

Amy Harbin

From: Anna Walker <annawalker031@gmail.com>
Sent: Wednesday, May 21, 2025 9:41 AM
To: Amy Harbin; LBDS-EIR-Comments; Mayor; Shawna Stevens; Paul Monge; Council District 1; Lynn Ward; Council District 2; Rahul Sen; Council District 3; Nick Kaspar; Council District 4; Isabel Martinez; Council District 5; Robert Allarte; Council District 6; Chork Nim; Council District 7; Sean Bernhoft; Council District 8; Franbert Calderon; Council District 9; Anjelica Vargas; City Manager; Clayton Heard
Subject: Vote 'NO on the Environmental Impact Report for the Pacific Place Project (3701 Pacific Place)

-EXTERNAL-

Dear Long Beach Planning Commission and City Council Members:

As a resident of Long Beach deeply concerned about the future of our community, I urge you to vote "NO" on the Environmental Impact Report (EIR) for the proposed Pacific Place Project at 3701 Pacific Place. The draft EIR contained significant deficiencies that failed to adequately address the substantial environmental impacts this development would have on our community. We have every reason to believe that the final EIR will replicate these same deficiencies.

Not only that - this land needs to stay open to encourage people to run, to get outside, rather than stay inside and be a slave to consumerism. Right now the riverbed is beautiful with wildflowers in bloom, and I am planning to run there soon, and encourage everyone to get out for a walk or run.

The Report Fails to Adequately Address Critical Health Concerns

The proposed site sits between the 405 and 710 freeways in an area already designated as a "diesel death zone." Our community, predominantly Hispanic and Asian residents, already experiences pollution levels worse than 89% of communities in California, with asthma rates higher than 92% of communities statewide. Despite these alarming statistics, the DEIR:

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- Proposed only one inadequate measure to control construction pollution
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- Failed to properly analyze air quality impacts from hundreds of RVs
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- Acknowledged increased cancer risk without providing adequate mitigation
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- Ignored potential toxic emissions from the proposed wastewater dump station
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Toxic Contamination Analysis Is Insufficient

The DEIR's analysis of soil and water contamination at this former oil operator site was seriously flawed:

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- It improperly deferred responsibility to DTSC rather than conducting a thorough analysis
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- Relied on outdated studies from 2019-2020
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- Provided no verification of proper handling for previously moved contaminated soil
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- Failed to address potential impacts on groundwater, storm drains, and oil infrastructure
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- Postponed critical cleanup plans until after project approval
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The Project Description Was Incomplete and Relied on Outdated Information

A complete and accurate project description is fundamental to any environmental review, yet this DEIR:

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- Omitted basic operational details including permitted vehicle types, hours of operation,
- and wastewater dump station specifications
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- Relied on outdated studies from a previously rejected environmental document
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- Used analysis from a smaller version of the project (35% smaller) without updating for
- the current proposal
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Better Alternatives Were Unfairly Rejected

The DEIR defined the project so narrowly that only a storage facility could meet its objectives, and improperly dismissed:

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- A park alternative based on outdated information without considering new funding opportunities
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- Alternative locations for the RV parking lot without adequate analysis
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- Any substantially different use of the property that might better serve community needs
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The Project Contradicts Years of Official Planning Documents

For years, multiple official plans have designated this exact site for a park:

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- The Long Beach RiverLink Plan
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- The Los Angeles River Master Plan
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- The Lower LA River Revitalization Plan (which called it the "gem of the Lower LA River")
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- West Long Beach Livability Plans
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- Common Ground from the Mountains to the Sea Plan
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These designations reflect the severe shortage of open public recreational space in western Long Beach—just 1.33 acres per 1,000 residents compared to 16.7 acres in Eastern Long Beach and far below the city's goal of 8 acres.

Additional Critical Impacts Are Ignored

The DEIR also failed to adequately address:

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- Traffic safety concerns near the Metro train crossing and with slow-moving RVs
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- Water quality impacts from polluted runoff into the Los Angeles River
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- Loss of groundwater recharge in one of the last remaining areas where this can occur
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- Protection of sensitive plant species including the southern tar plant
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- Habitat loss for endangered species including the burrowing owl, bats, and the Crotch
- bumble bee
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- Restoration of equestrian trails and connected public green space
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This Site Represents a Critical Opportunity for Environmental Justice

This site represents one of the last opportunities to create desperately needed open public recreational space in a part of our city that has been environmentally disadvantaged for generations. California environmental law prohibits approving projects with significant environmental impacts when better alternatives exist.

I urge you to uphold your commitment to environmental justice and park equity by voting "NO" on this inadequate environmental review process. At minimum, a new and thorough environmental review must be completed before any decision can be made about this important piece of land.

Sincerely,

Best,

Anna Walker



Project Coordinator

Amy Harbin

From: Christina Cancino <christinacancino1@yahoo.com>
Sent: Thursday, May 22, 2025 9:58 PM
To: Amy Harbin; LBDS-EIR-Comments; Mayor; Shawna Stevens; Paul Monge; Council District 1; Lynn Ward; Council District 2; Rahul Sen; Council District 3; Nick Kaspar; Council District 4; Isabel Martinez; Council District 5; Robert Allarte; Council District 6; Chork Nim; Council District 7; Sean Bernhoft; Council District 8; Franbert Calderon; Council District 9; Anjelica Vargas; City Manager; Clayton Heard
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I urge you to uphold your commitment to environmental justice and park equity by voting "NO" on this inadequate environmental review process. At minimum, a new and thorough environmental review must be completed before any decision can be made about this important piece of land.

Sincerely,

Christina Cancino

[Redacted Signature]

christinacancino1@yahoo.com

[Redacted Address]

Amy Harbin

From: D <danamahrens@gmail.com>
Sent: Wednesday, May 21, 2025 8:16 AM
To: Amy Harbin; LBDS-EIR-Comments; Mayor; Shawna Stevens; Paul Monge; Council District 1; Lynn Ward; Council District 2; Rahul Sen; Council District 3; Nick Kaspar; Council District 4; Isabel Martinez; Council District 5; Robert Allarte; Council District 6; Chork Nim; Council District 7; Sean Bernhoft; Council District 8; Franbert Calderon; Council District 9; Anjelica Vargas; City Manager; Clayton Heard
Subject: Lifelong LB resident urging you Vote 'No' on the Environmental Impact Report for the Pacific Place Project (3701 Pacific Place)

-EXTERNAL-

Dear Long Beach Planning Commission and City Council Members:

My name is Dana. I was born at Long Beach memorial and have lived here's my whole nearly 30 year life. I consider myself a supporter and protector of Long Beach's green space having served as a corps member of the Conservation Corps of Long Beach and worked projects in this affected area. Sending this message through support from the Riverpark Coalition, I invite you to consider prioritizing constituents over money and implore you to read this message.

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Sincerely,

Dana Ahrens



Amy Harbin

From: Dani <alderete.daniel23@gmail.com>
Sent: Thursday, May 22, 2025 7:57 PM
To: Amy Harbin; LBDS-EIR-Comments; Mayor; Shawna Stevens; Paul Monge; Council District 1; Lynn Ward; Council District 2; Rahul Sen; Council District 3; Nick Kaspar; Council District 4; Isabel Martinez; Council District 5; Robert Allarte; Council District 6; Chork Nim; Council District 7; Sean Bernhoft; Council District 8; Franbert Calderon; Council District 9; Anjelica Vargas; City Manager; Clayton Heard
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--

In Solidarity,

Daní Alderete González, MSW

(They/Them/Elle) Pronouns

INFJ

Strengths: Empathy | Developer | Includer | Intellection | Arranger

Amy Harbin

From: David Dingman <davidjdingman@gmail.com>
Sent: Thursday, May 22, 2025 2:45 PM
To: Amy Harbin; LBDS-EIR-Comments; Mayor; Shawna Stevens; Paul Monge; Council District 1; Lynn Ward; Council District 2; Rahul Sen; Council District 3; Nick Kaspar; Council District 4; Isabel Martinez; Council District 5; Robert Allarte; Council District 6; Chork Nim; Council District 7; Sean Bernhoft; Council District 8; Franbert Calderon; Council District 9; Anjelica Vargas; City Manager; Clayton Heard
Subject: Subject: Vote 'No' on the Environmental Impact Report for the Pacific Place Project (3701 Pacific Place)

-EXTERNAL-

Dear Madams/Sirs:

The Pacific Place Project EIR contains serious deficiencies that are cause for it to be rejected unequivocally. I urge all Long Beach Councilmembers on June 5th to vote against accepting this EIR and to reject outright the proposed project. Below are the key issues that demonstrate why this EIR fails to adequately analyze the environmental impacts:

#1

AIR QUALITY CONCERNS

This site is within the AB 617-designated Wilmington-Carson-West Long Beach community, already heavily impacted by air pollution from ports, refineries, oil and gas industries, diesel trucks, warehouses, and railroads. The South Coast Air Quality Management District (SCAQMD) specifically designated this area for additional protections.

Critical deficiencies:

- The EIR admits the project would "create an increase in the frequency or severity of air quality violations" yet only proposes a single insufficient construction mitigation measure (MM-AIR-1)
- The mitigation measure is improperly deferred, lacks specific performance standards, and doesn't address operational impacts or impacts from surcharge activities already undertaken
- Fails to analyze potential CO hotspots from concentrated RV operations on the site
- Improperly uses SCAQMD lookup tables instead of preparing the required site-specific analysis for localized emissions (the site exceeds 5 acres)

- Acknowledges significant cancer risk for nearby residents but fails to propose adequate mitigation
 - Ignores potential odors and toxic emissions from the planned wastewater dump station that will service 500+ recreational vehicles
-

#2

HYDROLOGY & WATER QUALITY ISSUES

The EIR's hydrology and water quality section concludes all activities will have less than significant impacts requiring no mitigation measures, but this conclusion is unsupported by adequate analysis.

