. The appropriate standard under CEQA is whether the project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purposes of avoiding or mitigating an environmental effect. CEQA Guidelines Appendix G: Environmental Checklist Form.

As explained on page 5-62 of the MND, the Project includes an application for a General Plan amendment to change the General Plan designation for the McDonald Trust Parcels from OS to NI to permit light industrial and other uses on those parcels. The Project also includes an application for a Zone Change for the Artesia Parcels from IL to CS to permit self-storage facilities and RV storage with a Conditional Use Permit (CUP) on those parcels, which CUP is requested as part of the Project. Therefore, the MND appropriately concludes that the Project would not

conflict with applicable plans, policies or regulations, upon approval of the requested General Plan amendment and Zone Change.

At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

No evidence of a conflict with any other land use plan, policy, or regulation adopted for the purposes of avoiding or mitigating an environmental effect has been provided.

**Response 65.15.** The comment regarding Mitigation Measure BIO-1 (MND page 5-24) is acknowledged. That mitigation measure requires a survey of special status plant species (including the southern tarplant) during the peak blooming period and prior to construction activities. If impacts to the southern tarplant cannot be avoided, the related mitigation measures require payment of an in-lieu fee for the permanent preservation and conservation of the southern tarplant. If an in-lieu fee system is not yet available, the backup mitigation measure requires the translocation of the southern tarplant to a suitable location determined in collaboration with a qualified professional biologist pursuant to detailed specified criteria set forth under the mitigation measure. Again, mitigation would only be required where impacts to the southern tarplant cannot be avoided through, for example, delineation and observance of a no-disturbance buffer from the outer edge of the plant(s), as previously suggested by CDFW.

**Response 65.16.** An EIR is not required for the Project because all potentially significant impacts would be mitigated to a less than significant level under the MND and the commenter has not provided any evidence to the contrary. The MND already includes a thorough analysis of appropriate mitigation measures.

See Response 65.2 regarding disadvantaged communities and environmental justice claims.

See Response 65.8 regarding NAHC and AB 52 requirements.

See Response 65.8 regarding potential cultural resources impacts.

See Response 65.15 regarding the southern tarplant.

See Response 65.9 regarding potential runoff.

See Response 65.2 and Response 65.13 regarding air quality and hazardous materials, respectively.

---

## **Response to Comment Letter 66**

**Sara Ladd**  
**November 16, 2020**

**Response 66.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 66.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

Section VIII. Greenhouse Gases provides a full analysis of the Project's contributions to climate change, which includes the concept of trapping heat in the atmosphere. As noted in the MND, combined greenhouse gas emissions would not exceed the SCAQMD recommended threshold. Further, as noted in Section 2.2, Existing Conditions of the MND, the majority of the site exists as bare land with limited vegetation and the Project would include installation of landscaping along the Project site perimeter (refer to Section 3.1, Physical Characteristics of the MND).

*This page intentionally left blank*

---

## **Response to Comment Letter 67**

**Debby Lalonde**

**November 16, 2020**

**Response 67.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st).

---

No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

---

## **Response to Comment Letter 68**

**Mike Laquatra**

**November 16, 2020**

**Response 68.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor

Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

Section XVII. Transportation, of the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required. Further, a full air quality analysis was performed for the Project. The analysis, which is summarized in Section III of the MND, includes both construction- and operation-related impacts.

**Response 68.2.** As noted in the MND, Section XVII. Transportation, the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required and the amount of trips would not generate a Project-specific or cumulatively significant impact.

---

## **Response to Comment Letter 69**

**Corliss Lee**  
**November 16, 2020**

**Response 69.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor

Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

The comment about the zoning change is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

**Response 69.2.** A full geotechnical investigation was performed for the Project site and is summarized in Section VII. Geology and Soils and included as Appendix F1 of the MND (Geotechnical Exploration Proposed Self-Storage Facility 3701 North Pacific Place Long Beach, California). As detailed on pages 3 and 4 of the Geotechnical Exploration, subsurface exploration and laboratory testing was completed using a total of 15 cone penetrometer test soundings and 10 hollow-stem auger borings (also known as core samples), advanced to a target depth of 50 to

75 feet below the existing ground surface or deeper than 20 feet below the bottom of undocumented fill and sump materials. The samples were then evaluated for soil classification, moisture and density, particle size distribution, plasticity index, expansion index, direct shear, consolidation, compaction, R-value, and corrosivity. The Project Applicant has also undertaken a surcharge test as detailed below.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

Additionally discussed on page 10 of the Phase I Environmental Site Assessment (refer to Appendix G1 of the MND), two pipelines cross the southeastern corner of the Artesia Parcels and two additional pipelines are located approximately 1,000 feet from the Project site to the southeast. The two on-site pipelines are both active crude pipelines operated by Crimson Pipeline L.P. and do not pass beneath the proposed building footprint.

**Response 69.3.** A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

Due to the known contamination in the on-site soils, the Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation. The air quality analysis accounted for the presence of sensitive receptors, including residential neighborhoods, schools, and parks.

**Response 69.4.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

Prior to initiation of the soil surcharge work, a qualified biologist conducted a survey for special status plants species, delineated the locations of southern tarplant, making the locations visible to avoid disturbance (MM BIO-1), made notes of potential areas to be used as habitat for bats (MM BIO-5), and conduct a visual survey for the Crotch bumble bee and found no nests within the survey area (MM BIO-3). The qualified biologist collected seeds and prepared them for future translocation pursuant to MM BIO-1 of the MND as detailed in Attachment D.

**Response 69.5.** A full geotechnical investigation was performed for the Project site and is summarized in Section VII. Geology and Soils, and included as Appendix F1 of the MND (Geotechnical Exploration Proposed Self-Storage Facility 3701 North Pacific Place Long Beach, California). As noted, no evidence of faulting was found on the Project site. However, the main seismic hazards that may affect the site are strong ground shaking, liquefaction, and lateral

Spreading, which identifies the applicable seismic design method based on the 2016 California Building Code. As stated on page 5-37 of the MND, the Project elements proposed for the Artesia Parcels would be designed and constructed in accordance with the recommendations of the geotechnical exploration report and CBC seismic safety requirements.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC

**Response 69.6.** Section VIII. Greenhouse Gases provides a full analysis of the Project's contributions to climate change, including construction- and operation-related emissions, the anticipated increase in truck travel, and the concept of trapping heat in the atmosphere. As noted in the MND, combined greenhouse gas emissions would not exceed the SCAQMD recommended threshold. Further, as noted in Section 2.2, Existing Conditions of the MND, the majority of the site exists as bare land with limited vegetation and the Project would include installation of landscaping along the Project site perimeter (refer to Section 3.1, Physical Characteristics of the MND).

**Response 69.7.** As detailed in Section X, Hydrology and Water Quality, of the MND, the Project would include construction of an on-site storm drain system, including proposed detention

systems, storm drainpipes, and a biofiltration system. The locations and diameters of the storm drains, and the capacity of the detention system, would comply with requirements of the City of Long Beach Department of Public Works and the City's low impact development (LID) Manual. All existing and proposed storm drainpipes would be subject to inspection, and lining if necessary, to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

As detailed in Section X. Hydrology and Water Quality, all runoff would be subject to treatment consistent with the City's LID Manual, Los Angeles Regional Water Quality Control Board (LARWQB) Order No. R4-2014-0024, Waste Discharge Requirement for Municipal Separate Storm Sewer System Discharges from the City of Long Beach (MS4 Permit), prior to discharge into the storm drain facilities. As discussed in the MND, the Project would develop and implement a Storm Water Pollution Prevention Plan (SWPPP), including best management practices, to be implemented during construction. Additionally, the Project would include biofiltration techniques and stormwater detention during Project operation to ensure compliance with the MS4 Permit.

**Response 69.8.** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The comment about zoning is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

**Response 69.9.** The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

The zoning comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

**Response 69.10.** Section XVII. Transportation, of the MND includes a trip generation analysis which identifies the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Based on the June 2020 City of Long Beach guidelines concerning VMT, any project which generates fewer than 500 daily trips is considered to have less-than-significant transportation impact. This project is expected to generate 134 daily trips and is therefore exempt from VMT analysis. Thus, a Traffic Impact Analysis is not required. Additionally, no permitted equestrian uses exist on the Project site and impacts to adjacent uses, including the LA River and the trail which is located approximately 200 feet from the site at its nearest point, were considered throughout the MND analysis. The Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 69.11.** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 69.12.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

---

## **Response to Comment Letter 70**

**Krysta Lin**  
**November 16, 2020**

**Response 70.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 70.2.** The comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

**Response 70.3.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

*This page intentionally left blank*

## **Response to Comment Letter 71**

**Candace Mead and Brophy Dale**

**November 16, 2020**

**Response 71.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

*This page intentionally left blank*

---

## **Response to Comment Letter 72**

**Pat Querido**  
**November 16, 2020**

**Response 72.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 72.2.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 72.3.** Refer to Response 72.2.

**Response 72.4.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to

ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 72.5.** As noted in the MND, Section XVII. Transportation, the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required and the amount of trips would not generate a significant impact.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

**Response 72.6.** As detailed in Section X, Hydrology and Water Quality, of the MND, the Project would include construction of an on-site storm drain system, including proposed detention systems, storm drainpipes, and a biofiltration system. The locations and diameters of the storm drains, and the capacity of the detention system, would comply with requirements of the City of Long Beach Department of Public Works and the City's low impact development (LID) Manual. All existing and proposed storm drainpipes would be subject to inspection, and lining if necessary,

to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

As detailed in Section X. Hydrology and Water Quality, all runoff would be subject to treatment consistent with the City's LID Manual, Los Angeles Regional Water Quality Control Board (LARWQB) Order No. R4-2014-0024, Waste Discharge Requirement for Municipal Separate Storm Sewer System Discharges from the City of Long Beach (MS4 Permit), prior to discharge into the storm drain facilities. As discussed in the MND, the Project would develop and implement a Storm Water Pollution Prevention Plan (SWPPP), including best management practices, to be implemented during construction. Additionally, the Project would include biofiltration techniques and stormwater detention during Project operation to ensure compliance with the MS4 Permit.

**Response 72.7.** The comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

**Response 72.8.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 72.9.** The Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map and is not intended for preservation as open space. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City's

Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

Due to the known contaminants in the on-site soils, the Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

As detailed in Section I, Aesthetics, of the MND, a full analysis was prepared which addressed the Project's potential to degrade the existing visual condition of the site and from public viewsheds. According to CEQA, impacts are analyzed from public viewsheds and are not analyzed from private viewsheds. The site photographs (refer to Exhibit 4a and ab of the MND) are taken directly adjacent to the Project site and provide a closer, but representative view of the Project site from surrounding land uses, including residential uses to the northeast and southeast, Los Cerritos School, and Los Cerritos Park. As discussed in Section I, Aesthetics, of the MND, although the Project would modify the site's visual appearance from the surrounding community's public spaces, no significant impacts were identified.

---

## **Response to Comment Letter 73**

**Linda Scholl**  
November 16, 2020

**Response 73.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 73.2.** A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). As discussed in the MND, the Project site exists as vacant property is privately owned, and access to the site is restricted. The Project site does not currently exist as open space or parkland and the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations. In accordance with zoning and the General Plan designation, the site is not intended for preservation as recreation or open space.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City’s Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impacts after implementation of recommended mitigation.

Both the air quality and noise and vibration analyses accounted for the presence of sensitive receptors, including residential neighborhoods, schools, and parks.

As discussed in Section 3.0 of the MND, the Project proposes to remove all on-site trees; however, landscaping consisting of trees, shrubs, and ground cover would be installed along the southern and eastern sides of the proposed building and along the margins of the proposed parking lots east of the building and in the southeasterly extension of the Project site. Additionally, the proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 73.3.** Section VIII. Greenhouse Gases provides a full analysis of the Project’s contributions to climate change, which includes the concept of trapping heat in the atmosphere. As noted in the MND, combined greenhouse gas emissions would not exceed the SCAQMD recommended threshold. Further, as noted in Section 2.2, Existing Conditions of the MND, the

majority of the site exists as bare land with limited vegetation and the Project would include installation of landscaping along the Project site perimeter (refer to Section 3.1, Physical Characteristics of the MND). According to the Biological Resources Assessment for the Industrial-Self Storage/RV Parking at 3701 Pacific Place, Long Beach, California and the Results of a Biological Constraints Analysis for 3701 Pacific Place Project in the City of Long Beach, Los Angeles County, California (refer to Appendices C1 and C2 of the MND, respectively), the Project site contains limited trees and vegetation. According to Appendix C1, the 16.59-acre survey area contained 13.5 acres of disturbed area, 1.43 acres is ornamental landscape, and 1.66 acres is urban/commercial land or paved roadways and parking areas. The remainder of the site was characterized in Appendix C2 as disturbed areas including disturbed, non-native vegetation, bare ground, and asphalt paving.

**Response 73.4.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

As noted in Section 3.3 of the MND, DTSC is a responsible agency for the Project, and approvals would be required prior to initiation of construction to ensure the site is suitable and safe for development, as noted above. This includes consideration of the proposed Project features such as the structural load of the proposed structures and anticipated loads in the RV storage area.

**Response 73.5.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the

California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response to Comment Letter 74**

**Carli Macrate Steers**  
**November 16, 2020**

**Response 74.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

*This page intentionally left blank*

---

## **Response to Comment Letter 75**

**Amy Valenzuela**

**November 16, 2020**

**Response 75.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

As detailed in Sections V, Cultural Resources, and XVIII, Tribal Cultural Resources, of the MND, a full analysis was prepared, which addressed the Project's potential to impact archaeological and tribal cultural resources. This analysis also included compliance with Assembly Bill 52 and Senate Bill 18 and involved government-to-government consultation between the City and tribal representatives. The consultation effort was conducted pursuant to AB 52 and SB 18 requirements, and involved tribes who have indicated interest in receiving notification regarding projects in the City for AB 52 and tribal representatives identified by the California Native American Heritage Commission for SB 18. Mitigation measures TRIB CULT-1 through 5 were drafted based on this consultation, implementation of which would reduce any potentially significant impacts to less than significant levels. MMs TRIB CULT-1 through 5 require presence of a Tribal monitor to be present and monitor all Project-related, ground-disturbing activities as well as specific steps to be followed upon discovery of a tribal or archaeological resource.

A full biological analysis was performed for the Project, which is summarized in Section IV. Biological Resources of the MND. As part of the analysis, the Artesia parcels and McDonald Trust parcels were both surveyed for waters or wetlands potentially jurisdictional to the Corps, LARWQCB, or CDFW; no jurisdictional areas were identified. The Artesia parcels and McDonald Trust parcels were both surveyed for wildlife, including potential impacts to birds. It was identified that, with implementation of recommended mitigation measure BIO-4 related to nesting birds and in compliance with Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Section 3503, impacts would be less than significant. In addition to BIO-4 related to nesting birds, MM BIO-5 was identified in Section IV. Biological Resources, of the MND to reduce the potential for man-made impacts, including noise and dust associated with construction activities on bats.

