

**From:** Christine Ladewig [mailto:chrislad@yahoo.com]  
**Sent:** Monday, April 12, 2021 10:47 PM  
**To:** CityClerk <CityClerk@longbeach.gov>  
**Subject:** I oppose Agenda Item #8 -- Build the River Park Instead!

**-EXTERNAL-**

We residents who live on the west side of Long Beach, specifically in the Wrigley neighborhood, are very much opposed to any use of these lands except for that of a park along the river.

We urge a no vote on Agenda Item 8 at Tues. April 13 meeting.

Thank you,

Sincerely,

Christine Ladewig

**From:** Akerblom, Marty [mailto:MAkerblom@allenmatkins.com]  
**Sent:** Monday, April 12, 2021 10:50 AM  
**To:** CityClerk <CityClerk@longbeach.gov>  
**Cc:** Amy Harbin <Amy.Harbin@longbeach.gov>; Villa, Fernando <FVilla@allenmatkins.com>  
**Subject:** 3701 North Pacific Place Project - Letter for City Council Meeting 4/13/2021

**-EXTERNAL-**

I'm using Mimecast to share large files with you. Please see the attached instructions.

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City Clerk:

We are counsel for applicant Artesia Acquisition Company, LLC regarding the above-referenced project. On behalf of Artesia, I submit the attached letter in support of Artesia's application. This matter is to be heard by the City Council at their meeting tomorrow on April 13, 2021. Please provide this letter to the City Council in advance of the meeting to be included in the record for this matter.

Please note that the attachments to the letter are quite large, so I have attached the document using our large file share feature, and I'm also providing you a dropbox link here as a backup:  
<https://www.dropbox.com/sh/c9hc2x4hunexwwe/AACN5k8SMuYWuUngv1VOwaOya?dl=0>

Regards,  
Marty

**Margaret R. Akerblom Esq.**

Associate

Allen Matkins Leck Gamble Mallory & Natsis LLP

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(213) 622-5555 (main)

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**Allen Matkins**

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-----Original Message-----

From: Craig Anderson [mailto:clttt2@mac.com]

Sent: Tuesday, April 13, 2021 6:34 AM

To: CityClerk <CityClerk@longbeach.gov>

Cc: consultant@calheightsconsult.com

Subject: I oppose Agenda Item #8 -- Build the River Park Instead!

-EXTERNAL-

HELLO...

for many years I practiced driving golf balls at the are now designated for Wrigley park north. I was saddened when the golf range went out of business. I was also sad that the area was left vacant for so long and have always felt it would be utilized best as a park with nice trees and hiking trails..maybe even mountain bike trails? this site is perfect for a nature park and trails similar to the one adjoining Monte Verde park in Lakewood and the San Gabriel nature trail. please consider making this park a reality and do not develop it for commercial use.

concerned LB citizen

Craig Anderson

**From:** Laurie C. Angel [mailto:lcangel2012@gmail.com]

**Sent:** Monday, April 12, 2021 12:03 AM

**To:** Council District 8 <District8@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 9 <District9@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Jonathan Kraus <Jonathan.Kraus@longbeach.gov>; Mayor <Mayor@longbeach.gov>; Thomas Modica <Thomas.Modica@longbeach.gov>; CityClerk <CityClerk@longbeach.gov>

**Cc:** Ann Cantrell <anngadfly@aol.com>; Bob Marsocci <bmarsocci64@gmail.com>; Carlos Ovalle <csovalle@gmail.com>; Corliss Lee <corlisslee@aol.com>; David Walker <walkerdgdec@gmail.com>; Hawk McFayzen <hawkmcfadzen@gmail.com>; Ian Patton <ispatton@yahoo.com>; Juan E Ovalle <jeovallec@gmail.com>; Kimberly Walters <kimwalters@gmail.com>; Leslie Garretson <lamiller@pacbell.net>; Martin Holman <flight750@gmail.com>; Rae Gabelich <hoorae1@aol.com>; Renee Lawler <renee\_matt@live.com>; Serena Steers <serenasteers.ccv@gmail.com>

**Subject:** City Council Agenda Item #8 for 4/13/21 Hearing to Appeal of Planning Commission Approval for 3701 Pacific Place.

**-EXTERNAL-**

City Clerk, please add this email to the public record for this agenda item.

## **UPHOLD THE APPEAL and REQUEST AN EIR**

We need your focused attention and due diligence to address the disparities in open space on the west side of Long Beach with this and 712 Baker which are very critical land use decisions. Every single land use decision deeply affects our lives. It is important you do the right thing for the community.

There are very few opportunities along the Los Angeles River left to correct these disparities nor rescue our environment from the adverse impacts of poor air / water quality, traffic, noise, climate change.

You simply cannot allow any of the few remaining properties along the LA River to be used for any other use than open space regardless of current condition or circumstances. Resources are available. Negotiations can be accomplished for the greater good. It is that important to the westside, the city and the region that these properties be used as open space – the entirety of ANY parcels. It is important for our sustained health and survival. Period.

How important do you suppose clean water is to our survival, given the push to densify throughout the city? What we do with our watershed is absolutely critical to the entire Dominguez Watershed. This comment is from “The Greater Los Angeles County Open Space for Habitat and Recreation Plan (Integrated Regional Water Management Plan Update – 2012)”



**“If properly preserved, open space will enhance our ability to capture stormwater. Our need for water is increasing as we experience less rain and more urbanization and densification.”**

[https://dpw.lacounty.gov/wmd/irwmp/docs/Prop84/GLAC\\_OSHARP\\_Report\\_Final.pdf](https://dpw.lacounty.gov/wmd/irwmp/docs/Prop84/GLAC_OSHARP_Report_Final.pdf)

**Table 14. Infiltration and Potential Groundwater Recharge Benefits from Open Space Projects**

	Potential Groundwater Recharge Capacity (AF/yr)		
	Habitat	Recreation	Total
North Santa Monica Bay	-	-	-
Upper Los Angeles River	2,000	19,000	21,000
Upper San Gabriel and Rio Hondo	3,000	15,000	18,000
Lower San Gabriel and Los Angeles River	1,000	5,000	6,000
South Santa Monica Bay	-	2,000	2,000
<b>Greater Los Angeles County</b>	<b>6,000</b>	<b>41,000</b>	<b>47,000</b>

**Table 15. Potential Stormwater Quality Benefits from Open Space Projects**

	Potential Capture Capacity (AF/yr)		
	Habitat	Recreation	Total
North Santa Monica Bay	200	200	400
Upper Los Angeles River	600	3,900	4,500
Upper San Gabriel and Rio Hondo	900	2,600	3,500
Lower San Gabriel and Los Angeles River	1,100	4,400	5,500
South Santa Monica Bay	800	6,400	7,200
<b>Greater Los Angeles County</b>	<b>3,600</b>	<b>17,000</b>	<b>21,000</b>

You were elected by the people of this city to represent them and do your work in support of the community. We expect you to look out for our best interests as well as the city and the city's role in the long-term health and sustainability of the region.

The community needs for you to do the right thing, right now regarding this property and 701 Baker and be as creative as you can to acquire the property and create critically needed open space.

The loss of the 10.6 acres Boy Scout camp adjacent the LA River was a tragic loss from which the city will never be able to recover. That very important and easy opportunity for the city to convert that parcel to public use is gone forever.

As you are fully aware, we / human beings / flora and fauna must have open space and a healthy environment / habitat to survive and thrive. **This body has recognized the need for open space on the west and north sides time and again. Your**

**commitment and understanding of this need has been stated in numerous planning documents that this body has approved and supported.**

**The Long Beach RiverLink Plan was approved by the city council on 2 occasions in 2007 and unanimously in 2015. Implementing this plan is referred to in the latest general plan and the intent has been incorporated into numerous requests for funding. The public expects you to follow through on the promise and clear intent of adding open space. We are at a juncture that you can not dismiss a single parcel regardless of status.**

The last minute, and improperly vetted decision to change the 3701 Pacific Place site to neo industrial while the public was distracted deliberating on proposed high density and 5 and 6 story housing (encroaching in MY neighborhood) which gave cover to change this parcel from open space at the last possible moment.

**Changing the zoning to neo industrial on this property was the wrong thing to do. There was NO transparency with this last minute, behind the scenes change, and you need to be fully aware of that fact. It was simply wrong. Done for the wrong reasons, and completely contrary to public expectations and decades of planning.** Please review each and every one of the LA River related plans, legislation, and communication regarding this property to understand the commitment and continuously stated intent of the property.

This property was included in the Countywide Open Space and Recreation Plan completed in 2016, prioritizing the property for acquisition as open space. The mayor wrote a letter of support for SB 1374 for a Lower Los Angeles River Recreation and Park District in 2016 – state legislation to support the open space concept.

This property was specifically included in the North Long Beach Project Area in 1996 earmarked as open space until redevelopment was eliminated in 2012. The intention was very clear with this property over decades in multiple plans (see attached project area for the northern parts of the plan.

The public has expectations that the Los Angeles River would be a continuous stream of open space for public use AS PROMISED and the general plan states. You voted for RiverLink you have the opportunity to implement it. You have a very important opportunity to do the right thing for the community now. It is your responsibility.

**This property and that of 712 Baker is infinitely more critical and valuable than concrete expanses or buildings. This region needs the water. We need the open space. We need to protect and enhance the watershed. We need to ensure our water will not harm us, the river nor the bay. We need to improve our environmental situation and sustainability not continue to detract and diminish it.**

We need to see your meaningful intention to act responsibility for the people – not developers – FOR THE PEOPLE. This is a life affirming choice.

We need the contamination on the site, in the water table, and the watershed to the river evaluated and cleaned up to protect the people, habitat, our water, the river and the bay.

We need for you to recognize that traffic density at this site has been evaluated in the 98% worst traffic in California according to the EnviroStor database of the Department of Toxic Substances Control (DTSC). **DTSC documents the adverse environmental score at the worst 86 to 90% for the site in all of California.** (See EnviroStor Summary from the DTSC)

[https://www.envirostor.dtsc.ca.gov/public/profile\\_report?global\\_id=70000161](https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=70000161)

Contaminants and toxins are present in the soil, the water, and in the air we breath, and the community is exposed to them. Several studies continue to identify the area along the I710 as some of the worst in the nation. This project can not be mitigated in that regard. **This project must be stopped so that it will not pile on to these issues that have proven to reduce our life expectancy. Putting concrete over the site does not fix all of the literal underlying contamination issues. These sites must be cleaned up for the health of the region.**

**In addition, alternative and healthier uses must be diligently evaluated for this site. You are fully aware that the worst land uses continue to be piled up on the west and north side. Every single land use decision adds to or can help reduce the absolute worst health issues. This speaks to the reason there are so many plans to green and keep a sizable buffer on either side of the Los Angeles River.**

An impartial environmental evaluation (EIR) must be done on this property to evaluate all pertinent elements contained in an EIR including: habitat, noise, air, water, cultural and historical resources, aesthetics, every element of an EIR, including the site's possible contribution to carbon emissions, heat island effect and global warming as currently proposed in contrast to critical, healthy alternatives. These adverse climate impacts must be addressed by you as the RESPONSIBLE decision makers on every single land decision that comes before you and the Planning Commission.

Our very survival and long-term health depends on you to do the right thing.

Do not sit in silent and tacit complacency or compliance and allow for bad outcomes.

You can do something. You can make this a better outcome for all of us.

**Further, the city council rejected an EIR for a strikingly similar self storage and RV parking at 712 Baker in the early 2000's. This body did the right thing - they did not approve the EIR because it was inadequate. That project did not happen for good reason and it must serve as a precedent for this project. It is more of an assault today than it was then. This project does not even have an EIR AND it is a highly undesirable use. How on earth is a property of this level of concern not undergoing an EIR?**

You are the deciders. You have the obligation to do the right thing. We can no longer squander this land for these adverse and incompatible uses. There is little land left in Long Beach to revitalize and advance the beauty, habitat and health of our communities.

You must protect the community.

You must make the BEST land use decisions for the community and this city.

As the city's governing body the people need your responsible leadership to do your due diligence . You absolutely have every opportunity and right to do the following:

- **Require an Environmental Impact Report** for 3701 Pacific Place to address very serious environmental concerns and more critical land use options. Allowing the applicant to evaluate the environmental issues is biased, unreliable and incomplete review. We have no idea the magnitude of the real environmental issues. ***Allowing a Mitigated Negative Declaration is absurd given the magnitude of a range of environment risks and need to diligently evaluate alternative needs.***
- **Deny all requests for zoning changes** – a storage facility can go anywhere. We should not be squandering this critically located land. The owner is purchasing this land and it is not yet entitled and should not be. It was a risk they took that should not be rewarded at the expense of the community and our health. This use was never vetted with the public.
- **Uphold the appeal and deny all Planning Commission approvals and permits as noted in the agenda item (Site Plan Review, Standards Variance, CUP and Lot Merger, Construction and Operation).** The applicant has already intentionally and illegally conducted extensive work on this property IN THE MIDDLE OF THE NIGHT without necessary approvals, entitlements, reviews or public warning and appropriate precautions moving highly contaminated soil at great risk to the public. This activity should be seriously prosecuted, not rewarded. This is an incompatible use for this site and inconsistent with RiverLink's requirements for open space. There are concerns that the Planning Commission was even adequately informed of objections and concerns with the project.
- **Do the morally responsible work to acquire this property regardless of how imposing or difficult it may seem.** Acquire this property for critically needed open space this body has continually promised and planned for, and the community absolutely expects and needs.
  - Negotiate with the property owner and help them to relocate to a better site. A storage facility can go anywhere (Target site on Bellflower or

several opportunities along the SR91 freeway). There is absolutely no need for this facility to be in this location. NONE. It is barely feasible that the property could support the weight that a storage facility, office building, and storage for almost 600 RV's or

- When you deny the use and zoning changes you likely may have a willing seller.
- Otherwise, if you want to do the right thing for the community you can. You just need to be bold and you will be justified to take the appropriate action. Where there is a will, there is a way. Do you have the will?

**UPHOLD THE APPEAL and REQUEST AN EIR**

Respectfully,

Laurie Angel



Figure 1-1  
**Study Area**

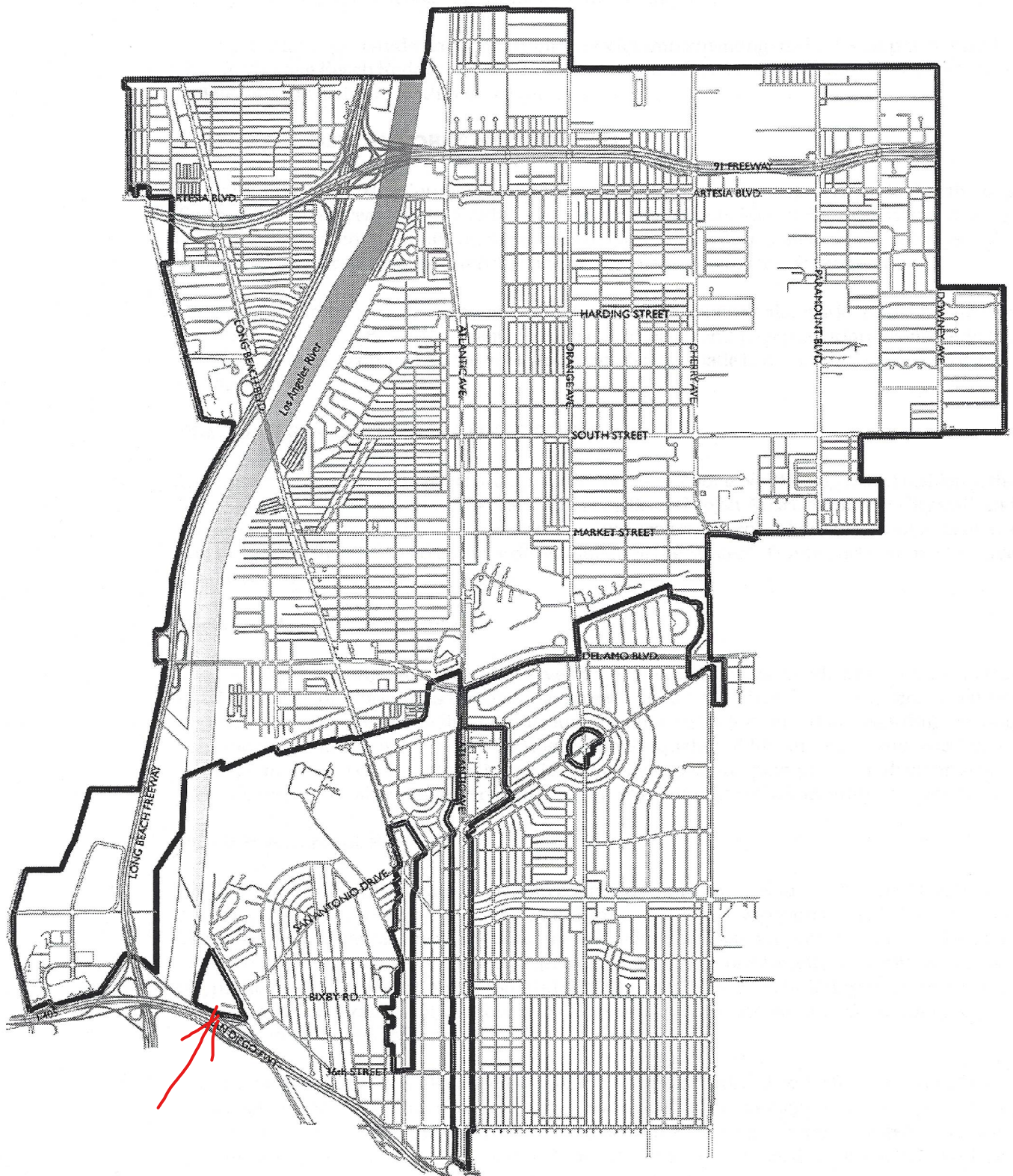
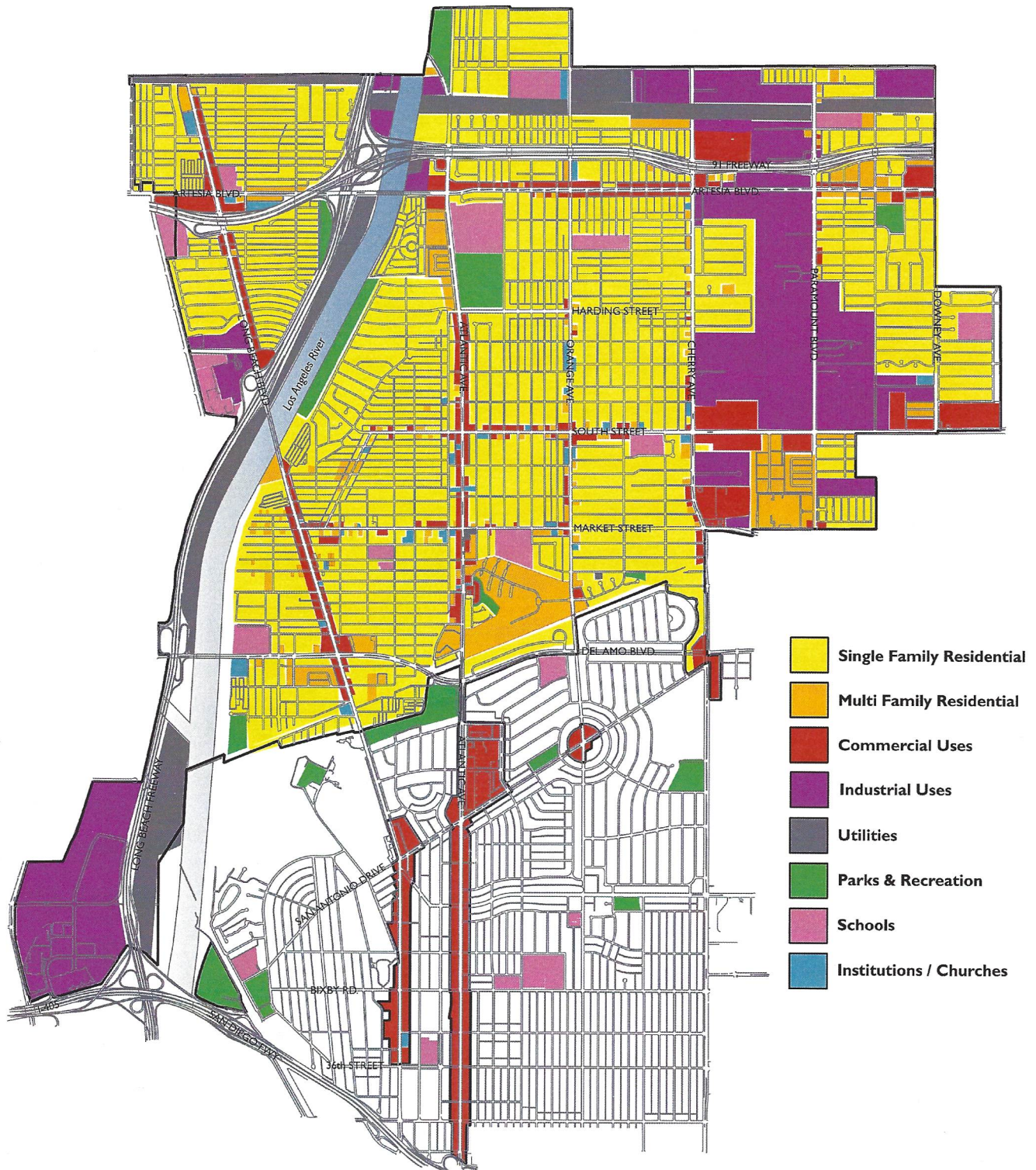




Figure 3-1

# Existing Land Uses - Generalized



**From:** Laurie C. Angel [mailto:lcangel2012@gmail.com]

**Sent:** Tuesday, April 13, 2021 7:49 PM

**To:** Council District 8 <District8@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 9 <District9@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Jonathan Kraus <Jonathan.Kraus@longbeach.gov>; CityClerk <CityClerk@longbeach.gov>; Mayor <Mayor@longbeach.gov>; Thomas Modica <Thomas.Modica@longbeach.gov>

**Cc:** Amy Valenzuela <acahni@gmail.com>; Ann Cantrell <anngadfly@aol.com>; Bob Marsocci <bmarsocci64@gmail.com>; Carlos Ovalle <csovalle@gmail.com>; Corliss Lee <corlisslee@aol.com>; David Walker <walkerdgdec@gmail.com>; Hawk McFayzen <hawkmcfadzen@gmail.com>; Ian Patton <ispatton@yahoo.com>; Juan E Ovalle <jeovallec@gmail.com>; Kimberly Walters <kimwalters@gmail.com>; Leslie Garretson <lamiller@pacbell.net>; Martin Holman <flight750@gmail.com>; Rae Gabelich <hoorae1@aol.com>; Renee Lawler <renee\_matt@live.com>; Serena Steers <serenasteers.ccv@gmail.com>

**Subject:** Re: City Council Agenda item #8 3701 Pacific Place

**-EXTERNAL-**

With out a full EIR alternatives will never be honestly and completely reviewed. All elements of and EIR will never be addressed. The public will never be involved in the process.

You have a neighborhood immediately adjacent, LCNA, and none of their concerns are being addressed. The building will be visible. People will walk out of their homes and see RVs and storage. How on earth is that compatible at all!

It appears city council are the only ones that do not appreciate this could be a park. Escrow has not closes and entitlements not made. This could be over come.

Opportunity LOST. Forget about all of the plans that called this as open space. This could have been negotiated.

Laurie Angel

On Tue, Apr 13, 2021 at 6:12 PM Laurie C. Angel <[lcangel2012@gmail.com](mailto:lcangel2012@gmail.com)> wrote:  
My presentation for the hearing for your review and consideration.

**My name is Laurie Angel, with the Riverpark Coalition.**

**Make no mistake, this hearing is important and the outcome will affect the health and well being of 10's of thousands of people on the west side that have been deprived of the open space others in this city enjoy.**

**Today your decisions will set the tone for this city's future.**



- This body has recognized the need open space on the westside time and again.
- We are at a point where every single parcel along the river is needed for open space.
- We need to protect and enhance the watershed.
- We need to improve our environmental situation and sustainability NOT continue to detract and diminish it.

**You must follow through on your promises.**

In the early 2000s, the city council rejected a strikingly similar project across the street, because a FULL EIR was inadequate due to traffic issues.

That project did not happen because the council did its job. You must too.

This must serve as a precedent for this project

You are fully aware that the worst land uses continue to be piled up on the westside. The actions you take, and your land use decisions either attest to your commitment to the community OR

they show a "reckless disregard" for all the critical issues that continue to lead to extensive health issues & diminished life expectancy.

**OPEN SPACE WILL HELP!!!**

**PLEASE!! UPHOLD THE APPEAL and REQUEST A FULL EIR**

**Laurie Angel**

**From:** Donna Bergeron-Birge [mailto:birgebergeron@gmail.com]

**Sent:** Tuesday, April 13, 2021 3:54 PM

**To:** Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 9 <District9@longbeach.gov>; Robert Garcia <Robert.Garcia@longbeach.gov>; CityClerk <CityClerk@longbeach.gov>

**Subject:** Agenda Items 8 & 9

**-EXTERNAL-**

Mr. and Mrs. James Birge  
4681 E. Goldfield Avenue  
Long Beach, CA 90807  
April 13, 2021

Subject: 3701 Pacific Place/ Agenda Items 8 & 9

To All Who Will “Hopefully” be Concerned:

As much as this plea is about the west side’s needs for green space, the decisions and plans that you make will speak loudly about how you are viewed as trusted advocates (or not) for the health and well-being of our community and how faithful you are to your commitments.

People are talking; residents and voters, even Assemblyman O’Donnell, Speaker Rendon, Congressman Lowenthal, former Councilwoman Rae Gabelich; all are advocates for the plans for the LA River revitalization made over the last 20 years. A lot of us are talking...about how corporate interests are increasingly more valuable than the concerns of those impacted by their plans.

According to information from the Trust for Public Lands, the City of Long Beach has not been forthright in attempting to acquire this property. TPL’s frustration with the parcel acquisition was that the City didn’t take it seriously and TPL was never engaged by the City as its purchasing agent. They became completely frustrated with the City’s lack of interest and commitment.

You must realize that the proposed project at 3701 Pacific Place is an improper fit for the Lower LA River’s long-range plans. There have been repeated revitalization commitments for the Lower Los Angeles River for which you were lauded. You know this. The City also has also made a commitment to equity and environmental justice. You know this.

I can only assume that you know the following: **This area was classified as a [disadvantaged community by the CalEPA for the purposes of SB 535 due to the residents’ exposure to disproportionately high rates of pollution.](#)** According to the **Coalition for Clean Air**, the proposed project-3701 Pacific Place (at the 405 & 710) is where

residents are already heavily impacted by poor air quality and toxic diesel emissions from the highways.

With all due respect...given the preceding, how does a multi-story concrete storage facility that will house hundreds of gas-guzzling RVs offset such contamination? How does it fit into the long-range plans of reviving the LA River? Can you in good faith to the community you serve...give such a project the green light?

Sincerely,

Donna Bergeron-Birge and Jim Birge  
Residents; District 8

"The beauty of the living world...has always been uppermost in my mind...I have felt bound by a solemn obligation to do what I could--if I didn't at least try-I could never again be happy in nature...there would be no peace for me if I kept silent."--**Rachel Carson** (1907-1964)

**From:** Stephanie Booth [mailto:sbooth.md@gmail.com]  
**Sent:** Tuesday, April 13, 2021 12:35 PM  
**To:** CityClerk <CityClerk@longbeach.gov>  
**Subject:** 4/13/2021 vote NO on AGENDA #8

**-EXTERNAL-**

4/13/2021 MEETING regarding AGENDA #8

Good afternoon Ms. DeLaGarza,

I have two concerns to share with you today.

**First issue:**

The Long Beach City Council will vote today to go forward with the plan to develop the land at 3701 Pacific Place into a commercial building and an RV parking lot, without requiring an Environmental Impact Report.

For an area that used to be a toxic waste dump, it appears unconscionable to accept the Planning Commission's approval of the developer's proposal to build on this parcel without an EIR.

I am deeply concerned that this project will increase air pollution and contaminate our water.

Don't all responsible parties want to know for sure? **Performing a complete EIR is the responsible thing to do.** I can't do anything; but, as decision-makers for Long Beach, our City Council can. They should insist on getting an EIR. That is the right thing to do.

**Second issue:**

Because this project has so many parties interested in an alternate use of the space at 3701 Pacific Place, the City Council should be allowing more of their constituents to speak their mind. When their elected officials do not appear to be listening, serious discontent arises among those whom they are supposed to represent.

It is unfortunate that, to the public, the City Council is not being forthcoming and transparent -- as it should be. It appears that something is being hidden from us, because we are not getting answers to the questions we have asked and we are not being allowed the opportunity to voice our concerns. Witness the eight speaking slots for today's meeting were gone before I -- and 24 other seriously interested parties whom I directly know of -- even knew about them. Neither is there much mentioned about this project in the media. It has all been through word of mouth.

If commercial development of this property is allowed, the City of Long Beach would lose the opportunity to create a healthy environment and activity space, the previously planned Riverpark. Long Beach must not be left behind in the struggle to help marginalized communities that disproportionately suffer from poor health and premature death related to adverse environmental exposures.

**Please urge City Council to get an EIR.  
Let the public know about the intended use of this land.  
And, please, let us speak!**

Respectfully,  
Stephanie

*Stephanie Booth, MD  
Los Angeles County Medical Association Board Member  
President Long Beach District- Los Angeles County Medical  
Association  
Chair - LACMA Women Physicians Issues and Advocacy  
Committee  
LACMA Delegate to the California Medical Association  
LA Care Health Plan Board of Governors - Physician  
Representative*

**From:** Alise Brillault [mailto:akbrillault@gmail.com]  
**Sent:** Tuesday, April 13, 2021 4:57 PM  
**To:** CityClerk <CityClerk@longbeach.gov>  
**Subject:** Build a park at 3701 N Pacific Place

**-EXTERNAL-**

Hi,

I am a Long Beach resident. I stand with the Riverpark Coalition to demand that 3701 N Pacific Place be converted into a park. This is an issue of environmental and racial justice and will improve our city enormously.

Best,  
Alise B.



The Riverpark Coalition, a grassroots group formed to oppose the project, says that the city didn't make enough of an effort to turn the property into a park, breaking its promise to create more green space for the "park-poor, disadvantaged residents of the western half of the city." In a feasibility report issued last week, the city found that the site is unsuitable for a park, citing that it is owned by a private party, has poor pedestrian access, and would need considerable remediation work. The Riverpark Coalition claims these are bad faith excuses to justify the development and called the report a "sham and cover-up."

**From:** anngadfly@aol.com [mailto:anngadfly@aol.com]

**Sent:** Monday, April 12, 2021 4:02 PM

**To:** CityClerk <CityClerk@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; Council District 9 <District9@longbeach.gov>; Mayor <Mayor@longbeach.gov>

**Subject:** Agenda Item 8, 4/13/21

**-EXTERNAL-**

Dear Decision Makers:

Attached please find my comments for tomorrow night's hearing on the appeal of the Planning Commission's approval of the 3701 Pacific Place MND.

Sincerely,

Ann Cantrell

Board Member Riverpark Coalition

Sierra Club Los Cerritos Wetlands Task Force

Citizens About Responsible Planning



To: Long Beach City Council

From: Ann Cantrell, Co-chair Sierra Club Los Cerritos Wetlands Task Force; Treasurer Citizens About Responsible Planning; Board Member Riverpark Coalition; appellant of Planning Commission Approval of Pacific Place Project, 3701 Pacific Place and 3916-4021 Ambeco Road (Mitigated Negative Declaration-10-19-20)

Item 8 on April 13, 2021 Agenda

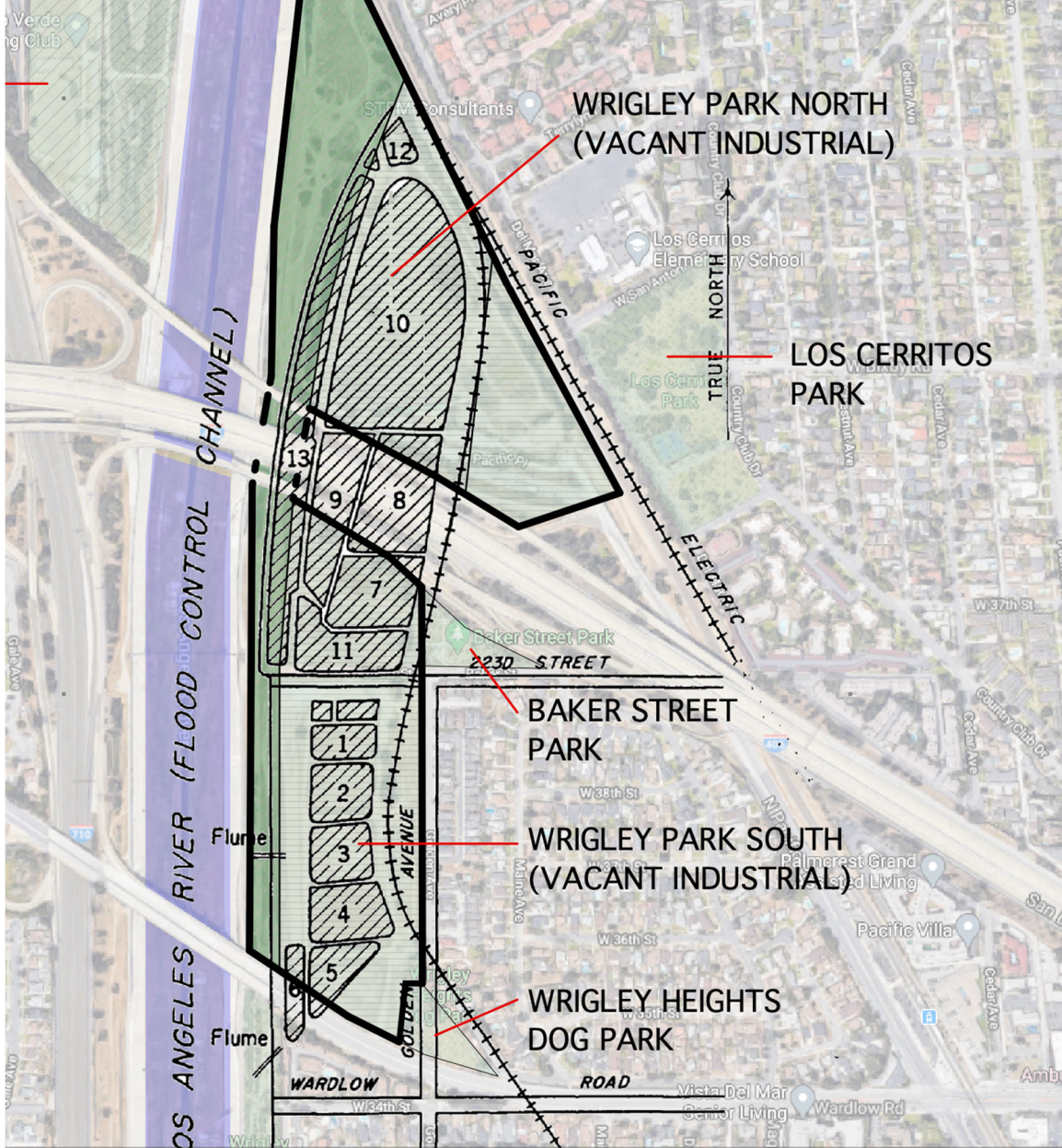
Dear Decision Makers:

You are being asked to Adopt a Resolution certifying Mitigated Negative Declaration (MND 07-20), making certain findings related thereto, and adopting a Mitigation Monitoring and Reporting Program, and approving the Pacific Place Project at 3701 Pacific Place; Declare an Ordinance approving Zone Change ZCHG20-004 from Light Industrial (IL) to the Commercial Storage (CS) zoning district, on four lots at 3701 Pacific Place (APN 7140-014- 019, 7140-014-032, 7140-014-033, 7140-014-025), read the first time and laid over to the next regular meeting of the City Council for final reading; and, Uphold the Planning Commission's approval of Site Plan Review SPR20-015, Standards Variance SV20-006, Conditional Use Permit CUP20-010, and Lot Merger LMG20-009, for the construction and operation of a three-story, 152, 745-square-foot commercial building for self-storage, in conjunction with an accessory recreational vehicle parking lot and patron (private) car wash at 3701 Pacific Place. (District 8)

As seen in the map below, the 3701 Pacific Place is the northern portion of the Oil Operators Property containing parcels 10 and a silver of parcel 8. (Parcels 8, 9 and 13 were eliminated by the 405 Freeway in the 1960's). The southern portion of the Oil Operators property is now known as 712 Baker Street and parcels 1-6 the proposed location for a gated housing development. Parcels 7, 11 and part of 9 are proposed as park land. (223D Street is now Baker St.)