Critical deficiencies:

- Fails to identify a clear environmental baseline for hydrology and water quality impacts, making it impossible to assess the degree of change in stormwater pollution
 - Improperly defers to compliance with water quality regulatory schemes without analyzing the environmental consequences
 - Provides only a vague description of "typical urban pollutants" without specific analysis of heavy metals, oil, grease, trash, and other contaminants expected from an RV park and car wash
 - Fails to discuss the volume of stormwater runoff, making it impossible to assess pollutant loading or whether the proposed stormwater system is adequately sized
 - Doesn't analyze how climate change and increasing storm intensity may overwhelm the planned stormwater management systems
-

#3

BIOLOGICAL RESOURCES IMPACTS

The site, which abuts the Los Angeles River, was habitat for the southern tarplant, a special status species. Prior to approval of the former project proposal, the Applicant removed over 1,300 southern tarplants and other sensitive species from the site and approximately 1,500 square feet of potential habitat for special status species was cleared without proper biological surveys and permits.

Critical deficiencies:

- While the previous Mitigated Negative Declaration that was done for this land identified 830 tarplant individuals on the site, we now know that almost 1,300 tarplants were removed
- The EIR claims to mitigate these impacts through MM BIO-1b, calling for on-site restoration using propagules (seeds, topsoil) collected in 2020, but the California Department of Fish and Wildlife (CDFW) specifically objected to this approach as having "a low likelihood of success"
- CDFW noted that transplantation projects typically have a poor success rate (10-15%) and often demonstrate a downward trend of survival over time
- The EIR proposes relocating tarplants to "landscaped areas," yet southern tarplants require sandy, disturbed soils and will not survive in typical landscaped settings
- The EIR's proposed 1:1 mitigation ratio is severely inadequate - CDFW recommended a minimum 10:1 ratio for this rare 1B.1 ranked plant species
- Surveys for other special status plants were conducted at improper times, missing peak blooming periods for species like Coulter's goldfields and prostrate vernal pool navarretia
- CDFW noted that the presence of southern tarplant often indicates vernal pool habitats, yet the EIR fails to assess for vernal pools or conduct required wet/dry season protocol surveys
- The site could support Crotch's bumble bee (a candidate for state endangered listing), but surveys were conducted at the very end of the active season, reducing detection probability
- Evidence of California ground squirrels on site indicates potential burrowing owl habitat, but the EIR lacked adequate focused surveys for this Species of Special Concern
- The EIR provides inadequate protections for nesting birds and lacks mitigation for the removal of potential bat roosting habitat
- The site is part of a critical wildlife corridor along the Los Angeles River that provides habitat for numerous species, yet the EIR fails to assess the project's impacts on wildlife movement and connectivity

#4

CULTURAL AND INDIGENOUS RESOURCES IMPACT

The site has high potential for cultural significance to Indigenous peoples such as the Tongva and Gabrielinos. The equestrian trail adjacent to the site is also part of a culturally significant equestrian lifestyle dating from the 1700s Spanish and 1800s Rancho periods in California history.

Critical deficiencies:

- The EIR fails to evaluate the site's connection to Indigenous people's historic uses and its potential eligibility for listing in the California Register of Historical Resources
- Despite being near the Los Angeles River, an area with historical significance to the Gabrielino/Tongva peoples (as acknowledged in Section 4.4 of the EIR), there was inadequate field investigation to identify potential archaeological or tribal cultural resources
- The cultural resources analysis relies on outdated information, including a Phase I Archaeological Study from 2020 and an updated literature review that only checked existing records
- The analysis doesn't account for the site's location in an area with historical significance dating back to the Paleoindian Period (11,000-7000 B.C.), as noted in the EIR's own cultural chronology
- The EIR fails to acknowledge the site's historic significance despite its recognition in several legal cases including Historic Equestrian Trail Association of Wrigley Heights v. LACFCD
- The EIR relies on a single mitigation measure (MM CUL-1) that only addresses inadvertent discoveries rather than proactive identification of potential resources

#5

**LOSS OF AESTHETIC VISION/VISTAS AND
CONFLICT WITH PLANNING DOCUMENTS**

The Project conflicts with numerous land use plans and policies designating the site as park space.

Critical deficiencies:

- The EIR ignores that the site is identified in multiple planning documents, including:
 - RiverLink Plan
 - Long Beach Department of Parks, Recreation, and Marine Strategic Plan

- West Long Beach Livability Implementation Plan
- West Long Beach I-710 Community Livability Plan
- Los Angeles River Master Plan
- Lower Los Angeles River Revitalization Plan
- Common Ground Plan
- The EIR claims development as park space is "infeasible" due to private ownership and funding needs, but this is irrelevant to the City's obligation to analyze plan inconsistencies as per CEQA
- Improperly relies on a Project Design Feature (PDF-4) to set aside an easement along the southern border for future pedestrian/bicycle access, but this feature lacks enforcement mechanisms
- The height of the facility and zoning height variances will negatively impact scenic vistas along the river that have been continuously diminished through development
- The Project conflicts with multiple regional, local and Long Beach City General Plan goals and policies, including those in the Open Space and Recreation Element adopted to reduce environmental impacts from lack of open space and disparate access to open space

WHY THIS MATTERS

The western Long Beach continues to face environmental injustice with:

- Higher exposure to pollution from freeways, ports, and industries
- 5-10 years shorter life expectancy than east Long Beach residents
- One of the highest asthma rates in the nation
- Only 1.33 acres of parkland per 1,000 residents compared to 16.7 acres in East Long Beach

This project is more than just a development decision—it's about health equity, environmental justice, and the future livability of western Long Beach. Together, we can ensure that 3701 Pacific Place becomes the green space our community desperately needs, not another industrial development that worsens our air quality and quality of life.

Sincerely,
David Dingman
Resident, Long Beach District 5

Amy Harbin

From: diana lejins <dianalejins@yahoo.com>
Sent: Thursday, May 15, 2025 6:43 PM
To: Scott Kinsey; LBDS-EIR-Comments
Cc: diana lejins; Leslie Garretson; Rhina M. Ovalle; Juan Ovalle; Ian Patton; Ann Cantrell; Dan Pressburg; Lavonne Miller; Council District 5; Council District 7; Council District 9
Subject: RiverPark - Pacific Ave project

-EXTERNAL-

"Parks Strategic Plan"

Gazette Newspapers

dianalejins@yahoo.com shared a document

Gazettes Another View - Equity Needed in Parks

Published around Sep 2021

By Diana Lejins

Numerous points in the Parks, Recreation, and Marine (PRM) 10-year Strategic Plan are outstanding, but are they just fluff.?

"Parks and open space are free resources that yield tremendous social, physical, and mental health benefits."

"Our parks and open spaces are vital to our personal health, improving our mind and body, and our community health, making our neighborhoods more attractive places to live and work."

"Parks have always been an important place of gathering."

During the 1920s, redlining based on racial makeup of a neighborhood, "forced people of color to live in areas of Long Beach that are more crowded and have little green space." "The Ku Klux Klan had a strong presence in Long Beach and held large demonstrations around the city, including in our local parks."

"To this day, these neighborhoods lack sufficient access to parks space, further inhibiting their quality of life."

These residents have a life expectancy that is approximately 5 years lower than those in the more park-rich areas.

Additionally, the west side has historically been piled high with industrial buildings and other facilities with high levels of pollution that are not conducive to clean air and healthy living. Asthma rates among Long Beach children are the highest in the region, with related hospitalizations also the highest. In fact,

the area along the Los Angeles River is known as "Asthma Alley" and ranks the worst in the United States for air quality.

The homes in the more-impacted poorer neighborhoods have comparatively little yard space. And there are relatively few pools in those areas. In contrast, the eastside homes often have pools and large yards in which to play and entertain. With a dearth of parkland and open space, it is truly a double whammy for those in west-north-central (WNC) Long Beach.

*Very little has changed in over a hundred years.

The Strategic Plan further states:

"We aim to honor and correct the histories of park and open space creation and position park equity as a central concept to this strategic plan."

Commitment to park equity goals: "End systemic racism in Long Beach"

"Improve health and wellness In the City by eliminating social and economic disparities"

"The PRM Strategic Plan considers racial equity integral in the conversation of park equity"

Yet, very little is actually being done to resolve this chasm of disparity. This city continues to disregard viable possibilities, spend taxpayer dollars frivolously on eastside items such as the \$3+ million artificial grass field with another 3 million estimated for maintenance, and disregards much needed repairs on existing park amenities. Just this month our beautiful iconic swan died most likely due to an inadequate filtration system at the El Dorado Park duck pond.

Then, there's the Queen Mary. Spending \$500 million to renovate it is unconscionable. That consideration shouldn't even be on the table.

Other inequities include a \$100+ million pool, renovation of the Belmont Pier, \$9 million for a beach concession stand, creating an eastside greenbelt along the San Gabriel River. These may be lofty ideas but they are all on the eastside with comparatively little investment in the WNC areas where the need for parks is dire. The current ratio of parks and open spaces east vs. west-north-central is an appalling 17:1 acres. The inequity of this is staggering and shameful. The idea of busing kids to eastside facilities only adds insult to injury.

It is very telling that there are at least 5 public golf courses on the east side and zero in the WNC areas.

Take a look at the fallow Willow Springs Park that has the potential of growing into a stellar facility providing much-needed respite and recreation to underserved areas of the city. These are the types of projects we should be focusing on.