The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed

for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 75.2.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

---

## **Response to Comment Letter 76**

**Joseph M. Weinstein, Ph.D.**

**November 16, 2020**

**Response 76.1.** The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 76.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate

findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 76.3.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

---

## **Response to Comment Letter 77**

**Roger Martin Holman**

**November 16, 2020**

**Response 77.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 77.2.** A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

**Response 77.3.** As detailed in Sections V, Cultural Resources, and XVIII, Tribal Cultural Resources, of the MND, a full analysis was prepared, which addressed the Project's potential to impact archaeological and tribal cultural resources. This analysis also included compliance with Assembly Bill 52 and Senate Bill 18 and involved government-to-government consultation between the City and tribal representatives. The consultation effort was conducted pursuant to AB 52 and SB 18 requirements, and involved tribes who have indicated interest in receiving notification regarding projects in the City for AB 52 and tribal representatives identified by the California Native American Heritage Commission for SB 18. Mitigation measures TRIB CULT-1 through 5 were drafted based on this consultation, implementation of which would reduce any potentially significant impacts to less than significant levels. MMs TRIB CULT-1 through 5 require presence of a Tribal monitor to be present and monitor all Project-related, ground-disturbing activities as well as specific steps to be followed upon discovery of a tribal or archaeological resource.

**Response 77.4.** As detailed in Section X, Hydrology and Water Quality, of the MND, the Project would include construction of an on-site storm drain system, including proposed detention systems, storm drainpipes, and a biofiltration system. The locations and diameters of the storm drains, and the capacity of the detention system, would comply with requirements of the City of Long Beach Department of Public Works and the City's low impact development (LID) Manual. All existing and proposed storm drainpipes would be subject to inspection, and lining if necessary, to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

As detailed in Section X. Hydrology and Water Quality, all runoff would be subject to treatment consistent with the City's LID Manual, Los Angeles Regional Water Quality Control Board (LARWQB) Order No. R4-2014-0024, Waste Discharge Requirement for Municipal Separate Storm Sewer System Discharges from the City of Long Beach (MS4 Permit), prior to discharge into the storm drain facilities. As discussed in the MND, the Project would develop and implement a Storm Water Pollution Prevention Plan (SWPPP), including best management practices, to be implemented during construction. Additionally, the Project would include biofiltration techniques and stormwater detention during Project operation to ensure compliance with the MS4 Permit.

**Response 77.5.** The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations. The Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map and is not intended for recreational use or preservation as open space.

**Response 77.6.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the

California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 77.7.** As detailed in the MND, the Project proposes development of a three-story 152,745-square foot (sf) self-storage building with approximately 1,132 self-storage units, a 2,153 sf car wash, a recreational vehicle (RV) parking facility with 578 parking spaces, and a 5,000 sf office space on 4-parcels totaling approximately 14-acres (i.e., Artesia parcels) with anticipated industrial uses including a single-story building with up to 77,000 square-feet of building area consisting of 73,500 square-feet warehouse space and 3,500 square-feet of office space, and a proposed vacated roadway easement adjacent to the self-storage, car wash, and RV parking facility on four parcels totaling approximately 5.5. acres (i.e., McDonald Trust parcels). Should an alternative use be considered in the future, any potential plans would be subject to review and approval by the City of Long Beach. As part of that review, the City would conduct a consistency analysis with the approved CEQA document to ensure that all project assumptions and anticipated impacts would be the substantially similar. Use of the Project site as a Distribution Center would have a different trip generation rate, which would trigger the need for additional review.

**Response 77.8.** As noted in the MND, Section XVII. Transportation, the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required and the amount of trips would not generate a significant impact.

**Response 77.9.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and

Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations. The Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map and is not intended for recreational use or preservation as open space.

## **Response to Comment Letter 78**

**Robert Fox**  
**November 16, 2020**

**Response 78.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

*This page intentionally left blank*

---

## **Response to Comment Letter 79**

**Dr. Dave Gerhart**  
**November 16, 2020**

**Response 79.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 79.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with

SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

Due to the known contamination in the on-site soils, the Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

---

## **Response to Comment Letter 80**

**Grace Orpilla**

**November 16, 2020**

**Response 80.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

Due to the known contamination in the on-site soils, the Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*,

Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

A full noise and vibration analysis was performed for the Project, which is summarized in Section XIII. Noise of the MND. As part of the analysis, both construction- and operation-related noise was modeled. As noted in the analysis, the Project would be required to comply with the City's Noise Ordinance and recommended mitigation measures. As detailed in the MND, the Project would not result in a significant noise impact after implementation of recommended mitigation.

As detailed in Section I, Aesthetics, of the MND, a full analysis was prepared which addressed the Project's potential to degrade the existing visual condition of the site. Although the Project would modify the site's visual appearance from the surrounding community including Los Cerritos School, no significant impacts were identified.

---

## **Response to Comment Letter 81**

**Carlos S. Ovalle**

**November 16, 2020**

**Response 81.1.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 81.2. and Exhibit A** As discussed in Section 3.2, Construction Activities, on-site foundations would be constructed using a conventional shallow spread-footing and floor slab on grade or a mat-type foundation, or a deep foundation system involving driven pre-cast concrete piles and drilled caissons. For either deep foundation alternative, displacement augers that push materials to the side rather than corkscrewing them to the surface will be used to minimize handling of potentially contaminated soils and sump materials. Additionally, for the driven pile alternative, a hole would be pre-drilled with a displacement auger and then the pile would be driven to design depths beyond the depth of pre-drilling to minimize ground vibrations and noise impacts.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 81.3. and Exhibit B** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a

determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

As noted in Section 3.3 of the MND, DTSC is a responsible agency for the Project, and approvals would be required prior to initiation of construction to ensure the site is suitable and safe for development, as noted above. This includes consideration of the proposed Project features such as the structural load of the proposed structures and anticipated loads in the RV storage area.

A full geotechnical investigation was performed for the Project site and is summarized in Section VII. Geology and Soils, and included as Appendix F1 of the MND (Geotechnical Exploration Proposed Self-Storage Facility 3701 North Pacific Place Long Beach, California). As noted, no evidence of faulting was found on the Project site. However, the main seismic hazards that may affect the site are strong ground shaking, liquefaction, and lateral spreading, which identifies the applicable seismic design method based on the 2016 California Building Code. As stated on page 5-37 of the MND, the Project elements proposed for the Artesia Parcels would be designed and constructed in accordance with the recommendations of the geotechnical exploration report and CBC seismic safety requirements.

**Response 81.4. and Exhibit C** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

Additionally discussed on page 10 of the Phase I Environmental Site Assessment (refer to Appendix G1 of the MND), two pipelines cross the southeastern corner of the Artesia Parcels and two additional pipelines are located approximately 1,000 feet from the Project site to the southeast. The two on-site pipelines are both active crude pipelines operated by Crimson Pipeline L.P. and do not pass beneath the proposed building footprint. For the storm drain pipe that does pass beneath the proposed building, as detailed in Section X, Hydrology and Water Quality, of

the MND, all existing and proposed storm drainpipes would be subject to inspection, and lining if necessary, to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

As noted in Section 3.3 of the MND, DTSC is a responsible agency for the Project, and approvals would be required prior to initiation of construction to ensure the site is suitable and safe for development, as noted above. This includes consideration of the proposed Project features such as the structural load of the proposed structures and anticipated loads in the RV storage area.

**Response 81.5.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 81.6. and Exhibits D and E** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located

within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

The comment about zoning is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

**Response 81.7.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 81.8. and Exhibit F** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

---

## **Response to Comment Letter 82**

**Cristian Ovalle**

**November 16, 2020**

**Response 82.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

**Response 82.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

As discussed on page 10 of the Phase I Environmental Site Assessment (refer to Appendix G1 of the MND), two pipelines cross the southeastern corner of the Artesia Parcels and two additional pipelines are located approximately 1,000 feet from the Project site to the southeast. The two on-site pipelines are both active crude pipelines operated by Crimson Pipeline L.P. and do not pass beneath the proposed building footprint. For the storm drain pipe that does pass beneath the proposed building, as detailed in Section X, Hydrology and Water Quality, of the MND, all existing

and proposed storm drainpipes would be subject to inspection, and lining if necessary, to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

As noted in Section 3.3 of the MND, DTSC is a responsible agency for the Project, and approvals would be required prior to initiation of construction to ensure the site is suitable and safe for development, as noted above. This includes consideration of the proposed Project features such as the structural load of the proposed structures and anticipated loads in the RV storage area.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

---

## **Response to Comment Letter 83**

**Juan E. Ovalle**

**November 16, 2020**

**Response 83.1. and Attachments** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

Due to the known contamination of on-site soils, the Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading

and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

**Response 83.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

Additionally discussed on page 10 of the Phase I Environmental Site Assessment (refer to Appendix G1 of the MND), two pipelines cross the southeastern corner of the Artesia Parcels and two additional pipelines are located approximately 1,000 feet from the Project site to the southeast. The two on-site pipelines are both active crude pipelines operated by Crimson Pipeline L.P. and do not pass beneath the proposed building footprint. For the storm drain pipe that does pass beneath the proposed building, as detailed in Section X, Hydrology and Water Quality, of the MND, all existing and proposed storm drainpipes would be subject to inspection, and lining if

necessary, to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

As noted in Section 3.3 of the MND, DTSC is a responsible agency for the Project, and approvals would be required prior to initiation of construction to ensure the site is suitable and safe for development, as noted above. This includes consideration of the proposed Project features such as the structural load of the proposed structures and anticipated loads in the RV storage area.

**Response 83.3.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. Topics that were analyzed include, but are not limited to, hazards and hazardous materials (Section IX), greenhouse gases (Section VIII), transportation (Section XVII), public services (Section XV), biological resources (Section IV), cultural resources (Section V), aesthetics (Section I), and land use and planning (Section XI) in the MND. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 83.4. and Attachments** The zoning comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 83.5.** The comment does not raise a question regarding the CEQA process or MND. The Commenter’s opposition to the Project is noted and no additional response is required.

*This page intentionally left blank*

## **Response to Comment Letter 84**

**Juan Ovalle Jr.**  
**November 16, 2020**

**Response 84.1.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

*This page intentionally left blank*

---

## **Response to Comment Letter 85**

**Rhina Ovalle**

**November 16, 2020**

**Response 85.1.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 85.2.** As noted in the MND, Section XVII. Transportation, the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required and the amount of trips would not generate a significant impact. The Commenter referenced a memorandum related to development of a 500-space park-and-ride facility, stating that the proposed Project would also exacerbate conditions at the Wardlow Road and Pacific Place intersection. While it is understood that there are existing operational concerns at the intersection of Wardlow Road and Pacific Place, this is an existing issue related primarily to the Metro crossing. Access into and out of the neighborhood would continue similar to existing conditions via Pacific Avenue and/or Long Beach Boulevard given the small contribution of vehicle trips related to the Project. Further, Project-related traffic would not exclusively use the identified intersection given the availability of other routes and the likelihood of traffic coming from multiple directions. Additionally, the trip generation related to a park-and-ride facility would be greater than what is expected with the proposed Project. According to the ITE Trip Generation Manual for a park-and-ride lot with bus and light rail service (land use code 090), a 500-space facility would generate 1,405 daily trips which exceeds the proposed Project's expected 134 daily trips<sup>ii</sup>.

The trip generation memoranda (refer to Appendices I1 and I2 of the MND) were prepared pursuant to input from the City of Long Beach Public Works Department. Before work on the memoranda began, the City agreed that the CMP guidelines for analysis were most appropriate. Given the size and location of the project, it was agreed that a full study would not be needed. Based on the June 2020 City of Long Beach guidelines concerning VMT, any project which generates fewer than 500 daily trips is considered to have less-than-significant transportation impact. This project is expected to generate 134 daily trips and is therefore exempt from VMT analysis.

**Response 85.3.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

**Response 85.4.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 85.5.** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

*This page intentionally left blank*

---

## **Response to Comment Letter 86**

**Netson Araujo**

**November 16, 2020**

**Response 86.1.** As detailed in Section I, Aesthetics, of the MND, a full analysis was prepared which addressed the Project's potential to degrade the existing visual condition of the site. Although the Project would modify the site's visual appearance from the surrounding community including Los Cerritos School, no significant impacts were identified.

Section VIII. Greenhouse Gases provides a full analysis of the Project's contributions to climate change, which includes the concept of trapping heat in the atmosphere. As noted in the MND, combined greenhouse gas emissions would not exceed the SCAQMD recommended threshold. Further, as noted in Section 2.2, Existing Conditions of the MND, the majority of the site exists as bare land with limited vegetation and the Project would include installation of landscaping along the Project site perimeter (refer to Section 3.1, Physical Characteristics of the MND).

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

**Response 86.2.** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC. As noted in Section 3.3 of the MND, DTSC is a responsible agency for the Project, and approvals would be required prior to initiation of construction to ensure the site is suitable and safe for development, as noted above. This would not constitute piece-mealing because initiation of Project construction would be contingent on DTSC approval, as detailed in

mitigation measures HAZ-1 through HAZ-5 which require preparation of a remediation plan for the Artesia Parcels, and preparation of a Phase I Environmental Site Assessment and implementation of all resulting recommendations for the McDonald Trust Parcels.

---

## **Response to Comment Letter 87**

**Dora Araujo**  
November 16, 2020

**Response 87.1** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

Section VIII. Greenhouse Gases provides a full analysis of the Project's contributions to climate change, which includes the concept of trapping heat in the atmosphere. As noted in the MND, combined greenhouse gas emissions would not exceed the SCAQMD recommended threshold. Further, as noted in Section 2.2, Existing Conditions of the MND, the majority of the site exists as bare land with limited vegetation and the Project would include installation of landscaping along the Project site perimeter (refer to Section 3.1, Physical Characteristics of the MND).

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

*This page intentionally left blank*

---

## **Response to Comment Letter 88**

**Carlos Turcios**

**November 16, 2020**

**Response 88.1** The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

Section VIII. Greenhouse Gases provides a full analysis of the Project's contributions to climate change, which includes the concept of trapping heat in the atmosphere. As noted in the MND, combined greenhouse gas emissions would not exceed the SCAQMD recommended threshold. Further, as noted in Section 2.2, Existing Conditions of the MND, the majority of the site exists as bare land with limited vegetation and the Project would include installation of landscaping along the Project site perimeter (refer to Section 3.1, Physical Characteristics of the MND).