Starting in the 1920's, the entire Oil Operators Property was an oil brine water treatment facility for oil wells all over the area, along with active oil wells on site. Activities included the pumping of oil brine to oil sumps (evaporation and treatment ponds), with the majority of the Project site serving as a treatment sump. As a result of the treatment activities, water seepage into the subsurface below the sumps caused a sludge residue onsite.

Although both the Pacific Place and the Baker Street projects are part of the same oil operations; contain the same hazardous waste; have the same Cultural Tribal History; have the same poor air quality, biological resources, transportation, recreational, and other environmental issues, the City of Long Beach, as the lead agency for both projects, elected to do a Mitigated Negative Declaration for the 3701 Pacific Place project and an Environmental Impact Report for the 712 Baker Street Project! The appellants urge you to require an EIR for both parcels.



The appellants believe the Negative Declaration done for 3701 Pacific Place is inadequate and failed to properly analyze the many environmental issues.

In addition, the mitigations, especially for the Biological Resources, are not only inadequate, but impossible to fulfill. Mitigations for Biological Resources, repeatedly state: Before the removal of trees; before the removal of vegetation; before construction begins. The Surcharging done August to October, 2020 has removed all vegetation, including at least 830 special species of Southern Tarplant, leaving these mitigations moot.

The CA Fish and Wildlife letter, written to Amy Harbin on 11/17/2020, is missing from the Comment Letters in the Planning Commission staff report. However, the author, Felicia Silva, advised me that the letter is in the State Clearinghouse archive. (Note: CEQAnet is where you

can find all documents related to projects submitted to the State Clearing-house: <https://ceqanet.opr.ca.gov/>

And here is the page for the Pacific Place Project

MND: <https://ceqanet.opr.ca.gov/2020100290/2>

If you scroll to the bottom of the page, you can find CDFW comments in the State Comments section.}

The Fish and Wildlife letter lists many concerns and suggested mitigations for protection of the animals and plants on the property, especially the endangered bees, bats, burrowing owls and native plants.

Ms. Silva was especially concerned with the translocation Mitigation for the Southern Tarplant. She states: **“CDFW, in general, does not recommend transplantation of rare plants as a mitigation measure because successful implementation of translocation is rare with minimal documented success. In addition, the MND states, “Section 21.42. Southern tarplants (*Centromadia parryi* ssp. *australis*) proposed for removal from the development area would be relocated to the proposed landscaped area in the north end of the Artesia parcels.” Southern tarplants require sandy, disturbed soils, and will not have a high success rate of survival in a landscaped area.”**

.Now that the project area has been scraped clear of all vegetation, including trees, and covered with 15 feet of dirt, the biological mitigations contained in MND are no longer possible. How can the Council approve mitigations which cannot be fulfilled?

A new CEQA document must be done which will evaluate the current conditions and environmental impacts.

Another need for an EIR is a study of alternative uses for this site, which a Negative Declaration does not do. As this property was long considered open space and possible park land in the approved River Link, LA Master Plan and Lower LA River Projects, we believe this use should be considered in an EIR. The City Council approved the RiverLink plan in 2015, with great support from Mayor Garcia for the possibility of additional park land.

The purposed project requires a zoning change from Light Industrial to Storage. This appears to be spot zoning in response to the developer's wishes. If the zoning is to be changed, change it to park/open space.

We also are appealing the change in height from 28 feet to 43 feet, 11 inches as we believe this is incompatible with the neighborhood.

In conclusion, we urge the Council to deny approval of the Mitigated Negative Declaration, the zoning change, the CUP and height variance for the 3701 Pacific Place project.

Sincerely,  
Ann Cantrell



**From:** Melinda Cotton [mailto:mbcotton@hotmail.com]

**Sent:** Sunday, April 11, 2021 3:24 PM

**To:** Mayor <Mayor@longbeach.gov>; Council District 9 <District9@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; CityClerk <CityClerk@longbeach.gov>

**Cc:** anngadfly@aol.com; renee\_matt@live.com; corlisslee@aol.com; Anna Christensen <annachristensen259@gmail.com>; Juan Ovalle <jeovallec@gmail.com> <jeovallec@gmail.com>; Carlos Ovalle <csovalle@gmail.com>; RAE GABELICH <hoorae1@aol.com>; Laurie Angel <lcangel2012@gmail.com>; Jeff Miller <jeff.miller@csulb.edu>; rwgutmann@gmail.com

**Subject:** (Item 8 21-0308) SUPPORT APPEALS -- save 3701 Pacific Place from construction - BUILD THE RIVER PARK!!!

**-EXTERNAL-**

As a resident of East Long Beach, I recognize the unfairness that allows East Long Beach to have 17 times the amount of Park Land in our area as do those living in West Long Beach near the LA River. I urge you to support the Appeals before you, and take this opportune time to provide more Park Land in this area.

Given the urgent need for increasing park spaces in western Long Beach, and given the immediate threat posed to the last remaining parcels along the lower LA River, I urge you use any and all available means to acquire the time-sensitive 3701 Pacific Place and Oil Operators Inc parcel at 712 Baker St before they are built on and lost forever to our community and all who care about the LA River.

Acquiring these properties along the LA River will enable the City to make significant progress toward its long-established promise laid out in the RiverLink Plan, which was unanimously approved by the City Council in 2015. The City must begin negotiations in earnest with the landowners to acquire these properties for the public while assisting the would-be developers to relocate their proposed construction to more suitable and less sensitive locations. These lands are too valuable to the City to lose. The Council's available tools include:

- Requiring an Environmental Impact Report at 3701 Pacific Place
- Denying all requests for zoning changes
- Denying all approvals and permits for construction
- Using eminent domain to meet the dire need for green space along the lower LA River

Many millions of dollars have been earmarked by state agencies for acquisition (e.g. AB 530 and Prop 68); significant federal funding is also available to clean these lands to meet the needs of our communities for green space. The Mayor and the City Council must do everything in their

power to stop the construction and instead bring these last open spaces into the public domain before they are paved over and gone to us and future generations forever.

Thank you for your attention.

Sincerely,  
Melinda Cotton

**From:** Melinda Cotton [mailto:[mbcotton@hotmail.com](mailto:mbcotton@hotmail.com)]

**Sent:** Monday, April 12, 2021 11:54 AM

**To:** Amy Harbin <[Amy.Harbin@longbeach.gov](mailto:Amy.Harbin@longbeach.gov)>; Christopher Koontz <[Christopher.Koontz@longbeach.gov](mailto:Christopher.Koontz@longbeach.gov)>

**Cc:** Mayor <[Mayor@longbeach.gov](mailto:Mayor@longbeach.gov)>; Council District 9 <[District9@longbeach.gov](mailto:District9@longbeach.gov)>; Council District 1 <[District1@longbeach.gov](mailto:District1@longbeach.gov)>; Council District 2 <[District2@longbeach.gov](mailto:District2@longbeach.gov)>; Council District 3 <[District3@longbeach.gov](mailto:District3@longbeach.gov)>; Council District 4 <[District4@longbeach.gov](mailto:District4@longbeach.gov)>; Council District 5 <[District5@longbeach.gov](mailto:District5@longbeach.gov)>; Council District 6 <[District6@longbeach.gov](mailto:District6@longbeach.gov)>; Council District 7 <[District7@longbeach.gov](mailto:District7@longbeach.gov)>; Council District 8 <[District8@longbeach.gov](mailto:District8@longbeach.gov)>; CityClerk <[CityClerk@longbeach.gov](mailto:CityClerk@longbeach.gov)>

**Subject:** Preserve the Horse Overlay Zoning - Protect Long Beach History Re: 712 Baker Street, aka: River Park Residentail

**-EXTERNAL-**

I urge preservation of the City's Horse Overlay Zoning, and call your attention to the Importance of protecting Long Beach culturally significant equestrian lifestyle dating from the 1700s - Spanish and 1800's Rancho periods in California History.

"Concrete Cowboy" - the new Netflix film, shows the importance and need for retaining Horse Overlay Zones in urban settings. Long Beach needs to do the same. Philadelphia - the setting for "Concrete Cowboy" - bulldozed stables and riding areas in this historic American City - few remain. Yet they provide a safe and sane and important lifestyle for Blacks in Philadelphia - and for our Hispanic and Anglo and other communities on the West side of Long Beach.

Do not wipe out this important history - and way of life!!!!

Horses and a community of teen age riders in an Oregon County Fairgrounds setting provided a welcome and nurturing environment for me as a young person growing up - recognize and encourage this kind of outdoor activity for young people and adults.

I urge your support, and join Renee Lawler's comments which are attached.

Thank you.

Melinda Cotton

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**From:** Renee Lawler <[Renee\\_Matt@live.com](mailto:Renee_Matt@live.com)>

**Sent:** Monday, April 12, 2021 11:01 AM

**To:** Richard Gutmann <[rwgutmann@gmail.com](mailto:rwgutmann@gmail.com)>; [regina17@verizon.net](mailto:regina17@verizon.net) <[regina17@verizon.net](mailto:regina17@verizon.net)>; Melinda Cotton <[mbcotton@hotmail.com](mailto:mbcotton@hotmail.com)>; Joe Weinstein <[jweins123@hotmail.com](mailto:jweins123@hotmail.com)>; SUSAN MILLER <[mpshogrl@msn.com](mailto:mpshogrl@msn.com)>

**Cc:** Tilly (Good is Better) <[tilly@goodisbetter.net](mailto:tilly@goodisbetter.net)>; [gggilbertent@aol.com](mailto:gggilbertent@aol.com) <[gggilbertent@aol.com](mailto:gggilbertent@aol.com)>



**Subject:** FW: 712 Baker Street, aka: River Park Residentail aka OOI South aka Wrigley Heights Park South; Integral Developers

FYI comments due by 4:30pm for anyone who wishes to weigh in and  
Oppose the Horse overlay zoning removal request  
Request further storm water run off impact review due to sub-standard and aging infra-structure  
and levee integrity risks due to overland run off and downstream pooling of water next to the  
levee  
Renee Lawler  
562-433-0757

**From:** Renee Lawler

**Sent:** Monday, April 12, 2021 9:57 AM

**To:** [amy.harbin@longbeach.gov](mailto:amy.harbin@longbeach.gov)

**Subject:** 712 Baker Street, aka: River Park Residentail aka OOI South aka Wrigley Heights Park South;  
Integral Developers

Dear Ms. Harbin and staff:

With respect I submit my comments on the IS for the above-referenced property that is  
comprised of multiple parcels, but commonly referred to as 712 Baker Street.

I oppose the request to remove the Horse overlay in this zone for cultural and historical reasons  
and storm water run-off, hydrology and sub-watershed issues and infra-structure deficiencies as  
well as other issues require as per/CEQA further analysis for remediation, mitigation or no-  
project or an alternative solution that is more suitable to the needs of the community and wishes  
of the stakeholders. I also oppose the request for street vacation of Baker street ROW without  
further analysis.

Thank you.

Renee Lawler  
562-433-0757  
HETASC  
CARP  
Riverpark Coalition



712 BAKER

To: Amy Harbin, Development Services

Re: Scoping Comments on the Initial Study for the planning gated housing project at 712 Baker Street (River Park Project).

Dear Ms Harbin:

I submit my comments on the Initial Study (IS) in effort to see them addressed in the Draft EIR being prepared for the 712 Baker Street (River Park Residential Project) aka: OOI south, Wrigley Heights Park South.

The proposed project will have significant adverse environmental impact on Cultural, Historic resources, Habitat & Biological Resources, Hydrology and Water Quality, Mobility & Transportation, Social Equity & Land Use and Planning, Recreation & Open Space , Aesthetics & Scenic vistas, Tribal, Public Services, Utilities, Air Quality, Geology and Soils.

## **Cultural Resources**

Horse Overlay protected zone recognizes culturally significant equestrian lifestyle dating from the 1700s - Spanish and 1800's Rancho periods in California History. The culture requires low density with access to the river open spaces and regional trail system that is a critical mobility corridor between the communities. This location is a culturally significant location and removal of the zone and reduction of it's open space in any manner will cause negative consequence to the equestrian communities to the south, north and in the region.

In the 1900s Gregorio Encinas purchased the land that is now the site of Baker Street Park from the Bixby family. The Encinas family was one of California's early pioneering families and used the land to create a large ranch and farm. Several generations of the Encinas family worked on this land, operating a dairy and riding academy, and growing alfalfa, beets and other crops.

Sara Bixby Smith often spoke of how the rancho horses were kept by the river and horses live still live and travel these lands to this day.

Despite centuries of equestrian history at this specific site and vicinity, the City of Long Beach continues to methodically whittle away at those critical zones reducing the habitat necessary for the local resident stake-holder horses who have no voice in this process but who are living, breathing and touchable in the area – animals who have needs that the Horse overlay zoning intended to protect by recognizing the

need to maintain consistency of lot size with a proper balance of low density minimum 8000 square foot lots sizes, with set backs, construction restrictions, open space buffers, private and public trails easements and open space with space trail separations that these animals require for their habitat and needs that CEQA law mandates be evaluated – there is no distinction between “wild or domesticated” animals.

Long Beach with this zoning removal request is not making good on it’s promise in 1977 to protect and preserve equestrian lifestyle through the establishment of the 6 historic equestrian zones and again the LUE in 2020 stating that the “Wrigley Heights Equestrian zone is to remain”.

## **Biological Resources**

**Will the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?**

**YES - Potentially Significant Impact – but the “IS”** erroneously indicates there is a “less than significant impact on plant and animals communities and so it needs further evaluation in reference to the loss of open space habitat.

This site has been allowed to go fallow, back to a natural vegetative state longer than it was “oil commercial operations” and to remove the additional restorative habitat opportunity has a cumulative impact on all species who depend on the corridor for foraging, nesting, shelter, and hunting. It has a cumulative impact on the survival of the eco-system on this property, adjoining river lands and within the Dominguez Gap, Wrigley Greenbelt and south past the Willow Street Bridge. Audubon has logged 216 known species of birds in the vicinity through recent years, including endangered and watched species such as Bells Vireo, and Burrowing owls.

**Have a substantial adverse effect on any riparian habitat or other sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?**

**YES - THIS WILL HAVE AN IMPACT –** This land is part of a larger vision to restore linear greenbelts and open spaces along the river corridor that provide for hunting, foraging, nesting grounds, home to species of rodents and small mammals, rest stops for migratory, coastal and protected birds such as Eagles observed during migration from Catalina to Big Bear for nesting. This parcel is part of a linear biological corridor with multi-use recreation and cultural significance that must be reviewed in an “in-the-whole” manner as it relates to the larger larger resource and other projects in the vicinity as per vision of AB530 Lower Los Angeles River Master

Plan, and further by the Department of Fish and Wildlife, and in respect to any sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Department of Fish and Wildlife.

**Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

**YES - This will have Potentially Significant Impact.** It is a major migratory bird and wildlife corridor that has been dramatically impacted by man-made encroachments such as this project and the levees and channelization and needs further EIR review.

**Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved State, regional, or local habitat conservation plan? –**

**YES -** The idea that it is not considered as habitat by the City of Long Beach is disturbing given the history of this as habitat for many migratory bird species, sea birds, watched and endangered species – further EIR review is needed.

**Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?**

**Potentially Significant Impact.** CEQA Guidelines Section 15064.5 defines a historic resource – and this location and it's proximity to the historic trail, rancho land uses should be further reviewed for determination to be eligible for listing in the California Register of Historical Resources; any .....site, area, place, ....to be historically significant or significant in the ...economic, agricultural, educational, social, .... cultural annals of California may be considered an historical resource,....supported by substantial evidence in light of the whole record. Generally, a resource shall be considered “historically significant” by the lead agency if the resource meets the criteria for listing on the California Register of Historical Resources. Additional analysis is required to determine if the site contains any features with historic significance.

## Hydrology and Water Quality

*This location is part of a sub-watershed has been part of a receiving basin for overland run-off that is not diverted into storm drain pipes as well as a contributor to overland run-off downstream. The topography, due to the natural slope toward the lower elevation of the river land to the west directs run-off and combines with the natural swales that flow north to south along the trail and lands adjacent to the east levee of the LA River. In addition it is documented that there is a north to south flow that runs along the greenbelt lands contributing to known flooding conditions documented downstream. These existing conditions and any proposed alterations to the site and infra-structure lacking or sub-standard requires further evaluation by multiple agencies responsible for NPDES and MS4 permits, and for this EIR. There are substantial changes in elevation, grade and slope on the property that will affect the adjacent and downstream lands which CEQA requires further review.*

*These low lands do not have substantial or in most cases any storm drain pipes existing and are not sufficient to tie into from the blue line crossing to the north, south to the Wrigley Greenbelt SD6 pump station on the east side of the east levee of the LA River.*

*The practice to allow run off to divert overland was fine when there was no levee and a large alluvial plain to absorb and when there was lower overall density when the storm drain pipes and infra-structures were built in the 1930s,40s and 50s – but that is no longer the case. There has been increased density since the 1930s that the same storm drains are serving and this project will cause cumulative negative impact to an already over-burdened and known sub-standard storm drain infrastructure that no amount of “bio-swale” system on site will be able to mediate. (See Carollo Engineering Report 2016 – City of Long Beach for details on sub-standard storm drain systems in the vicinity).*

*There are either no pipes or undersized pipes in the vicinity and adding this type of density or any development that will reduce permeable space and without significantly upgrading the system the project will tie into all the way to SD6 at Willow will contribute to significant potential for downstream flood impacts including overland run-off and allows for Title 22, VOCs and toxins to travel to other lands and into the waterway with possible CWA 1972 violations.*

A recent report produced by Hromadka indicates – “Records indicate that the City of Long Beach has been subject to historic flooding, even before 1981. A report titled “A History of Significant Weather Events in Southern California” by the National Weather Service indicates that large areas of Long Beach were inundated in February 1927. Additionally, a USGS Report, Water Supply Paper 426, titled “Southern California Floods of January, 1916” by H. D. McGlashan and F. C. Ebert states “There were heavy floods on Los Angeles and San Gabriel river in 1825, 1833, 1862, 1867, 1884, 1886, 1889, 1890, 1911, and 1914, and it is said that serious floods occurred also in 1842, 1852, and 1874.” Specifically, an

article by Beachcomber states “The Long Beach area was constantly hit by hard storms and flooding particularly in 1862, 1867, 1873, 1884, 1891, 1911, 1913 and 1914.” and that “In 1938, the heavy rain storms... again took their toll on Long Beach.”

Long Beach had significant storm events in the 1980s, 1995, 2000. There is continual evidence of overland un-controlled run off in this sub-watershed that includes this parcel and downstream therefore necessary for further review in an EIR is required before any development within the corridor should proceed - in 2014, 2016, 2017, see *Lawler v LACFCD* and *City of Long Beach* and *Grayley v LACFCD* and continued in 2018, 2019 and 2020

This EIR will require the further assessment that may include a “response plan” by DTSC and by any all agencies such as LA Regional Water Quality Board, City of Long Beach Storm Drain Division, LACFCD, USACE for any alternation along this reach of the LA River sub-watershed from the blue line to Willow between the east levee of the LA River to the first up-land points of connection for City and County flood control pipes and pump systems upstream and within this sub-watershed to determine capacities, load, and for BMP’s with respect to mitigation for existing and future flooding impacts within the entire sub-watershed and downstream. That will include a permit from the USACE in advance of any grading or earth-moving activities as per the 1999 Maintenance and use agreement with LACFCD and Title 33 requirements for Flood Control Management.

**In the** Notice of Incomplete Application, Application No. 1906-07 (CSPR19-004) 8/1/2019, Page 2 of 3 Item 3.  
**Open Space – Staff Stated** *“Staff wishes to clarify that bioswales, biofiltration areas, and detention basins cannot be counted toward usable project open space.*

The Baker Street proposed park cannot be counted toward useable open space for this project as per Staff Notice of Incomplete Application. This entire location has a *history of being a “detention basin” for overland storm water run-off in this sub-watershed.*

In a recent report by expert hydrologist “HORODIMKA” he indicated – “Records indicate that the City of Long Beach has been subject to historic flooding, even before 1981. A report titled “A History of Significant Weather Events in Southern California” by the National Weather Service indicates that large areas of Long Beach were inundated in February 1927. Additionally, a USGS Report, Water Supply Paper 426, titled “Southern California Floods of January, 1916” by H. D. McGlashan and F. C. Ebert states “There were heavy floods on Los Angeles and San Gabriel river in 1825, 1833, 1862, 1867, 1884, 1886, 1889, 1890, 1911, and 1914, and it is said that serious floods occurred also in 1842, 1852, and 1874.” Specifically, an article by Beachcomber states “The Long Beach area was constantly hit by hard storms and flooding particularly in 1862, 1867, 1873, 1884, 1891, 1911, 1913 and 1914.” and that “In 1938, the heavy rain storms... again took their toll on Long Beach.”

**Urbanization of the City of Long Beach Decreased Flood Risk: Natural and Historic Topography** - Review of the USGS 1896 Topographic Map for the Downey Quadrangle shows that the land.....is located in a historic flow path through which runoff from the surrounding area would drain

Lawler v LACFCD and City of Long Beach and Grayley v LACFCD and City of Long Beach case history further emphasizes the need for evaluation of storm water run-off, flood control, water quality, hydrology, erosion, soils and toxin transfer from overland flow in this sub-watershed before any alteration, project or construction commences thereby further EIR review on this subject is required.

## **Aesthetics**

Encroachment of construction right up to the river parcels is not protecting the scenic and natural features within this one mile zone of the river and not in line with the vision of AB530 and linear river revitalization and respecting “established” communities.

The IS states: “On a local scale, the Long Beach General Plan Urban Design Element designates the Los Angeles River as a scenic route as it provides a viewshed that is worthy of protection and enhancement, and also serves as a non-motorized trail.<sup>5</sup>

This development does have potential to be visible from the Los Angeles River trail, and views of the proposed residential development **WILL NOT BE similar to current views** of residences available from this trail along the Los Angeles River, **IT WILL substantially alter the existing and scenic opportunity for enhanced natural views** along the Los Angeles River Historic Equestrian bridle/hiking trail that was dedicated in 1947. The Long Beach General Plan fails to sufficiently recognize in the Plan Historic Preservation Element, that the project DOES contain historic resources by the very nature of the “H” overlay zone and adjacent historic bridle/hiking trail that are a historic district and feature recognized in 1947 and 1977 and again in the LUE in 2020 and many local, regional state and federal documents and therefore should be eligible or designated as a historic resource under the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register). As such, those feature require further analysis.

There will be additional glare and light impact to the river environmental habitat and 1 mile zone as identified in the LA River Master plan and needs further analysis with respect to the impact on wildlife in the EIR.

## **Air Quality**

The higher density, more traffic, more congestion will contribute significantly to reduced air quality in this “diesel death zone” and the “significant impact” needs further analysis.

**Expose sensitive receptors to substantial pollutant concentrations** – potential significant impact that needs further analysis.

**Geology and Soils - Directly or indirectly cause potential substantial  
iii) Seismic-related ground failure, including  
liquefaction and lateral spreading?**

This site is in a liquefaction zone, see attached map and further analysis is required.

**b) Result in substantial soil erosion or the loss of topsoil? The IS states Less Than Significant Impact.** THAT IS NOT THE CASE, there is plenty of evidence to show that soil erosion, loss of top soil and impacts from construction would be SIGNIFICANT IMPACT and mitigation measure and further review in the EIR is required. “The existing soils and exposed soils subject to rainfall and wind, thereby potentially resulting in soil erosion and as part of the plan check requirements, the Project would be required to have a stormwater management program, including a Storm Water Pollution Prevention Plan (SWPPP)”.

*That review must take into consideration the overland run-off and flood history in the sub-watershed, recent case history and documentation of the sub-standard piping and aging infrastructure known within this sub-watershed.*

It also the EIR needs to evaluate in comparison to the Long Beach RiverPark Residential Project **IS-36** City of Long Beach Initial Study February 2021 and pursuant to NPDES permit requirements. As part of the SWPPP, BMPs would be implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible.

***THIS IS NOT CORRECT – “Based on compliance with regulatory requirements, including the implementation of BMPs, impacts from construction would be less than significant, and no mitigation measures are required.”***

“According to the *Preliminary Drainage Study (Appendix B)*, the stormwater from the Project would be collected by an on-site drainage system that would connect into a proposed City of Long Beach maintained storm drain system that discharges into the Los Angeles River. Since the stormwater would eventually discharge into a tidally influenced portion of the Los Angeles River, no erosion or negative downstream impacts are projected. Based on the analysis provided, impacts from operation would be less than significant, and no mitigation measures are required.” THIS IS NOT A CORRECT STATEMENT AND FURTHER EIR REVIEW IS REQUIRED TO

MITIGATE FOR THE POTENTIAL IMPACTS THAT INCLUDE Title 22, 1972 Clean Water Act and 1999 Maintenance and Use Agreement obligations by City of Long Beach and LACFCD as local and district operators and USACE permits prior to construction.

**c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, and drainages) or waters of the United States or California, as defined by § 404 of the federal Clean Water Act or California Fish & Wildlife code § 1600, et seq. through direct removal, filling, hydrological**

This is within the boundaries of a navigable waterway as determined by the USEPA and is known to be historic marsh and wetland habitat that should be evaluated for restoration opportunities or mitigation and impact through an EIR.

## Land Use and Planning

Staff response indicated: **"Minimum Unit Size and Minimum Lot Size** - Although all development standards specified for a PUD will apply to this project, staff wishes to draw particular attention to the minimum unit size standard of 1,200 sq. ft. and 16 feet in width, and the minimum lot size of 2,400 sq. ft. Your site plan will need to be substantially redesigned to comply."

THE DESIGN AND EVEN THIS RE-DESIGN is NOT COMPLIANT with the existing LOW-DENSITY Land Use, the Horse Historic protective zone that came with extensive pre-CEQA EIR review. It was establish the OVERLAY ZONE DISTRICT for continuity of low-density for the health and safety of the animals and to protect and preserve the lifestyle that cannot be achieved with high-density variances such as what is proposed with this project. The zone established was not specific to just a few parcels as staff and the developers wishes you to believe. The Horse Overlay, is consistent with the adjacent open space uses and the lower density single family adjacent neighborhoods of Wrigley Heights, Los Cerritos or Wrigley North and it is also compatible with any low density commercial equestrian use such as public arenas and stables also compatible and in keeping with the theme of multi-use recreation opportunities identified in each of the past and present master plans. Staff has been less than transparent about the existence of the "H" overlay, by excluding it from the LUE maps, despite clearly being advised about its' presence and the historic cultural value it represents.

The applicant is requesting removal of the horse overlay that was applied to the entire zone – increased density in any more of this zone as was the case within this and several "H" overlay protected zones will contribute further to cumulative negative impact to an already



at risk, endangered minority community due to this type of zone encroachment that removes important living historic cultural resources.

The applicant references parcels #'s 7203-002-007, 008, and 010: CS, Horse Overlay – and Meredian describes the zoning at the site but fails to accurately describe that development code requires that when an OVERLAY DISTRICT, is present, regardless of commercial or residential underlying zone, the “overlay” takes precedent, the more stringent, lower density applies and so this project density is non-complaint with the Overlay

**Oppose the *Necessary Approvals – that will cause negative impact*** required for Project development

1. Zone Change to remove the Horse (H) Overlay District
- 2 change to residential Planned Unit Development (RP)
3. Waiver of height standard for providing 5% Very Low Income Housing
5. Street Vacation for General Plan conformity – THIS STREET VACATION SHOULD BE OPPOSED – it is a critical easement for public access to the river greenbelt to the west and to vacate this easement ROW to this developer for profit exhibits preferential judgement at the expense of the equestrian and stakeholder communities and should be further evaluated for the negative impacts.

This project has not complied with: Public Works Development Guidelines: July 18, 2019

“PW reviews a project for conformance with numerous factors encompassing nearly all aspects of a project outside of the property line and within public right-of-way. This includes, but is not limited to:

City Master Plans, Public right-of-way standards, subdivision requirements, drainage, water quality, traffic control, traffic circulation, safety, accessibility, mobility, easements or land use concerns, existing conditions, and constructability”

A sample of the MASTER PLANS THIS PROJECT IS NON-CONFORMING WITH:

1973 Master Plan - LA County

2020 LUE – General Plan- “Wrigley Heights Equestrian Zone will remain”

2020 Lower Los Angeles River Revitalization Plan

2006 LA River Master Plan

2003 Long Beach Riverlink - open space

1996 LA River Master Plan - identified this as open space

## Integrated Regional Water Management Plan – Greater Los Angeles Region

### Storm Water Best Management Practices

This project is non-compliant with Development Services Process as outlined 4/23/2019:

"1.2 Development Process Overview Development projects start with the City's Development Services (DV) Department. ....to ensure compliance with zoning, environmental and land planning laws and codes and compatibility with the community and surrounding neighborhoods. PW works closely with DV to ensure compatibility with existing public infrastructure by issuing conditions during the entitlement process "

It is not compatible with the surrounding neighborhoods, not compatible with the horse overlay zoning, it does not recognize or address any impact to the added users crossing the historic equestrian trail at that location, removal of some of the trail easements at that location and the encroachment of the habitat and trails and river open spaces high density uses will create and will contribute to traffic congestion in the vicinity of Wardlow and Long Beach Blvd at the blue line.

NOTE Development Services Process: 2.2.3 PW

THE FOLLOWING CONFORMANCE REVIEWS NEED TO STILL BE COMPLETED:

- Conformance with City records
- Consistency with adjacent City/ Private project
  - Conformance with Street Master Plans as defined by the mobility element  
[http://www.lbds.info/mobility\\_element/default.asp](http://www.lbds.info/mobility_element/default.asp) EQUITY NEEDS TO BE REVIEWED FOR SOCIAL JUSTICE EQUITY FOR THE CONNECTIVITY BETWEEN THESE HORSE ZONES ON THE HORSE TRAIL
- Conformance with existing easements and agreements that effect the property
- Conformance with Subdivision Map Act requirements <http://californiasurveyors.org/members/1980%20SMA.pdf>

TRAFFIC REVIEW TEAM • Review traffic capacity of adjacent streets

- Conformance with mitigation measures called for within the traffic study
- Conformance of ingress from and egress to the adjacent ROW
- Review on site traffic circulation
- Conformance with bicycle master plan [http://www.lbds.info/bicycle\\_master\\_plan.asp](http://www.lbds.info/bicycle_master_plan.asp)
- Conformance with traffic signal, and striping standards <http://www.longbeach.gov/pw/resources/engineering/standard-plans/>
- Conformance with mobility standards <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4112>
- Coordination with Long Beach Transit as applicable

Development Services guidelines needs to be included in the study:

6.3 Traffic Impact Analysis (TIA) Guidelines TRIP GENERATION: For any development, new passenger vehicle trips, pass-by trips and internal capture (if any) should be estimated using the rates and methodologies outlined in ITE Trip Generation Manual, latest edition. Land-Use code and rates should be confirmed with Traffic Engineering.

CIVIL REVIEW TEAM need to ensure:

- Conformance with City standard plans <http://www.longbeach.gov/pw/resources/engineering/standard-plans/>
- Conformance with street moratoriums <http://www.longbeach.gov/pw/resources/engineering/utility-coordinationcorner/>
- Conformance with Pedestrian Accessibility Guidelines <http://www.longbeach.gov/pw/resources/> • Compliance with storm drain master plan <http://www.longbeach.gov/PW/Resources/Stormwater-Management/LB-Stormwater-Plan/> AND <http://www.longbeach.gov/pw/resources/stormwatermanagement/best-practices/>
- Protection and compatibility of existing public facilities.
- Conformance with Street Tree standards <http://www.longbeach.gov/pw/services/street-trees/>
- Coordination with Long Beach Water and Energy Resources departments as applicable
- Assist with coordination with interested agencies or utility companies\* (e.g. Caltrans, MTA, LA Flood Control, SCE, or City Light and Power)

There are other public agencies that will require further coordination as per City of Long Beach Development Services Guidelines: "Applicant is responsible for coordination with other utilities and public agencies. Each reviewer shall prepare draft conditions of approval which shall be compiled by PW staff, reviewed by a manager, any concerns addressed, and delivered back to the Planner for inclusion

with the other stakeholder conditions. The entire process from receipt of application to delivery of draft conditions should take approximately 15 days.”

## **Recreation**

It is a potentially significant impact to remove the horse overlay zone that will further remove the recreation and lifestyle opportunities the protective zoning intended to preserve.

It will be a potentially significant impact to disrupt the safe horse trail connectivity and experience for the equestrian community by the reckless addition from this dense development by way of more crossing and merger hazard over and on the historic horse trail, not even mentioned in the IS. The cumulative increase in volumes of added users since 1947 without sufficient signage, education, trail separation and buffers needs to be further evaluated in an EIR – and as suggested in the County Trails Manual, LA River Master Plan, NPS Federal and State recognized guidelines for separation of trail user groups and buffer zones in all cases where the land space allows to maintain SAFE trails and connections. There needs to be a mitigation plan with signage and education to multi-users not aware of or accustomed to the right-of-way horses require, in order to maintain safe recreation and trail connectivity for the horse/bridle trail which serves as the critical mobility corridor for the equestrian community – it needs to be for social justice equal to the linear trails available to the bike or walking community of users.

70+ acres is a vast difference than 5 acres here or 11 acres there when looking at the context of the linear continuity of habit, recreation, open space, cultural and historic needs that these lands serve. To develop vast acres of open land, comprised of this and adjacent parcels needs further evaluation and not this project should be the decision

Plus the idea that the County “promise” that they will keep that portion of land outside the channel for parkland when it SHOULD BE KEPT THAT WAY ANYWAY is like dangling a carrot when the whole bunch is what should be preserved and seems pitiful from the agency supposed to be embracing the concept of collaboration when planning in the 1 mile zone along the sensitive river environmental corridor and not a compromise sufficient to mitigate the cumulative loss development of these lands would create and it has the

potential to become **an urban forest and that option needs further consideration in an EIR.**

## **Tribal Cultural Resources**

There will be potentially significant impact for the native Tongva who must be allowed to be involved in this process due to the high potential the site will contain burial and artifact finds.