Consider the 70-acre RiverPark situation by the Los Angeles River. This prime piece of land was historically designated as open space, and the council unanimously approved the Riverlink plan update that included this parcel. But around 2019 the mayor and city council backtracked and rezoned it as neo-industrial. Subsequently, a campaign-contributing pay-to-play developer is attempting to install an

ill-planned, pollution-producing RV lot. How would you like that going up in your neighborhood or replacing an eastside park.?

While I commend the Commission's sentiments, the actions of our mayor and council make the words of the Strategic Plan seem empty and condescending. The city is constantly patronizing citizens about equity and making promises but doing very little about it.

The dramatic systemic inequities of Long Beach have hugely fragmented our city. To quote a well-known authority on the subject of inequality, Dr. Martin Luther King, "An injustice anywhere is a threat to justice everywhere."

We must demand that city hall rights these wrongs post haste.!

Diana Lejins

Riverpark Coalition

Environmental Concerns of Greater Long Beach

RE: Parks Strategic Plan

Please acknowledge receipt and enter into the record.!

Amy Harbin

From: J Prell <actingup54@yahoo.com>
Sent: Monday, May 26, 2025 4:30 PM
To: Amy Harbin; LBDS-EIR-Comments; Mayor; Shawna Stevens; Paul Monge; Council District 1; Lynn Ward; Council District 2; Rahul Sen; Council District 3; Nick Kaspar; Council District 4; Isabel Martinez; Council District 5; Robert Allarte; Council District 6; Chork Nim; Council District 7; Sean Bernhoft; Council District 8; Franbert Calderon; Council District 9; Anjelica Vargas; City Manager; Clayton Heard
Subject: Vote 'No' on the Environmental Impact Report for the Pacific Place Project (3701 Pacific Place)

-EXTERNAL-

Dear Long Beach Planning Commission and City Council Members:

As a resident of Long Beach, who lives adjacent to this site in the Crown Pointe Community, I urge you to vote "NO" on the Environmental Impact Report (EIR) for the proposed Pacific Place Project at 3701 Pacific Place. The draft EIR contained significant deficiencies that failed to adequately address the substantial environmental impacts this development would have on our community.

The Report Fails to Adequately Address Critical Health Concerns

The proposed site sits between the 405 and 710 freeways in an area already designated as a "diesel death zone." Our Crown Pointe Community already experiences high air pollution levels, worse than 89% of communities in California, with asthma rates higher than 92% of communities statewide. Despite these alarming statistics, the DEIR:

- Proposed only one inadequate measure to control construction pollution
- Failed to properly analyze air quality impacts from hundreds of RVs
- Acknowledged increased cancer risk without providing adequate mitigation
- Ignored potential toxic emissions from the proposed wastewater dump station

Would you and your family want to live adjacent to a project that increases your cancer risk and potentially emit toxins?

Toxic Contamination Analysis Is Insufficient

The DEIR's analysis of soil and water contamination at this former oil operator site was seriously flawed:

- It improperly deferred responsibility to DTSC rather than conducting a thorough analysis
- Relied on outdated studies from 2019-2020
- Provided no verification of proper handling for previously moved contaminated soil
- Failed to address potential impacts on groundwater, storm drains, and oil infrastructure
- Postponed critical cleanup plans until after project approval

The Project Description Was Incomplete and Relied on Outdated Information

A complete and accurate project description is fundamental to any environmental review, yet this DEIR:

- Omitted basic operational details including permitted vehicle types, hours of operation, and wastewater dump station specifications

- Relied on outdated studies from a previously rejected environmental document
- Used analysis from a smaller version of the project (35% smaller) without updating for the current proposal

Better Alternatives Were Unfairly Rejected

The DEIR defined the project so narrowly that only a storage facility could meet its objectives, and improperly dismissed:

- A park alternative based on outdated information without considering new funding opportunities
- Alternative locations for the RV parking lot without adequate analysis
- Any substantially different use of the property that might better serve community needs

The Project Contradicts Years of Official Planning Documents

For years, multiple official plans have designated this exact site for a park:

- The Long Beach RiverLink Plan
- The Los Angeles River Master Plan
- The Lower LA River Revitalization Plan (which called it the "gem of the Lower LA River")
- West Long Beach Livability Plans
- Common Ground from the Mountains to the Sea Plan

These designations reflect the severe shortage of open public recreational space in western Long Beach—just 1.33 acres per 1,000 residents compared to 16.7 acres in Eastern Long Beach and far below the city's goal of 8 acres.

Additional Critical Impacts Are Ignored

The DEIR also failed to adequately address:

- Traffic safety concerns near the Metro train crossing and with slow-moving RVs
- Water quality impacts from polluted runoff into the Los Angeles River
- Loss of groundwater recharge in one of the last remaining areas where this can occur
- Protection of sensitive plant species including the southern tar plant
- Habitat loss for endangered species including the burrowing owl, bats, and the Crotch bumble bee
- Restoration of equestrian trails and connected public green space

This Site Represents a Critical Opportunity for Environmental Justice

This site represents one of the last opportunities to create desperately needed open public recreational space in a part of our city that has been environmentally disadvantaged for generations. A much better alternative to a polluting commercial enterprise. California environmental law prohibits approving projects with significant environmental impacts when better alternatives exist.

Additionally, a green-space park with trees and shrubs will create a buffer, improve air quality, increase freeway sound absorption and provide recreational park space for our Crown Pointe Community and others who live adjacent to this parcel.

I urge you to uphold your commitment to environmental justice and park equity by voting "NO" on this inadequate environmental review process and protecting residents living in proximity to this project. At minimum, a new and thorough environmental review must be completed before any decision can be made about this important piece of land.

Sincerely,

Jerry Prell

[REDACTED]

[REDACTED]

actingup54@yahoo.com

Amy Harbin

From: joyandhayim@verizon.net
Sent: Wednesday, May 21, 2025 3:41 PM
To: Amy Harbin; LBDS-EIR-Comments; Mayor; Shawna Stevens; Paul Monge; Council District 1; Lynn Ward; Council District 2; Rahul Sen; Council District 3; Nick Kaspar; Council District 4; Isabel Martinez; Council District 5; Robert Allarte; Council District 6; Chork Nim; Council District 7; Sean Bernhoft; Council District 8; Franbert Calderon; Council District 9; Anjelica Vargas; City Manager; Clayton Heard
Subject: Vote 'No' on the Environmental Impact Report for the Pacific Place Project (3701 Pacific Place)

-EXTERNAL-

Dear Long Beach Planning Commission and City Council Members:

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I urge you to uphold your commitment to environmental justice and park equity by voting "NO" on this inadequate environmental review process. At minimum, a new and thorough environmental review must be completed before any decision can be made about this important piece of land.

Sincerely,



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

May 30, 2025

Amy L Harbin, AICP
Department of Development Services, Planning Bureau
City of Long Beach
411 West Ocean Boulevard, 3rd Floor
Long Beach, CA 90802
Sent by Email: amy.harbin@longbeach.gov; LBDS-EIR-Comments@longbeach.gov

RE: 3701 Pacific Place – Application No.: 2407-21
Planning Commission Hearing – June 5, 2025

Dear Ms. Harbin:

Thank you for continuing coordination with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed construction of a four-story, 206,756-square-foot self-storage facility (Project) located at 3701 Pacific Place in the City of Long Beach (City). Metro has reviewed the Notice of Public Hearing for the Project, which is being heard by the Planning Commission on June 5, 2025. Metro respectfully requests that the City consider including the following condition within the Project's Conditions of Approval:

"The applicant shall concurrently submit grading, shoring, and construction plans with engineering calculations, including any crane placement and radius, to the City of Long Beach Department of Development Services and to the Los Angeles County Metropolitan Transportation Authority (Metro) to evaluate potential impacts to the Metro A Line infrastructure in relationship to the Project. The Applicant shall demonstrate Metro's approval on the final set of plans and calculations prior to City of Long Beach building permit issuance."

This is based on previous comments Metro provided on the project through CEQA comment letters on the project (attached).

If you have any questions regarding this letter, please contact me by phone at 213.418.3484, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,

Justin Klaparda
Senior Transportation Planner, Development Review Team
Transit Oriented Communities

3701 Pacific Place
Notice of Public Hearing – Metro Comments
May 29, 2025

cc: Shine Ling, Senior Director, Development Review Team

Attachments:

- 230626_3701 Pacific Place



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

June 26, 2023

Amy L. Harbin, AICP
City of Long Beach
Development Services Department
4111 West Ocean Blvd., 3rd Floor
Long Beach, CA 90802

Sent by Email: lbds-eir-comments@longbeach.gov

RE: Pacific Place Project – 3701 Pacific Place
Notice of Preparation of Environmental Impact Report (EIR)

Dear Ms. Harbin:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Pacific Place Project (Project) located at 3701 Pacific Place in the City of Long Beach (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts on the Metro A Line facilities and services which should be analyzed in the EIR, and provides recommendations for mitigation measures as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹

In addition to the specific comments outlined below, Metro is providing the City and Applicant with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at <https://www.metro.net/devreview>.

Project Description

The Project includes a four-story, 206,756 square feet self-storage building. The remainder of the Project site would include 426 rentable recreation vehicle parking stalls. The project would also include a dedication of an easement for development of a publicly accessible trail and trailhead.

¹ See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

Recommendations for EIR Scope and Content

Light Rail Adjacency

1. Rail Operations: The Metro A Line currently operates weekday peak service as often as every six minutes in both directions. Trains may operate in and out of revenue service, 24 hours a day, seven days a week, in the ROW adjacent to the Project.
2. Impact Analysis: Due to the Project's proximity to the A Line ROW, the EIR must analyze potential effects on light rail operations and identify mitigation measures as appropriate. Critical impacts to be studied should include (without limitation): impacts of Project construction and operation on and potential damage to the structural and systems integrity of tracks and related infrastructure; and disruption to light rail service. Specific impacts and mitigation measures that should be studied include:
 - a. Disturbance to Light Rail Structural Support: If the Project includes excavation and construction of underground structures, tiebacks supporting these structures have the potential to disturb adjoining soils and jeopardize support of the light rail tracks.