As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

**Response 88.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed

Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

---

## **Response to Comment Letter 89**

**Susana Barrera**

**November 16, 2020**

**Response 89.1** The comment does not raise a question regarding the CEQA process or MND. The Commenter's opposition to the Project is noted and no additional response is required.

**Response 89.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

Additionally discussed on page 10 of the Phase I Environmental Site Assessment (refer to Appendix G1 of the MND), two pipelines cross the southeastern corner of the Artesia Parcels and two additional pipelines are located approximately 1,000 feet from the Project site to the southeast. The two on-site pipelines are both active crude pipelines operated by Crimson Pipeline L.P. and do not pass beneath the proposed building footprint. For the storm drain pipe that does pass beneath the proposed building, as detailed in Section X, Hydrology and Water Quality, of the MND, all existing and proposed storm drainpipes would be subject to inspection, and lining if necessary, to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

As noted in Section 3.3 of the MND, DTSC is a responsible agency for the Project, and approvals would be required prior to initiation of construction to ensure the site is suitable and safe for

development, as noted above. This includes consideration of the proposed Project features such as the structural load of the proposed structures and anticipated loads in the RV storage area.

According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

---

## **Response to Comment Letter 90**

**Kenia Barrera**

**November 16, 2020**

**Response 90.1** The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 90.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil

surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

Additionally discussed on page 10 of the Phase I Environmental Site Assessment (refer to Appendix G1 of the MND), two pipelines cross the southeastern corner of the Artesia Parcels and two additional pipelines are located approximately 1,000 feet from the Project site to the southeast. The two on-site pipelines are both active crude pipelines operated by Crimson Pipeline L.P. and do not pass beneath the proposed building footprint. For the storm drain pipe that does pass beneath the proposed building, as detailed in Section X, Hydrology and Water Quality, of the MND, all existing and proposed storm drainpipes would be subject to inspection, and lining if necessary, to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

As noted in Section 3.3 of the MND, DTSC is a responsible agency for the Project, and approvals would be required prior to initiation of construction to ensure the site is suitable and safe for development, as noted above. This includes consideration of the proposed Project features such as the structural load of the proposed structures and anticipated loads in the RV storage area.

---

## **Response to Comment Letter 91**

**David Pulitzer**

**November 16, 2020**

**Response 91.1.** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

The zoning comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

**Response 91.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and

comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

Additionally discussed on page 10 of the Phase I Environmental Site Assessment (refer to Appendix G1 of the MND), two pipelines cross the southeastern corner of the Artesia Parcels and two additional pipelines are located approximately 1,000 feet from the Project site to the southeast. The two on-site pipelines are both active crude pipelines operated by Crimson Pipeline L.P. and do not pass beneath the proposed building footprint. For the storm drain pipe that does pass beneath the proposed building, as detailed in Section X, Hydrology and Water Quality, of the MND, all existing and proposed storm drainpipes would be subject to inspection, and lining if necessary, to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

As noted in Section 3.3 of the MND, DTSC is a responsible agency for the Project, and approvals would be required prior to initiation of construction to ensure the site is suitable and safe for development, as noted above. This includes consideration of the proposed Project features such as the structural load of the proposed structures and anticipated loads in the RV storage area.

According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 91.3.** As noted in the MND, Section XVII. Transportation, the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required and the amount of trips would not generate a significant impact.

At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur

within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

As detailed in Section X. Hydrology and Water Quality, all runoff would be subject to treatment consistent with the City’s LID Manual, Los Angeles Regional Water Quality Control Board (LARWQB) Order No. R4-2014-0024, Waste Discharge Requirement for Municipal Separate Storm Sewer System Discharges from the City of Long Beach (MS4 Permit), prior to discharge into the storm drain facilities. As discussed in the MND, the Project would develop and implement a Storm Water Pollution Prevention Plan (SWPPP), including best management practices, to be implemented during construction. Additionally, the Project would include biofiltration techniques and stormwater detention during Project operation to ensure compliance with the MS4 Permit.

**Response 91.4.** As discussed in Section III. Air Quality, of the MND, the proposed dump station would be designed to connect directly to the City’s sewer system and would meet all sanitation requirements to protect against spills and odors. Additionally, as discussed in Section X. Hydrology and Water Quality, of the MND, the Project would implement best management practices for managing and capturing stormwater runoff, which would include any unanticipated spills.

**Response 91.5.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its

CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

Additionally discussed on page 10 of the Phase I Environmental Site Assessment (refer to Appendix G1 of the MND), two pipelines cross the southeastern corner of the Artesia Parcels and two additional pipelines are located approximately 1,000 feet from the Project site to the southeast. The two on-site pipelines are both active crude pipelines operated by Crimson Pipeline L.P. and do not pass beneath the proposed building footprint. For the storm drain pipe that does pass beneath the proposed building, as detailed in Section X, Hydrology and Water Quality, of the MND, all existing and proposed storm drainpipes would be subject to inspection, and lining if necessary, to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

As noted in Section 3.3 of the MND, DTSC is a responsible agency for the Project, and approvals would be required prior to initiation of construction to ensure the site is suitable and safe for development, as noted above. This includes consideration of the proposed Project features such as the structural load of the proposed structures and anticipated loads in the RV storage area.

**Response 91.6.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 91.7.** As noted in the MND, Section XVII. Transportation, the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required and the amount of trips would not generate a significant impact.

**Response 91.8.** As discussed in Section III. Air Quality, of the MND, the proposed dump station would be designed to connect directly to the City's sewer system and would meet all sanitation requirements to protect against spills and odors. Additionally, as discussed in Section X. Hydrology and Water Quality, of the MND, the Project would implement best management practices for managing and capturing stormwater runoff, which would include any unanticipated spills.

**Response 91.9.** The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 91.10.** The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The zoning comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

*This page intentionally left blank*

---

## **Response to Comment Letter 92**

**Miriam Pulitzer**

**November 16, 2020**

**Response 92.1.** The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

The zoning comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

**Response 92.2.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and

comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

Additionally discussed on page 10 of the Phase I Environmental Site Assessment (refer to Appendix G1 of the MND), two pipelines cross the southeastern corner of the Artesia Parcels and two additional pipelines are located approximately 1,000 feet from the Project site to the southeast. The two on-site pipelines are both active crude pipelines operated by Crimson Pipeline L.P. and do not pass beneath the proposed building footprint. For the storm drain pipe that does pass beneath the proposed building, as detailed in Section X, Hydrology and Water Quality, of the MND, all existing and proposed storm drainpipes would be subject to inspection, and lining if necessary, to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

As noted in Section 3.3 of the MND, DTSC is a responsible agency for the Project, and approvals would be required prior to initiation of construction to ensure the site is suitable and safe for development, as noted above. This includes consideration of the proposed Project features such as the structural load of the proposed structures and anticipated loads in the RV storage area.

According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 92.3.** As noted in the MND, Section XVII. Transportation, the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required and the amount of trips would not generate a significant impact.

At the nearest point, the Project site is located over 200 feet from the top of the LA River bank and is separated from the river by an area designated as Open Space which exists as a berm and an asphalt paved walking/riding pathway. No formal riding trails or equestrian uses occur

within or immediately adjacent to the Project site. As noted on page 11 of the 2007 Long Beach Riverlink (February 2007), except for a small portion along the northern-most edge, the Project site is located outside of the Riverlink planning area, referenced as Destination 6: Wrigley Heights – North. LA-M-86 is an implementation strategy for updating and implementing the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths. As noted, development of the site would not impede development according to the currently available Riverlink plan.

The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a 'Planned Major Project' however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

As detailed in Section X. Hydrology and Water Quality, all runoff would be subject to treatment consistent with the City's LID Manual, Los Angeles Regional Water Quality Control Board (LARWQB) Order No. R4-2014-0024, Waste Discharge Requirement for Municipal Separate Storm Sewer System Discharges from the City of Long Beach (MS4 Permit), prior to discharge into the storm drain facilities. As discussed in the MND, the Project would develop and implement a Storm Water Pollution Prevention Plan (SWPPP), including best management practices, to be implemented during construction. Additionally, the Project would include biofiltration techniques and stormwater detention during Project operation to ensure compliance with the MS4 Permit.

**Response 92.4.** As discussed in Section III. Air Quality, of the MND, the proposed dump station would be designed to connect directly to the City's sewer system and would meet all sanitation requirements to protect against spills and odors. Additionally, as discussed in Section X. Hydrology and Water Quality, of the MND, the Project would implement best management practices for managing and capturing stormwater runoff, which would include any unanticipated spills.

**Response 92.5.** As discussed in the MND (Section 3.0 Project Description, and Section IX. Hazards and Hazardous Materials), the Project site has been subject to an extensive evaluation process involving the Department of Toxic Substances Control (DTSC), including preparation of a Phase I Environmental Site Assessment that meets the requirements of eligibility for the California Land Reuse and Revitalization Act (CLRRA) agreement, a Final Site Assessment, and Response Plan. The Project Applicant has not commenced any remediation or other response action, which will not occur unless and until DTSC approves the draft Response Plan. This Plan proposes various response actions that the Project Applicant would undertake on the proposed Project Site. DTSC has circulated the draft Response Plan for public review and comment, and will host a community meeting on this Plan on December 3, 2020 for which a public notice has issued. Following this community meeting and the completion of the 30-day public review and comment period, DTSC will prepare written responses to each public comment received, make any changes to this draft it determines are necessary or advisable based on comments received, and take action under CEQA and on the draft Response Plan. DTSC has concurrently conducted a review of the Response Plan under CEQA, and would make a determination and appropriate findings before deciding whether to approve the draft Response Plan. After DTSC completes its

CEQA review and if it approves the Response Plan, the Project Applicant would commence the Response Actions in accordance with the approved Response Plan.

The soil surcharge work has commenced on the Artesia parcels to determine the feasibility and suitability of this location for the construction of the proposed project on this site, such as the type of foundations that may be needed. It is in the nature of a geotechnical study, and similar to other site investigations, such as environmental sampling, that are needed to evaluate the feasibility and suitability of a property for development. It does not reflect any commitment to or approval of the proposed project by the City, or any commitment to or approval of the draft Response Plan by DTSC. The Project Applicant obtained all necessary permits from the City to undertake the soil surcharge evaluation which included conditions for undertaking the work, including dust and vapor control measures to be implemented in accordance with the SCAQMD requirements. During this activity, real-time air monitoring was conducted in work areas and at the property boundary to ensure that dust and vapor levels were kept to a minimum and did not impact the surrounding neighborhood or school. Please refer to Attachment C for the public notice issued by DTSC.

Additionally discussed on page 10 of the Phase I Environmental Site Assessment (refer to Appendix G1 of the MND), two pipelines cross the southeastern corner of the Artesia Parcels and two additional pipelines are located approximately 1,000 feet from the Project site to the southeast. The two on-site pipelines are both active crude pipelines operated by Crimson Pipeline L.P. and do not pass beneath the proposed building footprint. For the storm drain pipe that does pass beneath the proposed building, as detailed in Section X, Hydrology and Water Quality, of the MND, all existing and proposed storm drainpipes would be subject to inspection, and lining if necessary, to ensure no leakage would occur, and that no water would be introduced into the capped waste material.

As noted in Section 3.3 of the MND, DTSC is a responsible agency for the Project, and approvals would be required prior to initiation of construction to ensure the site is suitable and safe for development, as noted above. This includes consideration of the proposed Project features such as the structural load of the proposed structures and anticipated loads in the RV storage area.

**Response 92.6.** According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section 15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

**Response 92.7.** As noted in the MND, Section XVII. Transportation, the MND includes a trip generation analysis that shows the total peak hour average daily trips falling beneath the City of Long Beach VMT screening threshold. Thus, a Traffic Impact Analysis is not required and the amount of trips would not generate a significant impact.

**Response 92.8.** As discussed in Section III. Air Quality, of the MND, the proposed dump station would be designed to connect directly to the City's sewer system and would meet all sanitation requirements to protect against spills and odors. Additionally, as discussed in Section X. Hydrology and Water Quality, of the MND, the Project would implement best management practices for managing and capturing stormwater runoff, which would include any unanticipated spills.

**Response 92.9.** The proposed project properties are partially located within the area that is included in the Los Angeles River Master Plan (LARMP) area. This Master Plan is currently in the process of being updated, led by the Los Angeles County Public Works Department. According to the LARMP this area adjacent to the river, which includes the subject properties, is designated a ‘Planned Major Project’ however, the properties are privately owned and the property owner has proposed a different use of the property. Even though the self-storage building and RV Storage area proposed for a significant portion of the site, the Applicant has indicated they are willing participants to work with the entity responsible for developing this particular area of LARMP. That commitment includes development and on-going maintenance of a section of the Native Plant Preserve located within their property boundaries at the northwest corner of their site, and development and on-going maintenance of the accessway to the larger LARMP site, proposed to be located in the southwestern corner of the property.

**Response 92.10.** The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

The zoning comment is not related to a physical change to the environment, nor is it associated with the proposed Project. Please refer to Attachment E which addresses the prior change in land use designation.

*This page intentionally left blank*

---

## **Response to Comment Letter 93**

**Long Beach Area Group, Sierra Club**  
**November 16, 2020**

**Response 93.1.** As detailed in Sections V, Cultural Resources, and XVIII, Tribal Cultural Resources, of the MND, a full analysis was prepared, which addressed the Project's potential to impact archaeological and tribal cultural resources. This analysis also included compliance with Assembly Bill 52 and Senate Bill 18 and involved government-to-government consultation between the City and tribal representatives. The consultation effort was conducted pursuant to AB 52 and SB 18 requirements, and involved tribes who have indicated interest in receiving notification regarding projects in the City for AB 52 and tribal representatives identified by the California Native American Heritage Commission for SB 18. Mitigation measures TRIB CULT-1 through 5 were drafted based on this consultation, implementation of which would reduce any potentially significant impacts to less than significant levels. MMs TRIB CULT-1 through 5 require presence of a Tribal monitor to be present and monitor all Project-related, ground-disturbing activities as well as specific steps to be followed upon discovery of a tribal or archaeological resource.

As discussed in Section X. Hydrology and Water Quality, the Project would not increase the rate or amount of surface runoff and a significant impact related to flooding on- and off-site would not occur. The proposed stormwater detention systems and biofiltration systems would have capacity to meet City requirements and the Project would not cause flooding on- or offsite and would not exceed the capacities of existing storm drains to which Project site runoff would be discharged. The Project site is outside of 100-year flood hazard zones, and Project development would not impede or redirect flood flows in such zones.