Also the applicant is requesting removed of the horse overlay that was applied to the entire zone which will cause negative impacts to several established communities with a negative impact to cultural resources.

## **Utilities and Service Systems**

This is a potentially significant impact and further analysis of the load capacity for the known undersized storm drains, use of overland "BASINS" in lieu of storm drain pipes as well as other utilities, fresh water needs, police, fire, EMS service the project plans to tie into need to be further evaluated.

**From:** John.delatorre@verizon.net [mailto:john.delatorre@verizon.net]

**Sent:** Monday, April 12, 2021 7:54 PM

**To:** CityClerk <CityClerk@longbeach.gov>; Mayor <Mayor@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; Council District 9 <District9@longbeach.gov>

**Subject:** Agenda Item 8 April 13 council meeting

**-EXTERNAL-**

Please do the right thing and vote no on Item 8. I am disheartened that only 20 people are allowed to speak. Our voices should be heard about the need for more park space and to give up the last possible open space is criminal.

Best,

John

John De La Torre

[john.delatorre@verizon.net](mailto:john.delatorre@verizon.net)

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-----Original Message-----

From: Glennis Dolce [mailto:glennisd@mac.com]

Sent: Monday, April 12, 2021 9:37 PM

To: CityClerk <CityClerk@longbeach.gov>

Subject: I oppose Agenda Item #8 -- Build the River Park Instead!

-EXTERNAL-

I oppose agenda item 8. For years Long Beach residents have been promised green space along the LA River and Long Beach electeds have failed to deliver.

We need green space, not an RV storage facility. You have the responsibility to create this park space for west side residents who are sorely lacking open space.

The RiverPark Coalition has shown you the way.

Please do the right thing and vote to oppose agenda item 8.

Thank you.

Glennis Dolce

D7

**From:** Lynette Ferenczy [mailto:lferenczy62@verizon.net]

**Sent:** Monday, April 12, 2021 9:38 PM

**To:** Mayor <Mayor@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 8 <District8@longbeach.gov>; CityClerk <CityClerk@longbeach.gov>; Council District 9 <District9@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 4 <District4@longbeach.gov>

**Subject:** City Council - 3701 Pacific Place project

**-EXTERNAL-**

April 13, 2021

City Council

Re: 3701 Pacific Place self storage facility

I am opposed to the adoption of a Mitigated Negative Declaration and approval of the project entitlements for the following reasons.

1. A full EIR should be processed for this project. The site was used for oil drilling and storage for multiple years, has abandoned oil wells, active oil pipelines, and is in close proximity to Los Cerritos Park, an elementary school and residential uses to the north across the blue line. In addition, this project will pave nearly 14 acres that are currently open.

2. I do not support a standards variance to exceed the permitted height by 14 feet which will allow an additional floor. As the site is isolated and adjacent to the freeway a few feet for architectural projections is reasonable but not 14 feet. Additionally, the plans do not show height from grade or top of curb as required by the permit application. The documents indicate that the height of the proposed building is being measured from 9 feet above natural grade. Based on grading plans it appears they will build on top of the surface cap and surcharge pile. The elevation plans do not show the finished grade or building height relative to the LA river bike path or blue line tracks, nor do the plans show the adjacent top of curb at Pacific Place as required by the Zoning Code. Please clarify the height from the adjacent top of curb on Pacific Place.



Story height poles are required for a height variance and were not installed as required by code section 21.21.3025. B. Thus, no action can be taken without violation of the City Municipal Code. Height poles were not installed 14 days prior to the hearing at Planning Commission.

3. The Dept. of Toxic Substances Control has not completed its study of the site so how can the environmental review process move forward without this information? The DTSC is still accepting public comment for the project. Meanwhile grading has created a huge amount of possibly toxic dust being carried west into the surrounding residential community.

DTSC (Department of Toxic Substances Control) and Long Beach Development Services have neglected to address the issue of damage to the existing storm drain since the surcharge pile is damaging the only storm drain for the area which includes Del Mar Ave, Los Cerritos Park, and adjacent residential areas.

DTSC and Long Beach Development Services have neglected to address the issue of damage to the existing abandoned oil wells since the 1 million pound surcharge pile is sitting on top of them.

DTSC and Long Beach Development Services have neglected to address the issue of damage to the existing oil pipelines since the 1 million pound surcharge pile is sitting on top of them.

DTSC and Long Beach Development Services have neglected to cite the developer for having performed grading operations and built the surcharge pile without adequate dust control as required, potentially spreading contaminated dust to the neighboring residential areas, school, and public park.

Furthermore almost 5 months have transpired since the surcharge pile was built and it has not been covered as required.

4. The Wrigley Association did not receive a Notice of Public Hearing for this project. Although this project is located in council district 8, it is adjacent to council districts 6 and 7 and the traffic from this project will be traveling through the north portion of the Wrigley area on Pacific Avenue and Wardlow Road. The Planning Commission reports states 145 Notices were sent out. According to the City's mailing list and radius map only 25

notices were mailed. I requested a copy of the mailing radius and mailing list to verify this information. Please explain the difference between these two numbers? The noticing for this project is insufficient and did not give the community adequate time to respond. Additionally, only one community group was noticed for this large and controversial project. After bringing this issue up at the Planning Commission meeting, the Wrigley Association still did not receive a Notice of Public Hearing for this City Council meeting. What does it take for a neighborhood group to get a notice for a project in their community.

5. Transportation/Traffic - The site is accessed by only one road, Pacific Place, which is not a classified street. Also, Pacific Place, Wardlow Road, and Pacific Avenue are not truck routes. Truck access to the site has not been fully analyzed. The MND does not analyze how trucks will arrive at the site from the 405/710 freeway exit ramps. Eastbound Wardlow Road was been reduced from three to two lanes from the 710 to Long Beach Blvd. to allow a bike lane a few years ago. The MND states 436 average daily trips will be generated from this project. Rush hour traffic eastbound on Wardlow Road is already extremely heavy during non-Covid conditions and these additional trips will have a negative impact on traffic, especially for those turning left from Wardlow Road to Pacific Place.

There is no analysis of southbound traffic leaving the site. This is a one lane road which goes under the 405 and will be very dangerous as slow moving semi trucks, RV's, moving trucks, and over 400 cars must cross two lanes of traffic as people are picking up speed entering the freeway ramp for the 405 and 710. A full traffic study with analysis of the freeway on/off ramps and southbound traffic from the project site should be provided.

6. Noise and lighting were not adequately analyzed for the self storage facility. The RV parking will obviously be lit and may spill into the Los Cerritos neighborhood along with light from the 42 foot high building. The height of the light standards is not clearly indicated.

7. The Zone change will result in a lost opportunity for open space on the West side which has an extreme shortage of park space. A full EIR will analyze no project or a reduced project size and the resulting change to open space.

8. Landscaping - Other than a little perimeter landscaping and a small area at the very north of the site there is almost no on site landscaping within the walls of the project and approximately 13.5 acres of hardscape. Also, there is no perimeter landscaping on the east side that faces Los Cerritos where it is needed most to screen the use. All this paving will generate much more heat (heat island) and will not allow water to penetrate the soil. In addition, compliance with NPDES does not appear to be analyzed and verified. The site is 14.33 acres or about 624,000 square feet. How much is landscaped? The plans do not provide this information, but it appears that the landscape area at the northern portion of the site is about 13,600 sq. ft or .021% of the project. The landscape area to the west is about 10,000 sq. ft. for a total of .03% of the project. This will create a huge heat island. Please require a redesign with more landscaping and less paving.

9. The MND does not considered the cumulative traffic of a potential project on Wardlow Road east of the 710 with approximately 225 proposed new homes to be built on a currently vacant site. This traffic must be included in the traffic study so that the cumulative effect can be analyzed.

10. Site Drainage and storm run off - the site drains towards the south along the river. How will the site drain as there are no sufficiently sized storm drains on site? The paving of 14 acres may cause flooding to the property owners to the south in the northern portion of Wrigley. This issue does not seem to be adequately addressed in the MND.

11. The Tarplants (endangered species) that were removed supposedly for safekeeping have been destroyed.

12. Due to the City's minimal mailing requirements for projects (300' radius including the public rights of-way (streets) only 25 Notice of Public Hearing were mailed to adjoining property owners and tenants for a project of this size.

Lastly, it appears that the voices of the community that live in the immediate area are continuing to be ignored. If City hall wants a project approved it's a done deal by the time it reaches Planning Commission. Regardless of the wishes and concerns of the community, those who live nearby have to live with the resulting negative impacts not the mayor or City council members. The residents in the area have to suffer with the project's traffic, noise, pollution, loss of open space, etc. yet we

have no voice in the decision making process. Please do not approve the proposed entitlements and require a full EIR for this project.

Thank You

Lynette Ferenczy and Mike Laquatra  
Wrigley residents

[lferenczy62@verizon.net](mailto:lferenczy62@verizon.net)

**From:** RAE GABELICH [mailto:hoorae1@aol.com]

**Sent:** Monday, April 12, 2021 10:02 AM

**To:** lcangel2012@gmail.com; Council District 8 <District8@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 9 <District9@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Jonathan Kraus <Jonathan.Kraus@longbeach.gov>; Mayor <Mayor@longbeach.gov>; Thomas.Modica@longbeach.gov; CityClerk <CityClerk@longbeach.gov>

**Cc:** anngadfly@aol.com; bmarsocci64@gmail.com; csovalle@gmail.com; corlisslee@aol.com; walkerdgdec@gmail.com; hawkmcfadzen@gmail.com; ispatton@yahoo.com; jeovallec@gmail.com; kimwalters@gmail.com; lamiller@pacbell.net; flight750@gmail.com; renee\_matt@live.com; serenasteers.ccv@gmail.com

**Subject:** Re: City Council Agenda Item #8 for 4/13/21 Hearing to Appeal of Planning Commission Approval for 3701 Pacific Place.

**-EXTERNAL-**

Thank you Laurie.....you said it all! I'd like to forward to the council if it's okay with you.

I'll add a statement at the beginning in my own words, but not necessary to rewrite.

Rae

-----Original Message-----

From: Laurie C. Angel <lcangel2012@gmail.com>

To: Councilmember Al Austin <district8@longbeach.gov>; Councilmember Cindy Allen <district2@longbeach.gov>; Councilmember Daryl Supernaw <district4@longbeach.gov>; Councilmember Mary Zendejas <district1@longbeach.gov>; Councilmember Rex Richardson <district9@longbeach.gov>; Councilmember Roberto Uranga <district7@longbeach.gov>; Councilmember Stacy Mungo <district5@longbeach.gov>; Councilmember Suely Saro <district6@longbeach.gov>; Councilmember Suzie Price <district3@longbeach.gov>; Jonathan Kraus <jonathan.kraus@longbeach.gov>; Mayor Robert Garcia <mayor@longbeach.gov>; Thomas Modica <Thomas.Modica@longbeach.gov>; Long Beach City Clerk <cityclerk@longbeach.gov>

Cc: Ann Cantrell <anngadfly@aol.com>; Bob Marsocci <bmarsocci64@gmail.com>; Carlos Ovalle <csovalle@gmail.com>; Corliss Lee <corlisslee@aol.com>; David Walker <walkerdgdec@gmail.com>; Hawk McFayzen <hawkmcfadzen@gmail.com>; Ian Patton <ispatton@yahoo.com>; Juan E Ovalle <jeovallec@gmail.com>; Kimberly Walters <kimwalters@gmail.com>; Leslie Garretson <lamiller@pacbell.net>; Martin Holman <flight750@gmail.com>; Rae Gabelich <hoorae1@aol.com>; Renee Lawler <renee\_matt@live.com>; Serena Steers <serenasteers.ccv@gmail.com>

Sent: Mon, Apr 12, 2021 12:02 am

Subject: City Council Agenda Item #8 for 4/13/21 Hearing to Appeal of Planning Commission Approval for 3701 Pacific Place.

City Clerk, please add this email to the public record for this agenda item.

**UPHOLD THE APPEAL and REQUEST AN EIR**

We need your focused attention and due diligence to address the disparities in open space on the west side of Long Beach with this and 712 Baker which are very critical

land use decisions. Every single land use decision deeply affects our lives. It is important you do the right thing for the community.

There are very few opportunities along the Los Angeles River left to correct these disparities nor rescue our environment from the adverse impacts of poor air / water quality, traffic, noise, climate change.

You simply cannot allow any of the few remaining properties along the LA River to be used for any other use than open space regardless of current condition or circumstances. Resources are available. Negotiations can be accomplished for the greater good. It is that important to the westside, the city and the region that these properties be used as open space – the entirety of ANY parcels. It is important for our sustained health and survival. Period.

How important do you suppose clean water is to our survival, given the push to densify throughout the city? What we do with our watershed is absolutely critical to the entire Dominguez Watershed. This comment is from “The Greater Los Angeles County Open Space for Habitat and Recreation Plan (Integrated Regional Water Management Plan Update – 2012)”

**“If properly preserved, open space will enhance our ability to capture stormwater. Our need for water is increasing as we experience less rain and more urbanization and densification.”**

[https://dpw.lacounty.gov/wmd/irwmp/docs/Prop84/GLAC\\_OSHARP\\_Report\\_Final.pdf](https://dpw.lacounty.gov/wmd/irwmp/docs/Prop84/GLAC_OSHARP_Report_Final.pdf)

**Table 14. Infiltration and Potential Groundwater Recharge Benefits from Open Space Projects**

	Potential Groundwater Recharge Capacity (AF/yr)		
	Habitat	Recreation	Total
North Santa Monica Bay	-	-	-
Upper Los Angeles River	2,000	19,000	21,000
Upper San Gabriel and Rio Hondo	3,000	15,000	18,000
Lower San Gabriel and Los Angeles River	1,000	5,000	6,000
South Santa Monica Bay	-	2,000	2,000
<b>Greater Los Angeles County</b>	<b>6,000</b>	<b>41,000</b>	<b>47,000</b>

**Table 15. Potential Stormwater Quality Benefits from Open Space Projects**

	Potential Capture Capacity (AF/yr)		
	Habitat	Recreation	Total
North Santa Monica Bay	200	200	400
Upper Los Angeles River	600	3,900	4,500
Upper San Gabriel and Rio Hondo	900	2,600	3,500
Lower San Gabriel and Los Angeles River	1,100	4,400	5,500
South Santa Monica Bay	800	6,400	7,200
<b>Greater Los Angeles County</b>	<b>3,600</b>	<b>17,000</b>	<b>21,000</b>

You were elected by the people of this city to represent them and do your work in support of the community. We expect you to look out for our best interests as well as the city and the city's role in the long-term health and sustainability of the region. The community needs for you to do the right thing, right now regarding this property and 701 Baker and be as creative as you can to acquire the property and create critically needed open space.

The loss of the 10.6 acres Boy Scout camp adjacent the LA River was a tragic loss from which the city will never be able to recover. That very important and easy opportunity for the city to convert that parcel to public use is gone forever.

As you are fully aware, we / human beings / flora and fauna must have open space and a healthy environment / habitat to survive and thrive. **This body has recognized the need for open space on the west and north sides time and again. Your commitment and understanding of this need has been stated in numerous planning documents that this body has approved and supported.**

**The Long Beach RiverLink Plan was approved by the city council on 2 occasions in 2007 and unanimously in 2015. Implementing this plan is referred to in the latest general plan and the intent has been incorporated into numerous requests for funding.** The public expects you to follow through on the promise and clear intent of adding open space. **We are at a juncture that you can not dismiss a single parcel regardless of status.**

The last minute, and improperly vetted decision to change the 3701 Pacific Place site to neo industrial while the public was distracted deliberating on proposed high density and 5 and 6 story housing (encroaching in MY neighborhood) which gave cover to change this parcel from open space at the last possible moment.

**Changing the zoning to neo industrial on this property was the wrong thing to do. There was NO transparency with this last minute, behind the scenes change, and you need to be fully aware of that fact. It was simply wrong. Done for the wrong reasons, and completely contrary to public expectations and decades of planning.** Please review each and every one of the LA River related plans, legislation, and communication regarding this property to understand the commitment and continuously stated intent of the property.

This property was included in the Countywide Open Space and Recreation Plan completed in 2016, prioritizing the property for acquisition as open space. The mayor wrote a letter of support for SB 1374 for a Lower Los Angeles River Recreation and Park District in 2016 – state legislation to support the open space concept.

This property was specifically included in the North Long Beach Project Area in 1996 earmarked as open space until redevelopment was eliminated in 2012. The intention was very clear with this property over decades in multiple plans (see attached project area for the northern parts of the plan).

The public has expectations that the Los Angeles River would be a continuous stream of open space for public use AS PROMISED and the general plan states. You voted for RiverLink you have the opportunity to implement it. You have a very important opportunity to do the right thing for the community now. It is your responsibility.



**This property and that of 712 Baker is infinitely more critical and valuable than concrete expanses or buildings. This region needs the water. We need the open space. We need to protect and enhance the watershed. We need to ensure our water will not harm us, the river nor the bay. We need to improve our environmental situation and sustainability not continue to detract and diminish it.**

We need to see your meaningful intention to act responsibility for the people – not developers – FOR THE PEOPLE. This is a life affirming choice.

We need the contamination on the site, in the water table, and the watershed to the river evaluated and cleaned up to protect the people, habitat, our water, the river and the bay.

We need for you to recognize that traffic density at this site has been evaluated in the 98% worst traffic in California according to the EnviroStor database of the Department of Toxic Substances Control (DTSC). **DTSC documents the adverse environmental score at the worst 86 to 90% for the site in all of California.** (See EnviroStor Summary from the DTSC)

[https://www.envirostor.dtsc.ca.gov/public/profile\\_report?global\\_id=70000161](https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=70000161)

Contaminants and toxins are present in the soil, the water, and in the air we breath, and the community is exposed to them. Several studies continue to identify the area along the I710 as some of the worst in the nation. This project can not be mitigated in that regard. **This project must be stopped so that it will not pile on to these issues that have proven to reduce our life expectancy. Putting concrete over the site does not fix all of the literal underlying contamination issues. These sites must be cleaned up for the health of the region.**

**In addition, alternative and healthier uses must be diligently evaluated for this site. You are fully aware that the worst land uses continue to be piled up on the west and north side. Every single land use decision adds to or can help reduce the absolute worst health issues. This speaks to the reason there are so many plans to green and keep a sizable buffer on either side of the Los Angeles River.**

An impartial environmental evaluation (EIR) must be done on this property to evaluate all pertinent elements contained in an EIR including: habitat, noise, air, water, cultural and historical resources, aesthetics, every element of an EIR, including the site's possible contribution to carbon emissions, heat island effect and global warming as currently proposed in contrast to critical, healthy alternatives. These adverse climate impacts must be addressed by you as the RESPONSIBLE decision makers on every single land decision that comes before you and the Planning Commission.

Our very survival and long-term health depends on you to do the right thing.

Do not sit in silent and tacit complacency or compliance and allow for bad outcomes.

You can do something. You can make this a better outcome for all of us.

**Further, the city council rejected an EIR for a strikingly similar self storage and RV parking at 712 Baker in the early 2000's. This body did the right thing - they did not approve the EIR because it was inadequate. That project did not happen for good reason and it must serve as a precedent for this project. It is more of an assault today than it was then. This project does not even have an EIR AND it is a**

**highly undesirable use.** How on earth is a property of this level of concern not undergoing an EIR?

You are the deciders. You have the obligation to do the right thing. We can no longer squander this land for these adverse and incompatible uses. There is little land left in Long Beach to revitalize and advance the beauty, habitat and health of our communities.

You must protect the community.

You must make the BEST land use decisions for the community and this city.

As the city's governing body the people need your responsible leadership to do your due diligence . You absolutely have every opportunity and right to do the following:

- **Require an Environmental Impact Report** for 3701 Pacific Place to address very serious environmental concerns and more critical land use options. Allowing the applicant to evaluate the environmental issues is biased, unreliable and incomplete review. We have no idea the magnitude of the real environmental issues. ***Allowing a Mitigated Negative Declaration is absurd given the magnitude of a range of environment risks and need to diligently evaluate alternative needs.***

- **Deny all requests for zoning changes** – a storage facility can go anywhere. We should not be squandering this critically located land. The owner is purchasing this land and it is not yet entitled and should not be. It was a risk they took that should not be rewarded at the expense of the community and our health. This use was never vetted with the public.

- **Uphold the appeal and deny all Planning Commission approvals and permits as noted in the agenda item (Site Plan Review, Standards Variance, CUP and Lot Merger, Construction and Operation).** The applicant has already intentionally and illegally conducted extensive work on this property IN THE MIDDLE OF THE NIGHT without necessary approvals, entitlements, reviews or public warning and appropriate precautions moving highly contaminated soil at great risk to the public. This activity should be seriously prosecuted, not rewarded. This is an incompatible use for this site and inconsistent with RiverLink's requirements for open space. There are concerns that the Planning Commission was even adequately informed of objections and concerns with the project.

- **Do the morally responsible work to acquire this property regardless of how imposing or difficult it may seem.** Acquire this property for critically needed open space this body has continually promised and planned for, and the community absolutely expects and needs.

- o Negotiate with the property owner and help them to relocate to a better site. A storage facility can go anywhere (Target site on Bellflower or several opportunities along the SR91 freeway). There is absolutely no need for this facility to be in this location. NONE. It is barely feasible that the property could support the weight that a storage facility, office building, and storage for almost 600 RV's or

- o When you deny the use and zoning changes you likely may have a willing seller.
- o Otherwise, if you want to do the right thing for the community you can. You just need to be bold and you will be justified to take the appropriate action. Where there is a will, there is a way. Do you have the will?

**UPHOLD THE APPEAL and REQUEST AN EIR**

Respectfully,  
Laurie Angel

**From:** RAE GABELICH [mailto:hoorae1@aol.com]

**Sent:** Tuesday, April 13, 2021 12:45 PM

**To:** Al Austin <Al.Austin@longbeach.gov>; Mayor <Mayor@longbeach.gov>

**Cc:** Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 9 <District9@longbeach.gov>; CityClerk <CityClerk@longbeach.gov>

**Subject:** Agenda Item #8, April 13th

**-EXTERNAL-**

Dear Mayor and Long Beach City Council Members -

I implore you to question, explore and consider the well being of thousands of Long Beach residents before you cast your deciding vote tonight to deny the RiverPark Coalition appeal against the 3701 Pacific project.

Tonight you will be shown the history of this property that leaves no doubt about the contaminated condition of the land. Is simply covering it up the right thing to do for our future generations? In addition, it has been marked as "open space" in the city and county planning documents for the past two decades knowing that mitigation would be necessary.

The zoning change was determined during the LUE2017 fiasco when thousands of LB residents demanded consideration of quality of life changes that greater density would promote across our city. This parcel was rezoned during the adoption of the LUE and definitely was way under the public radar.

During the LUE community meetings the owner of the adjacent property, Jeannie McDonald, threatened a lawsuit if her 5 acres was then labeled as open space lowering her ability to sell at a higher price. Was this the reason for the change in zoning? What will the new zone change from light industrial to commercial storage do for the developer? Increase the property value?

This land is, at minimum, equally as contaminated as the 2nd phase of Davenport Park. That parcel took years to remediate and now is becoming additional open space for our eastside 8th district neighborhoods. Why is this discussion not taking place for our 7th and 8th district westside communities?

Please ask the questions and vote to require a full EIR on this land before approving any development regardless of who benefits. It's the right thing to do!

Respectfully,

Rae Gabelich

**From:** Debra Greco [mailto:dgrecohomes@gmail.com]  
**Sent:** Tuesday, April 13, 2021 3:11 PM  
**To:** CityClerk <CityClerk@longbeach.gov>  
**Subject:** I oppose Agenda Item #8 -- Build the River Park Instead!

**-EXTERNAL-**

To the City Council,

As a resident and Real Estate agent I understand the vital need for “green space” to maintain property values, quality of life and balance in our communities. Many people move to LB because of this-to be away from the “concrete jungle” of the City.

Please Build The River Park-Item #8 on your Agenda

Debra Greco  
Keller Williams

--

Debra Greco  
Keller Williams Luxury  
562.508.7000

Inline image

**From:** john hayes [mailto:johnandtanner@hotmail.com]  
**Sent:** Tuesday, April 13, 2021 1:56 PM  
**To:** CityClerk <CityClerk@longbeach.gov>  
**Cc:** Long Beach Reform Coalition <consultant@calheightsconsult.com>  
**Subject:** I support Agenda Item #8 -- Don't build the River Park

**-EXTERNAL-**

I am not in favor of construction of a new river park unless the city has found a way to deal with the homeless situation in Long Beach. Building another expensive park and having to maintain it in perpetuity while it just provides more free housing for homeless people is NOT a good use of my tax dollars. The only people who will use it are the ones that will eventually live in it. Let them pay for it.

John Hayes

**From:** Tilly (Good is Better) [mailto:tilly@goodisbetter.net]

**Sent:** Tuesday, April 13, 2021 1:39 PM

**To:** CityClerk <CityClerk@longbeach.gov>

**Cc:** Kyle J. Smith <Kyle.J.Smith@longbeach.gov>

**Subject:** Re: Agenda Item #8 - Hearing #210308 - Appeal for 3701 Pacific Place, also known as LB Industrial, Pacific Place Project, OOI North APL20-0006

**-EXTERNAL-**

Re: Agenda Item #8 - Hearing #210308 - Appeal for 3701 Pacific Place, also known as LB Industrial, Pacific Place Project, OOI North APL20-0006

Dear Ms Garza,

In lieu of the opportunity to comment at the City Council meeting, please ensure that my comments below are included in deliberations this evening.

I am asking the City to adequately fulfill its CEQA obligations in relation to this property, and also not to make the zoning changes as requested by the developer.

Furthermore, I wish to register my deep concern that constituents have been denied the opportunity to speak at today's Council meeting. For a hot button issue in a City with half a million residents, providing only 20 speaking slots is manifestly inadequate. Ditto the lack of transparency as to who is selected to speak. I understand that the Mayor has discretion to open more speaking opportunities, and the fact that he has chosen not to leaves me with little confidence that due process has been or will be followed with regard to 3701 Pacific Place. If there is a decision made to allow spoken public comments this evening, I would be very pleased to be added to that list.

The proposed project will have significant adverse environmental impacts and is therefore unsuited to a Mitigated Negative Declaration. Conducting a full CEQA process is imperative. Indeed the City of Long Beach has recently affirmed this being a necessity. How so? The pigeon pair of this land parcel – 712 Baker Street – is currently undergoing a full CEQA. The characteristics of these two properties form an almost entirely overlapping Venn diagram, and yet the City is waiving Pacific Place through with a reckless Mitigated Negative Declaration, a manifestly unsuitable application of CEQA's MND provisions. This is unjustified in the documentation, and unjustifiable in any reasonable analysis of the material facts of this case.

It is my view that potentially significant environmental impacts exist in terms of Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Recreation, Transportation and Circulation, and Tribal Cultural Resources. Further, the river adjacent location of the site amplifies the importance of following due environmental process. That makes CEQA necessary and it must not be sidestepped by a Council that seems intent on undermining the integrity of the CEQA process and giving the developer a free pass to build a project that flagrantly disregards zoning, land use, environmental common sense, and community sentiment.



And if the potential impacts alone were not enough to convince this council, there are still more reasons: The 262 pages of public comment letters in late 2020, almost unanimous in opposing the proposed development speak, should be enough to give the City pause on this project. The long-running efforts (including by the City) to purchase the land as public open space, should be enough. Incompatibility of the project with both the Lower LA River Revitalization Plan and the draft county-wide LA River Master Plan should be enough. That this development will steal any hope of a greener environment and a healthier life for several generations of West Long Beach residents should be enough. That there are unanswered questions about site stability and toxicity should be enough. That there are dire Los Angeles River water quality concerns in relation to interactions between the site and the aging infrastructure of the surrounding stormwater systems should be enough. The incompatibility of the site design with the definition of the Neo-Industrial land use designation in the General Plan should be enough.

Any one of these factors would give any reasonable Mayor, Councilmember, or City Clerk pause. The simultaneous presence of all these factors give you no option but to reject the Mitigated Negative Declaration and zoning changes.

I know that CEQA is a self-executing statute and that this gives the City fairly ample latitude for recklessness in applying its requirements. I am going to ask that you instead take the high road and meet your CEQA obligations to the letter and the spirit of the law, rather than paving an easy road for the developer whilst you brazenly ignore your constituents, your river, and in many regards the future of West Long Beach.

I wish I could be offering these comments verbally at this evening's meeting, but I trust that you will pay attention to them, nevertheless.

Best regards,  
Tilly Hinton, PhD

**Dr Tilly Hinton**

Writer | Research Scholar | Floral Designer | Facilitator |  
Grants and Awards Wrangler | Cultural Producer | Impact  
Consultant

**E** [tilly@goodisbetter.net](mailto:tilly@goodisbetter.net) **W** [linktr.ee/tillyhinton](https://linktr.ee/tillyhinton)

**Us phone** +1 323-536-7998

**Au phone** +61 7 5660 6759

**From:** Carlos Keith [mailto:ckinca@gmail.com]

**Sent:** Tuesday, April 13, 2021 3:43 PM

**To:** CityClerk <CityClerk@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 9 <District9@longbeach.gov>

**Subject:** Fwd: 2021\_04\_13 City council.docx

**-EXTERNAL-**

My comments to the City council for issue 8 for the 4/13/2021 meeting.

Thank you?

Keith Tyschper

My name is Keith Tyschper, a Los Cerritos resident ask you to consider the following before you vote:

1. How will an RV Park and storage facility provide a benefit better than or comparable to open space?
2. How does the proposed development ensure the revitalization and proliferation of the LA River flora and fauna?
3. How do RV's mitigate air pollution in an area with some of the worst air quality in southern California?
4. How does the proposed development support our Long Beach administration's pledge of equity in an area with a deficit of parkland 17 times that of east LB?
5. Why does our planning department continue to ignore that the 2007 Riverlink plan clearly identifies this site as **open space**, not a park specifically but certainly not a light industrial use?
6. Imagine a bucolic riverfront setting; How does this development near the river support that that vision?
7. Would you be comfortable following a path to the LA River sandwiched between a freeway embankment and cyclone fence enclosing hundreds of RVs?
8. And finally: Are you prepared to embrace the **moral obligation as a leader** to reject hypocrisy, protect our communities, support the revitalization of the LA River and the environment? Show us how you characterize responsible leadership and reject this development.

**From:** Cynthia Kellman [mailto:cpk@cbcearthlaw.com]

**Sent:** Monday, April 12, 2021 3:20 PM

**To:** CityClerk <CityClerk@longbeach.gov>; City Manager <CityManager@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; Council District 9 <District9@longbeach.gov>; Mayor <Mayor@longbeach.gov>

**Cc:** Doug Carstens <dpc@cbcearthlaw.com>; Sunjana Supekar <sss@cbcearthlaw.com>

**Subject:** April 13, 2021 City Council Hearing, Agenda Item 8 (21-0308, 21-0309): Appeal of Planning Commission Approval of Pacific Place Project, 3701 Pacific Place and 3916-4021 Ambeco Road (Mitigated Negative Declaration-10-19-20)

**-EXTERNAL-**

Dear Mayor, City Council Members, City Manager, and City Clerk,

Attached please find a letter from Sunjana Supekar regarding the above-captioned subject.

The letter including the attachments is in the [Revised](#) Dropbox Link below:

<https://www.dropbox.com/sh/xm2kk3ibwdf60de/AACNtLWrCNFAKGmIX3xCVW8fa?dl=0>

We are also sending the letter with attachments via Fedex overnight.

Please feel free to contact me with any questions or concerns.

Cynthia Kellman  
CHATTEN-BROWN, CARSTENS & MINTEER  
2200 Pacific Coast Highway, Ste. 318  
Hermosa Beach, CA 90254  
Direct Tel: 323-296-9026  
Fax: 310-798-2402  
[cpk@cbcearthlaw.com](mailto:cpk@cbcearthlaw.com)  
[www.cbcearthlaw.com](http://www.cbcearthlaw.com)



**Chatten-Brown, Carstens & Minter LLP**

2200 Pacific Coast Highway, Suite 318  
Hermosa Beach, CA 90254  
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Phone: (310) 798-2400

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Phone: (858) 999-0070

Phone: (619) 940-4522

**Douglas Carstens**

Email Address:

[dpc@cbcearthlaw.com](mailto:dpc@cbcearthlaw.com)

Direct Dial:

310-798-2405

April 12, 2021

Via email (cityclerk@longbeach.gov; citymanager@longbeach.gov;  
district1@longbeach.gov; district2@longbeach.gov; district3@longbeach.gov;  
district4@longbeach.gov; district5@longbeach.gov; district6@longbeach.gov;  
district7@longbeach.gov; district8@longbeach.gov; district9@longbeach.gov;  
mayor@longbeach.gov)

Mayor Robert Garcia

Council Members Mary Zendejas, Cindy Allen, Suzie Price, Daryl Supernaw, Stacy  
Mungo, Suely Saro, Roberto Uranga, Al Austin, Rex Richardson

City Clerk Monique De La Garza

City Manager Tom Modica

Long Beach City Hall

411 W. Ocean Blvd.

Long Beach, CA 90802

Re: April 13, 2021 City Council Hearing, Agenda Item 8 (21-0308, 21-0309): Appeal of Planning Commission Approval of Pacific Place Project, 3701 Pacific Place and 3916-4021 Ambeco Road (Mitigated Negative Declaration-10-19-20)

Dear Mayor, City Council Members, City Manager, and City Clerk,

On behalf of the Riverpark Coalition, The River Project, and LA Waterkeeper, we submit these comments opposing the Planning Commission's approval of the Pacific Place Project ("Project") as proposed and the City's reliance on a mitigated negative declaration (MND) prepared for it. Riverpark Coalition is a collection of community groups and individuals including residents of western Long Beach. This community-based coalition works to promote public-serving open space in nature-deprived areas of western Long Beach. The River Project is a non-profit organization dedicated to planning

and action to protect, reclaim, and restore vital ecosystems in Los Angeles County. The River Project's mission is to realize a regenerative, equitable, just, and climate-resilient Los Angeles through evidence-based watershed planning, and positive action that provides local government and communities with tools to safely adapt to rapidly changing conditions. LA Waterkeeper is a non-profit organization that fights for the health of the region's waterways, and for sustainable, equitable and climate-friendly water supplies. LA Waterkeeper supports the restoration of the LA River in a way that maximizes ecological health while safeguarding local communities.

Riverpark Coalition appealed the Planning Commission's December 17, 2020 approval of the Project MND because of numerous flaws in the environmental review for the Project. We incorporate by reference our initial letter opposing the Project MND, submitted on November 16, 2020. (Exhibit ("Exh.") A.) In addition to the objections stated in that letter, we request that the City Council grant our appeal for the below reasons.

**I. The Project Will Have Significant Public Health and Environmental Justice Impacts.**

Development of the Project will have numerous significant environmental impacts that must be studied in an EIR, as outlined below and in our previous letter to the Planning Commission. (Exh. A.) Many of these impacts will have significant environmental justice consequences. The Project Site is located on a site formerly used for oil production activities, including oil wells and oil brine treatment. (Exh. B, Project MND, p.108.) As discussed further below in Sections II, III, and VIII, disturbance of the property in order to develop the Project Site will lead to further surface and groundwater contamination in the vicinity of the Project Site. The City must act to grant this appeal and prevent the site from becoming another disaster like the Exide Battery Facility, which poisoned communities in East Los Angeles. (Exh. C, Jessica Garrison, "*Exide ordered to clean up toxic substances near Vernon plant*," LA Times, Dec. 18, 2013, available at: <https://www.latimes.com/local/la-xpm-2013-dec-18-la-me-exide-20131219-story.html>; Exh. D, Tony Barboza, "*Auditor slams California for Exide cleanup delays, says cost could reach \$650 million*," LA Times, Oct. 27, 2020, available at:

<https://www.latimes.com/california/story/2020-10-27/auditor-slams-states-management-exide-cleanup-says-it-may-cost-650-million>.) Instead of installing a cap on the contaminated site, which we do not believe will be sufficient to prevent contamination and leaching into surface and groundwater, the City and DTSC must commit to a full cleanup and remediation of the site to protect the public health and safety of residents of western Long Beach.