Recommended mitigation measures:

- i. Technical Review: The Applicant shall submit engineering drawings and calculations, as well as construction work plans and methods, to evaluate any impacts to the Metro A Line infrastructure in relationship to the Project. Before issuance of any building permit for the Project, the Applicant shall obtain Metro's approval of final construction plans.
- ii. Structure Setback: Where the Project site is immediately adjacent to Metro ROW, all building structures (above ground and below grade) and projections shall be set back at least five (5) feet from the property line shared by the Project property and Metro to allow adequate space for construction and property maintenance activities. Property owners will generally not be permitted to access Metro property to construct or maintain private development and/or landscaping, except as approved as indicated in paragraph 3.d below.
- iii. Construction Safety: The construction and operation of the Project shall not disrupt the operation and maintenance activities of the Metro A Line or the structural and systems integrity of Metro's light rail infrastructure. Not later than two months before Project construction, the Applicant shall contact Metro to schedule a pre-construction meeting with all Project construction personnel and Metro Real Estate, Construction Management, and Construction Safety staff. During Project construction, the Applicant shall:
 1. Work in close coordination with Metro to ensure that Station access, visibility, and structural integrity are not compromised by construction activities or permanent build conditions;
 2. Construct a protection barrier to prevent objects, material, or debris from falling onto the ROW;
 3. Notify Metro of any changes to construction activities that may impact the use of the ROW;
 4. Permit Metro staff to monitor construction activity to ascertain any impact to the A Line ROW.
- b. Overhead Catenary System (OCS) Setback: Overhead catenary wires and support structures adjacent to the Project power Metro trains. OCS wires should be treated like any high voltage

electrical utility wires. The Project's structures, including protrusions that face the ROW (e.g. awnings and other appurtenances), are proposed to be in close proximity to the OCS and can pose an electrocution hazard during Project construction and operation.

Recommended mitigation measures:

- i. Technical Review: The Applicant shall submit engineering drawings and calculations, as well as construction work plans and methods including any crane placement and radius, to evaluate any impacts to the Metro A Line infrastructure in relationship to the Project. Before issuance of any building permit for the Project, the Applicant shall obtain Metro's approval of final construction plans.
 - ii. OCS Protection: The Applicant shall take all necessary measures to protect the OCS from damage due to Project activities during and after construction, pursuant to applicable California Department of Industrial Relations regulations (Cal. Code of Regulations, Title 8). The Applicant shall post proper signage for equipment working around the OCS wires.
 - iii. Setback: Any building protrusions facing the ROW (e.g. awnings and other appurtenances), as well as landscaping shall be set back at least ten (10) feet from the OCS wires and support structures.
 - iv. Construction Safety: The construction and operation of the Project shall not disrupt the operation and maintenance activities of the Metro A Line or the structural and systems integrity of Metro's light rail infrastructure. Not later than two months before Project construction, the Applicant shall contact Metro to schedule a pre-construction meeting with all Project construction personnel and Metro Real Estate, Construction Management, and Construction Safety staff. During Project construction, the Applicant shall:
 1. Work in close coordination with Metro to ensure that visibility, and structural integrity are not compromised by construction activities or permanent build conditions;
 2. Construct a protection barrier to prevent objects, material, or debris from falling onto the ROW;
 3. Notify Metro of any changes to construction activities that may impact the use of the ROW;
 4. Permit Metro staff to monitor construction activity to ascertain any impact to the A Line ROW.
 5. Apply for and obtain approval from Metro for any special operations, including the use of a pile driver or any other equipment that could come into close proximity to the OCS or support structures, not later than two months before the start of Project construction.
 - v. In addition, Metro strongly recommends that the following be incorporated into the Project to address these potential impacts:
3. Advisories to Applicant: The Applicant is encouraged to contact Metro Development Review early in the design process to address potential impacts. The Applicant should also be advised of the following:
 - a. Occupational Safety and Health Administration (OSHA) Requirements: Demolition, construction and/or excavation work in proximity to Metro ROW with potential to damage light rail tracks and related infrastructure may be subject to additional OSHA safety requirements.

- b. Technical Review: Metro charges for staff time spent on engineering review and construction monitoring.
- c. ROW Entry Permit: For temporary or ongoing access to Metro ROW for demolition, construction, and/or maintenance activities, the Applicant shall complete Metro's Track Allocation process with Metro Rail Operations and obtain a Right of Entry Permit from Metro Real Estate. Approval for single tracking or a power shutdown, while possible, is highly discouraged; if sought, the Applicant shall apply for and obtain such approval from Metro not later than two months before the start of Project construction.
- d. Cost of Impacts: The Applicant will be responsible for costs incurred resulting from Project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure, including single-tracking or bus bridging around closures. The Applicant will also bear all costs for any noise mitigation required for the Project.

If you have any questions regarding this letter, please contact me by phone at 213.547.4326, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,



Cassie Truong
Transportation Planner, Development Review Team
Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/devreview>

Amy Harbin

From: DevReview <DevReview@metro.net>
Sent: Friday, May 30, 2025 11:31 AM
To: Amy Harbin
Cc: LBDS-EIR-Comments; DevReview; Ling, Shine
Subject: LA Metro Comments: 3701 Pacific Place, Long Beach
Attachments: 250530_TAC_Ltr_NPH_FEIR.pdf

-EXTERNAL-

Hi Amy,

Thank you for the opportunity to comment on the project located at 3701 Pacific Place in the City of Long Beach. Attached are Metro's comments, which contains a request that a condition of approval be included requiring the Applicant to coordinate with Metro prior to issuance of a building permit. Note that this is the same condition that was included for the 131 W 3rd St.

Please kindly reply to confirm receipt. Please contact us by phone at 213.418.3484 or devreview@metro.net if you have any questions.

Best,
Justin

Justin Klaparda, AICP

Senior Transportation Planner, Development Review Team
Transit Oriented Communities

213-922-5538

klapardaj@metro.net

Our mission is to provide world-class transportation for all.

Amy Harbin

From: Lisa Dimitrov <lisadimitrov@gmail.com>
Sent: Wednesday, May 21, 2025 8:49 AM
To: Amy Harbin
Subject: Vote 'No' on the Environmental Impact Report for the Pacific Place Project (3701 Pacific Place)

-EXTERNAL-

Dear Long Beach Planning Commission and City Council Members:

As a resident of Long Beach deeply concerned about the future of our community, I urge you to vote "NO" on the Environmental Impact Report (EIR) for the proposed Pacific Place Project at 3701 Pacific Place. The draft EIR contained significant deficiencies that failed to adequately address the substantial environmental impacts this development would have on our community. We have every reason to believe that the final EIR will replicate these same deficiencies.

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I urge you to uphold your commitment to environmental justice and park equity by voting "NO" on this inadequate environmental review process. At minimum, a new and thorough environmental review must be completed before any decision can be made about this important piece of land.

Sincerely,

Lisa Dimitrov

A black rectangular redaction box covering the signature area.



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante

Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

May 28, 2025

Ref. DOC 7502250

VIA EMAIL amy.harbin@longbeach.gov and LBDS-EIR-Comments@longbeach.gov

Ms. Amy Harbin, AICP, Planner
City of Long Beach, Community Development Department
411 West Ocean Boulevard, 3rd Floor
Long Beach, CA 90802

Dear Ms. Harbin:

Third Response to Pacific Place Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Public Hearing (NOPH) for the subject project located in the City of Long Beach on May 15, 2025. The proposed project is located within the jurisdictional boundaries of District No. 3. Previous comments submitted by the Districts in correspondences dated June 28, 2023, and September 16, 2024 (copies enclosed) still apply to the subject project with the following updated information:

1. As indicated in the June 28, 2023, and September 16, 2024 response letters, the wastewater generated by the proposed project will be treated at A.K. Warren Water Resource Facility. The wastewater generated by the proposed project will NOT be treated at the Long Beach Water Reclamation Plant.
2. All other information concerning Districts' facilities and sewerage service contained in the document is current.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2742, or phorsley@lacsd.org.

Very truly yours,

Patricia Horsley

Patricia Horsley
Environmental Planner
Facilities Planning Department

PLH:plh

Enclosure



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante

Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

September 16, 2024

Ref. DOC 7319163

VIA EMAIL LBDS-EIR-Comments@longbeach.gov

Ms. Amy Harbin, AICP, Planner
City of Long Beach, Community Development Department
411 W. Ocean Boulevard, 3rd Floor
Long Beach, CA 90802

Dear Ms. Harbin:

NOA Response to Pacific Place Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR) for the subject project located in the City of Long Beach on July 31, 2024. The proposed project is located within the jurisdictional boundaries of District No. 3. Previous comments submitted by the Districts in correspondence dated June 28, 2023 (copy enclosed), still apply to the subject project with the following updated information:

1. **Section 4.17 Utilities and Service Systems, pages 4.17-1, 4.17-3, and 4.17-17:** Stated that “wastewater would then be treated at either the Long Beach Water Reclamation Plant (LBWRP) or the Joint Water Pollution Control Plant (JWPCP) in the City of Carson.” As indicated in the June 28, 2023 response letter, the wastewater generated by the proposed project will be treated at the A.K. Warren Water Resource Facility (formerly known as the Joint Water Pollution Control Plant) located in the City of Carson, which has a capacity of 400 million gallons per day (mgd) and currently processes an average flow of 247.2 mgd.
2. **Section 4.17 Utilities and Service Systems, pages 4.17-4, 4.17-5, 4.17-22, 4.17-23, and 4.17-26:** The Southeast Resource Recovery Facility (SERRF) is now closed as of January 31, 2024.
3. All other information concerning Districts’ facilities and sewerage service contained in the document is current.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2742, or phorsley@lacsd.org.