A full biological analysis was performed for the Project, which is summarized in Section IV. Biological Resources of the MND. As part of the analysis, the Artesia parcels and McDonald Trust parcels were both surveyed for waters or wetlands potentially jurisdictional to the Corps, LARWQCB, or CDFW; no jurisdictional areas were identified. The Artesia parcels and McDonald Trust parcels were both surveyed for wildlife, including potential impacts to birds. It was identified that, with implementation of recommended mitigation measure BIO-4 related to nesting birds and in compliance with Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Section 3503, impacts would be less than significant. In addition to BIO-4 related to nesting birds, MM BIO-5 was identified in Section IV. Biological Resources, of the MND to reduce the potential for man-made impacts, including noise and dust associated with construction activities on bats.

The MND does identify local park and recreation opportunities as detailed in Section XVI, Recreation, of the MND; however, the Project site is planned for future development in accordance with existing zoning and the applicable General Plan land use map. The City of Long Beach Zoning Designation for the Project site is IL, Light Industry. The General Plan designation for most of the Project site is Neo Industrial (NI); the designation for part of one of the McDonald Trust Parcels, APN 7140-014-023, is Open Space with a two-story building height limit (OS/2st). No development plans have been submitted for the McDonald Trust Parcels and any future plans would need to be consistent with existing zoning and General Plan designations.

According to Section 15070 of the State CEQA Guidelines, a public agency shall prepare or have prepared a proposed MND instead of an environmental impact report when the Initial Study shows there is no substantial evidence that the project would have a significant effect on the environment after revisions to the project would avoid or mitigate the effects to a point where clearly no significant impact would occur. Based on the lack of significant and unavoidable impacts identified in the Initial Study, the City elected to prepare a MND to evaluate impacts of the proposed Project. The MND was prepared in accordance with the State CEQA Guidelines, and specifically Section

15070 of the State CEQA Guidelines. A MND is not required to identify or evaluate alternatives to the proposed Project.

---

## **Response to Comment Letter 94**

**Harris Cohen**

**November 16, 2020**

**Response 94.1.** A full air quality analysis was performed for the Project, which is summarized in Section III. Air Quality of the MND. Consistent with the CalEnviroScreen data for the Project area, a discussion of existing air quality conditions within the Project area was provided within the MND. The region's ambient air quality attainment status is disclosed as well as a description of the existing local air quality conditions based on monitoring station data taken at 2425 Webster Street, Long Beach, which is 2 miles southwest of the Project site. Both these sets of information describe the air quality conditions for which the Project site is located and were considered in the cumulative discussion on page 5-17.

As detailed on page 5-11 in Section III. Air Quality of the MND, the Project site would be subject to regular dust control activities, consistent with the requirements of SCAQMD Rule 403. Rule 403, Fugitive Dust, requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. It is noted that construction contractors must also comply with SCAQMD Rules 401, Visible Emissions, and 402, Nuisance; no quantitative reductions of particulate emissions are assumed for these rules. All remediation and construction-related activities on the sites would be subject to SCAQMD Rule 1466, requiring ambient PM10 monitoring, dust control measures, notification, signage, and recordkeeping requirements.

The Project would also comply with SCAQMD Rule 1166, requiring that an approved mitigation plan be obtained from SCAQMD prior to excavation of materials containing VOC material, handling or storage or VOC-contaminated soil, or treatment of VOC-contaminated soil. Although the Site is not a landfill, SCAQMD Rule 1150 will be followed because there were formerly sludge ponds on the Site. The requirements of SCAQMD Rule 1150 will be satisfied in an Excavation Management Plan (EMP) to be prepared for SCAQMD. The EMP will detail applicable mitigation and administrative measures identified in Section IX. Hazards and Hazardous Materials of the MND, should excavation occur into the underlying oily waste during implementation of the response actions or during on-Site grading and construction activities. According to the *SecureSpace Self Storage Motor Vehicle Addendum*, Occupant's Agreement to Store Motor Vehicles Item #7 Idling, included as Attachment A to this document, occupants are prohibited from idling vehicles for longer than 10 minutes while at the facility.

Additionally, the MND includes an analysis of potential impacts from air pollutants to sensitive receptors. As discussed in Threshold III(c) of the MND, based on trip generation estimates and the anticipated use of diesel-powered equipment and vehicles, the Project would not expose sensitive receptors to substantial local carbon monoxide emissions related to operations, or construction-related emissions such as nitrogen dioxide, carbon monoxide, and particulate matter. As detailed in the MND, the Project would not result in a significant air quality impact after implementation of recommended mitigation.

*This page intentionally left blank*

**ATTACHMENT A**

**MOTOR VEHICLE ADDENDUM**



### **MOTOR VEHICLE ADDENDUM**

Occupant Name:

Space/Unit #:

Vehicle Type:

Color:

Year:

Make:

Model:

Description:

Vehicle Length:

Remarks:

License #:

State:

Valid #:

Vehicle Identification # (VIN #):

Registered Owner:

Phone:

Address:

## OCCUPANT'S AGREEMENT TO STORE MOTOR VEHICLE

1. Insurance. Occupant acknowledges that Owner/Manager does not provide insurance covering Occupant's motor vehicle. Occupant agrees to maintain, at Occupant's expense, a policy of fire and extended coverage insurance with theft, vandalism, and malicious mischief endorsements for the full value of Occupant's stored Property. To the extent Occupant does not maintain such insurance, Occupant shall be deemed to have "self-insured" totally and shall bear all risk of loss or damage. Every vehicle, vessel, boat, or trailer that will be stored must have current registration and proof of insurance certificate on file.
2. Title/Registration. The described vehicle with license plate listed is the only vehicle permitted to be parked in the assigned space. Prior to the parking of any vehicle, vessel, boat, or trailer, a copy of the title and/or registration must be provided to Owner/Manager. All vehicles and boats must be titled and/or currently registered to Occupant. Occupant shall not be permitted to bring the vehicle, vessel, boat, or trailer onto the Facility until the necessary documentation is provided to Owner/Manager.
3. Vehicle Condition. Occupant agrees to keep motorized vehicles in "**drivable**" condition and to keep trailers and other such vehicles road worthy at all times.
4. Unauthorized Vehicles. Occupant agrees that any unauthorized vehicles can be removed by Owner/Manager at Occupant's expense and that Owner/Manager shall not be liable to Occupant for removal of unauthorized vehicles.
5. Rules and Regulations. Occupant acknowledges that Owner/Manager may from time to time establish additional rules and regulations regarding the storage of vehicles and Occupant further agrees to comply with said rules and regulations.
6. Prohibited Maintenance and Storage. Occupant shall not perform any maintenance, repairs, or dismantling of the vehicle or boat at any time at the Facility. Extra gasoline, diesel, oil, or any other hazardous materials may not be stored in the vehicle or boat while at the Facility.
7. Idling. Occupants are prohibited from idling vehicles for longer than 10 minutes while at the Facility.
8. Operating Hours / No Overnight Use. Occupant shall have access to the Facility during normal operating hours for the sole purpose of dropping off or picking up their stored Property. Occupant shall not and shall not permit any guests and invitees to spend the night in any vehicle or boat stored on site. **THERE IS NO OVERNIGHT USE OF ANY KIND PERMITTED.** Occupant acknowledges that the Facility is a drop-off and pick-up storage facility. Occupant shall use best efforts to limit Occupant's time during each entry to the Space and in the Facility to less than one hour.
9. Drip Pans / Oil / Old Batteries. Occupants shall place drip pans or similar device beneath all oil pans and gas tanks of vehicles and boats stored at the Facility to prevent contamination of the soil or surface beneath the vehicles and boats. No motor oil, hydraulic, or other fluids shall be drained from Occupant's vehicle or boat at the Facility. Old batteries must be disposed of off-site by Occupant at proper disposal sites in accordance with applicable law.
10. Human Waste Disposal. Disposal of human or animal waste or draining of septic tanks on the Space or anywhere at the Facility is prohibited.
11. Utility Hookups. There are no hookups at the Facility for charging batteries, filling water tanks, etc. Occupant must charge batteries or fill up water tanks off-site.
12. Vehicle/Boat Covers. Fitted vehicle and boat covers are allowed. Any tarps or plastic covers that are used to cover any vehicle or boat must be securely fastened by the Occupant so that they do not

fly off or flap against adjoining occupant's vehicles or boats during windy conditions. Any covers showing deterioration must be removed and disposed of by Occupant upon notice from the Owner/Manager.

13. Cleaning and Washing. No cleaning or washing of vehicles or boats at the Facility is allowed.
14. No Drugs or Alcoholic Beverages. No person entering the Facility shall use, serve, distribute, or give any drugs or alcoholic beverages to anyone. Any person found under the influence of drugs or alcohol will be asked to leave immediately.
15. No Generators, Stereos, or Sound-Generating Devices. Occupant shall comply with all applicable laws, ordinances, rules, and regulations respecting sound control and noise levels, and shall be responsible for controlling noise while on at the Facility. Owner/Manager reserves the right to require Occupants to remove or turn down the volume of any generators, stereos, or other devices that generate noise deemed to be excessively loud by Owner/Manager.
16. Nuisance. Occupant shall conduct all activities (and control the activities of its guests and invitees) while at the Facility in such a manner so that no public nuisance affecting persons or property on or in the vicinity of the Facility results from the activities of Occupant or any of Occupant's guests and invitees.
17. No Firearms or Weapons. No firearms, fireworks, explosives, cross-bows, or any other similar type of weapons are permitted to be used on site or stored within Occupant's vehicle or boat at any time.
18. Control of Guests and Invitees. Occupant shall control the activities of its guests and invitees at all times while at the Facility and Access Roads.
19. Speed Limits. Speed limit at the Facility is 5 mph.
20. Access. Each occupant has been granted a unique access code for ingress and egress to the Facility. Occupant is not permitted to share this code with anyone other than an alternative contact designated in this agreement. Occupant must use this code each time they wish to enter the Facility and Occupant must use this same code each time they exit the Facility. If these codes are not used in combination when entering and then exiting the Facility, future Facility access may be restricted until gate codes can be reprogrammed.

I have read, understand, and agree to all terms contained in this lease addendum.

Occupant's Signature

Date

**ATTACHMENT B**

**LSA RESPONSE LETTER**

## MEMORANDUM

**DATE:** December 7, 2020  
**To:** Annie Baek, InSite Property Group  
**FROM:** Lonnie Rodriguez, LSA Biologist  
**SUBJECT:** CDFW Response to Letter for the Self-Storage/RV Parking Lot Project at 3701 Pacific Place, Long Beach, Los Angeles County, California

This memorandum documents the response to comments and recommended mitigation measures from the California Department of Fish And Wildlife (CDFW) for the Self-Storage/RV Parking Lot Project (project) at 3701 Pacific Place, Long Beach, California.

### Comment #1. Vegetation Removal Activities

Southern tarplant (*Centromadia parryi* ssp. *australis*) was the only special-status plant species observed. In December 2019, LSA observed approximately 250 individual southern tarplant. As noted in the Focused Special-Status Plant Species Survey letter (LSA, August 2020), LSA observed and mapped 580 additional southern tarplant individuals located in areas where they were not observed in 2019. All 850 southern tarplant will be permanently impacted by the proposed project design. The 0.03-acre (1,500 sq. ft.) area that was cleared prior to LSA's completion of the Special Status Plant Survey likely supported additional southern tarplant individuals, as noted in the survey, based on observation of remnant southern tarplant in the duff. However, the remainder of project area (16.56 acres) was surveyed and due to the high level of ongoing disturbance within the project area and the prevalence of ruderal, nonnative plant species onsite, it is unlikely that any of the other special status species identified in the Biological Resources Assessment (BRA) occur in the project area.

- The potential impact would be less than significant based on the analysis contained in the IS/MND. Nevertheless, LSA recommends incorporating 0.34 acres (10:1) of special-status plant mitigation acreage into the existing Southern Tarplant Translocation Plan to ensure that the potential impact remains less-than-significant.

### Comment #2 Crotch's Bumble Bee

As noted in the BRA the habitat within the project area for the Crotch's bumble bee (*Bombus crotchii*) is low quality due to the low diversity of flowering plant species and isolation from better habitat. Based on the *Bombus crotchii* phenology for southern California, males can be observed through mid-September and workers to the end of August. The concern about the survey being

conducted at the end of the activity period is recognized; however, as mentioned above, the quality of habitat is low quality due to the low diversity of flowering plants and, as noted, a single male was seen foraging within the project area. Nonetheless, presence cannot be ruled out due to the late nature of the survey.

- The potential impact would be less than significant based on the analysis contained in the IS/MND. Nevertheless, LSA recommends incorporation of CDFW's Mitigation Measures Nos. 1 and 2 relative to Crotch's bumble bee to ensure that the potential impact remains less than significant.

#### **Comment #3 Impacts to Bats Species**

Only a preliminary survey was conducted for the presence of bats in the Mexican fan palms within the project site. The survey was conducted during the pre-construction nesting bird survey prior to the removal of the vegetation within the parking lot. No bats were heard in the palms nor was guano seen below the palms. Any remaining structures or vegetation should be inspected by a qualified biologist prior to demolition or removal.

- The potential impact would be less than significant based on the analysis contained in the IS/MND. Nevertheless, LSA recommends incorporation of CDFW's Mitigation Measures Nos. 1-4 relative to bats to ensure that the potential impact remains less than significant.

#### **Comment # 4 Burrowing Owl**

As noted in the BRA the area is highly disturbed and no burrowing owl or suitable burrows were observed during the habitat assessment in the project area and the area was noted as only having potential to be used for foraging. Prior to vegetation removal, a pre-construction nesting bird survey was conducted. Additional surveys should be conducted prior to construction activities to avoid the potential take of the species if found present on site.

- The potential impact would be less than significant based on the analysis contained in the IS/MND. Nevertheless, LSA recommends incorporation of Mitigation Measures 1-4 for the burrowing owl to ensure that the potential impact remains less than significant.

#### **Comment #5 Mitigation for Southern Tarplant**

The southern tarplant within the project area was mapped in 2019 and 2020 for avoidance prior to soil disturbance. All areas mapped with southern tarplant, the plants were collected and the topsoil salvaged and stockpiled onsite per the Southern Tarplant Translocation plan. Avoidance of the existing southern tarplant areas is infeasible due to the landfill cap requirements. However, restoration and enhancement of the southern tarplant habitat conditions will be incorporated in the Southern Tarplant Translocation Plan.

- The potential impact would be less than significant based on the analysis contained in the IS/MND. Nevertheless, LSA recommends incorporation of Mitigation Measures 1 and 2 to ensure that the potential impact remains less-than-significant.