We are particularly concerned with the grading that has already been done on the site. The DTSC Draft Response Plan indicates twelve areas of elevated concentrations of toxins on the site, including arsenic, total petroleum hydrocarbon (“TPH”), and lead. (Exh. E, DTSC Response Plan, pp. 139, 196, available at [https://www.envirostor.dtsc.ca.gov/public/community\\_involvement/1460157096/LBIP-OOI\\_3rd%20DRAFT%20Response%20Plan\\_10-15-2020\\_Part%201%20of%202.pdf](https://www.envirostor.dtsc.ca.gov/public/community_involvement/1460157096/LBIP-OOI_3rd%20DRAFT%20Response%20Plan_10-15-2020_Part%201%20of%202.pdf).) The areas of elevated concentrations are distributed across the site. (Exh. E, DTSC Response Plan, p. 196.) When the developer graded the site, those toxins were likely dispersed, impacting the health and safety of the adjacent community. Los Cerritos Elementary School, a public park and multiple residences are adjacent to the Project site.

Further, the DTSC Draft Response Plan’s discussion on exposure pathways did not provide notice that this site is but a few hundred feet from an elementary school and Los Cerritos Park, frequented by residents and their children. (Exh. E, DTSC Response Plan, p. 161.) No evaluation was done at these vulnerable locations. A full EIR is required to establish the baseline environmental setting and analyze impacts to these sensitive receptors.

**II. The Tookey Parcel, Adjacent to the Project Site, Contains Toxic and Hazardous Substances, and Development of the Project Site would Exacerbate Risks from These Substances.**

The Project Site is located in an area unsafe for development like the Project. The Tookey Parcel is a 0.25 acre parcel located on Ambeco Road and adjacent to 3701 Pacific Place, at the Project site. (Exh. F, Roux Associates, Inc., “Site Assessment Plan and Report of Findings Addendum, Tookey Parcel, Ambeco Road, Long Beach, California,”



April 10, 2020, p. 1 (“Tookey Parcel Report”).) The Tookey Parcel Report reveals the presence of hazardous substances at the Tookey Parcel site.

Fourteen metals regulated under Title 22 of the California Code of Regulations were detected in soil samples at the site. (Exh. F, Tookey Parcel Report, p. 218.) Of these, arsenic was detected in a concentration above a screening level and site-specific action level. (*Ibid.*) Arsenic is a confirmed carcinogen and can cause numerous acute and long-term health effects, including cancer, developmental effects, diabetes, pulmonary disease, and cardiovascular disease. (Exh. G, World Health Organization, Arsenic Fact Sheet, available at: <https://www.who.int/news-room/fact-sheets/detail/arsenic>.)

The soil analysis also revealed the presence of toluene above the laboratory method reporting limit at the Tookey Parcel site. (Exh. F, Tookey Parcel Report, p. 11.) Toluene is a volatile organic compound (VOC) that is linked to several acute and long-term health impacts, including central nervous system dysfunction and cardiac impacts. (Exh. H, U.S. EPA, Toluene Fact Sheet, available at: <https://www.epa.gov/sites/production/files/2016-09/documents/toluene.pdf>.) Numerous other VOC constituents were detected in soil vapor samples above laboratory method reporting limits as well. (Exh. F, Tookey Parcel Report, p. 219.)

Because the adjacent Tookey Parcel contains toxic and hazardous substances, there is at least a fair argument of a reasonable possibility that the Project will have significant environmental impacts. Thus, the City Council should grant the appeal and require the City to prepare an EIR that investigates and addresses these impacts.

### **III. The City’s Environmental Review Must Include the DTSC Analysis of the Project Site.**

The Planning Commission approved the Project MND even though the Department of Toxic Substances Control (“DTSC”) was undergoing a separate and subsequent environmental review process for the Draft Response Plan analyzing toxic hazards risks for the Project site. DTSC received comments from the community from November 16, 2020 through January 7, 2021, and held a community meeting on

December 2, 2020. DTSC only *just* released its master response to the comments that were received during that time period, on April 6, 2021. (Exh. I, DTSC Master Response; Exh. J, DTSC Responsiveness Summary.) These reports must be analyzed and reviewed by the public and decisionmakers prior to approval of the Project. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 394 [post-approval environmental review not allowed].)

The DTSC Master Response reveals several concerning issues that must be analyzed further in an EIR. The site “does not drain into the stormwater system and in fact is subject to dangerous sheet flow off the Site and into both the LA River and the larger stormwater conveyance system.” (Exh. I, p. 412.) This will certainly have water quality impacts and impacts to the water system. In *Friends of the Los Angeles River v. City of Los Angeles* (Los Angeles Superior Court case no. BS 067338), the court found the fact that water would flow over a parking lot and potentially carry oily waste into the Los Angeles River was substantial evidence supporting a fair argument the commercial project in that case could have a significant impact on the environment and therefore required an environmental impact report to address. Exhibit K includes various materials regarding that case, including a comment letter from Lawyers for Clean Water and a brief from the Attorney General. Comments made in that letter and brief about water runoff into the Los Angeles River are applicable to this case as well and we request the City to respond to them. The judgment and administrative record from the *Friends of the Los Angeles River* case are incorporated in this letter by reference. Similarly, in the present case, water flowing from the project site over a parking lot and into the Los Angeles River can create significant adverse environmental impacts.

The report notes that the “City is responsible for assessing potential impacts associated with surface water related to the operations of the development. Water quality analysis associated with construction and operations is the City’s responsibility.” (Exh. I, p. 412.) The City must analyze these impacts before approving the Project.

The DTSC Master Response notes that groundwater quality at the Project site is highly degraded, and notes that “historic oil and gas production in the area and on-Site contributed to poor water quality.” (Exh. I, p. 414.)

The DTSC Master Response also provided explanation regarding the “cap” that will be installed to attempt to mitigate the Project site’s toxicity (Exh. I, pp. 415-16), the surcharging process DTSC underwent in October 2020 prior to CEQA review (Exh. I, pp. 416-18.), and the alternative of excavating and removing toxic soils at the site (Exh. I, pp. 418-20.). This information should have been in front of the public and decisionmakers and analyzed *before* the Planning Commission approval of the Project.

**IV. The City of Long Beach General Plan Land Use Element Requires Implementation of the Riverlink Plan.**

Under CEQA, lead agencies must analyze whether a proposed project is inconsistent with applicable land use policies, such as the governing general plan. (Cal. Code Regs, tit. 14 (“CEQA Guidelines”) § 15125, subd. (d).) If substantial evidence supports a fair argument that the proposed project conflicts with the General Plan, then an EIR is required. (*Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 930.) The City of Long Beach General Plan Land Use Element requires implementation of the Long Beach Riverlink Plan. (Exh. L.) Implementation Strategy LU-M-86 requires the City to: “Update and implement the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths and linkages along the east bank of the Los Angeles River, as well as to connect to existing and future parks, open space and beaches along western portions of the City.” (Exh. L, p. 603.) The Project will surely conflict with this implementation measure, as it will foreclose public access and green space on the Project site. Thus, an EIR must be prepared to analyze this significant impact.

**V. The Project Will Have Significant Biological Impacts that Must Be Analyzed in an EIR, Including Impacts to Southern Tarplants.**

The MND identified that the Project would impact the southern tarplant (*Centromadia parryi ssp. australis*), a special status species on the Project site; approximately 830 southern tarplant individuals were located on the site. (Exh. B, Project MND, pp. 110-11, 113.) Southern tarplant is considered a California Rare Plant Rank (CRPR) List 1B species, which indicates that it is considered rare, threatened, or

endangered within California by the California Native Plant Society (CNPS). Riverpark Coalition previously objected to the proposed mitigation of impacts to these species, noting that transplantation of the southern tarplants would likely be ineffective. (Exh. A, Riverpark Coalition MND letter, p. 33.)

Prior to the surcharge work beginning in October 2020, and prior to the Planning Commission's approval of the Project, the Project applicant removed all vegetation from the Project site, including the southern tarplants. It appears this removal was done without any permits from DTSC, the City of Long Beach, or the California Department of Fish and Wildlife, despite repeated requests for such information. The unauthorized removal of rare plants violates the California Endangered Species Act, CEQA, the Native Plant Protection Act (Fish & Game Code § 1900 et seq.) and constitutes a significant impact under CEQA. The southern tarplants did not survive the removal.

The California Department of Fish and Wildlife ("CDFW") submitted a letter commenting on the MND with respect to the Project's biological impacts, including environmental impacts resulting from the unauthorized vegetation removal. (Exh. M, CDFW letter, available at: [https://files.ceqanet.opr.ca.gov/265257-2/attachment/\\_GXmGIUvfe0NjRJWXs\\_NF6RntAFKdSl00gDTjZ1hAGR0WJWWSU1CTRaEks0YnW2lKcnABgf1LIY7cUWF0](https://files.ceqanet.opr.ca.gov/265257-2/attachment/_GXmGIUvfe0NjRJWXs_NF6RntAFKdSl00gDTjZ1hAGR0WJWWSU1CTRaEks0YnW2lKcnABgf1LIY7cUWF0).) In the letter, CDFW recommended that "The vegetated area that was removed before adequate surveys were conducted should be identified as a significant impact." (Exh. M, p. 608.) CDFW also noted that the MND's planned mitigation of southern tarplant impacts would be ineffective, stating that the "Project may result in population declines or local extirpation of the species." (Exh. M, pp. 612-13.)

CDFW also recommended additional analysis and mitigation of impacts to Crotch's Bumble Bee (Exh. M, pp. 608-09); bat species, including California Species of Special Concern (Exh. M, pp. 609-11); burrowing owl (Exh. M, pp. 611-12); southern tarplant (Exh. M, pp. 612-13); special status plants (Exh. M, pp. 614-15); nesting birds (Exh. M, pp. 615-16); tree removal (Exh. M, pp. 616-17); and aquatic resources (Exh. M, pp. 617-618.) Each of these exceeds the fair argument standard, requiring the City to prepare a full EIR. (*Pocket Protectors*, *supra*, 124 Cal.App.4th 903, 928.)

**VI. The City's Continued Non-Provision of Documents Requested Under the Public Records Act Hinders Public Review.**

Counsel for Riverpark Coalition filed a Public Records Act request on November 23, 2020, prior to the Planning Commission's approval of the MND (Request # C009364-112320). The City responded a month later, on December 23, 2020, stating that responsive records exist and will be disclosed. However, the City has yet to provide any documents.

The Public Records Act at Government Code section 6253, subdivision (c) requires public agencies to respond to requests for public records within 10 days of receipt of a request, and authorizes extensions of no more than 14 days only under unusual circumstances. Even if a 14-day extension were warranted, the City cannot justify a delay of over four months in providing documents.

Because the Riverpark Coalition has been unable to obtain these documents, it has not had the opportunity to review all possible documents relating to the Project site. Thus, the Project should not move forward until the public has had the opportunity to review these documents and raise all potential concerns regarding the Project site.

**VII. The Project Site Was Intended for Much Needed Park Development in Western Long Beach.**

There is an enormous disparity of park and open space access in the City of Long Beach. Six out of seven members of the Long Beach Post Community Editorial Board recently published an editorial entitled "Make Green Space Not Development The Priority On The LA Riverfront," urging the City Council to prioritize green space on the LA River and to "stop plans for development in order to conduct a full Environmental Impact Report and to continue to advocate for the River Park." (Exh. N, Long Beach Post, Community Editorial Board, "*Make Green Space Not Development The Priority On The LA Riverfront*," Apr. 9, 2021, available at: <https://lbpost.com/voices/editorial-make-green-space-not-development-the-priority-on-the-la-riverfront>.)

According to the Long Beach Department of Parks, Recreation of Marine's ("DPRM") 2003 Strategic Plan, the West park district has only 1 acre of parkland per 1,000 residents, while the East park district has 16 acres per 1,000 residents. (Exh. O, p. 630.) To respond to this disparity, DPRM included Strategy 1.1 as part of its Strategic Plan, which established a target of 8 acres per 1,000 residents. (Exh. O, p. 631.) Strategy 1.1 identified 50 acres in Wrigley Heights for park development. (Exh. O, p. 631.) The City must maintain its commitment to provide much needed park space in western Long Beach by reserving the Project site for park access.

#### **VIII. The Project Will Have Additional Significant Impacts to Water Resources.**

The Project will have additional significant impacts to water resources. The surcharge is directly loading weight (1 million lbs) and displacing the only storm sewer pipe serving the site and the neighborhood to the east, including Los Cerritos Park. The displacing of the pipe segments will cause the most highly contaminated "toothpaste consistency" soil to leak into the storm drain pipe which discharges directly into the LA River. The displacement of the pipe segments will also cause the storm drain to cease working as intended resulting in flooding to the area.

The surcharge is directly loading weight on and potentially causing damage to two abandoned oil wells on the site, immediately north of the proposed building and two active oil pipelines. Exhibit P shows the location of the oil wells, surcharge pile, and their position relative to the storm drain.

The plans from developer InSite detail onsite treatment of storm drainage from the nearly 14 acres of impervious surface (asphalt and concrete paving, and the building) plus some storm drainage from the access road leading to the site. (Exh. Q.) The treated stormwater will then be dumped into the existing storm drain under the building. These 14 acres were never intended to drain into the storm drain pipe (referenced above) which will likely not be working as intended after the surcharge work is completed; instead, the permeable earth absorbed much of the rain during storm events.

The InSite plans detail onsite storm drainage tying into the existing 30 inch storm drain, yet available plans from the County Flood Control District indicate a storm drain pipe 24 inches in diameter, a 36% smaller capacity. (Exh. Q; Exh. R, County Flood Control District Plans.) Exhibit S is a graphic showing the difference in drain diameters.

Further, as mentioned above, the Project is located on a site contaminated from former oil drilling activities. Compaction, as is required prior to building on the site, is going to displace groundwater, and displacement of groundwater is going to spread contamination to new locations. This is a significant environmental effect that must be addressed in an EIR.

For all these reasons, a full EIR is needed to analyze and mitigate these impacts to water resources.

**IX. The Project Site is Not Stable Enough to Support Construction of the Project.**

The Project Site is not suitable to support construction of the Project. We incorporate by reference a May 27, 2009 Final Remedial Investigation Report for the Former Oil Operators North Site, 3701 Pacific Place, Long Beach, California, prepared by LFR Inc. ("May 2009 Report"). This report is available at: [https://www.envirostor.dtsc.ca.gov/public/deliverable\\_documents/8662384510/LB%20Ind.%20Park\\_May%2027%202009\\_LFR\\_CRG\\_RI%20Report%20%28Full%20%26%20FINAL%29.pdf](https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/8662384510/LB%20Ind.%20Park_May%2027%202009_LFR_CRG_RI%20Report%20%28Full%20%26%20FINAL%29.pdf).

In that report, LFR states that GEOFON, Inc. performed a geotechnical investigation to provide an evaluation of subsurface conditions at the Site in relation to the design and construction of a proposed business park development. (Exh. T, Excerpt from May 2009 Report, p. 659.) GEOFON concluded that surface conditions at the time were not suitable for supporting structures on shallow foundations. (Exh. T, Excerpt from May 2009 Report, p. 660.) The sump materials have highly variable engineering properties and are too compressible for supporting structures or fills. (*Ibid.*) A full EIR is required to evaluate these impacts.

**X. The Project Variance is Not Supportable Because it is a Self Imposed Hardship, and the Requirement of a Variance is an Significant Land Use Impact.**

The Project includes application for a variance from height restrictions to allow for a building height of 43 feet 11 inches, almost 16 feet over the maximum allowable height of 28 feet. There is no justification that would support a variance.

Under the Long Beach Municipal Code, a variance may only be approved in cases of undue hardship where it is necessary to enjoy a property right and does not convey a special privilege or remedy a self-imposed hardship. (Long Beach Municipal Code §§ 21.15.2890, 21.25.306; *Broadway, Laguna, etc., Ass'n v. Board of Permit Appeals* (1967) 66 Cal.2d 767, 772). An inconvenience is not sufficient to show an undue hardship. (Long Beach Municipal Code §§ 21.15.2890.) In this case, the excessive height of the building is a self-imposed hardship related to the building design the project applicant desires. There is no basis for granting a variance from the generally applicable Municipal Code.

Further, the requirement of a variance is a significant land use impact that should have been identified as an inconsistency with the zoning ordinance and analyzed in a full EIR. (*Pocket Protectors, supra*, 124 Cal.App.4th 903, 930-31 [finding that a project's inconsistency with city land use regulations triggered a full EIR].)

**XI. Conclusion.**

For the foregoing reasons, we urge the City Council to grant this appeal and direct the Planning Commission to require the City to prepare a full EIR and ensure the requirements of CEQA are adequately followed. Thank you for considering our comments. We look forward to the City's preparation of an EIR for this Project that carefully considers the direct and cumulative environmental impacts of the Pacific Place Project and that contains a thorough analysis of alternatives and mitigation measures



designed to reduce and avoid these adverse impacts on the City of Long Beach and its residents.

Sincerely,



Sunjana Supekar  
Douglas P. Carstens

Enclosures:

- A. Riverpark Coalition November 16, 2020 Letter Opposing MND
- B. Excerpts from Project Initial Study and Mitigated Negative Declaration, October 19, 2020.
- C. LA Times Article, Jessica Garrison, "*Exide ordered to clean up toxic substances near Vernon plant*," Dec. 18, 2013.
- D. LA Times Article, Tony Barboza, "*Auditor slams California for Exide cleanup delays, says cost could reach \$650 million*," Oct. 27, 2020.
- E. DTSC Draft Response Plan, Long Beach Industrial Park, Revised Oct. 15, 2020.
- F. Site Assessment Plan and Report of Findings Addendum, Tookey Parcel, prepared by Roux Associates, Inc., Apr. 10, 2020.
- G. Arsenic fact page, World Health Organization
- H. Toluene fact page, US Environmental Protection Agency
- I. DTSC Master Response to Comments, Draft Response Plan, Apr. 6, 2021.
- J. DTSC Responsiveness Summary, Draft Response Plan, Apr. 6, 2021.
- K. Materials relating to *Friends of the Los Angeles River v. City of Los Angeles* (Los Angeles Superior Court case no. BS 067338).
- L. Excerpts of City of Long Beach General Plan Land Use Element.
- M. November 17, 2020 Comment Letter from CDFW on the Project MND
- N. Long Beach Post, Community Editorial Board, "*Make Green Space Not Development The Priority On The LA Riverfront*," Apr. 9, 2021.
- O. Excerpts from Long Beach Department of Parks, Recreation, and Marine 2003 Strategic Plan Executive Summary, Apr. 7, 2003.
- P. Diagram showing surcharge loading weight on oil wells on site
- Q. Conceptual site plans for InSite Pacific Self Storage
- R. County Flood Control District Plans
- S. Graphic showing the difference in drain pipe diameters
- T. Excerpts from May 27, 2009 Final Remedial Investigation Report for the Former Oil Operators North Site, prepared by LFR Inc.

**From:** Renee Lawler [mailto:Renee\_Matt@live.com]

**Sent:** Tuesday, April 13, 2021 11:35 AM

**To:** CityClerk <CityClerk@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 9 <District9@longbeach.gov>; Mayor <Mayor@longbeach.gov>

**Subject:** Council Agenda Item #8 - Hearing #210308 - Appeal for 3701 Pacific Place, aka: LB Industrial, aka Pacific Place Project, aka: OOI north Page 1

**-EXTERNAL-**

Please see the attached comments for the above referenced agenda item:

I have included some of the attachments and will be forward the remainder under separate covers as they will all not fit in one e-mail

Thank you.  
Renee Lawler  
562-433-0757

To: Mayor, Council members and City Clerk

Re: Agenda Item #8 - Hearing #210308 - Appeal for 3701 Pacific Place, aka: LB Industrial, aka Pacific Place Project, aka: OOI north APL20-0006

Please uphold the appeal and deny the MND and zoning change to CS with a height variance.

The proposed project will have significant adverse environmental impacts on Habitat & Biological Resources, Tribal, Cultural, Historic resources, Aesthetics & Scenic vistas, Hydrology and Water Quality, Mobility & Transportation, Social Equity & Land Use and Planning, Recreation & Open Space, Public Services, Utilities, Air Quality, Geology and Soils.

Class I State CEQA Guidelines 15301 - the proposed project will consist of significant alteration to topographical features, grading and drainage solutions for storm water overland run off and is not exempt and therefore an EIR is required.

Class III CEQA Guidelines 15303 There will be a significant change in structures, equipment and major modifications to the site and the project is not exempt and therefore an EIR is required.

Class V CEQA Guidelines 15305 The project will consist of major alterations in land use and average slope changes that will result in changes in land use, density, lot line adjustments and set backs for location and adjoining properties and therefore it is not exempt and an EIR is required.

Class 11 Categorical Exemption CEQA Guideline 15311 This categorical exemption cannot be employed because this exemption requires consideration of where the proposed project is to be located as the project has the potential for significant impact on this particularly sensitive river sub-watershed riverine historic wetlands culturally significant bird and wildlife sensitive habitat corridor as well as topographical changes and significant changes of expansion of use beyond the time of the lead agency's determination. Pursuit of development as proposed will cause hazardous or impacts of critical concern and the project should not be exempt.

### **Cultural & Historic Resources**

The equestrian trail is part of the culturally significant equestrian lifestyle dating from the 1700s and Spanish and 1800's Rancho periods in California History dedicated in 1947 and the MND fails to identify or evaluate impacts to this resource. The culture requires low density with access to the river open spaces and regional trail system that is a critical mobility corridor between the communities. This location is a culturally significant location and development of this open space in any manner will

cause negative consequence to the equestrian communities to the south, north and in the region.

Sara Bixby Smith often spoke of how the rancho horses were kept by the river and horses live still live and travel these lands to this day.

Despite centuries of equestrian history at this specific site and vicinity, the City of Long Beach continues to methodically whittle away at the critical trails, zones and habitat necessary for the local resident stakeholder horses who have no voice in this process with a need for safe trails and open space buffers that these animals require for their habitat and needs that CEQA law mandates be evaluated – there is no distinction between “wild or domesticated” animals.

LUE in 2020 stating that the “Wrigley Heights Equestrian zone is to remain” and the trail is a culturally significant feature and adjacent to the proposed site.

## Biological Resources

**Will the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?**

**YES - Potentially Significant Impact** to plant and animals communities and so it needs further evaluation in reference to the loss of open space habitat.

This site has been allowed to go fallow, back to a natural vegetative state longer than it was “oil commercial operations” and to remove the additional restorative habitat opportunity has a cumulative impact on all species who depend on the corridor for foraging, nesting, shelter, and hunting. It has a cumulative impact on the survival of the eco-system on this property, adjoining river lands and within the Dominguez Gap, Wrigley Greenbelt and south past the Willow Street Bridge. Audubon has logged 216 known species of birds in the vicinity through recent years, including endangered and watched species such as Bells Vireo, and Burrowing owls.

This location is critical to a much larger regional habitat in the alluvial flood plain of the Los Angeles River from the 1800s to present day has experience dramatic alterations and must be evaluated properly through EIR and various other processes that the MND does not begin to address with respect to permanent negative impact that this project will have on the entire wildlife corridor.

**Have a substantial adverse effect on any riparian habitat or other sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?**

**YES - THIS WILL HAVE AN IMPACT** – This land is part of a larger vision to restore linear greenbelts and open spaces along the river corridor that provide for hunting, foraging, nesting grounds, home to species of rodents and small mammals, rest stops for migratory, coastal and protected birds such as Eagles observed during migration from Catalina to Big Bear for nesting. This parcel is part of a linear biological corridor with multi-use recreation and cultural significance that must be reviewed in an “in-the-whole” manner as it relates to the larger resource and other projects in the vicinity as per vision of AB530 Lower Los Angeles River Master Plan, and further by the Department of Fish and Wildlife, and in respect to any sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Department of Fish and Wildlife.

**Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

**YES - This will have Potentially Significant Impact.** It is a major migratory bird and wildlife corridor that has been dramatically impacted by man-made encroachments such as this project and the levees and channelization and needs further EIR review.

**Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved State, regional, or local habitat conservation plan?**

**YES** - The idea that it is not considered as habitat by the City of Long Beach is disturbing given the history of this as habitat for many migratory bird species, sea birds, watched and endangered species – further EIR review is needed.

**Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?**

**Potentially Significant Impact.** CEQA Guidelines Section 15064.5 defines a historic resource – and this location and its’ proximity to the historic trail, rancho land uses should be further reviewed for determination to be eligible for listing in the California Register of Historical Resources; any .....site, area, place, ....to be historically significant or significant in the ...economic, agricultural, educational, social, ....cultural annals of California may be considered an historical resource,....supported by substantial evidence in light of the whole record. Generally, a resource shall be considered “historically significant” by the lead agency if the resource meets the criteria for listing on the California Register of Historical Resources. Additional analysis is required to determine if the site contains any features with historic significance.

## Hydrology and Water Quality

*This location is part of a sub-watershed has been part of a receiving basin for overland run-off that is not diverted into storm drain pipes as well as a contributor to overland run-off downstream. The topography, due to the natural slope toward the lower elevation of the river land to the west directs run-off and combines with the natural swales that flow north to south along the trail and lands adjacent to the east levee of the LA River. In addition it is documented that there is a north to south flow that runs along the greenbelt lands contributing to known flooding conditions documented downstream. These existing conditions and any proposed alterations to the site and infra-structure lacking or sub-standard requires further evaluation by multiple agencies responsible for NPDES and MS4 permits. These low lands do not have substantial or in most cases any storm drain pipes existing and are not sufficient to tie into from the blue line crossing to the north, south to the Wrigley Greenbelt SD6 pump station on the east side of the east levee of the LA River.*

*The practice to allow run off to divert overland was fine when there was no levee and a large alluvial plain to absorb and when there was lower overall density when the storm drain pipes and infra-structures were built in the 1930s,40s and 50s – but that is no longer the case. There has been increased density since the 1930s that the same storm drains are serving and this project will cause cumulative negative impact to an already over-burdened and known sub-standard storm drain infrastructure. (See Carollo Engineering Report 2016 – City of Long Beach for details on sub-standard storm drain systems in the vicinity).*

*Adding this type of density or any development that will reduce permeable space and without significantly upgrading the system the project will tie into all the way to SD6 at Willow will contribute to significant potential for downstream flood impacts including overland run-off and allows for Title 22, VOCs and toxins to travel to other lands and into the waterway with possible CWA 1972 violations.*

A recent report produced by Hydrologist Hrodmdka – “Records indicate that the City of Long Beach has been subject to historic flooding, even before 1981. A report titled “A History of Significant Weather Events in Southern California” by the National Weather Service indicates that large areas of Long Beach were inundated in February 1927. Additionally, a USGS Report, Water Supply Paper 426, titled “Southern California Floods of January, 1916” by H. D. McGlashan and F. C. Ebert states “There were heavy floods on Los Angeles and San Gabriel river in 1825, 1833, 1862, 1867, 1884, 1886, 1889, 1890, 1911, and 1914, and it is said that serious floods occurred also in 1842, 1852, and 1874.” Specifically, an article by Beachcomber states “The Long Beach area was constantly hit by hard storms and flooding particularly in 1862, 1867, 1873, 1884, 1891, 1911, 1913 and 1914.” and that “In 1938, the heavy rain storms... again took their toll on Long Beach.”

Long Beach had significant storm events in the 1980s, 1995, 2000 and evidence of overland un-controlled run off in this sub-watershed in 2014, 2016, 2017, 2019.

This project should require an EIR as it will require the further assessment by any all all agencies such as LA Regional Water Quality Board, City of Long Beach Storm Drain Divison, LACFCD, USACE for any

alternation along this reach of the LA River sub-watershed from the blue line to Willow between the east levee of the LA River to the first up-land points of connection for City and County flood control pipes and pump systems upstream and within this sub-watershed to determine capacities, load, and for BMP's with respect to mitigation for existing and future flooding impacts within the entire sub-watershed and downstream.

**Urbanization of the City of Long Beach Decreased Flood Risk: Natural and Historic Topography** - Review of the USGS 1896 Topographic Map for the Downey Quadrangle shows that the land.....is located in a historic flow path through which runoff from the surrounding area would drain and there is INCREASED FLOOD RISK.

The "Recreation Park and Open Space Standards and Guidelines"

outlines issues Page 19, Section 2.1 – Increasing Urbanization and Urban Run off, Piecemeal Planning, Altered Hydrology and more to be considered in this type of planning. Lawler v LACFCD and City of Long Beach and Grayley v LACFCD and City of Long Beach case history also further emphasizes the need for evaluation of storm water run-off in this sub-watershed to evaluate all items related to flood control, water quality, hydrology, erosion, soils and toxin transfer from the known and potential impacts and increases in overland flow in this sub-watershed before any alteration, project or construction commences thereby further EIR review on this subject is required.

## Aesthetics

Encroachment of construction right up to the river parcels is not protecting the scenic and natural features within this one mile zone of the river and not in line with the vision of AB530 and linear river revitalization and respecting "established" communities.

On a local scale, the Long Beach General Plan Urban Design Element designates the Los Angeles River as a scenic route as it provides a viewshed that is worthy of protection and enhancement, and also serves as a non-motorized trail.

This development does have potential to be visible from the Los Angeles River trail, and views of the proposed project **WILL NOT BE similar to current views** available from this trail along the Los Angeles River, **IT WILL substantially alter the existing and scenic opportunity for enhanced natural views** along the Los Angeles River Historic Equestrian bridle/hiking trail that was dedicated in 1947. The Long Beach General Plan fails to sufficiently recognize in the Plan Historic Preservation Element, that the project DOES impact historic resources, the trail resource recognized in 1947, in the LUE in 2020 and many local, regional state and federal documents and therefore should be eligible or designated as a historic resource under the

National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register). As such, those feature require further analysis.

There will be additional glare and light impact to the river environmental habitat and 1 mile zone as identified in the LA River Master plan and needs further analysis with respect to the impact on wildlife in the EIR due to the height variances requested and location of the building.

## **Air Quality**

The higher density, more traffic, more congestion will contribute significantly to reduced air quality in this “diesel death zone” and the “significant impact” needs further analysis.

**Expose sensitive receptors to substantial pollutant concentrations** – potential significant impact that needs further analysis.

### **Geology and Soils - Directly or indirectly cause potential substantial iii) Seismic-related ground failure, including liquefaction and lateral spreading?**

This site is in a liquefaction zone, see attached map and further analysis is required.

**b) Result in substantial soil erosion or the loss of topsoil?** There is plenty of evidence to show that soil erosion, loss of top soil and impacts from construction would be SIGNIFICANT IMPACT and mitigation measure and further review in the EIR is required. “The existing soils and exposed soils subject to rainfall and wind, thereby potentially resulting in soil erosion and as part of the plan check requirements, the Project would be required to have a stormwater management program, including a Storm Water Pollution Prevention Plan (SWPPP)” – that review must take into consideration the overland run-off and flood history in the sub-watershed, recent case history and documentation of the sub-standard piping and aging infrastructure known within this sub-watershed.

It also the EIR needs to evaluate in comparison to the Long Beach RiverPark Residential Project **IS-36** City of Long Beach Initial Study February 2021 and pursuant to NPDES permit requirements. As part of the SWPPP, BMPs would be implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible.

FURTHER EIR REVIEW IS REQUIRED TO MITIGATE FOR THE POTENTIAL IMPACTS THAT INCLUDE Title 22, 1972 Clean Water Act and 1999 Maintenance and Use Agreement obligations by City of Long Beach and LACFCD as local and district operators.



**c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, and drainages) or waters of the United States or California, as defined by § 404 of the federal Clean Water Act or California Fish & Wildlife code § 1600, et seq. through direct removal, filling, hydrological**

This is within the boundaries of a navigable waterway as determined by the USEPA and is known to be historic marsh and wetland habitat that should be evaluated for restoration, mitigation and impact through an EIR.

**RECREATION** – Reduces and will cause negative impacts for the necessary buffers needed within the equestrian zone and historic trail network adjacent to the proposed project and the proposed height variance that should be denied for this location. It does not comply with the with the 2020 Lower Los Angeles River Revitalization – LA RIVER MASTER Plan 1.2 Improve safety, 2.1 Improve conditions of facilities (reduces open space)....recreation programs & facilities will be designed to serve a lifetime user through passive and education experiences (the reduced open space, historic recreational uses in-the-whole as a result of this proposed project will contribute to extreme cumulative negative impact on the fragile balance of user groups needs between equestrian, pedestrian and biking that will also compound habitat and restorative objectives..

2.2 Establish lifetime use opportunities

## Land Use and Planning

**Oppose the 1.** Zone Change to CS and height variance as it is non-compatible with the open space and adjacent residential and negatively impacts the historic trail that has not been considered in the MND.

This project has not complied with: Public Works Development Guidelines: July 18, 2019

“PW reviews a project for conformance with numerous factors encompassing nearly all aspects of a project outside of the property line and within public right-of-way. This includes, but is not limited to:

City Master Plans, Public right-of-way standards, subdivision requirements, drainage, water quality, traffic control, traffic circulation, safety, accessibility, mobility, easements or land use concerns, existing conditions, and constructability”

Sample of master plans, guidelines and reports and entities this PROJECT IS NON-CONFORMING WITH and/or need to be consulted with and therefore an EIR not MND is necessary.