Very truly yours,

Patricia Horsley

Patricia Horsley
Environmental Planner
Facilities Planning Department

PLH:plh

Enclosure



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

June 28, 2023

Ref. DOC 6942778

VIA EMAIL LBDS-EIR-Comments@longbeach.gov

Ms. Amy L. Harbin, AICP
City of Long Beach
Development Services Department
411 West Ocean Boulevard, 3rd Floor
Long Beach, CA 90802

Dear Ms. Harbin:

NOP Response to Pacific Place Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the subject project located in the City of Long Beach on June 7th, 2023. The proposed project is located within the jurisdictional boundaries of District No. 3. We offer the following comments regarding sewerage service:

1. The Districts maintain sewerage facilities within the project area that may be affected by the proposed project. Approval to construct improvements within a Districts' sewer easement and/or over or near a Districts' sewer is required before construction may begin. For a copy of the Districts' buildover procedures and requirements go to www.lacsd.org, under Services then Wastewater Program and Permits, and select Buildover Procedures. For more specific information regarding the buildover procedure, please contact Mr. Ryan Honda at (562) 908-4288, extension 2766.
2. Individual developments associated with the proposed project may require a Districts' Industrial Wastewater Discharge permit. Project developers should contact the Districts' Industrial Waste Section at (562) 908-4288, extension 2900, to reach a determination on this matter. If this permit is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction. Additional information for which can be found on our website at [Industrial Wastewater Discharge Permits](#).
3. The wastewater flow originating from the proposed project will discharge directly to the Districts' North Long Beach Trunk Sewer, located in a private right-of-way west of Pacific Place. The Districts' 30-inch diameter trunk sewer has a capacity of 7.7 million gallons per day (mgd) and conveyed a peak flow of 4.2 mgd when last measured in 2017. A 6-inch diameter or smaller direct connection to a Districts' trunk sewer requires a Trunk Sewer Connection Permit issued by the Districts. An 8-inch diameter or larger direct connection to a Districts' trunk sewer requires submittal of Sewer Plans for review and approval by the Districts. For additional information, please contact the Districts' Engineering Counter at engineeringcounter@lacsd.org or (562) 908-4288, extension 1205.
4. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 243.1 mgd.

5. The expected average wastewater flow from the project, described in the NOP as a 206,756-square-foot self-storage building, a 1,281-square-foot car wash, and 426 recreational vehicle parking stalls, is 33,339 gallons per day. For a copy of the District's average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits and select Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link.
6. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family Home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, please contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727. If an Industrial Wastewater Discharge Permit is required, connection fee charges will be determined by the Industrial Waste Section.
7. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or mandyhuffman@lacsd.org.

Very truly yours,

Mandy Huffman

Mandy Huffman
Environmental Planner
Facilities Planning Department

MNH:mnh

cc: J. Chung
R. Honda
A. Howard
A. Schmidt
Engineering Counter

Amy Harbin

From: Horsley, Patricia <phorsley@lacsds.org>
Sent: Wednesday, May 28, 2025 10:03 AM
To: Amy Harbin; LBDS-EIR-Comments
Subject: Third Response to Pacific Place Project
Attachments: DMS-#7507823-v2-Third Response Letter to City of Long Beach re_ Pacific Place Project.PDF

-EXTERNAL-

Dear Ms. Harbin:

Attached please find Los Angeles County Sanitation Districts' response to the subject project.

Sincerely,

Patricia Horsley

Environmental Planner | Planning

562-908-4288 ext. 2742

phorsley@lacsds.org



**LOS ANGELES COUNTY
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Converting Waste Into Resources

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Amy Harbin

From: Yek <yeknomlana@gmail.com>
Sent: Wednesday, May 21, 2025 10:25 AM
To: Amy Harbin; LBDS-EIR-Comments; Mayor; Shawna Stevens; Paul Monge; Council District 1; Lynn Ward; Council District 2; Rahul Sen; Council District 3; Nick Kaspar; Council District 4; Isabel Martinez; Council District 5; Robert Allarte; Council District 6; Chork Nim; Council District 7; Sean Bernhoft; Council District 8; Franbert Calderon; Council District 9; Anjelica Vargas; City Manager; Clayton Heard
Subject: Vote 'No' on the Environmental Impact Report for the Pacific Place Project (3701 Pacific Place)

-EXTERNAL-

Dear Long Beach Planning Commission and City Council Members:

As a resident of Long Beach deeply concerned about the future of our community, I urge you to vote "NO" on the Environmental Impact Report (EIR) for the proposed Pacific Place Project at 3701 Pacific Place. The draft EIR contained significant deficiencies that failed to adequately address the substantial environmental impacts this development would have on our community. We have every reason to believe that the final EIR will replicate these same deficiencies.

The Report Fails to Adequately Address Critical Health Concerns

The proposed site sits between the 405 and 710 freeways in an area already designated as a "diesel death zone." Our community, predominantly Hispanic and Asian residents, already experiences pollution levels worse than 89% of communities in California, with asthma rates higher than 92% of communities statewide. Despite these alarming statistics, the DEIR:

- Proposed only one inadequate measure to control construction pollution
- Failed to properly analyze air quality impacts from hundreds of RVs
- Acknowledged increased cancer risk without providing adequate mitigation
- Ignored potential toxic emissions from the proposed wastewater dump station

Toxic Contamination Analysis Is Insufficient

The DEIR's analysis of soil and water contamination at this former oil operator site was seriously flawed:

- It improperly deferred responsibility to DTSC rather than conducting a thorough analysis
- Relied on outdated studies from 2019-2020
- Provided no verification of proper handling for previously moved contaminated soil
- Failed to address potential impacts on groundwater, storm drains, and oil infrastructure
- Postponed critical cleanup plans until after project approval

The Project Description Was Incomplete and Relied on Outdated Information

A complete and accurate project description is fundamental to any environmental review, yet this DEIR:

- Omitted basic operational details including permitted vehicle types, hours of operation, and wastewater dump station specifications
- Relied on outdated studies from a previously rejected environmental document
- Used analysis from a smaller version of the project (35% smaller) without updating for the current proposal

Better Alternatives Were Unfairly Rejected

The DEIR defined the project so narrowly that only a storage facility could meet its objectives, and improperly dismissed:

- A park alternative based on outdated information without considering new funding opportunities
- Alternative locations for the RV parking lot without adequate analysis
- Any substantially different use of the property that might better serve community needs

The Project Contradicts Years of Official Planning Documents

For years, multiple official plans have designated this exact site for a park:

- The Long Beach RiverLink Plan
- The Los Angeles River Master Plan
- The Lower LA River Revitalization Plan (which called it the "gem of the Lower LA River")
- West Long Beach Livability Plans
- Common Ground from the Mountains to the Sea Plan

These designations reflect the severe shortage of open public recreational space in western Long Beach—just 1.33 acres per 1,000 residents compared to 16.7 acres in Eastern Long Beach and far below the city's goal of 8 acres.

Additional Critical Impacts Are Ignored

The DEIR also failed to adequately address:

- Traffic safety concerns near the Metro train crossing and with slow-moving RVs
- Water quality impacts from polluted runoff into the Los Angeles River
- Loss of groundwater recharge in one of the last remaining areas where this can occur
- Protection of sensitive plant species including the southern tar plant
- Habitat loss for endangered species including the burrowing owl, bats, and the Crotch bumble bee
- Restoration of equestrian trails and connected public green space

This Site Represents a Critical Opportunity for Environmental Justice

This site represents one of the last opportunities to create desperately needed open public recreational space in a part of our city that has been environmentally disadvantaged for generations. California environmental law prohibits approving projects with significant environmental impacts when better alternatives exist.

I urge you to uphold your commitment to environmental justice and park equity by voting "NO" on this inadequate environmental review process. At minimum, a new and thorough environmental review must be completed before any decision can be made about this important piece of land.

Thank you

Richard

Designer. Fabricator. Photographer.

██████████.

www.AtelierYek.com



Main Office Phone:
310-798-2400
Direct Dial:
310-798-2400 x7

Carstens, Black & Minter LLP
700 North Pacific Coast Highway, Suite 200
Redondo Beach, CA 90277
www.cbcearthlaw.com

Sunjana S. Supekar
Email Address:
sss@cbcearthlaw.com

April 16, 2025

Via Email (LBDS-EIR-Comments@longbeach.gov, Amy.Harbin@longbeach.gov)

Ms. Amy L. Harbin, AICP
City of Long Beach
Community Development Department, Planning Bureau
411 W. Ocean Boulevard, Third Floor
Long Beach, CA 90802
LBDS-EIR-Comments@longbeach.gov
Amy.Harbin@longbeach.gov

Re: 3701 Pacific Place; Recirculation of the Pacific Place Project DEIR

Dear Ms. Harbin:

On behalf of the Riverpark Coalition and Los Angeles Waterkeeper, **we urge the City of Long Beach (“City”) to recirculate the Draft Environmental Impact Report (“DEIR”) for the Pacific Place Project at 3701 Pacific Place, Long Beach, CA, (“Project”).** Recirculation of a new draft EIR is required under the California Environmental Quality Act (“CEQA”), in light of the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy’s (“RMC”) recent decision to allocate over \$16 million to acquire and develop the parcels adjoining 3701 Pacific Place, at 3916-4021 Amebco Road, for the Wrigley Heights River Park Planning Project. The Project’s intended land use is now directly inconsistent with intended adjacent land uses, and the environmental review must account for the new environmental impacts and impacts of increasing severity that will unavoidably result from this land use conflict.