### Comment #6 Special Status Plant Survey

On December 6, 2019 during the BRA field surveys, southern tarplant was identified, and as a follow-up to the BRA a Special Status Plant Survey was conducted on August 7, 2020 for special status plants that had the potential to occur within the project area. The August survey identified additional southern tarplant. However, as result of the area being highly disturbed from previous use of the project area as hazardous waste site, a driving range, and by off-road vehicles it was noted that the other special status species identified in the BRA were highly unlikely to occur.

- The potential impact would be less than significant based on the analysis contained in the IS/MND. Nevertheless, LSA recommends incorporation of 0.34 acre (10:1) of special-status plant mitigation acreage into the existing Southern Tarplant Translocation Plan to ensure that the potential impact remains less-than-significant.
- Furthermore, the existing Southern Tarplant Translocation Plan will be expanded to include seeding of Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*) and prostrate vernal pool navarretia (*Navarretia prostrata*) within the mitigation acreage. The Southern Tarplant Translocation Plan will be submitted to CDFW and USFWS for approval prior to implementation. With implementation of these measures, the potential impact would remain below a level of significance

### Comment #7: Impacts to Nesting Birds

LSA recommends incorporating Mitigation Measure No. 1, as suggested by CDFW. LSA further recommends the incorporation of the following measure to address CDFW's concerns regarding no-disturbance buffers around active nests:

- In order to ensure that the potential impacts to nesting birds are mitigated for should construction occur from February 15 (January 1 for raptors) through August 31, a survey will be conducted no more than 7 days prior to the beginning of any project-related activities for the entire site. If project related activities are delayed or suspended for more than 7 days during the breeding season; the survey will be repeated. If nesting raptors and migratory song birds are found, an exclusionary buffer will be established by the biologist, based on consideration of the bird species, the stage of nesting, and the nature of the adjacent construction activity. This buffer shall be clearly marked in the field by construction personnel under the guidance of the biologist, and construction or clearing will not be conducted within this area until the biologist determines that the young have fledged or the nest is no longer active. Any modification from the suggested buffer of 500 or 300 feet will be approved by CDFW prior to being implemented.
- With implementation of Mitigation Measure 1 and the supplemental mitigation provided above, the potential impact would remain below a level of significance.

### Comment #8 Tree Removal

Given the small number of trees on site, a tree survey and brief plan would be recommended. A small number of native trees (commensurate with the number removed) will be incorporated into on-site storm water handling or general landscaping.

- The potential impact would be less than significant based on the analysis contained in the IS/MND. Nevertheless, LSA recommends incorporation of Mitigation Measure Nos. 1 and 2 relative to tree removal to ensure that the potential impact remains less than significant.

### Comment #9 Impacts to Aquatic Resources

The BRA did not characterize the ponding areas onsite as potential vernal pools, and attributed the standing water to the recent rain events that occurred within the week prior to the BRA visit. The pooled water had off road vehicle tracks going through it, the water was turbid and muddy and did not exhibit conditions conducive to aquatic life. As noted in the BRA, an assessment for brachiopods was not considered because of the amount of past disturbance (e.g., soil importation for the landfill cap, illegal dumping, off-road use, use as a golf driving range) that has occurred within the project area. Due to the landfill cap requirements, avoidance of the ponded areas is not feasible; however, ponding conditions can be replicated in the Southern Tarplant receptor sites.

- Potential impacts would be less than significant based on the analysis contained in the IS/MND. Nevertheless, LSA recommends incorporating areas of ephemeral ponding conditions into the 0.34-acre Southern Tarplant Translocation receptor area.

If you have any questions or comments please contact me at [lonnie.rodriguez@lsa.net](mailto:lonnie.rodriguez@lsa.net) or 949-337-6113.

**ATTACHMENT C**

**DTSC PUBLIC NOTICE**

# COMMUNITY UPDATE

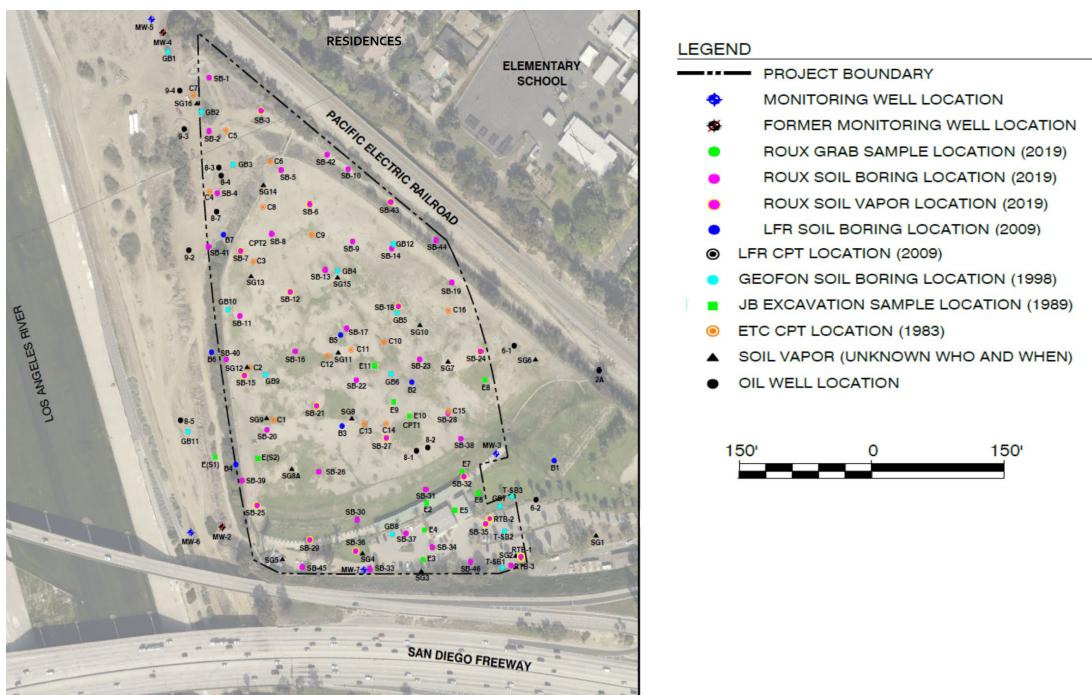
**Department of Toxic Substances Control** – Our mission is to protect the people, communities, and environment of California from harmful chemicals by cleaning up contaminated sites, enforcing hazardous waste laws, and compelling the development of safer products.

## LONG BEACH INDUSTRIAL PARK PROJECT (a.k.a. FORMER OIL OPERATORS) LONG BEACH, CALIFORNIA

This update is to inform you that fieldwork will be conducted at the Long Beach Industrial Park/Former Oil Operators property, located at 3701 North Pacific Place, Long Beach, Los Angeles County, California 90806 (Site). The current owner of the Site, Artesia Acquisition Company, LLC (Artesia), purchased the Site on November 1, 2019 and entered into a California Land Reuse and Redevelopment Act (CLRRRA) agreement with the Department of Toxic Substances Control (DTSC).

DTSC is a State agency responsible for overseeing the evaluation and cleanup of properties contaminated with hazardous wastes. DTSC will oversee the cleanup activities at the Site and ensure the cleanup complies with regulatory standards prior to the Site being developed by the owner into a recreational vehicle (RV) parking and storage warehouse.

**SITE LOCATION AND HISTORY:** The 14-acre Site is located in a mixed commercial and residential area of Long Beach. It consists of four (4) parcels and was historically owned and operated by Oil Operators, Inc., which used the land as an oil field waste disposal facility. Operations stopped in the mid-1950s. In the 1970s, a partial cleanup took place, which included removing, treating, and placing a portion of oily sump materials back on the Site. In the 1980s, additional soil was imported to the Site for grading. In 1996, the Site was developed and used as a golf learning center and driving range. Golfing operations ended in approximately 2016 and most structures associated with that facility were removed in 2017. Since then, the Site has remained vacant.



**PREVIOUS INVESTIGATIONS AND ONSITE CONTAMINATION:** The historical use of the Site as an oil field waste disposal facility resulted in environmental impacts to soil, soil vapor, and groundwater. To date, Artesia has conducted numerous investigations to evaluate the Site's contamination. (See previous Figure for all sampling locations.) Environmental investigations found chemicals including total petroleum hydrocarbons (TPHs), volatile organic compounds (VOCs) and methane, as well as, heavy metals including arsenic and lead at the Site.

**STOCKPILING AND SURCHARGE ON FUTURE BUILDING FOOTPRINT:** One part of the future construction plans includes building a three-story self-storage building that will be approximately 50,000 square feet in size. Due to historical Site operations, the soil beneath the future building is made of weak compressible earth (compressible clay and undocumented fill), which makes the Site susceptible to excessive settlement. Prior to construction, a test program, called surcharge, will be implemented to measure the bearing capacity of the area beneath the building footprint. The surcharge test program will include grading and moving existing surface soil from the northern section of the Site to the southern section of the Site and create a mound of soil (stockpile) to monitor the settlement over the proposed building footprint area. (See illustration in Figure below.) The resulting stockpile of soil will be approximately 15 feet high to simulate the future building weight and it will be covered to minimize dust generation. The surcharge test program will include several months of field monitoring to evaluate settlement behavior of the Site. Artesia plans to implement the test in August 2020. A work notice is attached with additional details of the work activities and approximate fieldwork start and end dates.



This conceptual diagram is being used as a preliminary means of environmental requirements and an analytical and possibly incomplete site analysis tool. It is intended merely to assist in exploring how the project might be developed. It is not a formal engineering drawing or design for permitting purposes only and does not necessarily reflect municipal code compliance.

SOIL TESTING SURCHARGING PLAN  
3701 PACIFIC PLACE  
LONG BEACH, CA

InSite

07.23.2020  
PAGE 2

**SOIL MANAGEMENT PLAN AND MONITORING ACTIVITIES:** In order to ensure that the pre-construction activities are done safely and within regulatory guidelines, Artesia developed a Soil Management Plan (SMP). The SMP describes the procedures and methods that Artesia will use to minimize potential environmental risks to the neighboring community.

**Activities associated with the SMP include, but are not limited to the following main tasks:**

- Baseline ambient air monitoring
- Perimeter air monitoring
- Storm Water Quality Management
- Soil movement/Grading
- Clearing and grubbing vegetation
- Dust control/suppression
- Creating a stockpile over the proposed warehouse building footprint for surcharging

**SAFETY MEASURES:** DTSC will require that dust and vapor control measures be implemented in accordance with the Southern California Air Quality Management District (SCAQMD) requirements. Real-time air monitoring will be conducted in work areas and at the property boundary. Air monitoring will ensure that dust and vapor levels are kept low and do not impact the surrounding neighborhood and school.

**WHAT TO EXPECT DURING FIELD WORK:** The noise will be minimal because the 405 freeway has access immediately adjacent to the southeast part of the Site. No soil will be brought to or taken off the Site. There will be minimal traffic in the neighborhood due to the location of this development and because the visitors and workers will enter the Site through a commercial corridor and park inside the Site.

### **WHERE TO FIND PROJECT DOCUMENTS:**

#### **DTSC Cypress Regional Office**

5796 Corporate Avenue  
Cypress, California 90630  
(714) 484-5337, call for an appointment

#### **DTSC EnviroStor Project Database:**

[https://www.envirostor.dtsc.ca.gov/public/profile\\_report?global\\_id=70000161](https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=70000161)

**WHAT HAPPENS NEXT:** First, the SMP will be implemented to initiate pre-construction activities. Simultaneously, a draft Response Plan (RP) will be developed because the contamination in soil, soil vapor, and groundwater is at levels that require response actions. The RP will include a proposal for cleanup that complies with regulatory standards and will ensure that the Site development is safe for occupants and the surrounding community. Once the draft RP is completed, DTSC will provide a public notice to the community for a 30-day review and comment period. Implementation of the RP will take place once all comments have been addressed and DTSC approves the document as final.

### **PROPOSED PROJECT SCHEDULE:**

Conduct baseline ambient air monitoring & begin surcharging fieldwork to test soil beneath future building footprint	August – September 2020
DTSC to release Response Plan for 30-day public review/comment	September 2020
Online Community Meeting (if requested)	September 2020
City to issue MND for 30-day public comment period	September 2020
DTSC to respond to all community comments and approve Final Response Plan	October 2020 (Tentatively)
DTSC to review/approve Remedial Design Implementation Plan (RDIP)	November 2020 (Tentatively)
Start remedy implementation	December 2020 (Tentatively)

If delays occur, the schedule will be modified accordingly.

## DTSC WANTS YOUR INPUT

DTSC would like to know if you are interested in attending an on-line meeting during the 30-day comment period. The purpose of the meeting would be to present the proposed remedial options in the draft RP. Please send an email letting us know if you are interested in attending the on-line meeting to: [Jessica.Anderson@dtsc.ca.gov](mailto:Jessica.Anderson@dtsc.ca.gov) and type "LB Community Meeting" in the subject line.

**CONTACT INFORMATION:** If you have any questions or concerns, please contact:

**Rania A. Zabaneh**

Project Manager

(714) 484-5479

[Rania.Zabaneh@dtsc.ca.gov](mailto:Rania.Zabaneh@dtsc.ca.gov)

**Jessica Anderson**

Public Participation Specialist

(714) 484-5354

[Jessica.Anderson@dtsc.ca.gov](mailto:Jessica.Anderson@dtsc.ca.gov)

**Sandy Nax**

Public Information Officer

(916) 324-6114

[Sanford.Nax@dtsc.ca.gov](mailto:Sanford.Nax@dtsc.ca.gov)

**Notice to Hearing Impaired Individuals:** TYY users can use the California Relay Service at 711 in state or (800) 855-7100 outside California. You may also call (714) 484-5354 to reach **Jessica Anderson**, DTSC Public Participation Specialist, or toll-free (866) 495-5651.



Hearing impaired individuals may use the California Relay Service at 711 or 800-735-2929 TTY/VCO/HCO to voice.



Additional information on DTSC sites can be found through our **EnviroStor**. (rev. 5-2020)

# COMMUNITY UPDATE

**Department of Toxic Substances Control (DTSC)** – Our mission is to protect the people, communities, and environment of California from harmful chemicals by cleaning up contaminated sites, enforcing hazardous waste laws, and compelling the development of safer products.

## DRAFT RESPONSE PLAN LONG BEACH INDUSTRIAL PARK PROJECT (a.k.a. FORMER OIL OPERATORS), LONG BEACH

### PUBLIC COMMENT PERIOD: NOVEMBER 16 TO DECEMBER 18, 2020

The Department of Toxic Substances Control invites you to comment on a draft cleanup plan, called a Response Plan, for the site located at the 3701 North Pacific Place, Long Beach, Los Angeles County, California 90806 (Site).