1947 Trail Preservation & Map Legislation, LA County & City of Long Beach

1963 CA Dept of Fish & Game, Inventoried Natural Communities (Table 1)

1965 Regional Recreation Parks Plan

1968 City of Los Angeles General Plan

1968 Master Plan of Riding & Hiking Trails Plan, City of Los Angeles “Integrated Recreation Corridors Plan”

1968 National Trails System Act

1970 Open Space Lands Act

1970 Environmental Development Guide LA County

1972 Coastal Act

1972 Clean Water Act (CWA) 401

1972 Significant Ecological Report – University of Los Angeles, LA County Natural History Museum

1973 Open Space Element – City of Los Angeles

1973 West Long Beach Recreation Park (County of Los Angeles Plan)

1973 General Plan of Los Angeles County

1974 Munzian System “Munz” Classification of Biotic Communities

1977 EIR Proposed Horse Overlay Zone, City of Long Beach

1976 Land Capability/Suitability Study

1976 Ecological Study – LA County

1984 California Wilderness Act of 1984, State of CA

- 
- 1990 Open Space Standards and Guidelines, The National Recreation and Park Association
- 1990 Rim of the Valley Corridor Plan, Santa Monica Conservancy
- 1991 Guide to Existing & Potential Equestrian Trails
- 1991 Southern California Water Trends, Knowles-Avery Land Company
- 1993 Mitch & Gosselink Hydrology
- 1994 Water Quality Control Board – Control Plan
- 1994 - 1995 Basin Plan – Hydrological Units Chart
- 1996 LA River Master Plan
- 1998 Preserving California's Natural Heritage, a bioregional guide to land and water conservation, The Resources Agency of California
- 1999 Memorandum from Wildlife corridor Conservation Authority, Wildlife Corridor Conservation Authority
- 1999 The Economic Benefits of Parks and Open Space – How Land Conservation Helps Communities Grow Smart and Protect the Bottom Line, The Trust For Public Land
- 1999 US Army Corps of Engineers (USACE) "District" & LA County Flood Control District (LACFCD) "Local Operator" MAINTENANCE AND USE AGREEMENT
- 2000 Dominguez Watershed Management Master Plan
- 2000 Wetlands of the Los Angeles River Watershed-Profiles and Restoration Opportunities, Coastal Conservancy
- 2000 Guidelines for Assessing the Effects of Proposed Projects on Rare Threatened & Endangered Plants & Natural Communities, CA Dept of Fish and Game
- 2000 Guidelines for Determining Flood Hazards on Alluvial Fans, FEMA
- 2000 Los Angeles County Significant Ecological Area Update Study
- 2001 Common Ground-from the Mountains to the Sea,

- 2002 Open Space and Recreation Element, City of Long Beach
- 2003 Linkages in the Landscape The Roles of Corridors and Connectivity in Wildlife Conservation, IUCN-The World Conservation Union
- 2003 Strategic Conservation Investments, Revised Methodology, CA Resources Agency
- 2003-2006 Riverlink Plan, City of Long Beach
- July 13 2005 BASIN 6 – Long Beach Stormwater Management System
- 2006 Open Space Management Plan
- 2006 LA River Master Plan, County of Los Angeles
- 2006 Integrated Regional Water Management Plan
- 2006 Vegetation Classification the Santa Monica Mountains National Recreation Area & Environs in Ventura & LA Counties, Version 1 Association Level and Specific Alliances, CA Dept of Fish and Game
- 2007 Green Building Incentives that Work: A Look at How Local Governments are Incentivizing Local Development, National Association of Industrial and Office Properties
- 2008 Best Management Practices for Wildlife Corridors, Beier, Newell and Grading
- 2010 California Essential Habitat Connectivity Project – CALTRANS & CADFG
- 2010 Federal Water Act
- 2010 Development Services, City of Long Beach Technical Map
- 2011 Americas Great Outdoors Initiative – Federal NPS, Dept of Interior
- 2013 LA Basin Conservation Study – Partnership with US Bureau of Reclamation & LA County Flood Control District (LACFCD)
- Climate Change Handbook
- 2014 Water Quality Supply & Infrastructure Improvement Act (Prop 1)
- 2015 Wrigley Greenbelt Agreement LACo & City of Long Beach

2016 Frank Gehry – Independent Data Driven Study of the LA River

2019 Stormwater Environmental Compliance Division PW city of Long Beach “To support Clean Water Act (CWA) 1972

2016 - 2020 LUE – General Plan- “Wrigley Heights Equestrian Zone will remain (the historic bridle trail runs through this zone)

2016 AB530 - Lower Los Angeles River Revitalization Bill (LLARRP), Anthony Rendon, State of CA

2020 Lower Los Angeles River Revitalization – LA RIVER MASTER Plan

2020 City of Los Angeles General Plan Open Space Element

June 2020 Episodic Riverine CRAM

CRAM – California Rapid Assessment Method (index for Wetlands)

WWRAPP - Wetland & Riparian Area Protection Policy

Title 33 , Part 208 FLOOD CONTROL REGULATIONS – Navigation & Navigable Waters – Chapter II Corps of Engineers, Dept of the Army

City of Long Beach Tree Policy

Coastal Tree Policy

Public Trust Doctrine

Integrated Regional Water Management Plan – Greater Los Angeles Region

Storm Water Best Management Practices

A95 Federal Grant Review

Government Code Section 6590-65912 - Open Space Sale of Properties

Government Code Section 65302 Technical Report

State Planning & Zoning Law Section 34211.1

Government Code – Seismic Safety, Noise, Scenic Highways & Safety Elements

Porter Cologne Water Control Act

Dept Fish & Game Code 1602

North American Waterfowl Management Plan

North American Wetlands Conservation Act

Riparian Habitat J.V.

Zoning Ordinance 1494

SB 1374 Lower LA Parks District, Senator Lara

Santa Barbara County General Plan – The Preservation of Natural Diversity, A Survey & Recommendations by “The Nature Conservancy”

Alternative 20 – The Ecosystem

Reducing Zinc in Industrial Stormwater, Oregon Dept of Environmental Quality

Zinc in Stormwater: Galvanizing Business Solutions, Northwest Pollution Prevention Resource Center

Reducing Copper in Industrial Stormwater, Oregon Department of Environmental Quality

Industrial Stormwater Best Management Practices, Oregon Department of Environmental Quality

Development Services Process as outlined 4/23/2019: This project is non-compliant with

”1.2 Development Process Overview Development projects start with the City’s Development Services (DV) Department. ....to ensure compliance with zoning, environmental and land planning laws and codes and compatibility with the community and surrounding neighborhoods. PW works closely with DV to ensure compatibility with existing public infrastructure by issuing conditions during the entitlement process “

It is not compatible with the surrounding neighborhood, it does not recognize or address any impact to the added users crossing the historic equestrian trail at that location, removal of some of the trail easements at that location and the encroachment of the habitat and trails and river open spaces high density uses will create.

NOTE: Development Services Process: 2.2.3 PW THE FOLLOWING CONFORMANCE REVIEWS NEED TO STILL BE COMPLETED:

- Conformance with City records

- Consistency with adjacent City/ Private project
  - Conformance with Street Master Plans as defined by the mobility element  
[http://www.lbds.info/mobility\\_element/default.asp](http://www.lbds.info/mobility_element/default.asp) EQUITY NEEDS TO BE REVIEWED FOR SOCIAL JUSTICE EQUITY FOR THE CONNECTIVITY BETWEEN THESE HORSE ZONES ON THE HORSE TRAIL
- Conformance with existing easements and agreements that effect the property
- Conformance with Subdivision Map Act requirements <http://californiasurveyors.org/members/1980%20SMA.pdf>

TRAFFIC REVIEW TEAM • Review traffic capacity of adjacent streets

- Conformance with mitigation measures called for within the traffic study
- Conformance of ingress from and egress to the adjacent ROW
- Review on site traffic circulation
- Conformance with bicycle master plan [http://www.lbds.info/bicycle\\_master\\_plan.asp](http://www.lbds.info/bicycle_master_plan.asp)
- Conformance with traffic signal, and striping standards <http://www.longbeach.gov/pw/resources/engineering/standard-plans/>
- Conformance with mobility standards <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4112>
- Coordination with Long Beach Transit as applicable

Development Services guidelines needs to be included in the study:

6.3 Traffic Impact Analysis (TIA) Guidelines TRIP GENERATION: For any development, new passenger vehicle trips, pass-by trips and internal capture (if any) should be estimated using the rates and methodologies outlined in ITE Trip Generation Manual, latest edition. Land-Use code and rates should be confirmed with Traffic Engineering.

CIVIL REVIEW TEAM need to ensure:

- Conformance with City standard plans <http://www.longbeach.gov/pw/resources/engineering/standard-plans/>
- Conformance with street moratoriums <http://www.longbeach.gov/pw/resources/engineering/utility-coordinationcorner/>
- Conformance with Pedestrian Accessibility Guidelines <http://www.longbeach.gov/pw/resources/> • Compliance with storm drain master plan <http://www.longbeach.gov/PW/Resources/Stormwater-Management/LB-Stormwater-Plan/> AND <http://www.longbeach.gov/pw/resources/stormwatermanagement/best-practices/>
- Protection and compatibility of existing public facilities.

- Conformance with Street Tree standards [http://www. longbeach.gov/pw/services/ street-trees/](http://www.longbeach.gov/pw/services/street-trees/)
- Coordination with Long Beach Water and Energy Resources departments as applicable
- Assist with coordination with interested agencies or utility companies\* (e.g. Caltrans, MTA, LA Flood Control, SCE, or City Light and Power)

There are other public agencies that will require further coordination as per City of Long Beach Development Services Guidelines: “\*Applicant is responsible for coordination with other utilities and public agencies. Each reviewer shall prepare draft conditions of approval which shall be compiled by PW staff, reviewed by a manager, any concerns addressed, and delivered back to the Planner for inclusion with the other stakeholder conditions. The entire process from receipt of application to delivery of draft conditions should take approximately 15 days.”

## Recreation

It will be a potentially significant impact to disrupt the safe horse trail connectivity and experience for the equestrian community by the reckless addition from this dense development by way of more crossing and merger hazard over and on the historic horse trail, not even mentioned in the IS. The cumulative increase in volumes of added users since 1947 without sufficient signage, education, trail separation and buffers needs to be further evaluated in an EIR – and as suggested in the County Trails Manual, LA River Master Plan, NPS Federal and State recognized guidelines for separation of trail user groups and buffer zones in all cases where the land space allows to maintain SAFE trails and connections. There needs to be a mitigation plan to maintain safe recreation and trail connectivity for the horse/bridle trail which serves as the critical mobility corridor for the equestrian community – it needs to be for social justice equal to the linear trails available to the bike or walking community of users.

70+ acres is a vast difference than 5 acres here or 11 acres there when looking at the context of the linear continuity of habit, recreation, open space, cultural and historic needs that these lands serve. To develop vast acres of open land, comprised of this and adjacent parcels needs further evaluation and not this project should be the decision.

The County has stated they will keep their promises for the portion of RIVER land outside the channel for parkland when it SHOULD BE KEPT THAT WAY ANYWAY. It is like dangling a carrot when the whole bunch is what should be preserved. It is pitiful from the agency supposed to be embracing the concept of collaboration in planning within the 1 mile zone along the sensitive river environmental corridor. It is not a compromise, nor is the developers offer of 5 acres sufficient open space buffer to mitigate the cumulative loss development of these lands would create.

## Tribal Cultural Resources

There will be potentially significant impact for the native Tongva who must be allowed to be involved in this process due to the high potential the site will contain burial and artifact finds.



## Utilities and Service Systems

This is a potentially significant impact and further analysis of the load capacity for the known undersized storm drains, use of overland "BASINS" in lieu of storm drain pipes as well as other utilities, fresh water needs, police, fire, EMS service the project plans to tie into need to be further evaluated.

Please uphold the appeals.

Thank you.

Sincerely,

Renee Lawler

562-433-0757

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**Executive Director**

Kathryn Miles



April 7, 2021

The Honorable Dr. Robert Garcia, Mayor  
& Members of the City Council  
City of Long Beach

Via: Email

RE: Long Beach Convention Center as temporary housing for  
migrant children

Dear Mayor Garcia and Members of the City Council,

The Board of Directors of Jewish Family & Children's Service of Long Beach (JFCS) wholeheartedly supports the city's decision to provide temporary housing in Long Beach for migrant children who are in the process of family reunification as requested by the US Dept. of Health and Human Services.

The mission of JFCS of Long Beach is to empower people to make positive life changes through professional, affordable counseling and support. Our agency has a long, rich history of helping children to cope with uncertainty and change, regardless of religion, race, socioeconomic status, or immigration status.

We stand with you and all supporters of this impactful act of humanitarianism.

Sincerely,

*Norma Stein*

Norma Stein  
President  
JFCS Board of Directors

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**216** Species 1722 Checklists

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	SPECIES NAME	COUNT	DATE	BY
1	Blue-winged Teal	2	16 Sep 2017	Jesse Ros s
2	Cinnamon Teal	90	16 Sep 2017	Jesse Ros s
3	Gadwall	6	16 Sep 2017	Jesse Ros s
4	Mallard	55	16 Sep 2017	Jesse Ros s
5	Pied-billed Grebe	1	16 Sep 2017	Jesse Ros s
6	Double-crested Cormorant	3	16 Sep 2017	Jesse Ros s
7	Great Egret	1	16 Sep 2017	Jesse Ros s
8	Snowy Egret	1	16 Sep 2017	Jesse Ros s
9	Black-crowned Night-Heron	8	16 Sep 2017	Jesse Ros s
10	Osprey	1	16 Sep 2017	Jesse Ros s
11	Cooper's Hawk	1	16 Sep 2017	Jesse Ros s
12	Red-shouldered Hawk	2	16 Sep 2017	Jesse Ros s
13	Red-tailed Hawk	1	16 Sep 2017	Jesse Ros s



### Recent Visits

Checklists submitted within the last hour are not shown.

OBSERVER	DATE	SPECIES
Jesse Ros s	16 Sep 2017	38
Anonymous eBirder	14 Sep 2017	5
Ed Stonick	11 Sep 2017	40
Ron Cyger	11 Sep 2017	33
Jim Moore	11 Sep 2017	45
Judy Mats uoka	11 Sep 2017	45
Southwest Bird Study Club	11 Sep 2017	48
Amy Wore ll	11 Sep 2017	36
Judy How ell	11 Sep 2017	29
Thomas H nnebusch	11 Sep 2017	41

[More Recent Visits...](#)

	SPECIES NAME	COUNT	DATE	BY
14	Common Gallinule	2	16 Sep 2017	Jesse Ros s
15	American Coot	40	16 Sep 2017	Jesse Ros s
16	Black-necked Stilt	230	16 Sep 2017	Jesse Ros s
17	American Avocet	76	16 Sep 2017	Jesse Ros s
18	Semipalmated Plover	2	16 Sep 2017	Jesse Ros s
19	Killdeer	2	16 Sep 2017	Jesse Ros s
20	Least Sandpiper	25	16 Sep 2017	Jesse Ros s
21	Western Sandpiper	55	16 Sep 2017	Jesse Ros s
	Short-billed/Long-billed Dowitcher	110	16 Sep 2017	Jesse Ros s
22	Spotted Sandpiper	2	16 Sep 2017	Jesse Ros s
23	Ring-billed Gull	4	16 Sep 2017	Jesse Ros s
24	Western Gull	80	16 Sep 2017	Jesse Ros s
25	California Gull	40	16 Sep 2017	Jesse Ros s
26	Mourning Dove	1	16 Sep 2017	Jesse Ros s
27	Vaux's Swift	4	16 Sep 2017	Jesse Ros s
28	Anna's Hummingbird	1	16 Sep 2017	Jesse Ros s
29	Yellow-chevroned Parakeet	2	16 Sep 2017	Jesse Ros s
30	Black Phoebe	1	16 Sep 2017	Jesse Ros s
31	American Crow	9	16 Sep 2017	Jesse Ros s
32	Common Raven	2	16 Sep 2017	Jesse Ros s

## Top eBirders

BY SPECIES | BY CHECKLISTS

1	Jon Fisher	153
2	Becky Turl ey	143
3	Kimball Ga rrett	135
4	Tracy Drak e	126
5	David Bell	125
5	Mark Sche el	125
5	Ed Griffin	125
8	Steve Morr is	124
9	Manuel Du ran	119
10	Janet Sche el	116

	SPECIES NAME	COUNT	DATE	BY
33	European Starling	2	16 Sep 2017	Jesse Ross
34	Common Yellowthroat	1	16 Sep 2017	Jesse Ross
35	Song Sparrow	3	16 Sep 2017	Jesse Ross
36	California Towhee	2	16 Sep 2017	Jesse Ross
37	Red-winged Blackbird	35	16 Sep 2017	Jesse Ross
38	House Sparrow	2	16 Sep 2017	Jesse Ross
39	Turkey Vulture	2	14 Sep 2017	Anonymous eBirder
40	Northern Shoveler	2	11 Sep 2017	Ed Stonick
41	American Wigeon	2	11 Sep 2017	Ed Stonick
42	Green-winged Teal	4	11 Sep 2017	Ed Stonick
43	Ruddy Duck	1	11 Sep 2017	Ed Stonick
44	Great Blue Heron	4	11 Sep 2017	Ed Stonick
45	Green Heron	1	11 Sep 2017	Ed Stonick
46	White-faced Ibis	1	11 Sep 2017	Ed Stonick
	peep sp.	60	11 Sep 2017	Ed Stonick
47	Red-necked Phalarope	1	11 Sep 2017	Ed Stonick
48	Greater Yellowlegs	14	11 Sep 2017	Ed Stonick
49	Lesser Yellowlegs	2	11 Sep 2017	Ed Stonick
50	Caspian Tern	2	11 Sep 2017	Ed Stonick
51	Rock Pigeon	6	11 Sep 2017	Ed Stonick
52	Eurasian Collared-Dove	1	11 Sep 2017	Ed Stonick
53	Peregrine Falcon	2	11 Sep 2017	Ed Stonick
		1	11 Sep 2017	Ed Stonick

	SPECIES NAME	COUNT	DATE	BY
54	Cassin's Kingbird	1		
55	Hooded Oriole	1	11 Sep 2017	Ed Stonick
56	Short-billed Dowitcher	2	11 Sep 2017	Ron Cyger
57	Long-billed Dowitcher	2	11 Sep 2017	Ron Cyger
58	Solitary Sandpiper	1	11 Sep 2017	Ron Cyger
59	Allen's Hummingbird	1	11 Sep 2017	Ron Cyger
60	Northern Flicker	1	11 Sep 2017	Ron Cyger
61	Scaly-breasted Munia	1	11 Sep 2017	Ron Cyger
62	Band-tailed Pigeon	1	11 Sep 2017	Jim Moore
63	House Wren	1	11 Sep 2017	Jim Moore
64	Northern Mockingbird	1	11 Sep 2017	Jim Moore
65	Savannah Sparrow	2	11 Sep 2017	Jim Moore
	teal sp.	4	9 Sep 2017	Tracy Drake
	gull sp.	3	9 Sep 2017	Tracy Drake
66	Northern Red Bishop	1	9 Sep 2017	Tracy Drake
	Blue-winged/Cinnamon Teal	10	7 Sep 2017	Jonathan Feenstra
	Rufous/Allen's Hummingbird	1	7 Sep 2017	Jonathan Feenstra
67	Barn Swallow	3	7 Sep 2017	Jonathan Feenstra
68	Yellow Warbler	1	7 Sep 2017	Jonathan Feenstra
69	Yellow-headed Blackbird	1	7 Sep 2017	Jonathan Feenstra
70	Sora	1	4 Sep 2017	



	SPECIES NAME	COUNT	DATE	BY
				Larry Sch mahl
71	Wilson's Phalarope	1	4 Sep 2017	Becky Turl ey
72	Forster's Tern	8	4 Sep 2017	Larry Sch mahl
73	Tree Swallow	4	4 Sep 2017	Becky Turl ey
74	Bushtit	10	4 Sep 2017	Larry Sch mahl
75	Black-headed Grosbeak	2	4 Sep 2017	Larry Sch mahl
76	Canada Goose	8	3 Sep 2017	Donna Pfaf f
77	American Kestrel	1	3 Sep 2017	Donna Pfaf f
	swallow sp.	1	3 Sep 2017	Donna Pfaf f
78	Willet	1	2 Sep 2017	KeithEB Q uinlivan
79	Belted Kingfisher	1	27 Aug 2017	Naresh Sat yan
80	Ash-throated Flycatcher	1	27 Aug 2017	Naresh Sat yan
81	Cliff Swallow	1	27 Aug 2017	Naresh Sat yan
82	House Finch	6	27 Aug 2017	Naresh Sat yan
83	Long-tailed Duck	1	27 Aug 2017	Thomas Mi ko
84	Semipalmated Sandpiper	1	27 Aug 2017	Thomas Mi ko
	Greater/Lesser Yellowlegs	1	27 Aug 2017	Thomas Mi ko
85	Brown-headed Cowbird	1	27 Aug 2017	Jonathan F eenstra
	tern sp.	X	26 Aug 2017	Jonathan Drury
86	Brown Pelican	2	26 Aug 2017	lynda fenn eman

	SPECIES NAME	COUNT	DATE	BY
	Mallard (Domestic type)	3	26 Aug 2017	Larry Sch mahl
87	Western Kingbird	1	22 Aug 2017	Randy Ehl er
88	Orange-crowned Warbler	1	21 Aug 2017	Kim Moore
	blackbird sp.	12	20 Aug 2017	Tracy Drak e
89	Black Skimmer	2	20 Aug 2017	KeithEB Q uinlivan
90	Western Grebe	4	19 Aug 2017	Randy Ehl er
91	Black-bellied Plover	15	19 Aug 2017	Randy Ehl er
92	Royal Tern	4	19 Aug 2017	Randy Ehl er
93	Eared Grebe	1	18 Aug 2017	Chris Dean
94	California Scrub-Jay	1	16 Aug 2017	Steve Morr is
95	American Goldfinch	1	16 Aug 2017	Steve Morr is
96	Lazuli Bunting	1	16 Aug 2017	Steve Morr is
97	Brandt's Cormorant	1	16 Aug 2017	Tracy Drak e
	hummingbird sp.	3	15 Aug 2017	David Moo dy
	Spinus sp. (goldfinch sp.)	3	15 Aug 2017	David Moo dy
98	Northern Rough-winged Swallow	1	13 Aug 2017	Michael Lo ng
99	Lesser Goldfinch	2	13 Aug 2017	Tracy Drak e
100	Marbled Godwit	1	12 Aug 2017	Thomas Mi ko
101	Elegant Tern	1	12 Aug 2017	Thomas Mi ko
102	Cattle Egret	1	8 Aug 2017	Thomas Mi ko



	SPECIES NAME	COUNT	DATE	BY
103	Least Tern	1	8 Aug 2017	Thomas Miko
104	Bewick's Wren	1	5 Aug 2017	Ed Stonick
105	Acorn Woodpecker	1	5 Aug 2017	David Grant
106	Downy Woodpecker	1	5 Aug 2017	David Grant
107	Nuttall's Woodpecker	1	5 Aug 2017	Ella Pennington
108	Heermann's Gull	1	3 Aug 2017	Joshua Stone
109	White-throated Swift	1	30 Jul 2017	
110	Western Tanager	1	29 Jul 2017	Merryl Edelstein
111	Northern Pintail	1	29 Jul 2017	Janet Scheel
	large parakeet sp. (former Aratinga sp.)	1	27 Jul 2017	Chris Dean
	Western/Clark's Grebe	3	25 Jul 2017	Elias Zuniga
112	Red-breasted Merganser	1	24 Jul 2017	Philip Carnehl
113	Stilt Sandpiper	1	23 Jul 2017	Chris Dean
114	Spotted Towhee	2	23 Jul 2017	Judi Hwa
115	Wood Duck	1	18 Jul 2017	dessi sieburth
116	Bell's Vireo	1	9 Jul 2017	David Bell
117	Bonaparte's Gull	1	13 Jun 2017	Richard Barth
	cormorant sp.	8	9 Jun 2017	Elias Zuniga
118	Glaucous-winged Gull	1	4 Jun 2017	Richard Barth
119	Wilson's Warbler	1	14 May 2017	Tracy Drake
120	Say's Phoebe	1	11 May 2017	Thomas Miko

	SPECIES NAME	COUNT	DATE	BY
121	Warbling Vireo	2	4 May 2017	David Moody
122	Cedar Waxwing	13	4 May 2017	David Moody
123	Bullock's Oriole	4	4 May 2017	David Moody
124	Dunlin	15	29 Apr 2017	Andrew Lee
125	Great-tailed Grackle	1	29 Apr 2017	Greg Madrigal
126	Bufflehead	1	25 Apr 2017	Robert Hamilton
127	Herring Gull	1	17 Apr 2017	dessi sieburth
	Horned/Eared Grebe	1	15 Apr 2017	Becky Turlay
128	Whimbrel	1	15 Apr 2017	Becky Turlay
129	American Pipit	1	15 Apr 2017	David Bell
130	White-crowned Sparrow	6	15 Apr 2017	David Bell
131	Horned Grebe	1	14 Apr 2017	Tracy Drake
132	Yellow-rumped Warbler	1	9 Apr 2017	Janet Scheel
	Royal/Elegant Tern	1	9 Apr 2017	Merryl Edelstein
133	Lesser Scaup	1	9 Apr 2017	Jon Fisher
134	Pacific Loon	1	9 Apr 2017	Jon Fisher
	Sharp-shinned/Cooper's Hawk	1	22 Mar 2017	Chris Dean
	Western/Glaucous-winged Gull	1	22 Mar 2017	Chris Dean
135	Wilson's Snipe	1	15 Mar 2017	Philip Carnehl
136	Ring-necked Duck	1	10 Feb 2017	axel hellman
137	Northern Harrier	1	10 Feb 2017	

	SPECIES NAME	COUNT	DATE	BY
				axel hellm an
	Greater/Lesser Scaup	4	23 Jan 2017	Bernardo Alps
138	<b>Mew Gull</b>	1	23 Jan 2017	Bernardo Alps
	parrot sp.	1	23 Jan 2017	Bernardo Alps
139	<b>Golden-crowned Sparrow</b>	3	23 Jan 2017	Bernardo Alps
	Bullock's/Baltimore Oriole	1	23 Jan 2017	Bernardo Alps
140	<b>Iceland Gull</b>	1	6 Jan 2017	Kim Moore
141	<b>American White Pelican</b>	2	31 Dec 2016	Kathryn W endel
142	<b>Ruby-crowned Kinglet</b>	1	31 Dec 2016	Kathryn W endel
	Muscovy Duck (Domestic type)	1	22 Nov 2016	Claus Holz apfel
143	<b>Red-crowned Parrot</b>	3	22 Nov 2016	Claus Holz apfel
144	<b>Sharp-tailed Sandpiper</b>	1	21 Nov 2016	Ron Cyger
	passerine sp.	X	21 Nov 2016	Yonghee L ee
145	<b>Redhead</b>	2	20 Nov 2016	Neil Gilbert
146	<b>Marsh Wren</b>	1	20 Nov 2016	Neil Gilbert
147	<b>Long-billed Curlew</b>	1	20 Nov 2016	Donna Pfaf f
148	<b>Hutton's Vireo</b>	1	20 Nov 2016	Deven Ka mmerichs- Berke
149	<b>Brewer's Blackbird</b>	4	20 Nov 2016	Deven Ka mmerichs- Berke
150	<b>Lincoln's Sparrow</b>	1	19 Nov 2016	Jeff Bray
	sparrow sp.	1	17 Nov 2016	Thomas Hi nnebusch

### ***Special Status Plants***

Several federally and/or State-listed as Endangered plant species are known to occur in the project region. These species include: California Orcutt grass (*Orcuttia californica*), Gambel's water cress (*Nasturtium gambelii*), Lyon's pentachaeta (*Pentachaeta lyonii*), salt marsh bird's beak (*Chloropyron maritimum* ssp. *maritimum*), and Ventura Marsh milk-vetch (*Astragalus pycnostachyus* var. *lanosissimus*).

Several plant species considered CNPS CRPR List 1B species, which indicates that they are considered rare, threatened, or endangered within California by the CNPS, occur in the project region. Included in this category are species such as aphanisma (*Aphanisma blitoides*), Coulter's saltbush (*Atriplex coulteri*), Davidson's saltscale (*Atriplex serenana* var. *davidsonii*), southern tarplant (*Centromadia parryi* ssp. *australis*), Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*), prostrate vernal pool navarretia (*Navarretia prostrata*), coast woolly-heads (*Nemacaulis denudata* var. *denudata*), Brand's star phacelia (*Phacelia stellaris*), estuary seablite (*Suaeda esteroa*), San Bernardino aster (*Symphyotrichum defoliatum*). Impacts on these species may be considered significant if they are present within the impact footprint of the project, and if the size and status of the population warrant a finding of significance under the California Environmental Quality Act (CEQA).

There is no potentially suitable habitat for any of the species that are either federally or State-listed as Threatened or Endangered, or CNPS 1B on the project site. The project site is highly disturbed and does not contain any native soils or habitat. None of the species listed above are expected to occur on the project site. Additionally, no plant species otherwise considered special status are expected to occur on the project site.

### ***Special Status Wildlife***

Several special status wildlife species are known to occur in the project region; however, only Threatened or Endangered species typically present constraints to development. Twelve federally or State-listed Threatened or Endangered species are known to occur in the project region and include: bank swallow (*Riparia riparia*), Belding's savannah sparrow (*Passerculus sandwichensis beldingi*), California least tern (*Sterna antillarum browni*), coastal California gnatcatcher (*Poliophtila californica californica*), green sea turtle (*Chelonia mydas*), least Bell's vireo (*Vireo bellii pusillus*), light-footed clapper rail (*Rallus longirostris levipes*), Pacific pocket mouse (*Perognathus longimembris pacificus*), Palos Verdes blue butterfly (*Glaucopsyche lygdamus palosverdesensis*), Riverside fairy shrimp (*Streptocephalus woottoni*), western snowy plover (*Charadrius alexandrinus nivosus*), and western yellow-billed cuckoo (*Coccyzus americanus occidentalis*). The California least tern may potentially travel up the Los Angeles River and could potentially occur as a fly-over, but is not expected to use the site for foraging or breeding.

There is no potentially suitable habitat for any of the species that are federally or State-listed as Threatened or Endangered on the project site. The project site is highly disturbed and does not contain any natural habitat. None of the species listed above are expected to occur on the project site. Additionally, no wildlife species otherwise considered special status are expected to occur on the project site.

### **Other Issues**

#### ***Wildlife Movement***

The project site consists primarily of disturbed bare ground areas with scattered non-native ornamental vegetation. Wildlife species that currently use the project area are expected to be relatively tolerant and/or acclimated to the existing land uses on the project site. The proposed project includes transformation of currently fenced-off, disturbed areas into public space planted with equestrian amenities including a



pedestrian and equestrian trail. These areas are currently of low value to wildlife due to the overall lack of native vegetation and hard packed soils. Development would be similar to existing uses and would be located adjacent to already developed areas; therefore, it would not be expected to change wildlife movement patterns within the project site or the surrounding area.

### ***Migratory Bird Treaty Act***

The project site has the potential to support birds subject to the Migratory Bird Treaty Act (MBTA). The MBTA prohibits activities that result in the direct take (defined as killing or possession) of a migratory bird. This includes the nests of all native bird species, including common species such as mourning dove, Anna's hummingbird, and house finch. Nesting birds are also protected by Fish and Game Code. Nesting birds have potential to occur in vegetation throughout the project site.

### ***Nesting Raptors***

The larger, mature trees on or adjacent to the project site have the potential to be used for nesting by raptors. Regulations prohibit activities that "take, possess, or destroy" any raptor nest or egg (CDFG Code 3503, 3503.5, and 3513) or result in direct take (MBTA).

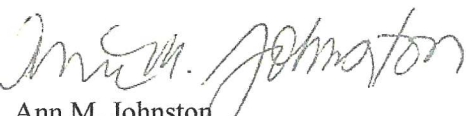
## **RECOMMENDATIONS**


The following is a list of recommendations to ensure that the project is consistent with regulations protecting biological resources:

1. A pre-construction survey for nesting birds is recommended within three days prior to the initiation of vegetation clearing or ground-disturbing activities during the bird nesting season (February 1 to August 31). If an active bird nest is observed, construction will be restricted within the immediate vicinity of the nest.
2. A pre-construction survey for nesting raptors is recommended within seven days prior to the initiation of vegetation clearing or ground-disturbing activities during the raptor nesting season (February 1 to June 30). If an active raptor nest is observed, construction will be restricted within the immediate vicinity of the nest.

Please contact Marc Blain at (626) 351-2000 if you have questions or comments.

Sincerely,  
**BonTerra Psomas**

  
Ann M. Johnston  
Vice President, Resource Management

  
Marc T. Blain  
Senior Project Manager

Enclosures:    Exhibit 1 –Regional Location  
                     Exhibit 2 – Local Vicinity  
                     Attachments A-1–A-4 – Representative Site Photographs

## COUNTY IN CRISIS

Los Angeles County is at a critical juncture in its history. For years, the county, with its many areas and communities, enjoyed a Mediterranean climate, mountains and beaches, ample job and business opportunities, and an informal way of life.

These and many other positive advantages have been offset more recently by staggering liabilities. A long-standing accumulation of mistakes in environmental planning and development has led to serious negative consequences—blight, congestion, pollution, economic decline and explosive social unrest.

We can't wait for the future to seek solutions to the environmental problems of today. Since ongoing events affect the physical, social and economic environment for years to come, the county must move quickly with positive plans and effective action.

# INTRODUCTION

## PROGRAM FOR ENVIRONMENTAL IMPROVEMENT

Los Angeles County and city governments have taken part in environmental planning for many years. But this involvement has been piecemeal and has lacked conviction. Most critically needed has been a bold, sustained effort to direct public and private resources toward environmental improvement.

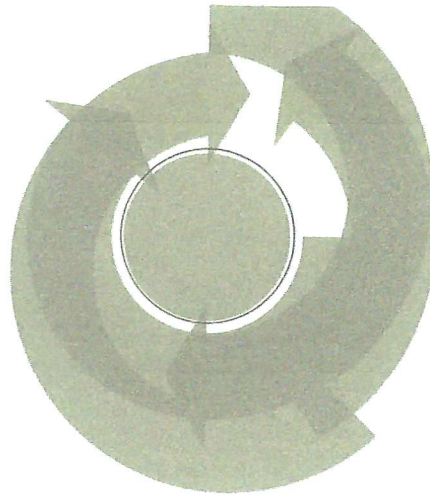
In August 1968, the county took a firm step in this direction when the Regional Planning Commission initiated the County General Plan Program. Diverting staff from other vital programs, the Commission embarked on a five-year, three-phase program aimed at producing an effective comprehensive general plan to improve the total environment—physical, social, economic and governmental—throughout the county.

The new program provides an action-oriented approach within a long-range planning framework. It emphasizes accomplishment of long term environmental goals through a coordinated series of high impact, short term programs in such high priority categories as housing, transportation, open space retention and public services.

Phase One has concentrated on a factual and analytic review of physical, social and economic conditions in Los Angeles County and how these conditions affect public policy. This report brings these results together. It relates broad social, physical, economic and governmental goals for the county and focuses on urgently needed adjustments in physical development policies and programs.

During Phase Two, analytical substance and policy review will be broadened and intensified. Special effort will be made to obtain widespread discussion and meaningful input by citizens and public officials. Groundwork will be laid in advance for effective implementation of the comprehensive general plan which is scheduled for preparation and adoption in Phase Three.

The *Environmental Development Guide* is a starting point in a process leading to a unified set of plans and programs geared to achieve full and equitable development of human and environmental resources. Success for the County General Plan Program will be measured by the degree to which a broad, representative range of groups and interests are consulted and by how their concerns are reflected in an effective follow-through effort.



LA CO

1970

environmental  
guide



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Arthur J. Baum, *vice-chairman*  
Mrs. L. S. Baca  
Louis Kanaster  
Owen H. Lewis  
Irma Ruther, *secretary to the commission*

Orville K. Christenson, *director*

Frederick J. Barlow, *deputy director*  
Edgar T. Irvine, *deputy director*  
Joseph K. Kennedy, *deputy director*

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Publication date—July 1, 1971  
Print date—February 1972





# CITY OF LONG BEACH

## DEPARTMENT OF PUBLIC WORKS

333 WEST OCEAN BOULEVARD • LONG BEACH, CA 90802 • (562) 570-6383 • FAX (562) 570-6012

May 23, 2017

**Mr. Ryan Butler**  
Civil Engineer  
Los Angeles County Public Works  
900 South Fremont Avenue  
Alhambra, CA 91803

**Re: Connection to Storm Water Inlet – Public Equestrian Rest Area**

Dear Mr. Butler,

Please be advised that your request to connect to the City of Long Beach storm drain has been denied.

We received your request to connect the proposed 18" ADS HP storm drain pipe into the city's storm water system at the intersection of Spring St. and San Francisco St.