I. Standard for Recirculation for Environmental Impact Reports.

Public Resources Code section 21092.1 imposes a statutory mandate on agencies to recirculate a draft environmental impact report upon addition of “significant new information.” This includes recirculation of CEQA’s notice and consultation requirements. Under California Code of Regulations, title 14 (“CEQA Guidelines”), section 15088.5, significant new information requiring recirculation of the DEIR includes when:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043).

II. The DEIR Must be Recirculated to Address New Significant Impacts and Impacts of Increased Severity.

The DEIR must be recirculated because of significant new information demonstrating that the Project would result in new significant impacts and/or a substantial increase in the severity of environmental impacts. This requires notice, as well as consultation with relevant agencies (such as trustee and responsible agencies). (CEQA Guidelines §15088.5, subd. (d).)

On January 22, 2025, the RMC Board unanimously voted to authorize grant funding to the Watershed Conservation Authority (“WCA”) for acquisition and development of four vacant parcels at 3916-4021 Amebco Road, known as the Wrigley Heights River Park Planning Project. (Attachment 1, Minutes from January 22, 2025 RMC Board Hearing; Attachment 2, January 22, 2025 RMC Board Staff Report, Item 12; Attachment 3, January 22, RMC Board Staff Report, Item 13.) This site, along with the Project site, has long been designated by the Lower Los Angeles River Revitalization Plan (“LLARRP”) as a signature site for development of open space as the Wrigley Heights River Park Opportunity Area. The parcels are immediately adjacent to the Project site (and indeed some of the parcels share a boundary with the Project site), and will be acquired and developed for the purpose of creating recreational open space in one of the last remaining areas adjacent to the Los Angeles River in Long Beach. The Wrigley Heights River Park will increase open space and green space in an environmental justice community of Long Beach that disparately lacks park access, as well as increase and improve connectivity both to and along the LA River Bike Path.

The recent approval of the acquisition and development of the Wrigley Heights River Park Planning Project is clearly significant new information that necessitates recirculation of the Project DEIR. At the time of the release of the DEIR, the subject parcels at 3916-4021 Amebco Road did not have any pending projects, actions, or transfers of ownership disclosed in the DEIR. Thus, the RMC’s planned acquisition of those parcels for the Wrigley Heights River Park Planning Project after the release of the DEIR presents new information about the surrounding land uses that renders many of the conclusions drawn in the DEIR outdated.

Due to the construction of the Wrigley Heights River Park adjacent to the Project site—and through which there will be sole access to the Project site—the Project would result in new significant impacts and/or substantially more severe impacts that have not been addressed by the DEIR. These impacts include, but are not limited to, the following:

Air Quality and Hazards Impacts

With the planned development of the Wrigley Heights River Park, the Project would be immediately adjacent to yet another sensitive receptor (a public recreation area), vulnerable to the Project's Air Quality and Hazards impacts. The EIR must be recirculated to address these and any other impacts.

Biological Resources Impacts

With the planned development of the Wrigley Heights River Park, the Project would be adjacent to a site that may serve as habitat for protected species and/or may serve as a connective corridor for such species. The EIR must be recirculated to address these and any other impacts.

Land Use Impacts

The planned development of the Wrigley Heights River Park implements longstanding fundamental, mandatory, and specific regional and local policies, identified on pages 11-19 of our September 30, 2024 DEIR Comment Letter, to preserve this area for park and open space.

Development of the Wrigley Heights River Park heightens the degree to which the Project will further frustrate and conflict with these applicable plans, policies, and goals, which were adopted for the purpose of avoiding and mitigating environmental impacts. These impacts must be addressed in a recirculated DEIR.

Noise Impacts

With the planned development of the Wrigley Heights River Park, the Project would be adjacent to yet another sensitive receptor, as parks are designated as sensitive receptors (DEIR, Attachment L, p. 7). The park and its visitors will be the most impacted by construction and operational noise from the Project at this site. The EIR must be recirculated to address these and any other impacts relating to noise.

Hydrology and Water Quality Impacts

We detailed numerous concerns regarding hydrology and water quality impacts, particularly stormwater impacts, in our September 30, 2024 DEIR Comment Letter. As indicated by DEIR Exhibit 4.9-1, drainage flows from the Project site onto the parcels at 3916-4021 Amebco Road, the planned location of the Wrigley Heights River Park. We are concerned that changes to hydrology resulting from the Project may impair the ability for the Wrigley Heights River Park to consider the full spectrum of configuration options to reduce flooding and address stormwater pollution through best management practices, while protecting public health from exposure to such pollutants when visiting the park. The EIR must be recirculated to address these and any other impacts relating to hydrology and water quality in light of the Wrigley Heights River Park adjacent to the site.

Transportation Impacts

The Project proposes a driveway that would run straight through the Wrigley Heights River Park to access Amebco Road, instead of utilizing an existing driveway at Pacific Place. The Project would also interfere with pedestrian and bicycle connectivity between the Wrigley Heights River Park and the LA River Bike Path. To the extent the Wrigley Heights River Park has a public parking lot, there will be increased traffic to and from the Project location along Pacific Place, making the existing traffic impacts analysis outdated and inadequate. Alternatively, if there will not be any public parking associated with the Wrigley Heights River Park, the Project's parking lot may need to account for anticipated impacts from members of the public parking in the Project's parking lot, even if they are not visiting the Project's development. The Project's transportation analysis must be recirculated to account for the Project's transportation and traffic safety impacts at the adjacent Wrigley Heights River Park.

Cumulative Impacts

The EIR must identify the Wrigley Heights River Park as a related project, and the City must recirculate the EIR to account for the cumulative impacts resulting from this project.

Alternatives

As articulated in our September 30, 2024 DEIR Comment Letter, the DEIR fails to analyze a Park Alternative for the Project, using outdated data to claim that such a project alternative is infeasible. The acquisition and development of the adjacent property for development of the Wrigley Heights River Park Planning Project demonstrates that a park alternative is indeed feasible at this site, and even further, that pursuing a park at the Project site would enhance the benefits of the Wrigley Heights River Park. Thus, the EIR must be recirculated to address these points.

III. Conclusion

CEQA's requirements must be scrupulously complied with in order to adequately analyze the Project's impacts, especially in light of the longstanding policy and vision of green, open space at this site. For all the reasons set forth above, we respectfully request that the City recirculate the Project DEIR, including notice and consultation for the recirculated DEIR.

Sincerely,


Sunjana Supekar

Attachment 1, Minutes from January 22, 2025 RMC Board Hearing.

Attachment 2, January 22, 2025 RMC Board Staff Report, Item 12.

Attachment 3, January 22, RMC Board Staff Report, Item 13.

Attachment 1

MINUTES
San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy
“Rivers and Mountains Conservancy” (RMC)

held on

Wednesday, January 22, 2025
at 9:00 am

At the following locations:

Bellflower City Hall
16600 Civic Center Drive, Bellflower, CA 90706

Natural Resources Agency
715 P Street, Farallon Room (20-105), Sacramento, CA 95814

OC Public Works
2301 N. Glassell Street, Orange, CA 92865

TELECONFERENCE MEETING VIA ZOOM ADDRESS:

<https://us02web.zoom.us/j/85236556102?pwd=a2S0w6Xm76EI3d7DuVeMUbaXxlG4Bp.1>

Meeting ID: 852 3655 6102 | Password: 329557 | And by phone at 1-669-444-9171

AGENDA

1. Call to Order

Vice Chair Kalmick called the meeting to order at approximately 9:08 am.

2. Roll Call

Voting Members Present

Ali Saleh, Mayor/City of Bell, Chair (Arrived: 9:16)
Joe Kalmick, Councilmember/City of Seal Beach
Margaret Clark, Mayor Pro Tem/City of Rosemead
Roberto Uranga, Councilmember/City of Long Beach (Arrived: 9:09)
Jennifer Stark, Councilmember/City of Claremont
Fred Jung, Fullerton City Councilmember (Left: 9:40)
David Fredendall, Councilmember/City of Glendora
Adrienne Mohan, Executive Director/Palos Verdes Peninsula Land Conservancy
Gloria Sandoval, California Natural Resources Agency

Vincent Chang, Board of Supervisors of the County of Los Angeles (Left: 10:47)

Non-Voting Members Present

Ernesto Rivera, Los Angeles County Department of Public Works
Christy Suppes, Orange County Public Works
Stan Chen, San Gabriel River Watermaster
John Walsh, Wildlife Conservation Board
Abigail Mejia, California State Senate

Members Absent

John Bishop, California Environmental Protection Agency
Korey Bradbury, General Manager/ Montebello Land and Water Company
Stephen Benson, State of California Department of Finances

Staff Present

Mark Stanley, Executive Officer
John Natalizio, Deputy Attorney General
Salian Garcia, Budgets and Administration Officer
Melissa Bahmanpour, Conservancy Project Development Manager
Blair Crossman, Conservancy Project Development Analyst
Arturo Gonzalez, Conservancy Project Development Analyst II
Chad Oberly, Natural Resources & Tribal Affairs Project Manager
Alison MacCarley, Conservancy Project Analyst
Karen Diaz, Conservancy Project Analyst
Steven Mendoza, Conservancy Project Analyst
Aimee Nguyen, Education & Outreach Coordinator
Amanda Chan, Budgets & Contracts Analyst
Danyel Conteras, Budgets & Contracts Analyst
Maria Medrano, Board Secretary

3. Public Comment

Juan Ovalle, Long Beach resident, supported agenda items 12 and 13, emphasizing the need to address inequity and disparities in western Long Beach. Ovalle applauded the Board and staff for all their diligence and hard work in bringing these items forward. Ovalle thanked the Board for their efforts and expressed hope for the project's success.