#### SITE LOCATION AND HISTORY

The 14-acre Site is located in a mixed commercial and residential area of Long Beach and is currently vacant. The Site was historically owned and operated by Oil Operators, Inc., which used the land as an oil field waste disposal facility. Operations ceased in the mid-1950s. The Site was later developed as a golf learning center and driving range facility, which operated from 1996 to approximately 2016. Most structures associated with the golf learning center facility were demolished in 2017. The Site has remained vacant since that time. On November 1, 2019, Artesia Acquisition Company, LLC., the current owner, purchased the Site.

#### Public Comment Period & Public Meeting Announcement

November 16, 2020 to December 18, 2020

A public comment period is being held to receive the community's comments on the draft Response Plan for Long Beach Industrial Park. **All comments must be post-marked or e-mailed by December 18, 2020, and sent to:**

**Rania A. Zabaneh, Project Manager**  
DTSC Cypress Regional Office  
5796 Corporate Avenue, Cypress, California 90630  
Phone: (714) 484-5479  
Email: [Rania.Zabaneh@dtsc.ca.gov](mailto:Rania.Zabaneh@dtsc.ca.gov)

#### COMMUNITY MEETING

A virtual meeting (due to the COVID-19 situation) has been scheduled, on **December 2, 2020** using Zoom platform, as requested by community members.

**Date:** December 2, 2020

**Time:** 6:00 to 8:00pm

**Where:** <https://bit.ly/3oWjCG3>

**Meeting Call in:** +1 669 900 6833

**Webinar ID:** 872 8710 8619

**Passcode:** 111111



Hearing impaired individuals may use the California Relay Service at 711 or 800-735-2929 TTY/VCO/HCO to voice.



Additional information on DTSC sites can be found through our **EnviroStor**. (rev. 5-2020)

**WHY CLEANUP IS NECESSARY:** The historical use of the Site as an oil field waste disposal facility resulted in soil contaminated with petroleum hydrocarbons, volatile organic compounds (VOCs), semi-VOCs, and metals, and the soil vapor is contaminated with methane and VOCs that are above protective health standards. For the Site to be developed with the current plan of self-storage and recreational vehicle parking and to ensure long-term protection of public health and safety of current and future users, cleanup of contamination in soil and soil vapor is required.

**WHAT IS PROPOSED IN THE RESPONSE PLAN:** The draft Response Plan evaluated several cleanup alternatives, and a media-specific preferred alternative was presented. This alternative proposes to excavate contaminated soil, consolidate, and place beneath an engineered cover or “cap”. In addition, vapor mitigation systems will be installed under the future building and the paved parking areas to prevent potential accumulation of methane and VOCs in soil vapor, as well as, to prevent off-Site migration. A Land Use Covenant will restrict any future activities that may disturb or impede the functionality of any part of the cap or mitigation system. Groundwater monitoring wells and soil vapor probes will be installed at the Site. These will be used to monitor the ongoing effectiveness of the cleanup. Implementation of the response actions will serve to eliminate or mitigate potential risk of exposure to future on and off-site receptors. The cleanup will be conducted by contractors working on behalf of Artesia Acquisition Company, LLC, under DTSC's oversight. DTSC's direction will ensure that cleanup related work is conducted in a manner that protects human health and the environment.

**CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA):** DTSC is required by law to review all environmental activities under CEQA. The City of Long Beach is the Lead Agency and DTSC is a Responsible Agency. As required under CEQA, DTSC will review the City's Final Initial Study/Mitigated Negative Declaration (MND) and conduct an independent analysis of the potential environmental impacts associated with this project before making a final CEQA determination. DTSC will implement all applicable mitigation measures detailed in the City's MND.

**CALIFORNIA LAND REUSE AND REVITALIZATION ACT (CLRRA):** This cleanup is being conducted under a CLRRA agreement, which provides limited environmental liability protection and immunity to Artesia Acquisition Company, LLC, when DTSC determines that the cleanup has been conducted as directed.

**WHERE TO FIND PROJECT DOCUMENTS:**

**DTSC Cypress Regional Office**

5796 Corporate Avenue - Cypress, California 90630 - (714) 484-5337, call for an appointment

**Department of Toxic Substances Control EnviroStor Project Database:**

<https://bit.ly/2TTPfI9>

**YOUR OPPORTUNITY TO PARTICIPATE:** DTSC invites the public to review and provide comments on the draft Response Plan during the public comment period, November 16 to December 18, 2020. A virtual meeting (due to the COVID-19 situation) has been scheduled, on **December 2, 2020** from 6:00 to 8:00pm using Zoom platform, as requested by community members.

**NEXT STEPS:** DTSC will review and consider all public comments at the end of the public comment period. A Response-to-Comments (RTCs) document will be sent to all those who submit public comments and provide their name and address. A copy of the RTCs document will be placed at the Information Repositories. Once considerations have been made, DTSC will finalize and approve the draft Response Plan for implementation.

**CONTACT INFORMATION:** If you have any questions or concerns, please contact:

**Rania A. Zabaneh**

Project Manager  
(714) 484-5479

[Rania.Zabaneh@dtsc.ca.gov](mailto:Rania.Zabaneh@dtsc.ca.gov)

**Jessica Anderson**

Public Participation Specialist  
(714) 484-5354

[Jessica.Anderson@dtsc.ca.gov](mailto:Jessica.Anderson@dtsc.ca.gov)

**Sandy Nax**

Public Information Officer  
(916) 327-6114

[Sanford.Nax@dtsc.ca.gov](mailto:Sanford.Nax@dtsc.ca.gov)



Hearing impaired individuals may use the California Relay Service at 711 or 800-735-2929 TTY/VCO/HCO to voice.



Additional information on DTSC sites can be found through our **EnviroStor**. (rev. 5-2020)

## **PUBLIC COMMENT FORM**

## **PUBLIC COMMENT PERIOD: NOVEMBER 16 TO DECEMBER 18, 2020**

## **FOR PROPOSED RESPONSE PLAN**

## **LONG BEACH INDUSTRIAL PARK (FORMER OIL OPERATORS), LONG BEACH**

You can use this form to send in your written public comments on the proposed Response Plan. You may also ask to be added or deleted from the project mailing list. If you know of anyone or any organizations that would like to be on the project mailing list, please use this form to notify us. Please send your comments to: Rania A. Zabaneh, DTSC Project Manager, Department of Toxic Substances Control, 5796 Corporate Avenue, Cypress CA 90630. You may also e-mail this same information to: [Rania.Zabaneh@dtsc.ca.gov](mailto:Rania.Zabaneh@dtsc.ca.gov).

**Reminder: All public comments on the draft Response Plan must be postmarked or e-mailed by December 18, 2020.**

Name: \_\_\_\_\_

Agency or Organization (if applicable): \_\_\_\_\_

Address: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Email Address: \_\_\_\_\_

Please add me to the Long Beach Industrial Park mailing list.

Please delete from the mailing list (add your address above).

## Comments:

*DTSC mailings are solely for the purpose of keeping persons informed of DTSC activities. Mailing lists are not routinely released to outside parties. However, they are considered public records and, if requested, may be subject to release.*



**Hearing impaired** individuals may use the California Relay Service at 711 or 800-735-2929 TTY/VCO/HCO to voice.



Additional information on DTSC sites can be found through our [EnviroStor](#). (rev. 5-2020)

# AVISO COMUNITARIO

Departamento de Control de Sustancias Tóxicas. Nuestra misión es proteger a la gente, las comunidades y el medio ambiente de California de los productos químicos nocivos, limpiando los sitios contaminados, haciendo cumplir las leyes sobre residuos peligrosos y obligando a desarrollar productos más seguros.

## BORRADOR DEL PLAN DE RESPUESTA PROYECTO PARQUE INDUSTRIAL LONG BEACH

### (previamente conocido como OIL OPERATORS), LONG BEACH

**PERIODO DE COMMENTARIOS PÚBLICO: 16 DE NOVIEMBRE A 18 DE DICIEMBRE, 2020**

El Departamento de Control de Sustancias Tóxicas le invita a comentar sobre un borrador del plan de limpieza, llamado Plan de Respuesta, para el sitio ubicado en 3701 North Pacific Place, Long Beach, Condado de Los Ángeles, California 90806 (Sitio).

#### UBICACIÓN E HISTORIA DEL SITIO

El Sitio de 14 acres está ubicado en una zona comercial y residencial mixta de Long Beach y actualmente está vacante. Históricamente el Sitio fue propiedad y operado por Oil Operators, Inc., quien utilizó la propiedad como una instalación de eliminación de desechos de campos petroleros. Las operaciones terminaron a mediados de la década de 1950. Más tarde, el Sitio se desarrolló como un centro de aprendizaje de golf y una instalación de campo de práctica, que operó desde 1996 hasta aproximadamente 2016. La mayoría de las estructuras asociadas con las instalaciones del centro de aprendizaje de golf fueron demolidas en 2017. El Sitio ha permanecido vacío desde ese momento. El 1 de noviembre de 2019, Artesia Acquisition Company, LLC., El propietario actual, compró el Sitio.

#### Período de Comentarios Público y Anuncio de Reunión Pública

**16 de noviembre, 2020 - 18 de diciembre, 2020**

Se está llevando a cabo un período de comentarios público para recibir los comentarios de la comunidad sobre el borrador del Plan de Respuesta para el Parque Industrial de Long Beach. **Todos los comentarios por correo postal o correo electrónico deben ser mandados a más tardar el 18 de diciembre de 2020 y deben enviarse a:**

**Rania A. Zabaneh, Gerente de Proyecto**  
Oficina Regional DTSC Cypress  
5796 Corporate Avenue, Cypress, California 90630  
Teléfono: (714) 484-5479  
Email: [Rania.Zabaneh@dtsc.ca.gov](mailto:Rania.Zabaneh@dtsc.ca.gov)

#### REUNIÓN DE LA COMUNIDAD

Se ha programado una reunión virtual (por la situación del COVID-19), el 2 de diciembre de 2020 utilizando la plataforma Zoom, según lo solicitado por los miembros de la comunidad.

**Date:** 2 de diciembre 2020

**Time:** 6:00 a 8:00pm

**Dónde:** <https://bit.ly/3oWjCG3>

**Para atender la reunión por vía telefónica (en inglés):** +1 669 900 6833

**Webinar ID:** 872 8710 8619

**Contraseña:** 111111



Las Personas con Discapacidad Auditiva pueden usar el Servicio de Retransmisión de California en el 711 o en el 800-735-2929 TTY/VCO/HCO para expresar su opinión.



Se puede encontrar información adicional sobre los sitios del DTSC a través de nuestro EnviroStor. (rev. 5-2020)

**POR QUÉ ES NECESARIA LA LIMPIEZA:** El uso histórico del Sitio como una instalación de eliminación de desechos de campos petroleros resultó en suelos contaminados con hidrocarburos de petróleo, compuestos orgánicos volátiles (COV), semi-COV y metales, y el vapor del suelo está contaminado con metano y COV que están por encima de los estándares de protección para la salud. Para que el Sitio se desarrolle con el plan actual de auto-almacenamiento y estacionamiento de vehículos recreativos, y para garantizar la protección a largo plazo de la salud pública y la seguridad de los usuarios actuales y futuros, se requiere la limpieza de la contaminación en el suelo y el vapor del suelo.

**LO QUE SE PROPONE EN EL PLAN DE RESPUESTA:** El borrador del Plan de Respuesta evaluó varias alternativas de limpieza y se presentó una alternativa preferida específica para los medios. Esta alternativa propone excavar el suelo contaminado, consolidarlo y colocarlo debajo de una cubierta o "tapa" diseñada. Además, se instalarán sistemas de mitigación de vapor debajo del futuro edificio y las áreas de estacionamiento pavimentadas para evitar la acumulación potencial de metano y COV en el vapor del suelo, así como para evitar la migración fuera del sitio. Un Pacto de Uso de la Tierra restringirá cualquier actividad futura que pueda perturbar o impedir la funcionalidad de cualquier parte del límite o del sistema de mitigación. Se instalarán pozos de monitoreo de agua subterránea y sondas de vapor del suelo en el Sitio. Estos se utilizarán para monitorear la efectividad continua de la limpieza. La implementación de las acciones de respuesta servirá para eliminar o mitigar el riesgo potencial de exposición a futuros receptores dentro y fuera del sitio. La limpieza será realizada por contratistas que trabajan en nombre de Artesia Acquisition Company, LLC, bajo la supervisión del DTSC. La dirección del DTSC garantizará que el trabajo relacionado con la limpieza se lleve a cabo de una manera que proteja la salud humana y el medio ambiente.

**LEY DE CALIDAD AMBIENTAL DE CALIFORNIA (CEQA):** El DTSC está legalmente obligado a revisar todas las actividades ambientales bajo CEQA. La ciudad de Long Beach es la agencia principal y el DTSC es la agencia responsable. Como lo requiere CEQA, el DTSC revisará el Estudio Inicial Final/Declaración Negativa Mitigada (MND) de la Ciudad y realizará un análisis independiente de los impactos ambientales potenciales asociados con este proyecto antes de tomar una determinación final de CEQA. El DTSC implementará todas las medidas de mitigación aplicables detalladas en el MND de la Ciudad.

**LEY DE REUTILIZACIÓN Y REVITALIZACIÓN DE TIERRAS DE CALIFORNIA (CLRRA):** Esta limpieza se está llevando a cabo bajo un acuerdo CLRRA, que brinda protección de responsabilidad ambiental limitada e inmunidad a Artesia Acquisition Company, LLC, cuando el DTSC determine que la limpieza se ha realizado según las instrucciones.

**DÓNDE ENCONTRAR DOCUMENTOS DEL PROYECTO:**

**Oficina Regional del DTSC Cypress**

5796 Corporate Avenue - Cypress, California 90630 - (714) 484-5337, llamar para una cita

**Base de datos del proyecto EnviroStor del Departamento de Control de Sustancias Tóxicas:**

<https://bit.ly/2TTPfI9>

**SU OPORTUNIDAD DE PARTICIPAR:** El DTSC invita al público a revisar y proporcionar comentarios sobre el borrador del Plan de Respuesta durante el período de comentarios público, del 16 de noviembre al 18 de diciembre de 2020. Se ha programado una reunión virtual (debido a la situación de COVID-19), el 2 de diciembre de 2020 desde 6:00 a 8:00 pm utilizando la plataforma Zoom, según lo solicitado por los miembros de la comunidad.

**PRÓXIMOS PASOS:** DTSC revisará y considerará todos los comentarios públicos al final del período de comentarios público. Se enviará un documento de Respuesta a Comentarios (RTC) a todos aquellos que envíen comentarios públicos y proporcionen su nombre y dirección. Se colocará una copia del documento RTC en los repositorios de información. Una vez que se hayan hecho las consideraciones, el DTSC finalizará y aprobará el borrador del Plan de respuesta para su implementación.