During the recent rains, the City of Long Beach experienced flooding issues in multiple locations due to drainage deficiencies. The main problem is that our storm drain pipes are undersized. After reviewing your project, we found that the 60" main storm drain pipe in which you proposed to connect is undersized, therefore no connection is allowed as this time. (Please see attached exhibit).

→ However, if we upgrade the pipes later, you may re-submit your application for consideration in the future.

If you have further questions, please contact Christian Perez directly at (562) 570-6679 or by email at [Christian.perez@longbeach.gov](mailto:Christian.perez@longbeach.gov).

Regards,

Alvin Papa  
Assistant City Engineer  
City of Long Beach

FCD\_001273



From: Amir Ibrahim  
Sent time: 09/25/2017 10:54:52 AM  
To: Daniel B. Sharp; Paul Shadmani  
Subject: Fwd: PERA Drainage Resolution  
Attachments: image002.png

---

Is this response adequate for Keith's Meeting?

Begin forwarded message:

**From:** Amir Ibrahim <[AIBRAHIM@dpw.lacounty.gov](mailto:AIBRAHIM@dpw.lacounty.gov)>  
**Date:** September 22, 2017 at 4:58:27 PM PDT  
**To:** Keith Lilley <[KLILLEY@dpw.lacounty.gov](mailto:KLILLEY@dpw.lacounty.gov)>  
**Subject: Re: PERA Drainage Resolution**

Keith, please let me know if you want to discuss. Unfortunately it will have to be over the phone since I will be in training all week in San Luis Obispo.

On Sep 22, 2017, at 7:59 AM, Christopher Rave <[crave@dpw.lacounty.gov](mailto:crave@dpw.lacounty.gov)> wrote:

Good Morning Keith,

Please see a summary below of the drainage issues presented in the Public Equestrian Rest Area (PERA) project and solutions identified by DES staff to resolve these issues.

#### BACKGROUND

- Midblock resident complaint of 1' to 2' flooding on property during storms
- 5 acre area tributary to this area with a 50-year peak flow rate of 5.5 cfs
- Total volume through area during 50-year storm is 1 ac-ft
- Ultimate level of protection for design is for a 50-year storm event; 25-year protection yields a 15% reduction in peak flow rate, volume, and cost
- DES proposed a drain to collect runoff from the PERA and flow into nearby City of Long Beach 60" storm drain
- City of Long Beach's storm drain is undersized, and therefore LACDPW was denied permission by the City to connect the proposed drain to the City's storm drain
- City has a greenbelt project directly north and south of the PERA

#### SOLUTIONS

- Install a 2,700 LF 60" detention system beneath the PERA to detain the 50-year volume and discharge into the City drain via a controlled release valve during non-storm events
- An infiltration study completed by GMED in March 2017 reveals that infiltration is not a favorable option for this location due to an existing clay layer

The drainage issues within this reach will be alleviated with the proposed improvement. The finished surface of the PERA will be sloped away from the residents' properties to ensure that no stormwater will be conveyed onto the properties. Please keep in mind that these solutions will require substantial communication and coordination with the City.

We also looked at grading the PERA so surface runoff may continue to flow downstream into the City's greenbelt project and ultimately down to a nearby City-operated pump station. This option is not a fully reliable solution, as it may result in continued flooding on the City's downstream property. Further hydrologic investigation would be required to make the recommendation for this option.

Please let us know if further clarification on these solutions is needed.

<image002.png>

Chris Ravé, P.E.

FCD\_000866

From: Amir Ibrahim  
Sent time: 09/25/2017 10:54:52 AM  
To: Daniel B. Sharp; Paul Shadmani  
Subject: Fwd: PERA Drainage Resolution  
Attachments: image002.png

---

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**Date:** September 22, 2017 at 4:58:27 PM PDT  
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Please let us know if further clarification on these solutions is needed.

<image002.png>

Chris Ravé, P.E.

FCD\_000866



My name is Anne Dove, and I am planner with the National Park Service, which is a federal agency and my role with that agency is to work as a planner and primarily we work with communities and local government organizations and just anyone who's interested in working on natural resource conservation and outdoor recreation issues within their communities.

When the NPS has a pretty long history with the Los Angeles River. Back in the 1990s when the county was going through its Master plan process for the LA River, the National Park Service through the rivers trails and conservation assistance program which works in communities to help them achieve their goals for natural resource conservation and outdoor recreation worked with the county to bring together different stakeholders and interested entities to figure what is their vision for the river and what would they like to see in the future, we've worked on watershed management plans for some of the tributaries of the LA River, so we've worked on the Arroyo Seco, the Tujunga Wash, Compton Creek and more recently we've been working on the Northeast LA Riverfront Collaborative effort both through our rivers and trails program and in part with the president's America's great outdoors initiative which was looking at establishing 21st century agenda for conservation and recreation.

So the America's Great Outdoors initiative is really focusing on how to connect people and communities to the natural resources in where they live and provide more opportunities for communities to recreate in outdoor spaces close to where they live, as a part of that goal, the Secretary of Interior Ken Salazar met the governors of each state to identify priority projects for each state so for California the L.A. River trail was identified as one of the top two priorities in California largely because of the huge population base in L.A. and because of the amazing amount of momentum that had already been built around the L.A. River and connecting it to the surrounding communities better.

So specifically within the Northeast LA Riverfront Collaborative, we were asked to provide some support, advice, things like that around how to better provide connectivity between the communities adjacent to the LA River so that people are aware that it's there and that the river becomes part of their broader community identity. And also how to provide better physical connectivity so that those communities as well as those from outside the area can better access the river and use it as the regional resource that it is really envisioned to be.

I think that sense of identity and that sense of awareness of the river and sense of connection whether it is emotional connection or physical connection to the river will help in the long term facilitating some of those water resource and water quality goals by building awareness that if you dump something in front of your house, it is going to end up in the river. So I think all of these different objectives are really intertwined together and work together towards achieving that broader vision.

There are limited resources available, limited funding and there is a broader recognition that a lot of different issues are intertwined together. So by bringing together a broad range of stakeholders and groups to work around common goals and issues, not only can you come up with more creative solutions that can address multiple objectives at once but it is also a way to better pool resources.

It really seems that there is a desire to see the river better integrated and woven into the fabric so having a stronger visibility for the river, whether it is actually having visual access to the river or seeing things like directional signage or the types of things that could actually happen along the river reflected in the community is something folks would like to see. And really it is just a matter of how to convert the turning your back on the river into turning towards the river and embracing it. So instead of having businesses that are adjacent to the river

with their solid back walls against the river, you know what are some opportunities for turning those around so that they are more integrated into that resource.

**From:** Dayna Rothman  
**Sent time:** 11/19/2015 01:36:28 PM  
**To:** Terri Grant; Mark Lombos; Paul Shadmani; Alexandra Nguyen-Rivera; Olivia Moreno  
**Subject:** LA River - PERA - Call from John Mustafa

---

I received a call from John Mustafa. He apologized for not being at the meeting, but had an opportunity to speak to some of the homeowners and wanted to ensure he understood what was discussed at the meeting. He asked if a sale was out of the question. I said yes.

I explained the project, and confirmed that we were planning to grant the 12 foot easement to the owners for access to the back of their properties at no cost to the owners. He asked if the easement could be wider. I told him that we didnt think there would be any room to provide a wider easement, since we needed to have a 6 foot pedestrian path for connectivity from Spring to 31<sup>st</sup> street. He mentioned a drainage issue near Renee Lawlers property at Spring Street. I suggested that Renee be prepared to comment on that issue at the next meeting.

I reiterated that this project is moving forward and input from the residents was very important. He understood and intends to attend the next meeting.

We need to get meeting notices out early next week.

***Dayna Rothman, Head Real Estate***  
***Department of Public Works***  
***Survey/Mapping & Property Management Division***  
***(626) 458-7072 (Office)***  
***(626) 940-4954 (Mobile)***  
***(626) 979-5322 (Fax)***

Your feedback is important to us. Please take a minute to complete our Customer Feedback Form at <http://dwp.lacounty.gov/nc/survey/>

**CONFIDENTIALITY NOTICE:** This email message, including any attachments, from the Department of Public Works is intended for the official and confidential use of the recipients to whom it is addressed. It contains information that may be confidential, privileged, attorney work product, or otherwise exempted from disclosure under applicable law. If you have received this message in error, be advised that any review, disclosure, use, dissemination, distribution, or reproduction of this message or its contents is strictly prohibited. Please notify the sender of this email immediately by reply email that you have received this message in error, and immediately destroy this message, including any attachments. Thank you in advance for your cooperation.

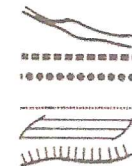
**FCD\_000777**





#### LEGEND

NEWPORT INGLEWOOD FAULT ZONE  
 DASHED WHERE INFERRED  
 DOTTED WHERE CONCEALED  
 PRE-QUATERNARY BURIED FAULTS  
 LIMITS OF RECENT FLOOD PLAINS  
 BOUNDARY OF TERRACE DEPOSITS



## FAULT MAP OF LONG BEACH

PLATE 10











**From:** Terri Grant  
**Sent time:** 11/03/2015 01:39:52 PM  
**To:** Mark Lombos; Cung Nguyen; Paul Shadmani  
**Subject:** RE: Thank you

---

That flooding issue is a good point. If we can address the drainage behind their homes to our project, we should include that in the presentation too.

---

**From:** Sziebl, Connie [mailto:CSziebl@lacbos.org]  
**Sent:** Tuesday, November 03, 2015 12:38 PM  
**To:** Moore, Julie; Terri Grant  
**Cc:** Mark Lombos; Cung Nguyen; Paul Shadmani  
**Subject:** Thank you

Hi-terri,

Thank you for arranging the conference call. I believe we were able to get much accomplished as we move forward with this issue. I appreciate your flexibility regarding the concerns we have about the schedule. I think once we begin the process, we will be able to tell if we can move at a little faster pace or not.

I am getting ready to forward the two flyers regarding the meeting on the 18<sup>th</sup>. That is all I will be emailing. Once you finish with the revised schedule, I will forward that document.


To DPW, I will send to Ara Malovan and Derek Wleske. When Derek contacted me after I wrote to Sean, Derek asked that I copy Dennis Jue the project manager in all my correspondence to them on this issue. I figure he might be a consultant since his e-mail address is not @longbeach.gov. Derek also copied Sean Crumby and George Kern. Who is George Kern, do any of you know? I take it you will send them the flyers.

To Parks Rec and Marine, I will e-mail Stephen Scott, the Acting Director and Valerie Davis his assistant. She knows eventually, should I copy Meredith Reynolds or will you copy her?

I will also be in touch with the City Manager's office.

So as soon as you tell me to whom I send the flyers - I do not want to step on your toes - I will send out my e-mail. Thanks.

Connie

 P.S. Do any of you remember if the City of Long Beach did any work on San Francisco Street to alleviate the flooding that takes place in the encroached area plus their garages during the rainy season? I understand it has been addressed. If anything, the flooding that might take place during this rainy season will play a major role in the design.

**From:** Daniel B. Sharp  
**Sent time:** 04/09/2016 04:23:10 PM  
**To:** Amir Ibrahim  
**Cc:** Terri Grant; Paul Shadmani  
**Subject:** Public Equestrian Rest Area - Request for assistance with drainage design

---

Hi Amir,

I'm not sure if you have heard of the Public Equestrian Rest Area project....it's about a 1-acre project in Long Beach that has been encroached upon for years by the adjacent residents. The plan is to remove the encroachments, add some equestrian amenities, and open the site to the public. This project has come about because the City of Long Beach is completing the Wrigley Greenbelt Project both north and south of this project location.

There have been local drainage issues at the location historically, and AED thought they could handle it with some simple re-grading. However, as they have gotten deeper into the design, we realize that the adjacent properties drain to the site so their proposed solution isn't workable.

We would like to have DES take a look and see if there are some reasonable solutions that don't involve pumps or a major new drain.

If that sounds reasonable, let us know who we should be working with on your staff and we will set a meeting to go over the specifics.

Let me know if you would rather have more info before we set up a larger meeting. Thanks. Dan.

---

**Daniel B. Sharp, P.E.**

Watershed Management Division  
County of Los Angeles Department of Public Works  
(826) 458-7153 office  
(826) 759-0355 mobile  
dsharp@dpuw.lacounty.gov

FCD\_000815

-----Original Message-----

From: candace lawrence [mailto:rence.claw@gmail.com]

Sent: Tuesday, April 13, 2021 8:23 PM

To: CityClerk <CityClerk@longbeach.gov>

Subject: I oppose Agenda Item #8 -- Build the River Park Instead!

-EXTERNAL-

Please register me as a citizen of District 8 who is disgusted by the possibility of transforming that beautiful piece of land by the LA River into a grimy concrete monstrosity of RV parking and junk storage.

Our kids need chlorophyll wafting through the air to combat the pollution of the three connecting freeways which have caused our asthma rates to skyrocket. And it's not just kids—I contracted asthma after I'd lived here for several years, with no family or behavioral history.

All of our local papers have come out in favor of a River Park instead of a parking lot. Surely you are not unaware of the signs everywhere that express our discontent with the proposed plan.

We are already far behind the other side of town on green space, but I can tell you that the home prices & property taxes in my neighborhood (VCC) are far higher than the real estate with the most park space. Why are we being punished? Is it because we're close to NLB? No neighborhood, rich or poor or medium, should be denied nature when it becomes available!

Candace Lawrence

District 8

Sent from my iPhone

**From:** corlisslee@aol.com [mailto:corlisslee@aol.com]

**Sent:** Tuesday, April 13, 2021 3:19 PM

**To:** Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; Council District 9 <District9@longbeach.gov>; Mayor <Mayor@longbeach.gov>; CityClerk <CityClerk@longbeach.gov>; City Manager <CityManager@longbeach.gov>

**Subject:** agenda item 8 council meeting 4/13/21 3701 Pacific Place

**-EXTERNAL-**

To City Clerk, - please include in comments to council members

I oppose approving the Mitigated Negative Declaration (MND) for 3701 Pacific Place, as well as the numerous entitlements including a general plan amendment, conditional use permit, site plan review, specific plan amendments, and a zone change with height increase.

The property is an old oil sump location that processed contaminants delivered to that location for over 20 years from oil wells all over the area. The pit is said to be 30 - 50 feet deep and the consistency of toothpaste. The soils reports show excessive contamination and unsafe conditions when the soil is disturbed. This area was a brownfield and determined not to be a buildable site in past investigations. The public deserves a full Environmental Impact Report (EIR) before any development. Additionally there are multiple issues with the MND that will be disclosed by the appellants in presentations at Council. The storm drain issues are compelling as well as multiple other CEQA (California Environmental Quality Act) substantive issues.

The community on the westside has suffered excessive pollution for years. They live in an area that has more people living with asthma, emergency dept visits for asthma symptoms, and deaths from asthma than 91% of census tracts throughout California (taken from CAL Enviroscreen website). This land is adjacent to the 405 and 710 freeways as well as being sited in the "diesel death zone" where trucks to and from the port routinely deposit contaminants and emissions all along the 710 freeway. The proposed development will increase the emissions load with over 500 RVs planned to be parked there, along with those using the self-storage going to and from the site, a planned corporate headquarters with employees (and their cars) and a warehouse with 9 truck docks. The proposed development will increase traffic, which is already dangerous and will also increase pollution. This community deserves better.

An MND does not require identifying alternatives and especially for land use while an EIR does require identification of alternatives that reduce negative environmental affects. An EIR will establish the facts and be comprehensive.

**There is a dire need for more green space in this area and precious little land left that could fulfill the promise of those plans.** It is possible to purchase this property and make good on the LA River Masterplan and Riverlinks Plan, which Council approved in Aug of 2015.

I have heard some profound speeches from the dais on equity and environmental equity. Speeches are good - but action is better. It is within your reach to do something meaningful for those that suffer. Deny this project and begin advocating for greenspace for these people. Trees are the best antidote for carbon emissions (see PBS NOVA Can We Cool the Planet?). This may be the most important opportunity you will get in your career to create legacy - something to be proud of for the rest of your life.

Respectfully,

Corliss Lee  
Eastside Voice  
(714) 401 7063

**From:** Marilyn Mathews [mailto:Pharacyde@msn.com]  
**Sent:** Monday, April 12, 2021 11:20 PM  
**To:** CityClerk <CityClerk@longbeach.gov>  
**Subject:** oppose Agenda Item #8 -- Build the River Park Instead!

**-EXTERNAL-**

I join in with so many Long Beach residents and environmental groups to OPPOSE AGENDA ITEM #8 up for a City Council vote on 4/13/2021.

I strongly oppose the Pacific Place project. I can't even believe the City Council even considered to agree to such a project in the first place. A River Park is the only thing that land should be used for.

Do not certify the MND (Mitigated Negative Declaration).

I demand an EIR (Environmental Impact Report) for that parcel.

Marilyn Mathews,

**From:** Gavin McKiernan [mailto:gavin.mckiernan@gmail.com]  
**Sent:** Tuesday, April 13, 2021 3:32 PM  
**To:** Council District 5 <District5@longbeach.gov>  
**Cc:** CityClerk <CityClerk@longbeach.gov>  
**Subject:** I oppose Agenda Item #8 -- Build the River Park Instead!

**-EXTERNAL-**

Stacy,

Please note my request for the record in regards to the Riverpark vote tonight.

The number 1, 2 and 3 reasons my family and I moved from the 6<sup>th</sup> district in Long Beach to the 5<sup>th</sup> district are open space and parks. Our area has it and the other side of town does not. We should want the entire city to have access to recreation at the same or greater level that we enjoy as parents, home owners, taxpayers, & voters in your district.

In that vein, please vote to oppose agenda item #8 tonight. Open space in a built our metro area like ours is rare and fleeting and this is a very unusual opportunity to create something of lasting impact for residents of the other, often neglected and forgotten, side of Long Beach. Open space there will benefit our city for generations. Image our district if 90% of the current El Dorado Park was homes and storage instead of the jewel of the city that it is right now? Would you want to live here? We can't condemn the poorest areas of the city and then them to eat asphalt, they deserve open spaces and recreation and this may be the last chance for them to get it. Don't miss this opportunity, please.

Thank you

Gavin Mc Kiernan  
5<sup>th</sup> District resident, property owner, small business owner and voter.

**From:** LA VONNE MILLER [mailto:lmiller853@aol.com]

**Sent:** Monday, April 12, 2021 8:44 PM

**To:** CityClerk <CityClerk@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 8 <District8@longbeach.gov>; Council District 9 <District9@longbeach.gov>; Mayor <Mayor@longbeach.gov>

**Subject:** 3701 Pacific Place development

**-EXTERNAL-**

Mayor Garcia, City Clerk and Council members,

I oppose the approval of agenda item #8 regarding the development of an RV parking lot and storage facility on land that should be open space.

In addition, I am outraged by the fact that only 20 people are being allowed to speak at the Council meeting of April 13, 2021.

La Vonne Miller  
8th District



-----Original Message-----

From: Rhina M Ovalle [mailto:rmaovalle@gmail.com]

Sent: Wednesday, April 14, 2021 10:27 AM

To: Council District 8 <District8@longbeach.gov>

Cc: contact@riverparkcoalition.org; CityClerk <CityClerk@longbeach.gov>

Subject: Approval of Self Storage Facility at Pacific Ave

-EXTERNAL-

Dear Mr. Austin,

I am very disappointed that once again you did not listened to your constituents in District 8 to request an EIR for this project. Despite of all the evidence shown from multiple organizations at the presentation yesterday and all the letters, post cards, petitions, signs from the residents, I find it difficult to believe you received more support in favor of continuing with this project as approved. You instead, opted to distract everyone with a “new” parcel to build a park. A parcel that we as taxpayers already own that was part of our RiverLink Plan approved in 2015. Instead of addressing the real issue and requesting EIR for the sake of our communities safety.

We did not expect much from you, our request was very simple, and once again you opted to favor the developers wish over the people.

Respectfully,

Rhina Ovalle

Sent from my iPhone

**From:** Rececca Robles [mailto:rebrobles1@gmail.com]  
**Sent:** Tuesday, April 13, 2021 4:55 PM  
**To:** CityClerk <CityClerk@longbeach.gov>; Mayor <Mayor@longbeach.gov>  
**Cc:** City Manager <CityManager@longbeach.gov>  
**Subject:** Appeal of Planning Commission Approval of Pacific Place Project, Long Beach City Council Meeting April 13, 2021, Agenda Item 8. 21-038

**-EXTERNAL-**

April 13, 2021

To: The Long Beach City Council, The Long Beach Planning Commission and the Long Beach Department of Developmental Services

From: Anthony Morales Tribal Chair of Gabrielino Tongva Band of Mission Indians San Gabriel, California

Rebecca Robles Acjachemen Tribal Elder and Culture Bearer

We make the following observation. **The MND is inadequate and the appeal should be upheld. The Pacific Place Project MND Cultural/Tribal Cultural Resources, Tribal Consultation and Environmental Justice with respect to CEQA and other state and federal laws protecting tribal peoples and rights is insufficient.**

The project site is eligible for Traditional Landscape status and is associated with the Tongva Village of Tevaaxaaga, the adobe Rancho Los Cerritos, where Tongva families lived and worked on the Rancho until the late 1930's is within a few miles from project site. Tribal preference for the site to be undisturbed by development and maintained or returned to a natural state in which native plants, animals and people can thrive.

The impact of paving and building on 19 acres of open space that are historically significant to Tongva and community is highly significant and cannot be measured or mitigated in an MND. Tribal cultural resources, including but not limited to tribal burials and artifacts could be unearthed , damaged , destroyed or removed to another location. Tribal access would be limited to visiting a parking lot.

The cumulative impacts of the ongoing erasure of tribal sites and the inability of tribal peoples to sustain a cultural connection to the land must be considered.

Tribal residents and the Tongva in particular suffer in particular .

The MND recommends no further archaeological studies and allows any Tribal Cultural evidence encountered during construction to be removed. This is inappropriate.

The MND gives preferences to a single Tongva group/government over others. This is problematic and I have attached a letter from NAHC referring to CEQA, AB52 and SB18. Public Resource Codes establish policies of consultation dealing with affiliated tribal groups. It appears to be bias in favor of one tribal government/group. Using the term "Tribe" may confuse that there are multiple Gabrielino groups/governments. It does not reflect that there is no single tribal entity that can make requests, accept tribal cultural materials, be notified of human remains , work closely with the project archeologist and approve or disapprove of specific practices on behalf of Tongva people and or multiple Tongva governments/ tribal councils recognized by the State of California.

We have attached a letter from NAHC written to another City in an effort to clarify consultation with Native American tribes/governments. We request to be notified regarding this project. We look forward to meaningful tribal consultation as required by law, and forming a relationship as we continue to preserve our tribal history and culture.

Chairperson Anthony Morales

PO Box 693

San Gabriel, CA 91778

Rebecca Robles  
Acjachemen Tribal Elder/Culture Bearer

PDF  
PDF

<https://www.menlopark.org/DocumentCenter/View/27238/Native-American-Heritage-commission>

**From:** Riverpark Coalition Press [mailto:press@riverparkcoalition.org]

**Sent:** Monday, April 12, 2021 11:29 AM

**To:** press@riverparkcoalition.org

**Subject:** Press Advisory: Riverpark Coalition's Own Independent Analysis and Rebuttal to the City's 'Park Acquisition Feasibility Study'

**-EXTERNAL-**

Ahead of the Council vote tomorrow, please find attached (and linked to on our website) Riverpark Coalition's independent report on the fiscal feasibility of the public acquisition, remediation, and recreational greening of 3701 Pacific Place, as well as our rebuttal to the recently released City staff 'feasibility study'. We consider that City report to be nothing more than a political document intended to justify further commercial development and exploitation of the LA River at the expense of public open space.

The Riverpark Coalition's Analysis document in this press advisory is also available on our website [[HERE](#)] or available for direct download [[HERE](#)]

The Rebuttal document in this press advisory is also available on our website [[HERE](#)] or available for direct download [[HERE](#)]

Riverpark Coalition

RiverParkCoalition.org

Contact: Juan Ovalle, (562) 900-9284

[press@riverparkcoalition.org](mailto:press@riverparkcoalition.org)



## **Independent Study into the Feasibility of Acquiring the Last Significant Open Spaces along the Lower LA River for the Development of Public Green Space**

Hawk McFadzen, MA  
Riverpark Coalition Board Member

2 March 2021

On 2 February, 2021, the Long Beach City Council voted to task the City Manager with identifying potential funding sources for the acquisition of lands along the LA River that could potentially become public parklands in accordance with the City's Riverlink Plan of 2001 and 2015. Acquiring the last remaining open spaces along the LA River for public park space is crucial, because Long Beach suffers from extreme park inequity, with its north and west sides having very low access to green spaces while simultaneously suffering from some of the worst air pollution in the nation. Specifically, west and north Long Beach have fewer than 1 acres of green space for every 1,000 residents (as of 2002), while residents of east Long Beach enjoy 16.7 acres of green space for every 1,000 residents. People living in west and north Long Beach experience substantially higher rates of asthma, cancer, and COVID-19 deaths than those in east Long Beach. They also suffer from significantly lower life expectancies among people of all classes and races. These stark disparities cannot be addressed by substantially expanding the green spaces in west and north Long Beach alone; however, a serious effort to rapidly acquire extensive lands to be planted with trees and turned into recreational green space in these parts of the City must be part of any realistic attempt to address the air quality, quality of life, and health disparities suffered by Long Beach residents along the Diesel Death Corridor of the I-710.

The largest and most significant of the remaining open spaces within the Diesel Death Corridor in Long Beach are the approximately 50 acres comprising 3701 Pacific Place, the adjoining MacDonald Trust parcel, and the Oil Operators Inc. properties. Together these properties straddle the I-405 at the point that it crosses the I-710. The report that follows will focus on these three parcels. All of these properties are privately owned at present, and as yet none of the owners have formally indicated their willingness to sell. To address the problem of severe pollution and park inequity along the I-710's Diesel Death Corridor, the present lack of agreement from the owners and commercial developers underscores the need for the City, the community, the site owners, and environmental planners to collaborate extensively in creating a workable and fair plan for meeting need for green space.

The most important steps that the City of Long Beach can take to make willing sellers of the present owners is to reverse their previous course of easing the way for the would-be developers as they seek to build. The more difficult it is for the developers to build on these open lands, the more willing they will become to sell them to the public for the development of the green space that residents desperately need. The City's role here ought to be clear: use its jurisdictional powers to create the urban spaces that its citizens require. To date, the City of Long Beach has made it far too easy for the would-be developers by agreeing to change the 2019 Land Use Element designations for these parcels from Open Space to Neo-industrial and Commercial



## The Riverpark Coalition

Storage (thereby giving past landowners the green light to sell these parcels to commercial developers or to build on the parcels themselves). The City Planning Commission has also eased the way for developers at 3701 Pacific Place to go forward without first completing an Environmental Impact Report (EIR) into the toxic history and substances on the site. They have instead approved a Mitigated Negative Declaration (MND), which requires far less time and resources for the would-be developer to complete. Paving the way like this for these developers is a dereliction of the City's duty to its residents within the Diesel Death Corridor.

If the City reverses its course and chooses to require the developer to undertake an EIR instead of an MND, the City will be able to significantly slow the progress of the would-be commercial developers at 3701 Pacific Place and make it less amenable and profitable for them to spoil the public's last chance for acquiring and greening significant space in west Long Beach. Short of the City of Long Beach throwing up any and all bureaucratic roadblocks that it has at its disposal—LUE designations, zoning changes, EIRs, permitting, etc.—the City cannot claim that it has done all that it could in attempting to acquire and green these last remaining open parcels on behalf of the residents of west Long Beach and people throughout Los Angeles County that care about the revitalization of the LA River.

The Riverpark Coalition has tasked its Grants Committee with conducting an independent feasibility study into all available funding for purchasing these “last chance” parcels in west Long Beach. The Riverpark Coalition proposes working in collaboration with the City Manager and the Trust for Public Land to access funding for the purposes of acquisition, cleanup and site safety, and development of these biologically and culturally important open spaces along the lower Los Angeles River.

What follows is a working list of funding opportunities that the Riverpark Coalition's Grants Committee has identified as of 2 March, 2021 organized into four subsections: Property Acquisition, Site Safety, Park Development, and Operations and Management.

## Property Acquisition Funds

### Regional Parks and Open Space District

#### *Measure A*

<https://rposd.lacounty.gov/measure-a/>

Measure A was drafted to meet current and future park needs, and its content reflects the findings of the PNA. Generating more than \$90 million per year for the county's local parks, beaches, and open space areas, Measure A is an annual parcel tax of 1.5 cents per square foot of improved property, and includes both formula-based allocations to Study Areas and competitive grants that are open to public agencies, non-profit organizations, and schools. Unlike Proposition A, Measure A does not have an expiration date.

#### Measure A Goals:

- To provide funds to benefit property and improve the quality of life throughout the Regional Parks and Open Space District by preserving and protecting parks, safe places



## The Riverpark Coalition

to play, community recreation facilities, beach, rivers, open spaces, water conservation, youth and veteran career development, and the urban tree canopy.

- Fund projects consistent with or similar to those identified in the 2016 Countywide Parks and Recreation Needs Assessment.

**Evaluation:** Given the biological and cultural—both tribal and equestrian—importance of the land parcels in question as well as the designation of the surrounding area as “high need” or “very high need,” the land parcels in question and the proposed use as open space, habitat restoration, and water conservation make this grant not only feasible, but an ideal use for these designated funds. Measure A Technical Assistance Grants are available to help cover the cost of planning.

### **Regional Parks and Open Space District**

#### ***Proposition A***

<https://rposd.lacounty.gov/manage-your-grant/>

The 1996 Prop A was approved by the voters on November 5, 1996, approving a second assessment for RPOSD with a term of 22 years, adding an additional assessment to each parcel in the District. The expenditure of the revenues generated by the two assessments are described in detail in the two propositions and were focused in the following ways:

- 1) Capital Park Projects- funds for park projects that were built, refurbished or acquired.
- 2) Maintenance and Servicing- funds to subsidize the cost of maintaining and operating these newly built, refurbished or acquired park projects.
- 3) Administration- funds for the administrative operations of the District, ensuring that the County or other public organization would not need to fund the District from their budgets.

**Evaluation:** Given the cultural (tribal and equestrian) and biological importance of the land parcels in question as well as the potential land uses of connectivity, natural lands, river restoration, equestrian, hiking, and walking trails, wildlife habitat, and tree planting, the land parcels in question and the proposed use as open space, habitat restoration, and water conservation make this grant not only feasible, but an ideal use for these designated funds.

### **California Department of Parks and Recreation**

#### ***Statewide Parks Program***

[https://www.parks.ca.gov/?page\\_id=29939](https://www.parks.ca.gov/?page_id=29939)

INTENT: Statewide Park Program (SPP) competitive grants will create new parks and new recreation opportunities in critically underserved communities across California.

#### **Proposition 68 Funding**

- \$650,275,000 will be distributed throughout multiple rounds.
- Use this Application Guide for each round.

LEGACY: Previously, Proposition 84 (2006 Bond Act) funded two rounds:

- \$2.9 billion was requested. \$368 million was awarded.



## The Riverpark Coalition

- Over one hundred new parks were created, and twenty existing parks were improved throughout California. SPP legislation is found in Public Resources Code §§5640 through 5653. Proposition 68 (2018 Bond Act) continues this program's legacy.

### ELIGIBLE APPLICANTS:

- Cities
- Counties
- Districts (as defined on page 71)
- Joint powers authorities (one member of the Joint powers authority must be either an eligible district, City, or County)
- Nonprofits with 501(c)(3) status

**TYPES OF PROJECTS:** A project must involve either development or a combination of acquisition and development to:

1. Create a new park, or
2. Expand an existing park, or
3. Renovate an existing park.

**Evaluation:** The timeline on the current year is quickly closing, as this grant application would be due on March 12th, however this remains a viable program for next year's cycle. According to the required Community FactFinder data, none of the North parcels are eligible for the grant due to the park acreage per 1000 residents being above 4. However, the 712 Baker St. parcel meets all qualifications. A consultation with the regional grant officer revealed that this parcel and the intended use are ideal for this grant, making it a feasible funding source.

## Rivers and Mountains Conservancy

### *Lower Los Angeles River Prop 68*

<http://rmc.ca.gov/grants/>

Over \$30 Million is available for RMC's Lower LA River Prop 68 Open Call for Projects. RMC's Lower LA River Grants are specific to the Lower LA River corridor, considered within 1.5 miles of the main stem of the Lower LA river. 80% for implementation, 10% planning, and 10% technical assistance (20% must serve Disadvantaged Communities). Projects should be consistent with the Lower LA River Revitalization Plan.

**Evaluation:** For the purposes of this grant, "implementation" does indeed include acquisition, and according to the Parks and Recreation Needs Assessment, the parcels are in areas designated as "high" or "very high" need. These parcels have repeatedly been identified by the Lower LA River Revitalization Plan, the LA River Master Plan, and the Long Beach Riverlink Plan as biologically, ecologically, and culturally important, both to tribal and equestrian interests. For these reasons, this is a very feasible funding source.

## Rivers and Mountains Conservancy

### *Lower Los Angeles River Prop 1*

<http://rmc.ca.gov/grants/>





## The Riverpark Coalition

Over \$30 Million is available for RMC's Lower LA River Prop 1 Open Call for Projects. RMC's Lower LA River Grants are specific to the Lower LA River corridor, considered within 1.5 miles of the main stem of the Lower LA river. 90% for Implementation and 10% planning. Projects should be consistent with the Lower LA River Revitalization Plan.

**Evaluation:** Given the proximity of the parcels to the River (all within 1.5 miles) and the watershed potential of the land, this fund is quite appropriate and more than feasible for acquiring and developing these parcels into riparian habitat.

### **California Wildlife Conservation Board**

#### ***California Riparian Habitat Conservation Program***

<https://www.grants.ca.gov/grants/california-riparian-habitat-conservation-program-3/>

**Purpose:** The Wildlife Conservation Board (WCB) California Riparian Habitat Conservation Program (Program) is accepting concept proposals for projects that provide meaningful and sustainable improvements to riparian habitats.

**Description:** Projects located in southern California (south of San Luis Obispo County) will be prioritized, as well as projects that advance the California Biodiversity Initiative (Executive Order N-82-20). Concept proposals should be for:

- Implementation of a capital improvement project that restores or enhances riparian habitats and functions, or
- Design and planning of a riparian habitat restoration project which leads directly to implementing a capital improvement project.

Shovel-ready implementation projects that have a completed CEQA document will be prioritized. The following project types will be emphasized:

- Restoration of native riparian vegetation biodiversity, habitat complexity and structure, and habitat for species of special concern.
- Re-establishing floodplain connectivity
- Contouring degraded, incised, or undefined streams to restore natural hydrology
- Upper watershed improvements that will benefit on-site and downstream riparian resources

Secondary funding priorities include planning projects and projects located in central and northern California.

**Evaluation:** Federal, state, and local government entities, non-profit organizations, and public districts are eligible to apply for riparian grants. The Program does not provide funding for maintenance activities or mitigation projects. Preference will be for projects that have matching funds.

### **California Wildlife Conservation Board**

#### ***Land Acquisition Program***

<https://wcb.ca.gov/Programs/Acquisitions>

The acquisition program is administered pursuant to the Board's original enabling legislation, "The Wildlife Conservation Law of 1947" (Fish and Game Section 1300, et seq.) and land



## The Riverpark Coalition

acquisition is a component of all Wildlife Conservation Board (WCB) programs. The WCB acquires real property or rights in real property on behalf of the California Department of Fish and Wildlife (CDFW) and can also grant funds to other governmental entities or nonprofit organizations to acquire real property or rights in real property.