Carlos Ovalle, environmentalist and architect, voiced his support for the acquisition of land for the Wrigley Group Park space. Ovalle, shared personal health issues related to pollution and the benefits of planting trees for oxygen production and CO2 reduction.

Sunjana Supekar, an attorney whose firm represents Riverpark Coalition and Los Angeles Waterkeeper, supported agenda items 12 and 13 indicating their firm's clients have long been advocating for a park at this site.

Benjamin Harris, senior staff attorney at Los Angeles Waterkeeper, echoed the support for items 12 and 13. Harris emphasized the need for green space in western Long Beach.

David Pulitzer, a local resident, supported items 12 and 13. Pulitzer, highlighted the lack of green space in Western Long Beach and the need for a buffer zone from pollutants.

Corliss Lee, board member of the Riverpark Coalition, emphasized the need for increased park space in western Long Beach due to pollution and shortened lifespans.

Anne Cantrell, co-chair of the Sierra Club Los Cerritos Wetlands Task Force, supported the acquisition of land for park use, highlighting the site's historical significance and environmental benefits.

Elena Tucci, supports items 12 and 13, emphasizing the importance of park equity and environmental benefits.

Robert Allarte, Chief of Staff for Councilman Megan Kerr, read Councilwoman Kerr's letter of support for items 12 and 13. Highlighting the importance of green spaces and environmental sustainability.

Chair Saleh read letter of support from the California Native Plant Society for items 14 and 15. Emphasized the importance of native plants for ecological services and community engagement.

Chair Saleh read Dawn Cody's letter of support for item 15. Cody expressed gratitude for funding and support for the West San Gabriel River Trail extension.

4. Approval of Minutes

One set of minutes from the November 18, 2024 meeting were approved.

Board member Fredendall moved to approve. Board member Jung seconded. Approved. Roll call vote: Ayes = 10; Nays = 0; Abstentions = 0.

5. Chair's Report

There was no Chair's report.

6. Election of Chair and Vice Chair

Board member Kalmick motioned to approve Board Member Saleh to Chair. Board member Jung seconded. Approved. Roll call vote: Ayes = 10; Nays = 0; Abstentions = 0.

Board member Jung motioned to approve Board Member Kalmick to Vice Chair. Board member Fredendall seconded. Approved. Roll call vote: Ayes = 10; Nays = 0; Abstentions = 0.

7. Deputy Attorney General's Report

There was no Attorney General Report.

8. Executive Officer's Report

a. Legislative Report

Chad Oberly provided an update on Proposition 4 implementation, which is expected to start in July 2025. Oberly stated the RMC will be going through a public comment period to develop best practices for the development of grant guidelines. The RMC will reach out to their tribal agencies as well as have at least two in-person workshops for the public to give their input. Oberly stated the RMC expects to receive at least \$100 million to make available to grantees.

Oberly stated AB 66 Wildfire Prevention Vegetation Management bill that would enact subsequent legislation to address wildfires by allowing more vegetation management within easements. Oberly stated staff also expect action be taken on homeowners insurance in wildfire prone areas.

b. Liaison Report

Blair Crossman, stated he would provide a brief update on the current wildfire situation in LA county. Crossman provided an update on wildfire prevention efforts, expressing condolences for fire victims and gratitude to first responders at both the Eaton and Pacific Palisades fires. Crossman stated containment of the fire at Eaton was over 90 percent and approaching 70 percent at Pacific Palisades. Crossman stated ongoing coordination with partner agencies around all of RMC's territories who are responding to and helping recover from the impacts of the Eaton Fire. Crossman emphasized the importance of wildfire prevention and mitigation efforts.

Melissa Bahmanpour stated Alondra Gateway Park, in the City of Compton, has reached substantial completion. On January 10, 2025, RMC Staff, Skanska, KASA, and StudioMLA conducted a substantial completion site walk in preparation for final completion. Site walk created a punch list, a final items for contractor to complete and it set off the 90-day plant establishment period. Bahmanpour stated temporary fencing will remain until the end of the 90-day for the plants to establish. Bahmanpour stated the RMC will also select a mosaic art vendor through a Request for Proposals (RFP) to create a mosaic art piece at the entrance of the park. The piece will reflect the rich cultural history of the City of Compton and Richlands Farms. Bahmanpour stated RMC staff create a maintenance manual for the City of Compton. Bahmanpour stated staff

Pages Intentionally Omitted

11. Consideration of a resolution approving a timeline extension and budget augmentation for professional services with Stephen Groner and Associates (SGA) for the Lower Los Angeles River Para Todos campaign (RMC22506).

Melissa Bahmanpour stated RMC staff brings forth the recommendation that the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC) Governing Board approve a 13-month timeline extension and \$348,824 budget augmentation to the professional services agreement with Stephen Groner and Associates for the Lower Los Angeles River Para Todos campaign. Bahmanpour stated Stephen Groner and Associates (SGA) requires an extension and budget augmentation to complete their services for the Lower Los Angeles River Para Todos campaign through the spring of 2026. SGA was selected through a Request for Proposals (RFP) released on March 8, 2022 for Lower Los Angeles River restoration and revitalization community outreach and engagement services. Several consultants, including SGA, were selected to create a bench through this RFP.

Bahmanpour stated the extension and budget augmentation is needed for them to complete the three-year effort. It is a three-year campaign to conduct research and robust community engagement to identify ways the agency can support community stabilization policies and programs through our project funding. This first year focused on research interviews to identify all capital improvement projects along the river. The second year now focuses on robust community engagement. The third year will continue research and engagement, as well as compile the effort in a report that will be shared publicly in spring 2026.

Bahmanpour stated, if approved, SGA would receive a timeline extension, which would allow them to continue efforts in the Para Todos campaign through March 31, 2026. SGA is requesting an additional \$348,824 and if approved the additional funding combined with the \$45,000 currently remaining in their budget would allow for a total budget of \$393,824 for their third and final year. The total awarded to date, if approved, would be \$865,386.

Board member Stark moved to approve. Board member Chang seconded. Approved. Roll call vote: Ayes = 9; Nays = 0; Abstentions = 0.

12. Consideration of a resolution awarding a grant to the Watershed Conservation Authority for the Wrigley Heights River Park acquisition

Karen Diaz stated RMC staff brings forth the recommendation that the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC) Governing Board approve a Los Angeles River General Fund grant for \$10,226,508 and a Proposition 1 Lower Los Angeles River grant award for \$5,773,492, totaling \$16,000,000, to the Watershed Conservation Authority for the Wrigley Heights River Park Acquisition.

Diaz stated the Watershed Conservation Authority (WCA) seeks to acquire 5.32 gross acres in the City of Long Beach (Exhibit A) along the Lower Los Angeles River to support

its mission to increase access to open space and align with the 2018 Lower Los Angeles River Revitalization Plan (LLARRP) vision. WCA is looking to acquire the Property to expand access to recreation and programming opportunities along the Lower LA River to a Severely Disadvantaged Community (SDAC). Diaz stated the property is within Wrigley Heights and has been identified as one of seven signature project sites. It is a portion of Opportunity Site 68 (Exhibit E) and was given the Opportunity Potential score of 98, making it one of the highest-ranking sites out of the 155 identified Opportunity Sites in the Plan. Diaz stated the property is comprised of 4 parcels of vacant land covering 4.33 acres and 0.90 of an acre in the City of Long Beach roadway. Diaz stated an outdoor advertising sign may potentially be included in the acquisition, which would provide future billboard revenues to the WCA.

Diaz stated the property was a part of a former North Long Beach oil field which was decommissioned in the mid-1980s. It was a golf learning center between 1996-2014 and during this time it was included in the concept of industrial park development by CRG Properties. Diaz stated in 2005 CRG Properties entered a Voluntary Clean Up Agreement (VCA) with the Department of Toxic Substances Control (DTSC), which erroneously included, the five-acre McDonald Property. In 2019, the owners of the Property conducted exploratory borings to test and analyze soil and oil vapor particles on their site. Diaz stated the Limited Subsurface Assessment found that environmental issues that had been found on the other parcels had not impacted the McDonald Property. Diaz stated subsequently, the owners of the property contacted DTSC to be removed from the VCA which was granted. As the WCA became interested in acquiring the property, the RMC conducted preliminary due diligence with a Phase 1 Environmental Site Assessment (ESA) and Phase 2 ESA to understand the current site condition. Diaz stated the Phase 2 ESA confirmed that the site does not need remediation to serve as open space.

Diaz stated the RMC received a willing seller letter on November 2, 2023 from the owner of the property. An independent appraisal was completed on May 10, 2024, and is undergoing review with an independent third-party appraiser before being reviewed by the State of California Department of General Services (DGS). Diaz stated the Watershed Conservation Authority leads the development and management of capital improvement projects throughout RMC territory and is the agency best suited to lead acquisition and planning efforts for Wrigley Heights River Park.

Diaz stated the Wrigley Heights River Park project would help increase connectivity both to and along the Lower LA River path. It would increase access to open space for the Wrigley Heights neighborhood. Diaz stated both planning and implementation of Wrigley Heights River Park would encourage work force development opportunities, and partnership with the Conservation Corps of Long Beach will be explored by WCA during site development. Diaz stated, after review by RMC staff, this grant received an initial score of 83 out of a total 100 points or 83% and recommends funding of this project.

Bahmanpour gave a brief project overview stating the WCA seeks to acquire 5.32 acres in the City of Long Beach near the Los Angeles River to develop into a new park.