**INFORMACIÓN DE CONTACTO:** Si tiene alguna pregunta o inquietud, comuníquese con:

**Rania A. Zabaneh**

Gerente de Proyecto  
(714) 484-5479

[Rania.Zabaneh@dtsc.ca.gov](mailto:Rania.Zabaneh@dtsc.ca.gov)

**Jessica Anderson**

Especialista en Participación pública  
(714) 484-5354

[Jessica.Anderson@dtsc.ca.gov](mailto:Jessica.Anderson@dtsc.ca.gov)

**Sandy Nax**

Oficial de Información Pública  
(916) 327-6114

[Sanford.Nax@dtsc.ca.gov](mailto:Sanford.Nax@dtsc.ca.gov)



Las Personas con Discapacidad Auditiva pueden usar el Servicio de Retransmisión de California en el 711 o en el 800-735-2929 TTY/VCO/HCO para expresar su opinión.



Se puede encontrar información adicional sobre los sitios del DTSC a través de nuestro EnviroStor. (rev. 5-2020)

# FORMULARIO DE COMENTARIO PÚBLICO

**PERÍODO DE COMENTARIOS PÚBLICO: 16 DE NOVIEMBRE AL 18 DE DICIEMBRE DE 2020  
PARA EL BORRADOR DEL PLAN DE RESPUESTA PROPUESTO  
PARQUE INDUSTRIAL LONG BEACH (previamente conocido como OIL OPERATORS), LONG BEACH**

Puede utilizar este formulario para enviar sus comentarios públicos por escrito sobre el Plan de respuesta propuesto. También puede solicitar ser agregado o eliminado de la lista de correo del proyecto. Si conoce a alguien u organización que le gustaría estar en la lista de correo del proyecto, utilice este formulario para notificarnos. Envíe sus comentarios a: Rania A. Zabaneh, Gerente de Proyectos del DTSC, Departamento de Control de Sustancias Tóxicas, 5796 Corporate Avenue, Cypress CA 90630. También puede enviar esta misma información por correo electrónico a:[Rania.Zabaneh@dtsc.ca.gov](mailto:Rania.Zabaneh@dtsc.ca.gov).

**Recordatorio: Todos los comentarios públicos sobre el borrador del Plan de Respuesta deben enviados por correo postal o por correo electrónico a más tardar del 18 de diciembre de 2020.**

Nombre: \_\_\_\_\_

Agencia u organización (si aplica): \_\_\_\_\_

Dirección: \_\_\_\_\_

Número de teléfono: \_\_\_\_\_

Dirección de correo electrónico: \_\_\_\_\_

Por favor agrégueme a la lista de correos del Parque Industrial de Long Beach.

Por favor elimíneme de la lista de correos.

## Comentarios:

*Los correos de DTSC tienen el único propósito de mantener informadas a las personas sobre las actividades de DTSC. Las listas de correo no se divultan habitualmente a terceros. Sin embargo, se consideran registros públicos y, si se solicitan, pueden*



Las Personas con Discapacidad Auditiva pueden usar el Servicio de Retransmisión de California en el 711 o en el 800-735-2929 TTY/VCO/HCO para expresar su opinión.



Se puede encontrar información adicional sobre los sitios del DTSC a través de nuestro EnviroStor. (rev. 5-2020)

# DTSC PUBLIC NOTICE

**Department of Toxic Substances Control** – Our mission is to protect the people, communities, and environment of California from harmful chemicals by cleaning up contaminated sites, enforcing hazardous waste laws, and compelling the development of safer products.

## DRAFT RESPONSE PLAN LONG BEACH INDUSTRIAL PARK PROJECT (a.k.a. FORMER OIL OPERATORS), LONG BEACH

**PUBLIC COMMENT PERIOD: NOVEMBER 16 TO DECEMBER 18, 2020**

**WHAT IS BEING PROPOSED:** The Department of Toxic Substances Control invites you to review and comment on a draft cleanup plan, called a Response Plan for the Long Beach Industrial Park Project, located at 3701 N. Pacific Place, in Long Beach, California 90806. The Site, currently vacant, was historically owned and operated by Oil Operators, Inc., which used the land as an oil field waste disposal facility, resulting in soil contaminated with petroleum hydrocarbons, volatile organic compounds (VOCs), semi-VOCs, and metals, and the soil vapor is contaminated with methane and VOCs that are above protective health standards.

The draft Response Plan evaluated several cleanup alternatives, and a media-specific preferred alternative was presented. This alternative proposes to excavate contaminated soil, consolidate, and place beneath an engineered cover or “cap”. In addition, vapor mitigation systems will be installed under the future building and the paved parking areas to prevent potential accumulation of methane and VOCs in soil vapor, as well as, to prevent off-Site migration. A Land Use Covenant will restrict any future activities that may disturb or impede the functionality of any part of the cap or mitigation system. Groundwater monitoring wells and soil vapor probes will be installed at the Site. These will be used to monitor the ongoing effectiveness of the cleanup. Implementation of the response actions will serve to eliminate or mitigate potential risk of exposure to future on and off-site receptors. The cleanup will be conducted by contractors working on behalf of Artesia Acquisition Company, LLC, under DTSC’s oversight. DTSC’s direction will ensure that cleanup related work is conducted in a manner that protects human health and the environment.

**PUBLIC COMMENT PERIOD (NOVEMBER 16 TO DECEMBER 18, 2020):** Please send comments to Rania A. Zabaneh, DTSC Project Manager at 5796 Corporate Avenue, Cypress, California 90630, email [Rania.Zabaneh@dtsc.ca.gov](mailto:Rania.Zabaneh@dtsc.ca.gov). All comments must be postmarked by **December 18, 2020**.

**COMMUNITY MEETING:** A virtual meeting (due to the COVID-19 situation) has been scheduled, on **December 2, 2020** from 6:00 to 8:00pm using Zoom platform, as requested by community members.

**Where:** <https://bit.ly/3oWjCG3>

**Meeting Call in:** +1 669 900 6833

**Webinar ID:** 872 8710 8619

**Passcode:** 111111

**CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA):** DTSC is required by law to review all environmental activities under CEQA. The City of Long Beach is the Lead Agency and DTSC is a Responsible Agency. As required under CEQA, DTSC will review the City's Final Initial Study/Mitigated Negative Declaration (MND) and conduct an independent analysis of the potential environmental impacts associated with this project before making a final CEQA determination. DTSC will implement all applicable mitigation measures detailed in the City's MND.



Hearing impaired individuals may use the California Relay Service at 711 or 800-735-2929 TTY/VCO/HCO to voice.



Additional information on DTSC sites can be found through our **EnviroStor**. (rev. 5-2020)

**WHERE TO FIND PROJECT DOCUMENTS:**

**DTSC Cypress Regional Office**  
5796 Corporate Avenue  
Cypress, California 90630  
(714) 484-5337, call for an appointment

**Department of Toxic Substances Control *EnviroStor* Project Database:**

<https://bit.ly/2TTPfl9>

**CONTACT INFORMATION:** If you have any questions or concerns, please contact:

**Rania A. Zabaneh**

Project Manager  
(714) 484-5479

[Rania.Zabaneh@dtsc.ca.gov](mailto:Rania.Zabaneh@dtsc.ca.gov)

**Jessica Anderson**

Public Participation Specialist  
(714) 484-5354

[Jessica.Anderson@dtsc.ca.gov](mailto:Jessica.Anderson@dtsc.ca.gov)

**Sandy Nax**

Public Information Officer  
(916) 327-6114

[Sanford.Nax@dtsc.ca.gov](mailto:Sanford.Nax@dtsc.ca.gov)



Hearing impaired individuals may use the California Relay Service at 711 or 800-735-2929 TTY/VCO/HCO to voice.



Additional information on DTSC sites can be found through our **EnviroStor**. (rev. 5-2020)

# AVISO PUBLICO DEL DTSC

**Departamento de Control de Sustancias Tóxicas (DTSC)**, Nuestra misión es proteger a la gente, las comunidades y el medio ambiente de California de los productos químicos nocivos, limpiando los sitios contaminados, haciendo cumplir las leyes sobre residuos peligrosos y obligando a desarrollar productos más seguros.

## BORRADOR DEL PLAN DE RESPUESTA

### PROYECTO PARQUE INDUSTRIAL LONG BEACH

#### (previamente conocido como OIL OPERATORS), LONG BEACH

**PERIODO DE COMMENTARIOS PÚBLICO: 16 DE NOVIEMBRE A 18 DE DICIEMBRE, 2020**

**LO QUE SE PROPONE EN EL PLAN DE RESPUESTA:** El Departamento de Control de Sustancias Toxicas (DTSC) lo invita a comentar sobre el borrador plan de limpieza, llamado Plan de Respuesta para el Proyecto del Parque Industrial de Long Beach, ubicado en 3701 N.Pacific Place, en Long Beach, California 90806 (Sitio). El Sitio, actualmente vacante, fue históricamente propiedad y operado por Oil Operators, Inc., que utilizó la tierra como una instalación de eliminación de desechos de campos petroleros, lo que resultó en un suelo contaminado con hidrocarburos de petróleo, compuestos orgánicos volátiles (COV), semi-COV y metales, y el vapor del suelo está contaminado con metano y COV que están por encima de los estándares de protección para la salud.

El borrador del Plan de Respuesta evaluó varias alternativas de limpieza y se presentó una alternativa preferida específica para los medios. Esta alternativa propone excavar el suelo contaminado, consolidarlo y colocarlo debajo de una cubierta o "tapa" diseñada. Además, se instalarán sistemas de mitigación de vapor debajo del futuro edificio y las áreas de estacionamiento pavimentadas para evitar la acumulación potencial de metano y COV en el vapor del suelo, así como para evitar la migración fuera del sitio. Un Pacto de Uso de la Tierra restringirá cualquier actividad futura que pueda perturbar o impedir la funcionalidad de cualquier parte del límite o del sistema de mitigación. Se instalarán pozos de monitoreo de agua subterránea y sondas de vapor del suelo en el Sitio. Estos se utilizarán para monitorear la efectividad continua de la limpieza. La implementación de las acciones de respuesta servirá para eliminar o mitigar el riesgo potencial de exposición a futuros receptores dentro y fuera del sitio. La limpieza será realizada por contratistas que trabajan en nombre de Artesia Acquisition Company, LLC, bajo la supervisión del DTSC. La dirección de DTSC garantizará que el trabajo relacionado con la limpieza se lleve a cabo de una manera que proteja la salud humana y el medio ambiente.

**PERIODO DE COMENTARIOS PÚBLICO (16 DE NOVIEMBRE A 18 DE DICIEMBRE):** Envíe sus comentarios a Rania A. Zabaneh, Gerente de Proyecto del DTSC en 5796 Corporate Avenue, Cypress, California 90630, o envíe un correo electrónico a [Rania.Zabaneh@dtsc.ca.gov](mailto:Rania.Zabaneh@dtsc.ca.gov). Todos los comentarios deben ser enviados por correo postal o correo electrónico a más tardar el **18 de diciembre de 2020**.

#### REUNIÓN DE LA COMUNIDAD:

Se ha programado una reunión virtual (por la situación del COVID-19), **el 2 de diciembre de 2020** de 6:00 a 8:00 pm utilizando la plataforma Zoom, según lo solicitado por los miembros de la comunidad.

Donde: <https://bit.ly/3oWjCG3>

Para atender la reunión por vía telefónica (en inglés): +1 669 900 6833

Webinar ID: 872 8710 8619

Contraseña: 111111

**LEY DE CALIDAD AMBIENTAL DE CALIFORNIA (CEQA):** El DTSC está legalmente obligado a revisar todas las actividades ambientales bajo CEQA. La ciudad de Long Beach es la agencia principal y el DTSC es la agencia responsable. Como lo requiere CEQA, el DTSC revisará el Estudio Inicial Final/Declaración Negativa Mitigada (MND) de la Ciudad y realizará un análisis independiente de los impactos ambientales potenciales



Las Personas con Discapacidad Auditiva pueden usar el Servicio de Retransmisión de California en el 711 o en el 800-735-2929 TTY/VCO/HCO para expresar su opinión.



Se puede encontrar información adicional sobre los sitios del DTSC a través de nuestro EnviroStor. (rev. 5-2020)

asociados con este proyecto antes de tomar una determinación final de CEQA. El DTSC implementará todas las medidas de mitigación aplicables detalladas en el MND de la Ciudad.

**DÓNDE ENCONTRAR DOCUMENTOS DEL PROYECTO:**

**DTSC Cypress Regional Office**  
5796 Corporate Avenue  
Cypress, California 90630  
(714) 484-5337, llamar para una cita

**Base de datos del proyecto EnviroStor del Departamento de Control de Sustancias Tóxicas:**  
<https://bit.ly/2TTPfl9>

**INFORMACIÓN DE CONTACTO:** Si tiene alguna pregunta o inquietud, comuníquese con:

**Rania A. Zabaneh**  
Gerente de Proyecto  
(714) 484-5479  
[Rania.Zabaneh@dtsc.ca.gov](mailto:Rania.Zabaneh@dtsc.ca.gov)

**Jessica Anderson**  
Especialista en Participación pública  
(714) 484-5354  
[Jessica.Anderson@dtsc.ca.gov](mailto:Jessica.Anderson@dtsc.ca.gov)

**Sandy Nax**  
Oficial de Información Pública  
(916) 327-6114  
[Sanford.Nax@dtsc.ca.gov](mailto:Sanford.Nax@dtsc.ca.gov)



Las Personas con Discapacidad Auditiva pueden usar el Servicio de Retransmisión de California en el 711 o en el 800-735-2929 TTY/VCO/HCO para expresar su opinión.



Se puede encontrar información adicional sobre los sitios del DTSC a través de nuestro EnviroStor. (rev. 5-2020)



**ATTACHMENT D**  
**SURCHARGE BIO REPORTS**

August 21, 2020

Annie Baek  
Artesia Acquisition Company, LLC  
811 North Catalina Avenue, Suite 1306  
Redondo Beach, CA 90277

Subject: Focused Special-Status Plant Species Surveys for the Industrial Self-Storage/RV Parking Project at 3701 Pacific Place, Long Beach, California

Dear Ms. Baek:

This letter report summarizes the findings of special-status plant species surveys conducted for the Industrial Self-Storage/RV Parking Project at 3701 Pacific Place (project), Long Beach, California (see Figure 1; all figures are provided in Attachment A).