All acquisitions are made on a "willing seller" basis pursuant to a fair market value appraisal as approved by the Department of General Services (DGS). The acquisition activities are carried out in conjunction with the CDFW, which generally entails CDFW evaluating the biological values of property through development of a Land Acquisition Evaluation (LAE; used for a single property) or Conceptual Area Protection Plan (CAPP; used for multiple properties). Once these evaluations are completed, they are submitted to CDFW's Director for review and approval and then sent to the WCB with a recommendation to fund. Typically, this process can take anywhere from 6 to 12 months. Concurrent to this the WCB regularly meets with CDFW to help evaluate and set acquisition priorities as new opportunities present themselves.

**Evaluation:** A recent consultation with this region's grants officer revealed that the properties in question have immense ecological importance to the LA River, to fish and wildlife, and to migrating birds and butterflies. Acquiring these parcels for the purpose of creating riparian habitat is exactly in alignment with the purposes set forth in this fund, making it a feasible source of funding.

## California Department of Parks and Recreation

### *Regional Park Program*

[https://www.parks.ca.gov/?page\\_id=29940](https://www.parks.ca.gov/?page_id=29940)

**Intent:** The Regional Park Program will create, expand, or improve regional parks and regional park facilities. This program is funded by Proposition 68 (2018 Bond Act) which is found in Public Resources Code §80065(a).

#### Eligible Applicants:

- Counties
- Regional Park Districts, Regional Open-Space Districts, and Open-Space Authorities formed pursuant to Public Resources Code Division 26 (commencing with Section 35100)
- Joint Powers Authorities where at least one of the members is otherwise eligible on this list
- Nonprofit organizations qualified to do business in California and qualified under Section 501(c)(3) of the Internal Revenue Code

#### Eligible Projects

- Acquisition for new or enhanced public access and use
- Development to create or renovate:
  - Trails, with preference given to multi-use trails over single-use trails
  - Regional sports complexes
  - Visitor and interpretive facilities
  - Other types of recreation and support facilities in regional parks



## The Riverpark Coalition

**Evaluation:** The Wrigley Heights Park, as rendered on the Long Beach Riverlink Plan and other plans, meets many of the eligibility criteria listed in the grant guidelines: multi-use (equestrian, hiking, and walking) trails, a potential tribal cultural facility, and riparian habitat restoration. This grant is a feasible funding source.

### **California Department of Parks and Recreation**

#### ***Land and Water Conservation Fund***

[https://www.parks.ca.gov/?page\\_id=21360](https://www.parks.ca.gov/?page_id=21360)

Land and Water Conservation Fund (LWCF) grants provide funding for the acquisition or development of land to create new outdoor recreation opportunities for the health and wellness of Californians. Since 1965, over one thousand parks throughout California have been created or improved with LWCF assistance.

**Evaluation:** Available to cities, counties, joint powers authorities, and nonprofit entities, this fund would support the acquisition of land and development into riparian habitat, multi-use trails (equestrian, hiking, and walking) that promote health and wellness, and vital watershed support for the LA River. This is a feasible funding source for these reasons.

### **Site Safety Funds**

#### **Department of Toxic Substances Control**

##### ***Brownfields Revolving Loan Fund***

<https://dtsc.ca.gov/revolving-loan-fund-rlf-program/>

The DTSC RLF Program establishes a revolving loan fund that provides loans to help developers, businesses, schools, and local governments clean-up and redevelop brownfields. This is a brownfields clean-up loan program administered through a Cooperative Agreement with the U.S. Environmental Protection Agency (U.S. EPA).

**Evaluation:** Despite its name, this fund does indeed issue property cleanup grants. The fund is designated for entities with no fiscal responsibility for the cleanup. Riverpark Coalition, backed by a fiscal sponsor, can assume this role, thereby making this grant feasible. Clarification is needed, however, on this land's designation as a brownfield site.

#### **Department of Toxic Substances Control**

##### ***Targeted Site Investigation Program***

<https://dtsc.ca.gov/brownfields-funding/#tsi>

Since 2004, the TSI Program has been part of DTSC's CERCLA 128(a) State and Tribal Response Program Grant, funded by the United States Environmental Protection Agency (U.S. EPA). DTSC provided environmental services to local governments, school districts, and nonprofits to facilitate the return of brownfields to safe and productive uses. The program



## The Riverpark Coalition

focused on properties with a clear need for redevelopment, strong redevelopment potential, real or perceived contamination, and municipal/community support for redevelopment. DTSC has provided assessment, investigation, and cleanup planning services to over 100 projects, in 68 cities, and 30 counties, throughout the State of California.

**Evaluation:** The sites that are the focus of this report have a clear need for redevelopment, strong redevelopment potential, are most definitely contaminated, and have community support for redevelopment into riparian habitat and open space for the “very high-need” Long Beach community residents. Assuming that the parcels are still designated as brownfield sites, this fund is a very feasible funding source for site cleanup.

### **California Water Boards State Water Resources Control Board** ***Underground Storage Tank Cleanup Fund***

[https://www.waterboards.ca.gov/water\\_issues/programs/ustcf/](https://www.waterboards.ca.gov/water_issues/programs/ustcf/)

The Underground Storage Tank (UST) Cleanup Fund (Fund) provides a means for petroleum UST owners and operators to meet the federal and state requirements of maintaining financial responsibility to pay for any damages arising from their tank operations. The Fund assists a large number of small businesses and individuals by providing reimbursement for expenses associated with the cleanup of leaking USTs. The Fund also provides money to the Regional Water Boards and local regulatory agencies to abate emergency situations or to cleanup abandoned sites that pose a threat to human health, safety, and the environment, as a result of a UST petroleum release.

**Evaluation:** Although more investigation is necessary to determine if the underground storage tanks are in fact leaking, this is an important funding source to track in case leaky storage tanks emerge as a problem with the parcels in question. This fund is potentially feasible.

### **California Environmental Protection Agency (CalEPA)** ***Environmental Justice (EJ) Small Grants***

<http://www.calepa.ca.gov/EnvJustice/Funding/>

This is a small grant program designed to assist non-profit organizations. The City might be able to partner with a non-profit organization to access the funding. The EJ Small Grants are awarded on a competitive basis. A minimum \$1 million in grant funds is available for the 2021 grant cycle. The maximum amount of a grant provided is \$50,000. As previously stated, the City must partner with a non-profit as these funds are strictly limited to a non-profit entity. Additionally, an applicant's project must address EJ small grant program goals in communities that are disproportionately affected by environmental pollution, or are especially sensitive to environmental pollution due to socio-economic factors.



**Evaluation:** Given that the Riverpark Coalition, a non-profit with a fiscal sponsorship, is willing to partner with the City to acquire this grant, this is a feasible funding source, although the award amount is very low.

### **CalEPA, State Water Resource Control Board**

#### ***The Orphan Site Cleanup Fund (OSCF)***

[http://www.waterboards.ca.gov/water issues/programs/ustcf/oscf.shtml](http://www.waterboards.ca.gov/water%20issues/programs/ustcf/oscf.shtml)

The Orphan Site Cleanup Fund (OSCF) is a grant program within the Division of Financial Assistance. OSCF provides financial assistance to eligible applicants for the cleanup of sites contaminated by leaking petroleum underground storage tanks (UST) where there is no financially responsible party, and the applicant is not an eligible claimant to the UST Cleanup Fund. The OSCF grants are available for response actions that characterize, assess, and investigate an unauthorized release from a petroleum UST. Assessment grants may also provide funding for UST system removal, free product removal, and soil excavation, not to exceed 500 cubic yards at the eligible site. Effective September 25, 2014, SB 445 (Hill), made changes to the OSCF. The law changed the eligibility criteria for OSCF so that it is no longer limited to funding brownfield sites; the maximum amount of grant monies available for an eligible occurrence is \$1 million for any grant application filed on or after January 1, 2015.

**Evaluation:** Given that the OSCF grant program seeks to provide financial assistance for the cleanup of petroleum USTs, it may be a potential funding source for the property cleanup of the Subject Property. However, it should be noted that available funding from this program is very low.

## **Park Development Funds**

### **California Conservation Corps**

#### ***Proposition 1- Water Bond***

<https://ccc.ca.gov/what-we-do/funding-opportunities/proposition-1-water-bond/>

Chapter 6 of Proposition 1 requires the services of the California Conservation Corps or a local conservation corps certified by the California Conservation Corps be used, whenever feasible, for restoration and ecosystem protection projects. Corps programs increase the public benefit of these projects by creating workforce development opportunities for young adults.

Organizations seeking funds for a Proposition 1 Chapter 6 project should carefully read the administering agency's guidelines and then consult with representatives of the CCC or the California Association of Local Conservation Corps (CALCC) to determine the feasibility of a corps' participation. The CCC provides supervised crews of 10-15 young adults trained and equipped to work safely on a wide variety of environmental projects related to the priorities of Prop 1.



## The Riverpark Coalition

**Evaluation:** Services are available to any entities that are eligible to receive Prop 1 funds, including non-profits and cities. The development of a habitat park falls well within the scope of work of the Conservation Corps.

### California Conservation Corps

#### *Proposition 68- Parks and Water Bond*

<https://ccc.ca.gov/what-we-do/funding-opportunities/proposition-68-parks-water-bond/>

Proposition 68's Section 80016 gives preference, to the extent feasible, for receipt of a grant to those who use the services of the California Conservation Corps and certified local conservation corps. Additionally, use of the corps also increases the public benefit of these projects by creating workforce development opportunities for young adults, which may assist an applicant's ability to comply with Proposition 68 Section 80001(b)(5).

Grant applicants are encouraged to contact the CCC or a certified local corps during the development of project proposals to determine how a corps program can be included. Organizations seeking funds for a Proposition 68 project should carefully read the administering agency's guidelines and then consult with representatives of the CCC or the California Association of Local Conservation Corps (CALCC) to determine the feasibility of a corps' participation. The CCC provides supervised work crews of 10-15 young adults trained and equipped to work safely on a wide variety of projects related to the priorities of Proposition 68.

**Evaluation:** Services are available to any entities that are eligible to receive Prop 68 funds, including non-profits and cities. The development of a habitat park on 3701 Pacific Place, the MacDonald Trust parcel, and the Oil Operators, Inc. parcel at Baker and Golen falls well within the scope of work of the Conservation Corps.

### California Wildlife Conservation Board

#### *Habitat Enhancement and Restoration Program*

<https://wcb.ca.gov/Programs/Habitat-Enhancement>

When the Wildlife Conservation Board (WCB) was created by the Wildlife Conservation Law of 1947, it was authorized to acquire and restore California lands to protect wildlife values and provide wildlife-oriented public access. The Habitat Enhancement and Restoration Program (HERP) was WCB's first program and incorporated all restoration projects until other WCB programs were initiated in 1990.

HERP continues to support a wide variety of restoration projects that fall outside WCB's other mandated programs. HERP projects are distributed throughout California and all habitat types. Broad categories of HERP projects include, but are not limited to:

- Habitat restoration (e.g., coast, forest, desert, wetland, grassland)
- Wildlife corridors
- Fisheries enhancements (e.g., fish ladders, barrier removal)





## The Riverpark Coalition

Most HERP funding is provided by the Habitat Conservation Fund and various voter-approved bonds. HERP projects must receive a recommendation from the California Department of Fish and Wildlife and provide for long-term maintenance following project completion.

**Evaluation:** The parcels in question, with the proper planning into developing the land into riparian habitat that provides continuity between the Dominguez Gap Wetlands and the Wrigley Greenbelt, are ideal for this fund. One barrier to accessing this and many development grants is that there is not a tangible plan nor budget for these areas. This barrier can come down if the city partners with Riverpark Coalition, the Trust for Public Land, and the community to develop a plan. That would make this funding source feasible.

### Port of Long Beach

#### ***Community Grant: Trees and Landscaping***

<https://www.polb.com/community/community-grants-program/#community-grant-opportunities>

The goal of this Grant Program is to reduce port-related impacts on the community associated with air quality, noise, traffic, and water quality. To that end, the Program funds upgrades at facilities serving sensitive populations that reduce the exposure to or health impacts associated with port-related air pollution and noise pollution and/or reduce, avoid, or capture greenhouse gas emissions.

All applicants must be facilities that serve sensitive populations within the Priority Zone. Sensitive populations are children, pregnant women, the elderly, the chronically ill, and individuals with respiratory and/or cardiopulmonary disorders and illnesses. Examples of eligible facilities include daycare centers, schools, after school programs, youth centers, senior centers, recreation centers, skilled nursing facilities, assisted living centers, adult daycare facilities, hospitals, clinics, hospice facilities, and other related facilities licensed under the California Health and Safety Code. Public and private agencies are eligible to apply.

**Evaluation:** Since park planning is still not solidified, there is room to develop a youth or afterschool center that hires local Long Beach residents--a Native American Cultural Center, for example--on the park site. Such a facility is not only culturally responsible, but would open up the park site(s) to many more funding sources. This is a feasible funding source, although award amounts can be low.

### California Department of Parks and Recreation

#### ***Recreational Trails Program***

[https://www.parks.ca.gov/?page\\_id=24324](https://www.parks.ca.gov/?page_id=24324)

The Recreational Trails Program (RTP) provides funds annually for recreational trails and trails-related projects. The RTP is administered at the federal level by the Federal Highway Administration (FHWA). It is administered at the State Level by the California Department of Parks and Recreation (DPR) and the Department of Transportation (Caltrans) Active Transportation Program (ATP).



## The Riverpark Coalition

**Evaluation:** Assuming that a lack of planning can be addressed in a timely manner, this program would fund any multi-use trails—equestrian, hiking, and walking—that are integrated into the plan. This is a potentially feasible source.

### **Rose Foundation**

#### ***Los Angeles Community Water Justice***

<https://rosefdn.org/grant-seekers-2/apply-for-a-grant/los-angeles-community-water-justice-grants-program/eligibility-and-priorities>

**Projects Supported:** Projects must be designed to benefit groundwater or surface water quality in the Los Angeles Region, including the coastal watersheds of Los Angeles and Ventura Counties, along with very small portions of Kern and Santa Barbara.

**Applicant requirements:** Projects must benefit underserved, vulnerable, or otherwise disadvantaged communities and should demonstrate a high degree of community support and community involvement. Projects that benefit public health in addition to water quality are especially encouraged.

**Evaluation:** The parcels in question meet the criteria established by the grant in that they are part of the LA River watershed. The public has demonstrated their high level of interest and involvement in decades of planning for these areas. This is a feasible source, although the grant amounts are extremely low.

### **California Environmental Protection Agency**

#### ***Environmental Justice Small Grants***

<https://calepa.ca.gov/envjustice/funding/>

The California Environmental Protection Agency (CalEPA) Environmental Justice (EJ) Small Grants Program offers funding opportunities authorized by California Code of Regulations Title 27, Division 1, Chapter 3, Article 1 to assist eligible non-profit community organizations and federally-recognized Tribal governments address environmental justice issues in areas disproportionately affected by environmental pollution and hazards. The EJ Small Grants are awarded on a competitive basis.

**Evaluation:** The Riverpark Coalition, as a nonprofit with fiscal sponsorship, and in partnership with the City is eligible to receive and manage this grant. This is a feasible funding source, although the grant amounts are low.

### **California Wildlife Conservation Board**

#### ***Monarch Butterfly and Pollinator Rescue Program***

<https://wcb.ca.gov/Programs/Pollinators>





## The Riverpark Coalition

The Monarch Butterfly and Pollinator Rescue Program (Program) was created by Assembly Bill 2421, and signed into law in 2018 becoming effective immediately. The Program was created for the purpose of recovering and sustaining populations of monarch butterflies and other pollinators. To achieve these purposes, the bill authorizes the Wildlife Conservation Board (WCB) to provide grants and technical assistance, as prescribed. The bill requires WCB to develop and adopt project selection and evaluation guidelines, in coordination with the Department of Food and Agriculture, before disbursing these grants. The bill establishes the Monarch Butterfly and Pollinator Rescue Fund Account in the State Treasury, and authorizes expenditure of monies in the account, upon appropriation by the Legislature, for purposes of the Program.

The Enabling Statute created the Monarch Butterfly and Pollinator Rescue Fund Account (Fund) in the State Treasury. Monies in the Fund became available, upon appropriation, for the purposes of the Program including:

- Provide grants for the restoration or enhancement of California prairie and other appropriate breeding habitat for monarch butterflies and pollinators on private and public lands.
- Provide grants for the restoration or enhancement of overwintering monarch butterfly habitat on private and public lands.
- Provide technical assistance to grant recipients, including farmers and ranchers, regarding restoration and enhancement of breeding, overwintering, and other appropriate monarch butterfly habitat.
- Provide grants for seasonal or temporary habitat improvements.
- Provide block grants in which suballocations are made by the grant recipient, with the approval of the Wildlife Conservation Board.

**Evaluation:** Riparian habitat and Monarch butterfly habitat are not mutually exclusive, so depending on the level of careful planning, this is a potentially feasible funding source.

## Operations and Maintenance Funds

### **Watershed Conservation Authority**

***Joint Powers: Rivers and Mountains Conservancy and LA County Flood Control District***

<https://www.wca.ca.gov>

WCA serves communities in our region through the conservation and preservation of open space and through the improvement of access to parks and trails. By working with nature in our plans and projects we seek to enhance local water resources, native plant habitats, wildlife, and to advance the overall quality of life in both our natural and urban communities.

**Evaluation:** More in-depth discussion is necessary to determine the feasibility of this option, as it would require close coordination between the City of Long Beach and the Watershed Conservation Authority.



## **Regional Parks and Open Space District**

### ***Measure A***

<https://rposd.lacounty.gov/measure-a/>

M&S funds may only be used by recipients to offset the increased maintenance and servicing costs resulting from projects that received funding from RPOSD's Measure A or Proposition A. M&S funds allocated to the County Department of Beaches and Harbors (DBH) shall be used for projects that repair and replace facilities impacted from high user activity and weatherization from being located near the ocean, such funds shall be used to supplement existing levels of service. An agency will not apply for M&S funds until the project has been completed and the grant has been closed (see Section 3.4.5 for details about grant closeout). However, if the grant consists of a project with several phases, acquisition and development, or acquisition of land from several land owners, some M&S funds may be claimed if eligible expenses are incurred prior to the grant closeout.

**Evaluation:** 15% of Measure A funds are designated for long-term management of the land, as allocated to the City of Long Beach. Additionally, the Riverpark Coalition, as a non-profit partner, can apply for additional management funds. This is a feasible funding source.

## **Regional Parks and Open Space District**

### ***Proposition A***

<https://rposd.lacounty.gov/manage-your-grant/>

The 1996 Prop A was approved by the voters on November 5, 1996, approving a second assessment for RPOSD with a term of 22 years, adding an additional assessment to each parcel in the District. The expenditure of the revenues generated by the two assessments are described in detail in the two propositions and were focused in the following ways:

- 1) Capital Park Projects- funds for park projects that were built, refurbished or acquired.
- 2) Maintenance and Servicing- funds to subsidize the cost of maintaining and operating these newly built, refurbished or acquired park projects.
- 3) Administration- funds for the administrative operations of the District, ensuring that the County or other public organization would not need to fund the District from their budgets.

**Evaluation:** 15% of Prop A funds are designated for long-term management of the land, as allocated to the City of Long Beach. Additionally, the Riverpark Coalition, as a non-profit partner, can apply for additional management funds. This is a feasible funding source.

This is not an exhaustive list of all possible operations and maintenance arrangements. There is also the possibility of establishing a special district for managing the park.



## Press Release

# Long Beach City Staff Report on Feasibility of Acquiring Open Space Along the L.A. River is a Sham and a Cover Up

LONG BEACH, CA, April 8, 2021

Yesterday the City of Long Beach released a '[feasibility study](#)' for the acquisition of open space along the Los Angeles River purportedly for parks, nature preserves, and restored wetlands. This study was requested by the City Council, agendized by Councilman Al Austin, very clearly in response to the public pressure campaign mounted by the Riverpark Coalition. With over a thousand petition signatures and growing community support, we have raised public awareness surrounding a development project at 3701 Pacific Place, for a self-storage facility and RV storage lot, which would strip the residents of their last opportunity to see a major new open space development along the river, in line with 25 years of river revitalization planning.

We very much hoped for a legitimate study, and thanked Councilman Austin for this proposal at the time, though we feared the worst—that the City would use this study as a disingenuous brief to defend its own betrayal of the community up to this point (having already greenlit initial stages of commercial development).

Sadly, our worst fears have been realized. This 'feasibility study' is in fact an *in*feasibility study: It is nothing more than a dishonest attempt to rewrite history. It is a retroactive rationalization and justification of decisions already made by callous, arrogant City Planning staff during the past two years, totally in contravention of the 2007/2015 [Long Beach RiverLink Plan](#), the 2015 [Lower LA River Revitalization Plan](#), and the [1996](#) and current [2020 Los Angeles River Master Plans](#). **It specifically takes the crown jewels of river revitalization, the large, 405 Freeway-adjointing tracts 3701 Pacific Place and 712 Baker Street, off the table and hands them over to private developers.**

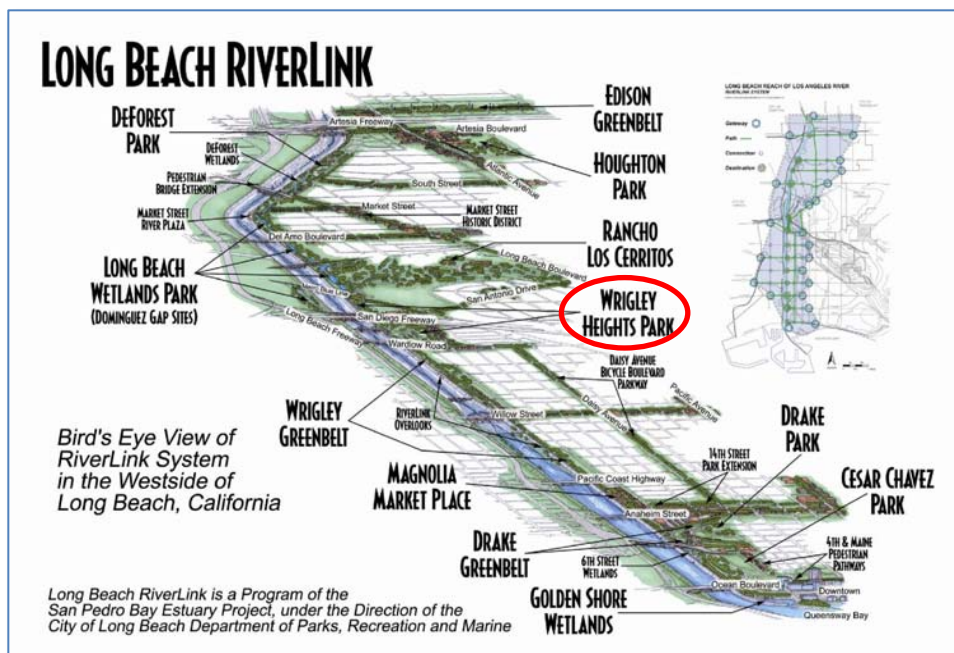
The bottom line is that the City plans to see that these crown jewels of future riverine park space, promised to the park-poor, disadvantaged residents of the western half of the city, *will be developed* and lost forever. River revitalization planning of two and a half decades *and* the residents *be damned*: The Long Beach section of the L.A. River *will be further industrialized*.



The dream that one day park equity would be taken on in a serious manner—that we would begin to rebalance the scales between 17 acres per thousand residents of park space on the Eastside to just 1 acre per thousand in West and North Long Beach—that dream, if the City Council accepts this dishonest report, is dead.

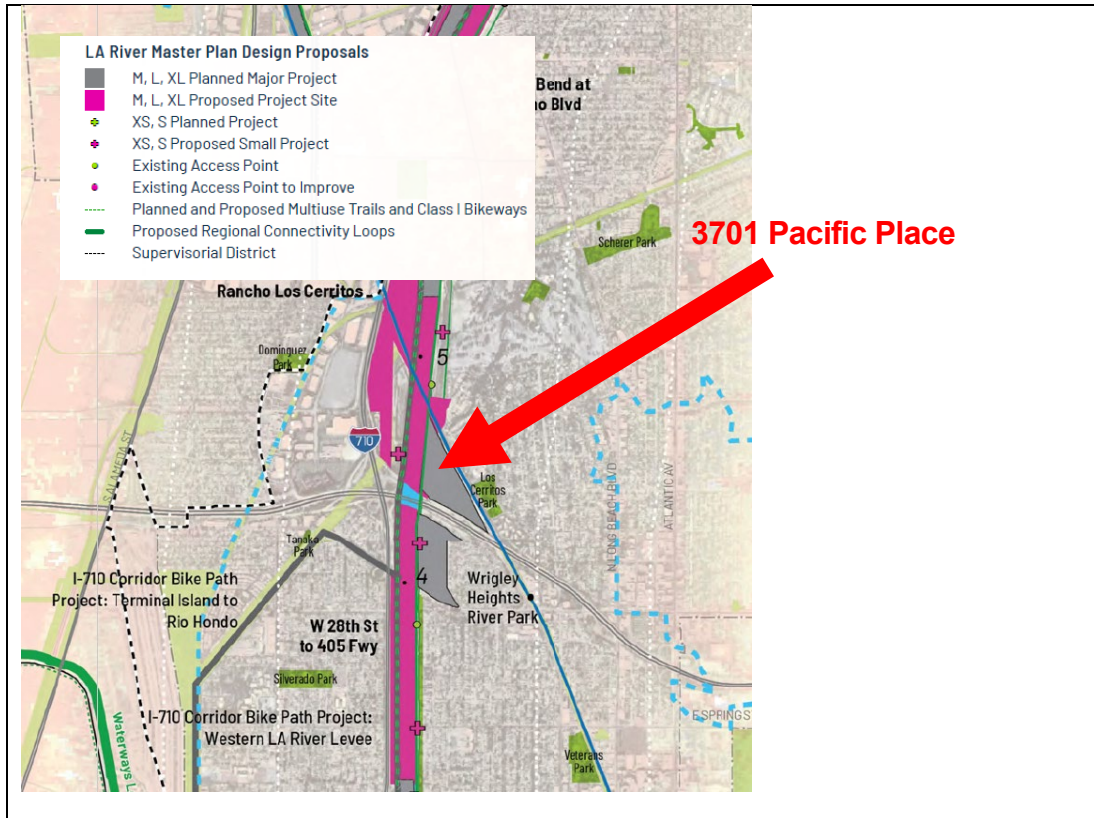
Long Beach City Hall was the executioner when it greenlit the initial development process in 2019 and 2020 and now it is the undertaker. As our recent op-eds in the [Press-Telegram](#), [Signal Tribune](#), and [Beachcomber](#) have made clear, park space is one of the [key equity issues in Long Beach](#). With this report, City Hall has abandoned equity and environmental justice.

For many years, river revitalization proposals have identified 3701 Pacific Place (the former golf driving range) and the adjacent major parcel to the south of the 405 Freeway (the former Oil Operators Inc. site at 712 Baker Street) as the future Wrigley Heights Park North and Wrigley Heights Park South, respectively (or just the Wrigley Heights Park or, in more recent plans, the Wrigley Heights River Park). These would form a large, regional parkland and would serve as the anchors of a revitalized and re-naturalized greenbelt, connecting other parks along almost the entirety of the river in our city.

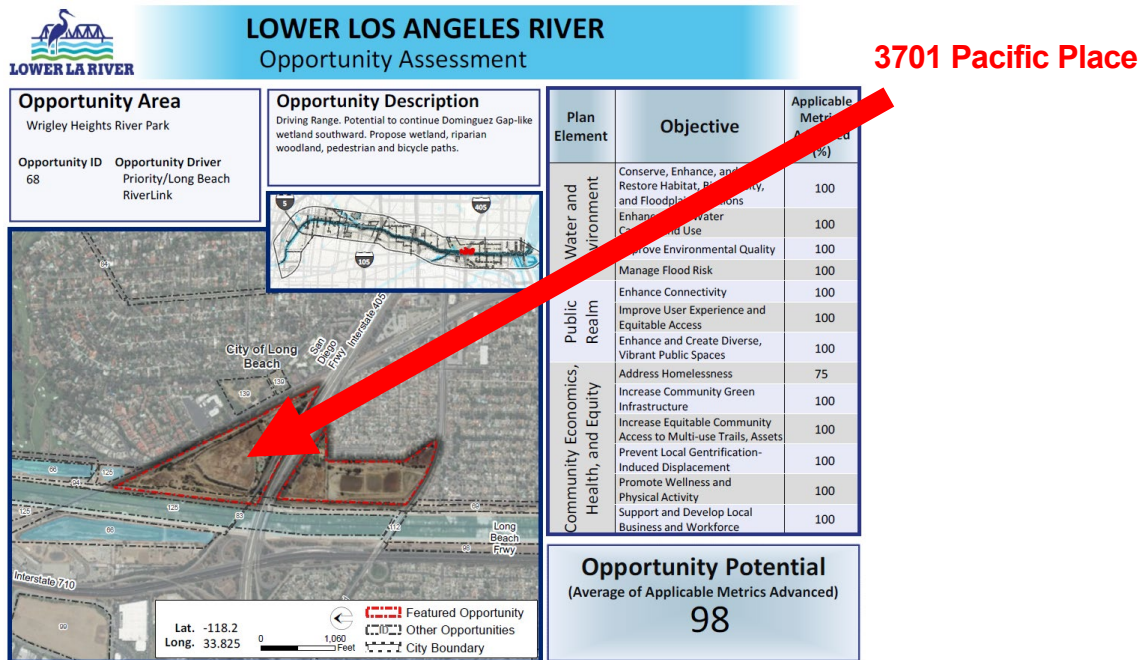


The 2020 LA River Master Plan, currently out in draft form for public comment, identifies two types of parcels along the river: "proposed" projects and longstanding "planned major" projects. In the case of both 3701 Pacific Place and 712 Baker Street this designation is "*planned major project*" in light of the longstanding commitment to this land for future open space.

2020 LA River Master Plan:



## 2015 Lower L.A. River Revitalization Plan:



Yet, instead of identifying the ample sources of grant funding available to acquire, remediate, and add accessible park space and nature preserves to these properties, the City's 'feasibility study' is in fact nothing short of a defense brief against the City's own culpability in selling out the residents and delivering this land into the hands of developers for commercial exploitation.

### **The Big Lie**

After months of activism and community organizing by Riverpark Coalition, City management had to make a decision: either accept responsibility for having made a mistake, the greenlighting of commercial development of land long planned for river revitalization, effectively giving up on that multi-decade effort, without a single community hearing or outreach session, or cover it up.

The choice they made is no surprise, given the pattern we have become used to as residents. They chose to cover it up. To do so, they needed a scapegoat, and so a scapegoat they found.

This entire 'feasibility study' essentially boils down to two sentences on p. 17 of the report:

"2017: The City engaged TPL [Trust for Public Land] again to connect with the private property owners for 712 Baker and 3701 N. Pacific Place and attempt to identify an amount the owners would entertain for the sale of these properties. After 10 months of repeated attempted communication with the property owners with no returned communication, TPL concluded that the property owners were not willing sellers and the City was not able to begin any discussions with the property owners that would result in acquisition."

This statement is categorically false. The Trust for Public Land is a non-profit organization which helps facilitate the acquisition and development of parks and open space. It is not the responsible party for the action or inaction of a municipality failing to serve its residents.

More to the point, we have been in close communication with TPL and it is our understanding that the characterization of TPL's role is wholly inaccurate as a factual matter. The reality is that they very much have an active plan for the acquisition of these properties and they have chronically failed to *receive* the cooperation of the City, despite repeated outreach. They were in fact *never* engaged by the City as its official representative to negotiate for purchasing the land either in 2017 or at any other time. But they have made clear to us, they are extremely motivated and eager to become involved.

It is frankly shocking and very disheartening that City staff would stoop so low as to throw a noble organization like the Trust for Public Land under the bus, so to speak, to cover up their own failure to serve the community and the fact that they are captured by outside development interests.

Furthermore, the City's claim that there is no willing seller of 3701 Pacific Place is blatantly dishonest and misleading. The current owner, an LLC which acquired the property for the purpose of InSite's



development, bought it from Pender Properties Inc. in Nov. 2019 for \$6 million. Pender had just purchased the property one week earlier from Sukkut Development Inc. for \$4 million (making a cool \$2 million, 50% profit in just 8 days).

The City never even made a bid. There were two willing sellers in a row, and the City never took an interest or entered into negotiation. Instead, after receiving an application for development in Feb. 2020, it did everything possible to accommodate and fast track the developer.

That developer is InSite, whose principal for this project is Paul Brown. Paul Brown has made it clear in at least one community meeting that InSite would be willing to sell at the right price. He stated that to activist and Riverpark Coalition board member Ann Cantrell. We do not know what 'the right price' is for one reason: InSite has never been approached by the City, except to facilitate its commercial development and further despoil the Los Angeles River.

What is more, there is a significant vacant parcel beside 3701 Pacific Place, all part of the same tract envisioned as the future park, which is owned by the McDonald Family Trust. Jeanne McDonald has been trying to sell this land for years, to no avail. Facts like these are why this report is nothing short of the Big Lie when it comes to the issue of LA River open space.

And yet other aspects of the 'feasibility study' also demonstrate that it was assembled as a defense brief rather than with a robust commitment to the truth.

For example, p. 12 of the report shows a 2010 'Green Vision Map' which identifies the very properties this report seeks to eliminate from consideration, 3701 Pacific Place and 712 Baker Street, as future wetland project open space. It also shows the former Will Reid Boy Scout Camp (another parcel long ID'd in river revitalization planning) as a park project—that site is now home to a controversial housing tract. The report claims that this map "created the framework for exploration and drove momentum for park acquisition and development". Of course, if that was the case, we would not be where we are now. In fact, in retrospect this is a map of significant lost opportunities and betrayal of the river-adjacent working class, mostly minority, western Long Beach communities.

With regard to the claim that 3701 Pacific Place—despite being seen as ideal for park development by river planning experts for decades, and having formerly served as private open space in the form of a golf driving range—is unsuitable because it is inaccessible, that too is a lie. To argue that because it has one access road at its southern end for vehicles means that the site must then become an "auto-oriented property" is logic impossible to comprehend. The reality is that the site can be accessed by bicycle and pedestrians from four different directions, and greater access could be added. [Here](#) is a map of some potential points of access.

By directly lying, this so-called 'feasibility study' reveals itself as nothing more than a political weapon, a weapon against the activism of residents to save their river for parks and open space. It repeats the false claim that "it is unlikely that the current property owners are willing sellers" (p. 27), despite the fact that no negotiation was ever undertaken, no ground has been broken (except on soil testing), and no City Council

decision has yet been made on whether an EIR (environmental impact report) should be required for for 3701 Pacific Place or if it should be rezoned to 'commercial storage'.

Another important issue unaddressed is trailing liability. Before the current series of owners of 3701 Pacific Place, it was for many years owned by the same petroleum consortium as 712 Baker Street still is, Oil Operators Inc. (OOI). OOI may have trailing liability for any lasting effects due to the industrial operations which fouled the soil, now capped over. The City of Long Beach, as an oil operator, is a member and co-owner of the OOI consortium. Should the City block a full EIR being conducted, it could be argued in court that indeed the City is illicitly attempting to cover up its own trailing liability for this site.

For all the foregoing reasons, this report should not be taken seriously. The only conclusion sought was *infeasibility*, in order to deflect blame for the further despoliation of the river through unfettered concrete commercial paving over and construction.