## INTRODUCTION

The surveyed project area is located north of Interstate 405 (I-405), east of Interstate 710 (I-710) and the Los Angeles River, and west of the Los Angeles Metropolitan Transportation Authority (Metro) A Line light rail tracks and Los Cerritos Park. Access to the site is currently provided at the intersection of Pacific Place/I-405 and the I-710 northbound on-ramps. In 1926, oil operators owned the site, which functioned as a receiving terminal for waste material from oil production activities. Partial cleanup took place in the 1970s and involved removal, treatment, and replacement of sump materials. Prior to the 2000s, the entire site was covered with fill material, which varied in thickness from 2 to 10 feet.

In the mid-2000s, the site operated as the Long Beach Golf Learning Center. The Golf Learning Center is no longer in operation and is vacant. Ornamental plants dominate the parking lot area on the south side of the project site, and the remaining project area (the former driving range) to the north has become dominated with nonnative vegetation and scattered native plant species. In addition, the site is currently highly disturbed by unauthorized off-road vehicle use. The Artesia Acquisition Company, LLC, (client) is the current owner of the project site.

## METHODOLOGY

On August 7, 2020, LSA senior biologist Jim Harrison conducted a site visit to survey for special-status plant species occurring on site. However, the survey was only partially completed (with the client's knowledge). During an unrelated site visit conducted by LSA senior biologist Lonnie Rodriguez on August 12, 2020, it was observed that an on-site area having vegetation that had not been surveyed on August 7 had been cleared (see Figure 2). The client was notified and indicated that no further vegetation clearing would occur on site until after completion of the focused surveys. On August 17, 2020, LSA senior biologists Jim Harrison and Lonnie Rodriguez returned to the project site and completed the focused survey for special-status plant species occurring on site.

At that time, LSA surveyed the remaining areas not surveyed on August 7 and mapped the area where vegetation had been removed (see Figure 2). At the completion of the August 17 survey, all vegetated areas had been surveyed on foot to identify the potential for or actual occurrence of any special-status plant species in the project area.

In addition, LSA completed mapping the locations of, and quantifying/estimating, the only special-status plant species (i.e., the southern tarplant [*Centromadia parryi* ssp. *australis*]) observed on site. See Figure 2 for locations of the southern tarplant on site. Areas having more than 15 southern tarplant individuals were mapped electronically using the ArcGIS Collector App and were physically demarcated in the field with wooden lath and flagging ribbon in order to facilitate the salvage of the associated topsoil for future translocation of the southern tarplant. This mapping information was used to create Figure 2.

## FINDINGS

During a biological resources assessment conducted by LSA biologists Lonnie Rodriguez and Jeremy Rosenthal on December 6, 2019, LSA identified and mapped the occurrence of approximately 250 southern tarplant individuals within the project area limits (see Figure 2). The southern tarplant, having a California Native Plant Society (CNPS) Rare Plant Rank of 1B.1, was the only special-status plant species observed on site, both in December 2019 and in August 2020.

Based on the conclusions in the Biological Resources Assessment report,<sup>1</sup> the special-status plants of primary focus during the surveys conducted on August 7 and 17, 2020, were Coulter's saltbush (*Atriplex coulteri*), Parish's brittlescale (*Atriplex parishii*), lucky morning glory (*Calystegia felix*), decumbent goldenbush (*Isocoma menziesii* var. *decumbens*), Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*), prostrate vernal pool navarretia (*Navarretia prostrata*), San Bernardino aster (*Symphyotrichum defoliatum*), and any additional southern tarplant individuals. The area where vegetation had been cleared (see Figure 2), which had not been surveyed on August 7, was surveyed and mapped on August 17, 2020; however, while most of the cleared vegetation had been removed from the area, some remnant vegetative material was present. Among this remaining plant material were some southern tarplant branches with flowers. Nevertheless, there was no way to ascertain how many or how widespread these southern tarplant individuals may have been in the cleared area.

During focused surveys conducted in August 2020, LSA observed and mapped approximately 580 additional southern tarplant individuals located in areas where they were not observed in 2019. Therefore, when combining the results from 2019 and 2020, LSA has estimated a total of approximately 830 southern tarplant individuals occurring within the project limits, all of which would be permanently impacted by the proposed project.

No other special-status plant species were observed during site surveys conducted in 2019 or 2020. Furthermore, due to the high level of ongoing disturbance within the project area and the

---

<sup>1</sup> LSA, Inc. 2020. Biological Resources Assessment for the Industrial Self-Storage/RV Parking at 3701 Pacific Place, Long Beach, California. Prepared for InSight Property Group.

prevalence of ruderal, nonnative plant species on site, it is highly unlikely that any of the other special-status plant species identified in the Biological Resources Assessment will occur in the project area.

Should you have any questions regarding the findings of this focused special-status plant species letter report, please contact me at (949) 553-0666 or [jim.harrison@lsa.net](mailto:jim.harrison@lsa.net).

Sincerely,

**LSA Associates, Inc.**



Jim Harrison  
Senior Biologist

Attachments: Figures 1 and 2

## ATTACHMENTS

### FIGURES 1 AND 2

Figure 1: Regional and Project Location

Figure 2: Locations of Southern Tarplant Occurrences

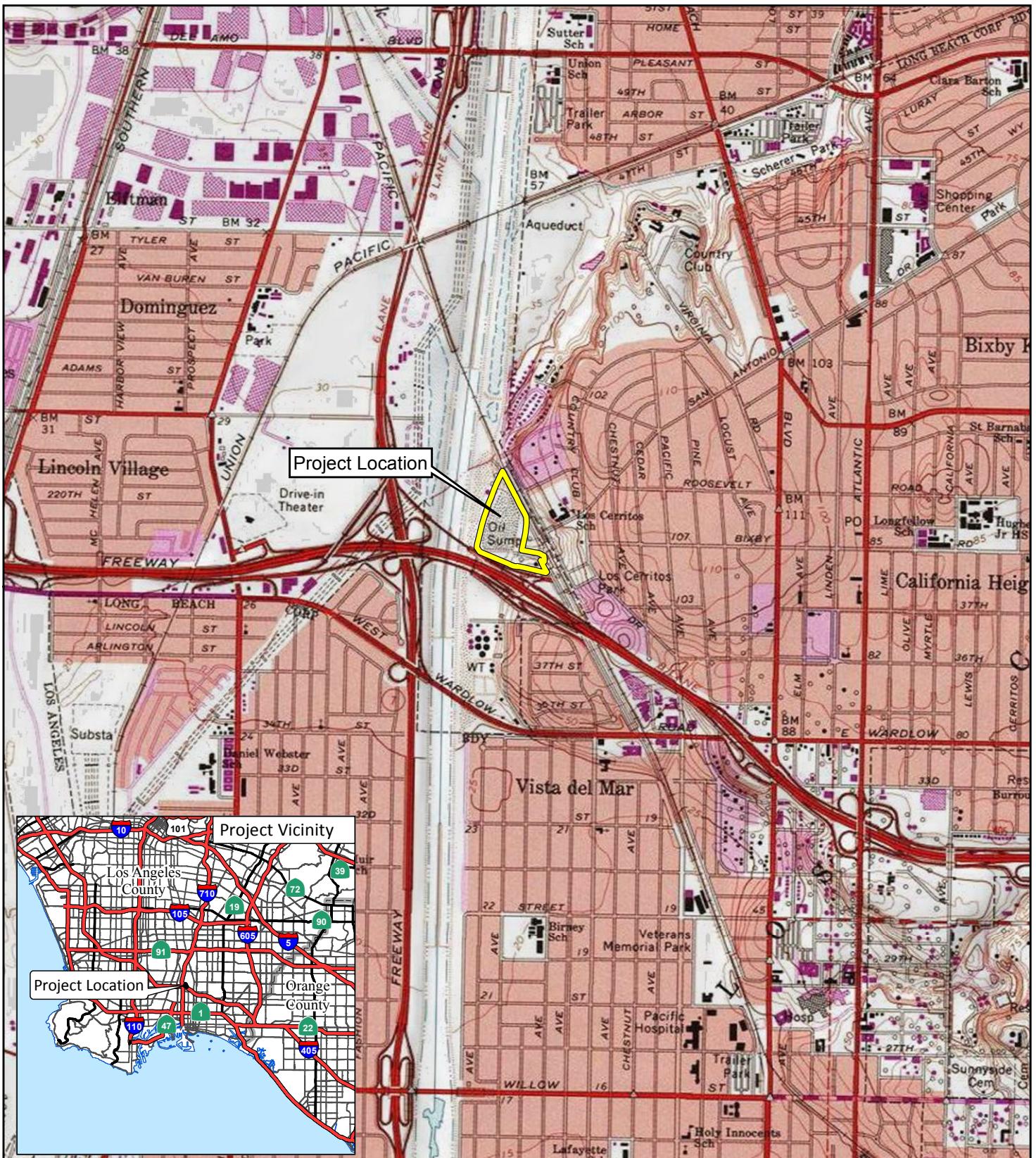
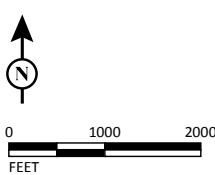


FIGURE 1



SOURCE: USGS 7.5' Quad - Long Beach (1978), CA

I:\SP1901\GIS\MXD\ProjLoc.mxd (12/30/2019)

Industrial-Self Storage/RV Parking at  
3701 Pacific Place  
Regional and Project Location



**LSA**

**LEGEND**

- Project Limits
- Southern Tarplant, Observed December 2019 (250±)
- Southern Tarplant, Observed August 2020 (580±)
- ▨ Vegetation Removal between 8/7/2020 and 8/17/2020

SOURCE: Nearmap (5/19/2020)

I:\ISP1901\GIS\MXD\Bio\SouthernTarplant\_2019\_2020\_Observations.mxd (8/21/2020)

**FIGURE 2**

Industrial-Self Storage/RV Parking at  
3701 Pacific Place

Locations of Southern Tarplant Occurrences

**ATTACHMENT E**

**PUBLIC NOTICE LANGUAGE REGARDING ZONING/LAND USE CHANGE**



LONG BEACH  
DEVELOPMENT  
SERVICES



# PUBLIC NOTICE

## NOTICE OF PUBLIC HEARING

### PLANNING COMMISSION

- Application Number:** 2005-08 (SPR20-015, ZCHG20-004, CUP19-041, SV20-006, LMG20-009)
- Application Date:** 04/30/2020
- Project Location:** 3701 Pacific Place (APNs: 7140-014-019, 7140-014-032, 7140-014-033, 7140-014-025)
- Project Applicant:** Paul Brown for InSite Property Group
- Approval(s) Requested:** Site Plan Review, Zone Change, Conditional Use Permits, Standards Variance, Lot Merger
- Proposed Project:** A Site Plan Review to develop a new 3-story, 152,745-sq.ft. building along with a Conditional Use Permit to operate a self-storage facility with accessory office space, recreational vehicle parking lot and a car wash for exclusive use by patrons parking vehicles onsite located at 3701 Pacific Place within the Commercial Storage Zoning District. A Standards Variance to allow a maximum building height of 42'-0" where 28'-0" is required and a Lot Merger to consolidate four lots into a single 13.95-acre parcel. (District 8)

This project **IS NOT** in the Coastal Zone and **IS NOT** appealable to the Coastal Commission.

**Environmental Review:** Pursuant to the California Environmental Quality Act (CEQA) and the State CEQA Guidelines, an Initial Study/Mitigated Negative Declaration (IS/MND07-20) has been prepared for the project and finds that by implementing identified mitigation measures related to air quality, biological resources, cultural resources, geology and soils hazards and hazardous materials, noise, and tribal cultural resources, the project will not result in significant effects to the environment. The IS/MND was circulated for a 30-day public review period between October 19, 2020 and November 16, 2020. City Hall is currently closed to the public due to the COVID 19 pandemic, however the IS/MND is available at the City's website at:

[http://www.lbds.info/planning/environmental\\_planning/environmental\\_reports.asp](http://www.lbds.info/planning/environmental_planning/environmental_reports.asp).

The **Planning Commission** will hear this item at the meeting detailed below:

- Meeting Date:** December 17, 2020
- Meeting Time:** 5:00 pm
- Meeting Place:** The Planning Commission will meet via teleconference pursuant to Executive Order N-29-20 issued by Governor Gavin Newsom. The Civic Chambers will be closed to the Public. Written public comments can be submitted by email at [PlanningCommissioners@longbeach.gov](mailto:PlanningCommissioners@longbeach.gov). For information on how to participate in the meeting, visit: <http://www.longbeach.gov/lbds/planning/commission/>

To view or download the meeting agenda, visit <https://longbeach.legistar.com/>

For more information, contact Cuentin Jackson, Project Planner, at [cuentin.jackson@longbeach.gov](mailto:cuentin.jackson@longbeach.gov) or (562) 570-6345 or Amy Harbin at [amy.harbin@longbeach.gov](mailto:amy.harbin@longbeach.gov) or (562) 570-6872.

You are receiving this notice because you are either a property owner or resident that is adjacent to the proposed project or are an interested party on record with the Planning Bureau.

**Written testimony may be submitted to the Planning Commission as follows:**

Planning Commission  
411 West Ocean Blvd., 3<sup>rd</sup> Floor  
Long Beach, CA 90802  
[PlanningCommissioners@longbeach.gov](mailto:PlanningCommissioners@longbeach.gov)

**You are not required to take any action. This is your opportunity to voice your opinion regarding the proposed project.** To establish "aggrieved" status (leading to a right to appeal) you must present oral or written testimony at this hearing; otherwise, you may not appeal this project.

**LONG BEACH DEVELOPMENT SERVICES  
411 W. Ocean Blvd., Third Floor  
Long Beach, CA 90802**

*DVPLENTITLE*

CJ



**OFFICIAL PUBLIC NOTICE**

**Hearing/Meeting Procedures:** The Planning Commission will meet via teleconference pursuant to Executive Order N-29-20 issued by Governor Gavin Newsom. Written public comments can be submitted at [PlanningCommissioners@longbeach.gov](mailto:PlanningCommissioners@longbeach.gov). The Project Planner(s) will present the project. After receiving public written testimony regarding the project, a decision may be rendered.

**Exhaustion of Administrative Remedies and Judicial Review:**

If you challenge this agenda item in court, you may be limited to raising only those issues you or someone else raised at the public hearing mentioned here, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90<sup>th</sup> day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

For more information on appeals to the Cultural Heritage Commission, Coastal Commission, City Planning Commission, and/or the City Council, please visit [www.longbeach.gov/lbds/planning/appeals](http://www.longbeach.gov/lbds/planning/appeals) or call (562) 570-6194.

To request this information in an alternative format or to request a reasonable accommodation, please contact the Development Services Department at longbeach.gov/lbds and 562.570.3807. A minimum of three business days is requested to ensure availability; attempts will be made to accommodate requests with shorter notice.