### **The Truth**

The truth is that park equity is about values and priorities. If there is a will, there is a way, and in this case it would require just a modicum of will. As Riverpark Coalition's own feasibility study ([available here](#)), as well as our conversations with the Rivers and Mountains Conservancy, the Trust for Public Land, and other experts on park space acquisition and development have shown, the money is there.

In fact, when we met with the Deputy City Manager in charge of preparing this report, Kevin Jackson, he admitted it out loud. When we told him about our research, he readily acknowledged that the lack of grant funding is simply not the problem: The money is there.

And the potential to remediate the land for park space is there, too. In fact, it is cheaper and easier to remediate for park space because the method which would be used for any development, capping and containment, lends itself to open space. It allows for the escape of trapped methane more easily (as is the case with Davenport Park), rather than the build up that occurs inside of buildings, and there are no massive million-pound structures pressing down on soil which does not have the strength and consistency solidly to resist and remain static. In the case of the InSite project, they plan to build a massive concrete self-storage facility directly over an over fifty-year-old storm drain pipe which likely would not be able to withstand the pressure and would cause deeply buried chemicals in the soil to leach into the Los Angeles River (a violation of the Clean Water Act). Furthermore, there could be a similar issue due to proximity to two 83-year-old abandoned oil wells and two active pipelines.

The problem is not the money, the problem is City Hall, which loves developers and disregards the residents on a routine basis. We have been told by everyone we have met with, outside of Long Beach, that the problem was Long Beach. Our City simply has refused to engage on the issue of river revitalization and park equity.

We call on the Long Beach City Council, and Councilman Al Austin in particular, who has embraced this report, not to go down in history as failures for their disadvantaged western Long Beach communities.

Heed the words of Mayor Garcia himself, when [in 2016 he wrote](#):

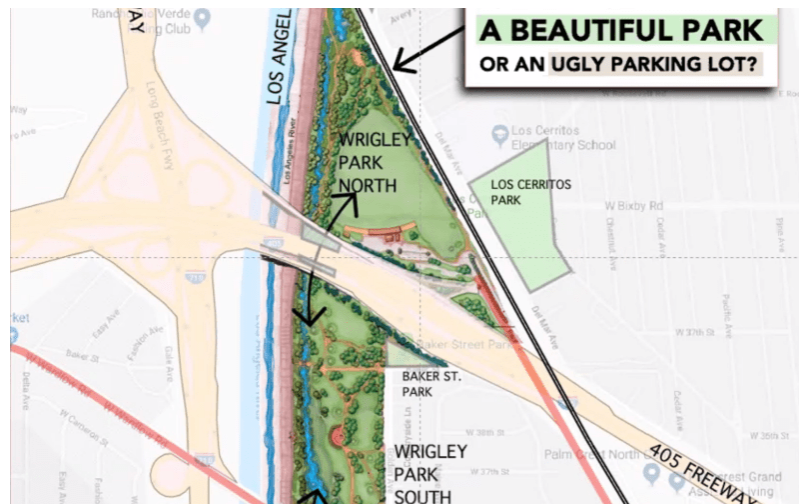
“The Los Angeles River flows through many disadvantaged communities, where residents are disproportionately impacted by poor air quality from local heavy industry and congested transportation corridors and suffer from a severe lack of access to recreational opportunities and outdoor space.” He encouraged utilization of the river as “a unique opportunity for open space development, urban greening, and...a relatively untapped recreational resource for the region.”

The alternatives offered in the report are a farce, and would only make sense as additions to the greenbelt that should be anchored by 3701 Pacific Place and 712 Baker Street.

Frankly, we strongly believe that these so-called alternatives will never actually be developed into open space or even acquired and are intended as a meaningless attempt to ameliorate the community as we watch the major vacant parcel, long promised as a park, being built up with concrete and lost forever.

The County-owned strip adjacent to 3701 Pacific Place, for example, would be a critical component of a large regional park. However, as an alternative to that park, it would merely serve as a “front yard” for the RV storage lot and self-storage facility and an enhancement to the value of the private development at public expense.

This report must be rejected, and the City Council must refuse the request to rezone and commercially develop 3701 Pacific Place when this report is presented and a hearing is held on Tuesday, April 13<sup>th</sup>.



Riverpark Coalition press release archive: [See here](#).

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**From:** Vivian Santibanez [mailto:artyfartyart@gmail.com]  
**Sent:** Tuesday, April 13, 2021 7:12 AM  
**To:** CityClerk <CityClerk@longbeach.gov>  
**Subject:** I oppose Agenda Item #8 -- Build the River Park Instead!

**-EXTERNAL-**

We need to provide open space along the river as we have for eastern side of Long Beach. Not only is it vital recreational area, but the park will act as a flood basin as our weather patterns change.

Thank you.

Vivian Santibanez

--

Vivian Santibañez -Director  
Unconventional Works Studios

**From:** Raj Singh [mailto:therajsingh1b@gmail.com]

**Sent:** Tuesday, April 13, 2021 1:25 PM

**To:** Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; Council District 9 <District9@longbeach.gov>; Mayor <Mayor@longbeach.gov>; CityClerk <CityClerk@longbeach.gov>; CityAttorney <CityAttorney@longbeach.gov>

**Subject:** Re: Material re Agenda Item #8 (4/13/21 Council Meeting) from Riverpark Coalition

**-EXTERNAL-**

passing along.....

You can read **Riverpark Coalition's op-eds** here:

*Press-Telegram* [Op-Ed](#)

*Signal Tribune* [Long Version Op-Ed](#)

*Beachcomber* [Long Version Op-Ed](#)

*Grunion Gazette* [Op-Ed](#)

Or you can read the **outstanding editorial** by the **Long Beach Post**, in support of Riverpark Coalition's position, here:

*Long Beach Post* [Editorial](#)

On Mon, Apr 12, 2021 at 10:43 AM Raj Singh <[therajsingh1b@gmail.com](mailto:therajsingh1b@gmail.com)> wrote:

Dear Honorable Mayor & City Council,

Please find attached the rebuttal to the City's erroneous 'feasibility study' of acquisition of open space. That study was in fact wrong on many points. Thanks go to Riverpark Coalition for correcting the record.

I support the Long Beach Riverpark Coalition's efforts to preserve 3701 Pacific Place as open space for the future park. We have been promised this park for many, many years by river revitalization plans and commitments made by City and County.

To accelerate this horrible development without even requiring an EIR would not only be a violation of those commitments, it would be a violation of both the California Environmental Quality Act and the federal Clean Water Act.

Specifically, I would like to draw your attention to the fact that the developer's MND ("mitigated negative declaration" aka excuse for not conducting an EIR) fails to account for damage to the very, very, very old storm water pipe directly under the massive, very heavy building structure of the new development, all built on very soft, polluted, inconsistent soil. This is a Clean Water Act violation, as

damage to the pipe will cause buried chemicals from the site to find their way into the Los Angeles River.

Please support parks and open space, not illegal commercial exploitation of the river.

Thank You,  
Raj Singh

**From:** Raj Singh [mailto:therajsinghlb@gmail.com]

**Sent:** Tuesday, April 13, 2021 3:48 PM

**To:** Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; Council District 9 <District9@longbeach.gov>; Mayor <Mayor@longbeach.gov>; CityClerk <CityClerk@longbeach.gov>

**Subject:** OMG Developer for Agenda #8 Signed up ALL SPEAKERS!!!!!!

**-EXTERNAL-**

Developer lobbyist Murchison signed up ALL SPEAKERS!!!!

<https://www.lbreport.com/news/apr21/rivpubspk.htm>

SPEAKER LIST ATTACHED. STARTS WITH MURCHISON CONSULTING.. ALL OTHERS SIGNED UP A FEW SECONDS LATER!!!

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passing along.....

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Please support parks and open space, not illegal commercial exploitation of the river.

Thank You,  
Raj Singh

**From:** Samantha Steinel [mailto:samanthasteinel@hotmail.com]  
**Sent:** Tuesday, April 13, 2021 4:51 PM  
**To:** CityClerk <CityClerk@longbeach.gov>  
**Cc:** Council District 7 <District7@longbeach.gov>  
**Subject:** I Object to Agenda Item #8

**-EXTERNAL-**

Dear City Clerk,

I am concerned about having clean air and open spaces for generations to come. I do NOT want to pave paradise and put up a parking lot! I want a park to be built; The Riverpark. Having a park would help mitigate our terrible air quality from The Port of Long Beach.

Please do NOT approve this environmental disaster.

Thank you for your consideration.

Sincerely,  
Samantha Steinel  
District 7

**From:** Regina Taylor [mailto:rnewman1212@gmail.com]

**Sent:** Tuesday, April 13, 2021 12:20 PM

**To:** CityClerk <CityClerk@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; Council District 9 <District9@longbeach.gov>

**Subject:** Agenda Item #8 3701 Pacific Place

**-EXTERNAL-**

I am opposed to this project in its current location. providing parking and servicing to 580 plus large RV's has no place within the boundaries of two council districts neighborhoods both of which are in need of more park/open space particularly district 7. The site is toxic and has never been remediated which would be a natural function of trees/shrubs/nature if the parking lot were situated elsewhere. It is also a natural area for water retention after rains which would protect those of us downstream (my home is downstream).

I also believe the west side has borne more than its share of discrimination in not being able to maximize its available open space thru the faulty decisions of council in maximizing density along the metro and specifically the plans around the Wardlow Station.

A full EIR is needed the results of which will support your decision to move this project elsewhere and give residents much needed open space in our neighborhood.

Regina Taylor

**From:** atolkoff@aol.com [mailto:atolkoff@aol.com]  
**Sent:** Monday, April 12, 2021 8:10 PM  
**To:** CityClerk <CityClerk@longbeach.gov>  
**Subject:** 3701 Pacific Place Appeal

**-EXTERNAL-**

Please include this in the record.

Re: 3701 Pacific Place Appeal

The the members of the Long Beach City Council:

I respectfully and strongly urge you to sustain the appeal and overturn the decision of the Long Beach Planning Commission. For more than 30 years, my family and I have lived quite close to the property and will be – and quite possibly already have been – adversely affected by this site's pollution.

There are a number of reasons why the City Council should sustain the appeal. Six of them are:

1. Keep the promise - For years, the City of Long Beach has had the explicit goal of leaving this property as open space, with the intention to create park/recreational land for west side residents. I well remember the City announcing the receipt of more than a \$5,000,000 grant expressly for the above purpose. (I have since learned the City returned this money. Apparently, such took place with no fanfare whatsoever.)
2. Diesel Death Zone - The people living near the 710 Freeway inhabit what has come to be termed the Diesel Death Zone. In my case, I specifically chose this area to raise my family, because research showed in 1990 it had the "cleanest air in the country." Many years later, after the release of USC's study, I learned that in fact I had relocated to what was and is probably the nation's *dirtiest* air. We need and deserve as much open land and trees as possible to help mitigate the harm to our long-term health.
3. Up-zoned with inadequate notice & no outreach - I am informed that this site's up-zoning occurred during the last moments of the Land Use Element negotiations. I happened to be present at that City Council meeting. Had I understood at the time what specific property was being up-zoned, I would have attempted to argue against it. Indeed, I am convinced that most citizens would have done so, as they still would. (As I recall, however, the change occurred after the Council was behind the rail.)
4. EIR - As you know, this land was heavily polluted for many decades. An EIR should be mandatory, regardless of almost any proposed use. Those of us potentially affected by the contaminants deserve to know that our City Council has done everything reasonably possible to protect our health, our quality of life and our property values.
5. Investigate Staff Feasibility Study's accuracy – As you may be aware, the city staff Feasibility Study states the City engaged the Trust for Public Land and that TPL subsequently reported that the landowner is an "unwilling seller." On the other hand, the RiverPark Coalition reports that TPL found the City was the primary obstacle. These two positions seem irreconcilable. Before making a decision which will affect the lives of tens of thousands of Long Beach residents, it behooves the City Council to establish the truth. The very credibility of the Council and our city government is at stake.
6. Environmental Justice – Long Beach has taken the position that environment equity is a top priority. It is well known that the east side has 17 times more parkland per capita than the west side. It seems to me that the City Council could and should prove that it walks its talk.



Thank you for considering my views.  
Very truly yours,  
Alan Tolkoff

-----Original Message-----

From: Mike Vaccaro [mailto:mike@mikevaccaro.com]

Sent: Monday, April 12, 2021 9:03 PM

To: CityClerk <CityClerk@longbeach.gov>; Mike Vaccaro <mike@mikevaccaro.com>

Subject: I oppose Agenda Item #8 -- Build the River Park Instead!

-EXTERNAL-

Are you really going to let someone build a business without an EIR?

REALLY?

Is the city that greedy?

You could instead cut back on spending for unnecessary projects instead.

Well you are going to do what you want anyway most likely.

The best i could hope for is more beauty.

Just think how great that would look from the transition road from the 405 to the 710.

And think how the neighborhood would appreciate the peace.

Mike Vaccaro

District 7

Sent from my iPhone

**From:** marievv@verizon.net [mailto:marievv@verizon.net]  
**Sent:** Tuesday, April 13, 2021 10:36 AM  
**To:** CityClerk <CityClerk@longbeach.gov>  
**Subject:** I oppose Agenda Item #8 -- Build the River Park Instead!

**-EXTERNAL-**

Time to listen to the citizens.

Marie and Richard Van Vooren

**From:** Debbie Vardi [mailto:[debbie@atvardi.com](mailto:debbie@atvardi.com)]

**Sent:** Monday, April 12, 2021 7:40 PM

**To:** Council District 1 <[District1@longbeach.gov](mailto:District1@longbeach.gov)>; Council District 2 <[District2@longbeach.gov](mailto:District2@longbeach.gov)>; CityClerk <[CityClerk@longbeach.gov](mailto:CityClerk@longbeach.gov)>; Mayor <[Mayor@longbeach.gov](mailto:Mayor@longbeach.gov)>; Council District 4 <[District4@longbeach.gov](mailto:District4@longbeach.gov)>; Council District 5 <[District5@longbeach.gov](mailto:District5@longbeach.gov)>; Council District 6 <[District6@longbeach.gov](mailto:District6@longbeach.gov)>; Council District 7 <[District7@longbeach.gov](mailto:District7@longbeach.gov)>; Council District 8 <[District8@longbeach.gov](mailto:District8@longbeach.gov)>; Council District 9 <[District9@longbeach.gov](mailto:District9@longbeach.gov)>

**Subject:** Re: I STRONGLY OPPOSE AGENDA ITEM 8 - THE 3701 PACIFIC PLACE PROJECT ON TOMORROW'S CITY COUNCIL AGENDA

**-EXTERNAL-**

Please listen to your constituents and do all that you can to build the River Park for all of us. This would be the strongest sign that our district representatives are truly representing the people they have committed to serve. Do what's right for the people, our health, our environment and future generations. If you do what's right, Long Beach can truly become a mecca in southern California, a city that thrives rather than is in decline as we residents experience it in so many ways. Think long term and all of us benefit as will your political future.

If you vote against the people you represent and renege on the decades long promise to revitalize the part of the Los Angeles River that runs through Long Beach, if you remove the last few opportunities to build much needed expansive park land on the west side of Long Beach, the city will become increasingly less livable and not the travel destination it could be. Please vote to improve Long Beach! Post Covid 19, we need this more than ever!

Thank you for paying attention and responding to our concerns.

--

Debra (Debbie) and Gidon Vardi

[debbie@atvardi.com](mailto:debbie@atvardi.com)

On Mon, Apr 12, 2021 at 7:36 PM Debbie Vardi <[debbie@atvardi.com](mailto:debbie@atvardi.com)> wrote:

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**Sent:** Monday, April 12, 2021 7:36 PM

**To:** Council District 1 <[District1@longbeach.gov](mailto:District1@longbeach.gov)>; Council District 2 <[District2@longbeach.gov](mailto:District2@longbeach.gov)>;  
[distric3@longbeach.gov](mailto:distric3@longbeach.gov); CityClerk <[CityClerk@longbeach.gov](mailto:CityClerk@longbeach.gov)>; Mayor <[Mayor@longbeach.gov](mailto:Mayor@longbeach.gov)>;  
Council District 4 <[District4@longbeach.gov](mailto:District4@longbeach.gov)>; Council District 5 <[District5@longbeach.gov](mailto:District5@longbeach.gov)>; Council  
District 6 <[District6@longbeach.gov](mailto:District6@longbeach.gov)>; Council District 7 <[District7@longbeach.gov](mailto:District7@longbeach.gov)>; Council District 8  
<[District8@longbeach.gov](mailto:District8@longbeach.gov)>; Council District 9 <[District9@longbeach.gov](mailto:District9@longbeach.gov)>

**Subject:** I STRONGLY OPPOSE AGENDA ITEM 8 - THE 3701 PACIFIC PLACE PROJECT ON TOMORROW'S  
CITY COUNCIL AGENDA

**-EXTERNAL-**

Please listen to your constituents and instead do all that you can to build the River Park for all of us. This would be the strongest sign that our district representatives are truly representing the people they have committed to serve. Do what's right for the people, our health, our environment and future generations. If you do what's right, Long Beach can truly become a mecca in southern California, a city that thrives rather than is in decline as we residents experience it in so many ways. Think long term and all of us benefit as will your political future.

If you vote against the people you represent and renege on the decades long promise to revitalize the part of the Los Angeles River that runs through Long Beach, if you remove the last few opportunities to build much needed expansive park land on the west side of Long Beach, the city will become increasingly less livable and not the travel destination it could be. Please vote to improve Long Beach! Post Covid 19, we need this more than ever!

Thank you for paying attention and responding to our concerns.

--

Debra (Debbie) and Gidon Vardi

[debbie@atvardi.com](mailto:debbie@atvardi.com)

**From:** Kimberly Walters [mailto:kimwalters@gmail.com]

**Sent:** Tuesday, April 13, 2021 4:54 PM

**To:** Mayor <Mayor@longbeach.gov>; CityClerk <CityClerk@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; Council District 9 <District9@longbeach.gov>

**Cc:** Editor BeachComber.news <editor@beachcomber.news>; [Beachcomber] Stephen Downing <stephen.beachcomber@gmail.com>; [Forthe.org] Joe Brizzolara <joe@forthe.org>; [Forthe.org] James Andrew Carroll <andrew@forthe.org>; Editor Gazettes <editor@gazettes.com>; HSalt Gazettes.com <hsalt@gazettes.com>; Louis Sahagun LA Times <louis.sahagun@latimes.com>; [LBBJ] <editor@lbbj.com>; Info LBBJ <info@lbbj.com>; Brandon Richardson LBBJ <Brandon\_Richardson@lbbj.com>; Alena Maschke - LBBJ <alena\_maschke@lbbj.com>; longbeachlocalnews@gmail.com; Editor LBPost <editor@lbpost.com>; jason@lbpost.com; jeremiah@lbpost.com; Kelly Puente - LBPost <kelly@lbpost.com>; melissa@lbpost.com; sebastian@lbpost.com; stephanie@lbpost.com; [LBPost] Tim Grobaty <tim@lbpost.com>; Mail LB Report <mail@lbreport.com>; Chris Haire SCNG.com <chaire@scng.com>; [PT] Donna Littlejohn <dlittlejohn@scng.com>; Emily Rasmussen - SCNG <erasmussen@scng.com>; [PT] Hayley Munguia <hayley.munguia@gmail.com>; PT News Press Telegram <ptnews@presstelegram.com>; [PT] Rich Archbold <rarchbold@scng.com>; [PT] Hunter Lee <hlee@scng.com>; [PT] Nathan Percy <npercy@scng.com>; Phillip Zonkel QVoiceNews <Phillip.Zonkel@QVoiceNews.com>; Newspaper SignalTribune <newspaper@signaltribune.com>; [The Sprawl] Joe Brizzolara <joebrizzolaralongbeach@gmail.com>; [Viking News] <vikingsnews@lbcc.edu>; [Diana Lejins] <dianalejins@yahoo.com>; [LB4D] Joe Mello <mello.joe@gmail.com>; jeovalle <jeovallec@gmail.com>; Carlos Stuardo Ovalle <csovalle@gmail.com>

**Subject:** Developer at 3701 Pacific Place has taken all public comment slots for tonight's agenda item

**-EXTERNAL-**

Dear Elected Officials and Members of the Press:

It has come to the attention of the Riverpark Coalition that “Between 7:30:59 and 7:33:08, twenty speakers signed up. By 7:34 a.m. April 7, all 20 public speaker slots for the hearing agenda item [Item #8] were filled” ([LBReport.com article today](#)).

Those speakers who signed up are below. The first is with Murchison Consulting, one of the lobbying firms for developer InSite, and we have received confirmation that indeed all the names that follow were entered into the City’s speaking sign up system by Murchison Consulting. These are all speakers organized to paint an extraordinarily deceptive perspective on community support for the development, when in fact almost none exists.

That fact has been demonstrated for months now as InSite’s facebook page for the 3701 Pacific Place project has been filled with negative comments which are periodically deleted or hidden. Indeed the

Riverpark Coalition has amassed over 1,000 signatures against this project and in support of at minimum an EIR. We have heard very few community voices in support, perhaps 1 for every 100 opponents.

Riverpark Coalition has contacted Long Beach City Clerk Monique De La Garza about this matter, who confirmed that, if her office can independently confirm what happened, it would set a terrible precedent.

A single developer cannot be allowed to monopolize public comment for an appeal hearing. We demand that additional accommodation be made for the genuine public opponents of this project.

Sincerely,

The Riverpark Coalition

						April 13, 2021 Agenda Item: (Select One)	If you're signing up for "Non-Agenda Public Comment" please provide the subject matter
ID	Start time	Completion time	Name: (First and Last Name)	Email:			
1	4/7/21 7:30:32	4/7/21 7:30:59	Tracy Hoelzel	<a href="mailto:Tracy@murchisonconsulting.net">Tracy@murchisonconsulting.net</a>		8	
2	4/7/21 7:31:01	4/7/21 7:31:23	Verdawn Davis	<a href="mailto:verdawn24@msn.com">verdawn24@msn.com</a>		8	
3	4/7/21 7:31:16	4/7/21 7:31:34	Joan wood	<a href="mailto:joanwood0210@yahoo.com">joanwood0210@yahoo.com</a>		8	
4	4/7/21 7:31:03	4/7/21 7:31:35	Mainak D'Attaray	<a href="mailto:mdattaray@dattaraylaw.com">mdattaray@dattaraylaw.com</a>		8	
5	4/7/21 7:31:28	4/7/21 7:31:43	Elaine Robinson	<a href="mailto:mama4444happy@gmail.com">mama4444happy@gmail.com</a>		8	
6	4/7/21 7:30:31	4/7/21 7:31:53	John Moreland	<a href="mailto:jrmoreland@gmail.com">jrmoreland@gmail.com</a>		8	
7	4/7/21 7:31:47	4/7/21 7:32:02	Shawn Boike	<a href="mailto:spboike@insta-grid.com">spboike@insta-grid.com</a>		8	
8	4/7/21 7:31:48	4/7/21 7:32:02	Courtney Harris	<a href="mailto:cchood80@gmail.com">cchood80@gmail.com</a>		8	
9	4/7/21 7:31:44	4/7/21 7:32:08	Pamela Sevoian	<a href="mailto:pupton7@aol.com">pupton7@aol.com</a>		8	
10	4/7/21 7:32:06	4/7/21 7:32:18	David Hammond	<a href="mailto:daveihammond@gmail.com">daveihammond@gmail.com</a>		8	
11	4/7/21 7:31:55	4/7/21 7:32:27	Mary Carter Reed	<a href="mailto:mary_reed1234@yahoo.com">mary_reed1234@yahoo.com</a>		8	
12	4/7/21 7:32:11	4/7/21 7:32:32	Ryan Kail	<a href="mailto:ryankail69@icloud.com">ryankail69@icloud.com</a>		8	
13	4/7/21 7:32:13	4/7/21 7:32:36	Linda Powell	<a href="mailto:Caderlo2230@gmail.com">Caderlo2230@gmail.com</a>		8	



14	4/7/21 7:32:22	4/7/21 7:32:39	Mason Wright	<a href="mailto:Mason@rebuiltca.com">Mason@rebuiltca.com</a>	8
15	4/7/21 7:32:28	4/7/21 7:32:42	David Giulio Zanatta	<a href="mailto:davidzanatta@jcaresources.com">davidzanatta@jcaresources.com</a>	8
16	4/7/21 7:32:42	4/7/21 7:32:56	Anastasia Apostol	<a href="mailto:stylingbyanastasia@yahoo.com">stylingbyanastasia@yahoo.com</a>	8
17	4/7/21 7:32:39	4/7/21 7:32:56	Linda Wilson	<a href="mailto:lindaiwilson@att.net">lindaiwilson@att.net</a>	8
18	4/7/21 7:32:30	4/7/21 7:32:56	Cora F. Merlos	<a href="mailto:jonesmom8999@gmail.com">jonesmom8999@gmail.com</a>	8
19	4/7/21 7:32:45	4/7/21 7:33:00	Helen Currie	<a href="mailto:hcurriemd@hotmail.com">hcurriemd@hotmail.com</a>	8
20	4/7/21 7:32:42	4/7/21 7:33:08	Ann Reynolds	<a href="mailto:lareynolds44@gmail.com">lareynolds44@gmail.com</a>	8

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Dr. Kimberly Walters

[Assistant Professor](#), International Studies, CSULB

Secretary, [Riverpark Coalition](#)

**From:** Kimberly Walters [mailto:kimwalters@gmail.com]  
**Sent:** Tuesday, April 13, 2021 4:32 PM  
**To:** Pablo Rubio <Pablo.Rubio@longbeach.gov>; CityClerk <CityClerk@longbeach.gov>  
**Cc:** Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; Mayor <Mayor@longbeach.gov>  
**Subject:** Fwd: Pacific Place Project 3701 Pacific Place Agenda Item 21-0308

**-EXTERNAL-**

----- Forwarded message -----

**From:** Jim Hannigan <[jim@ppsfx.com](mailto:jim@ppsfx.com)>  
**Date:** Tue, Apr 13, 2021, 3:27 PM  
**Subject:** Pacific Place Project 3701 Pacific Place Agenda Item 21-0308  
**To:** <[contact@riverparkcoalition.org](mailto:contact@riverparkcoalition.org)>

Honorable Mayor Garcia and Members of the City Council:

We live on Elm Avenue in Bixby Knolls east of the proposed development site. We often walk to Los Cerritos Park.

We support the appeals seeking to overturn the Planning Commission approval of the 3701 Pacific Place project because among other things, despite a site which presents environmental challenges, unknowns and potential impacts that can only be described as extreme, the Planning Commission decision was informed by a lower tier of environmental analysis under CEQA: a Mitigated Negative Declaration (MND), rather than the more thorough and complete Environmental Impact Report (EIR).

Many others, including several of the appellants, have raised issues of MND inadequacy and the need for an EIR. The response from the city as lead agency can be summarized as "An EIR is not mandatory".

But that misses the point of CEQA. CEQA was enacted, not to obstruct development or impoverish developers, but to provide public agencies, decision makers, and the public they serve with accurate, impartial, and appropriate information about the potential environmental impacts of a project so that the decision makers can make good decisions.

**In her appeal Renee Lawler raised "propane volatile risks" associated with RVs.**

The reply to her appeal on this subject is cursory, bordering on non responsive :

*"There is no propane dispensing on site. It is assumed that propane will only be associated with the recreational vehicles and used for heating and cooking. Recreational vehicles need to meet a variety of Federal Standards when being manufactured and this includes how the storage tanks for propane are installed and maintained. The Operators of the facility have requirements that each stored recreational vehicle be operational and maintained. If the Recreational Vehicles are not operational and maintained, the owner has mechanisms to evict the leasee."*

In addition to cooking and heating, many RV refrigerators switch to propane combustion operation when electrical power is not available, a common occurrence when an RV is parked with perishables onboard.

**An internet search for "RV Fires" "RV Storage Fires" and "Boat Storage Fires" yields abundant returns including links to news coverage of fires at RV storage facilities, often involving multiple vehicles with fire spreading from one to another.**

Project plans show fire hydrants in the parking area and identify fire lanes, but the gated single point access to the site and the absence of road access to any portion of the site perimeter could present significant difficulties should a fire occur in the parking area. There would not be an alternative to the commitment of firefighting resources past the single point of access/egress and onto the site itself, placing personnel and equipment between and among the densely packed stored vehicles.

The MND offers no analysis of fire risk and related environmental impacts of potential significance specific to the storage of large numbers of RVs in close proximity. Checklists from the CEQA guidelines prompt analysis of impacts related to wildfires, and to whether a project would require additional public service facilities, but the guidelines are not an absolute nor exhaustive template. Any area of potential significant impact deserves analysis, and in this instance, the MND provides none.

Similarly, neither RV generator nor RV air conditioning operations are considered in the MND determinations of potential project operational noise impacts. The project would provide RV parking spaces, but no electric power hookups. Per appendix B, all MND predictions of operational Air Quality and operational Green House Gas emissions and potential impacts are based on a theoretical 10.4 acre "parking lot" calculated to contribute emissions only when vehicles are moving, and zero emissions, none whatever when up to 580 RVs are stationary.

<> But many parked RVs, including even trailers with no powertrains would unquestionably produce emissions from the operation of onboard diesel, gasoline or propane powered generators. Onboard RV generators are substantial units, usually with electric start multi-cylinder engines and electrical outputs of 4 kilowatts or more.

Without "shore" electric power, regular generator operation would be the preference of many space renters, who might not have or not wish to deploy solar charging, in order to keep storage batteries charged and the rig functional. Generator operation would be the only way to operate an RV's air conditioning whether to control humidity or to maintain comfortable interior temperatures when loading, unloading or preparing for storage or travel.

In these instances the MND is clearly in error, the operational analysis fails to account for environmental impacts related to RV generators

An EIR is not a punishment, it is the best means available to get information of the highest quality to, in this case the Planning Commission and you the City Council. The type of information that could be crucial, when, as now, a site is contaminated, and a usage is controversial, or when an environmental impact is potentially subtle or cumulative.

**An MND is simply of lesser quality than an EIR. Indeed, decisions informed by an MND face a lower threshold of legal challenge than those supported by an EIR.**

What is wrong with seeking the best and most complete information on which to base an important decision ?

Respectfully

Jim Hannigan, Meg Crabtree  
3732 Elm Ave  
Long Beach 90807

[www.nps.gov/articles/p52-rv-fire-safety-101.htm?stat=041395&socialnet=facebook](http://www.nps.gov/articles/p52-rv-fire-safety-101.htm?stat=041395&socialnet=facebook)

[www.firehouse.com/community-risk/video/12276406/tx-rv-storage-fire](http://www.firehouse.com/community-risk/video/12276406/tx-rv-storage-fire)

[www.nbcbayarea.com/news/local/fire-reported-at-rv-storage-facility-near-highway-4-in-concord/155806/](http://www.nbcbayarea.com/news/local/fire-reported-at-rv-storage-facility-near-highway-4-in-concord/155806/)

<https://www.cummins.com/generators/rv-generators#products>

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Dr. Kimberly Walters

[Assistant Professor](#), International Studies, CSULB

Secretary, [Riverpark Coalition](#)



**From:** Weaver, Shane [mailto:Shane.Weaver@asm.ca.gov]  
**Sent:** Tuesday, April 13, 2021 4:12 PM  
**To:** CityClerk <CityClerk@longbeach.gov>  
**Subject:** Long Beach City Council-Agenda Item 8 Comments

**-EXTERNAL-**

Good afternoon,

Please see the comments below on behalf of Assemblymember Patrick O'Donnell.

As your voice and representative in Sacramento, Assemblymember O'Donnell has requested \$2.3 million in State funding to secure and improve open space along the Los Angeles River and 710 Freeway and impacted neighborhoods.

This requested funding will preserve open space and help improve the environment and quality of life for our Long Beach community living near the Los Angeles River.

Assemblymember O'Donnell acknowledges individuals and groups, that include River Park Coalition, the Sierra Club Los Cerritos Wetlands Task Force, Citizens About Responsible Planning, Historic Equestrian Trail Association of So Cal, and Los Cerritos Neighborhood Association, in their efforts to increase green space and park equity in west Long Beach.

Assemblymember O'Donnell would like to thank Councilmember Austin for requesting a feasibility report and his efforts to identify open space along the Los Angeles River.

Best,

**Shane Weaver**

Office of Assemblymember Patrick O'Donnell  
5000 E. Spring Street, Suite 550, Long Beach, CA 90815  
Desk: 562.429-0470 | [Shane.Weaver@asm.ca.gov](mailto:Shane.Weaver@asm.ca.gov)



**From:** Joe Weinstein [mailto:jweins123@hotmail.com]

**Sent:** Monday, April 12, 2021 11:35 PM

**To:** CityClerk <CityClerk@longbeach.gov>; Mayor <Mayor@longbeach.gov>; Council District 1 <District1@longbeach.gov>; Council District 2 <District2@longbeach.gov>; Council District 3 <District3@longbeach.gov>; Council District 4 <District4@longbeach.gov>; Council District 5 <District5@longbeach.gov>; Council District 6 <District6@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Council District 8 <District8@longbeach.gov>; Council District 9 <District9@longbeach.gov>

**Subject:** Item 8, City Council Meeting of 13 April 2021 - Hearing: 3701 Pacific Place - Comment for the public record

**-EXTERNAL-**

To: City Clerk, City Council and Mayor, City of Long Beach

Subject: Item 8, City Council Meeting of 13 April 2021 - Hearing: 3701 Pacific Place - Comment for the public record

Dear Council Members and Mayor,

Contrary to City management's anti-precaution anti-equity anti-park recommendations, please uphold the appeals of the Planning Commission's ill-advised decisions on the proposed project at 3701 Pacific Place. In particular:

\*Uphold due precaution. Do not certify the inadequate proposed Mitigated Negative Declaration (MND). Instead, do require a full Environmental Impacts Analysis and Report (EIR) before finally approving ANY specific project at the site.

The site has a history of known and potentially much unknown toxic contamination. For due precaution, a full environmental analysis and report (EIR) is needed, not merely a minimal MND, to develop and provide needed detail about all contaminants (known or as yet unknown) and their potential impacts.

\* Uphold, don't sabotage, minimal environmental justice and equity.

On 5 January, City management presented to you a 'Climate Action and Adaptation Plan' (CAAP). In the name of 'environmental justice and equity', the CAAP text notes and laments that - versus other parts of the city and indeed all urban California - Long Beach neighborhoods near the Los Angeles River are drastically underserved by public open space and parkland acreage. Despite this

CAAP lament, City management now asks you to approve a project which would entrench and intensify the cited INjustice and INequity. \_

\* Uphold, don't sabotage, decades of official river park plans, promises and reserve funding.

For decades, city and regional and state officials have spent time and energy to create plans and broadcast promises - some even in recent days - for a lower LA River river park progression - and have gotten the State to reserve millions of dollars to implement the promises. All the plans (LB Riverlink, LA River Revitalization, LA River Master Plan) encompass the 3701 parcels among the key needed riverside parcels. City management now asks you to approve a project which will directly sabotage all the plans and the promises.

CONCLUDING PLEA: PLEASE HELP, RATHER THAN HURT: the future of our city, your own legacy and credibility as city officials, and our quality of life (and property values too) as Long Beach residents. All these are now at stake.

Please uphold the appeals. Uphold equity and promises. Uphold reasoned precaution by requiring a full environmental impact analysis and report (EIR) for any project at the site.

Joe (Joseph M.) Weinstein