Bahmanpour highlighted the 5.32 acres on the project location map. Bahmanpour stated the budget would include the property acquisition amount of \$14.8 million, which would be dictated by the final appraisal of the property. The timeline and tasklist would again be dependent upon the final decision from DGS.

Board Member Mohan asked what were the current conditions of the five acres. Bahmanpour stated current conditions were vegetation overgrowth, a fence and a billboard.

Board Member Fredendall asked if WCA becomes the owner for life after acquiring the property. Stanley stated WCA will be part of the discussions with the City of Long Beach, specifically with their Parks and Recreation department who have expressed interest in the ownership of this property.

Board Member Uranga stated he was very happy to see this project through.

Board Member Clark thanked public speaker Carlos for his comments about the environment and how important trees and open space are for the environment and the health of our community and its members.

Board member Clark moved to approve. Board member Uranga seconded. Approved. Roll call vote: Ayes = 9; Nays = 0; Abstentions = 0.

13. Consideration of a resolution awarding a grant to the Watershed Conservation Authority for the Wrigley Heights River Park planning project

Karen Diaz, stated the report was in salmon color because funding sources were changed after the report was published.

Diaz stated RMC staff brings forth the recommendation that the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC) Governing Board approve a Proposition 68 grant in the amount of \$3,300,000 to the Watershed Conservation Authority for the Wrigley Heights River Park Planning Project.

Diaz stated the Watershed Conservation Authority (WCA) seeks to acquire 5.32 gross acres because its mission is to increase access to open space and is in alignment with the 2018 Lower Los Angeles River Revitalization Plan vision. The Watershed Conservation Authority is requesting a \$3,300,000 grant award to lead planning efforts for the project (Exhibit B). Diaz stated the planning grant requested would cover the costs of design, community engagement, site clearance, and environmental services such as CEQA. The grant would cover the cost of full design for the project including construction documents. Diaz stated the grant would have a performance period of April 1, 2025-March 31, 2028 (Exhibit C). Community engagement would occur early in the performance period to ensure the design is built from community needs.

Diaz stated WCA leads the development and management of capital improvement projects throughout RMC territory and is well suited to lead acquisition and planning efforts for Wrigley Heights River Park. WCA developed Parque Dos Rios along the Lower Los Angeles River and currently operates the Lower LA River Ranger program, which looks at providing operations and maintenance along the river. Diaz stated the development of this new park would enable WCA to leverage its current partnerships and projects to further increase access to and along the Lower LA River. Diaz stated, after review by RMC staff, this grant received an initial score of 14 out of a total 18 points or 77% and recommends funding of this project.

Diaz stated in 2015, California State Assembly Bill 530 (AB 530) was passed to revitalize the Lower Los Angeles River through development efforts informed by community input, nature-based solutions, and accessibility. AB 530 called for a working group, chaired by the RMC, which included community insight to create the Lower Los Angeles River Revitalization Plan.

Bahmanpour provided brief context on the planning grant. The \$3.3 million would allow WCA to move forward in site clearance, environmental services and community engagement. The budget would cover project management, site clearance, community engagement, full design, environmental services, permitting and indirect 20 percent. The timeline would begin April 1, 2025 allowing WCA and RMC to figure out how to structure the project team. Bahmanpour stated, the City will be re-engaged during this process.

Board Member Uranga stated these items have been in the works for a very long time and is happy to see them move forward.

Board Member Rivera, wanted to clarify that the \$3.3 million included project management, full design costs, environmental services, permitting. Bahmanpour stated that was correct.

Board member Uranga moved to approve. Board member Fredendall seconded. Approved. Roll call vote: Ayes = 9; Nays = 0; Abstentions = 0.

14. Consideration of a resolution to approve a Proposition 68 Lower LA River grant to the City of Long Beach for the planning of the Drake Chavez Connection Project.

Steven Mendoza stated RMC staff brings forth the recommendation that the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC) Governing Board approve a Proposition 68 grant in the amount of \$453,000 to the City of Long Beach for the Drake Chavez Connection Planning Project.

Mendoza stated the Drake Chavez Connection project seeks to convert a former metropolitan bus Transportation Authority lot used for bus services into a new park. The project site is identified as Opportunity Area 72 in the Lower Los Angeles River Master Plan. The site scored an Opportunity Potential of 98, deeming the site has a high priority

Pages Intentionally Omitted

Attachment 2

DATE: January 22, 2025

TO: RMC Governing Board

FROM: Karen Diaz, Associate Governmental Project Analyst

THROUGH: Mark Stanley, Executive Officer

SUBJECT: Item 12: Consideration of a resolution approving a grant to the Watershed Conservation Authority for the Wrigley Heights River Park Acquisition

PROGRAM AREA: Lower LA River, Rivers and Tributaries

PROJECT TYPE: Acquisition

JURISDICTION: City of Long Beach

PROJECT MANAGER: Karen Diaz

RECOMMENDATION: That the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC) Governing Board approve a Los Angeles River General Fund grant for \$10,226,508 and a Proposition 1 Lower Los Angeles River grant award for \$5,773,492, totaling \$16,000,000, to the Watershed Conservation Authority for the Wrigley Heights River Park Acquisition.

PROJECT DESCRIPTION:

Exhibit A: Location Map
 Exhibit B: Willing Seller Letter
 Exhibit C: Budget
 Exhibit D: Task List & Timeline
 Exhibit E: LLARRP Opportunity Site 68

The Watershed Conservation Authority (WCA) seeks to acquire 5.32 gross acres in the City of Long Beach (Exhibit A) along the Lower Los Angeles River to support its mission to increase access to open space and align with the 2018 Lower Los Angeles River Revitalization Plan (LLARRP) vision. WCA is looking to acquire the Property to expand access to recreation and programming opportunities along the Lower LA River to a Severely Disadvantaged Community (SDAC). The property is within the Wrigley Heights River Park Opportunity Area of the LLARRP and is one of seven signature project sites. It is a portion of Opportunity Site 68 (Exhibit E) in the Lower Los Angeles Revitalization Plan and was given the Opportunity Potential score of 98, making it one of the highest-ranking sites out of the 155 identified Opportunity Sites in the Plan. The property is comprised of 4 parcels (APN 7140-014-021, 022, 023, 027) of vacant land covering 4.33 acres, 0.90 of an acre is City of Long Beach roadway (North Pacific Place & Frontage Road) bisecting a portion of the four parcels, plus a right-of way easement over 0.09 of an acre (Amebco Road) that runs for approximately 160' to the northeast and dead ends at the

Metro A Line (former Blue Line) tracks. In addition, an outdoor advertising sign may potentially be included in the acquisition, which would provide future billboard revenues to the WCA.

The property was a part of the former North Long Beach Oil Field and by the mid-1980s oil operations had ceased. It became a Golf Learning Center from 1996-2014 and during that time was included in the concept of industrial park development by CRG Properties. That concept was based on an 18-acre potential industrial park and the partnership of two property owners, which is no longer active. In 2005, CRG Properties entered a Voluntary Clean Up Agreement (VCA) with the Department of Toxic Substances Control (DTSC), which erroneously included, the five-acre McDonald Property. In 2019, the owners of the Property conducted exploratory borings to test and analyze soil and soil vapor particles on their site. The Limited Subsurface Assessment found that environmental issues that had been found on the other parcels had not impacted the McDonald Property. Subsequently, the owners of the property contacted DTSC to be removed from the VCA, and the removal was granted. As the WCA became interested in acquiring the property, the RMC conducted preliminary due diligence with a Phase 1 Environmental Site Assessment (ESA) and Phase 2 ESA to understand the current site condition. The Phase 2 ESA confirmed that the site does not need remediation to serve as open space.

The RMC received a willing seller letter on November 2, 2023, from Jeanne E. McDonald, Trustee of the Jeanne E. McDonald Revocable Trust, owner of the property. An independent appraisal was completed on May 10, 2024, and is undergoing review with an independent third-party appraiser before being reviewed by the State of California Department of General Services (DGS). The RMC joint power authority (JPA) the Watershed Conservation Authority leads the development and management of capital improvement projects throughout RMC territory and is the agency best suited to lead acquisition and planning efforts for Wrigley Heights River Park.

The Wrigley Heights River Park project would help increase connectivity both to and along the Lower LA River path, as well as increase access to open space for the Wrigley Heights neighborhood. Both planning and implementation of Wrigley Heights River Park would encourage workforce development opportunities, and partnership with the Conservation Corps of Long Beach will be explored by WCA during both site development.

After review by RMC staff, this grant received an initial score of 83 out of a total 100 points or 83% and recommends funding of this project.

Project:	Wrigley Heights River Park Acquisition		
Applicant:	Watershed Conservation Authority		
Program area:	Urban Lands/ Lower LA River		
Amount requested:	\$16,000,000		
Amount recommended for funding:	\$16,000,000		
RMC PROP 1 LLAR GRANT PROGRAM - EVALUATION CRITERIA SUMMARY			
Factor	Total Points Received	Total Points Possible	
1.0 Restore River Parkways and Access to Trails	8	8	
2.0 Urban Land Value	15	17	
3.0 Water Sustainability/Water Quality/Water Infrastructure	9	14	
4.0 Habitat and Restoration Resource Values	7	7	
5.0 Matching Funds	4	8	

6.0 Environmental Justice and Disadvantaged Communities	23	23
7.0 Readiness	5	5
8.0 Stakeholders/Partners Resource Value	4	9
9.0 Stewardship and Management Plan Value	7	7
10.0 Educational/Interpretive Signage	1	2
Total Score	83	100

Projects that score above 80 for Los Angeles River submittals, and subject to other factors upon review, are prioritized for funding recommendations to the Governing Board. Project proponents are provided the opportunity to receive higher scores based on additional information provided through staff interviews that demonstrate an alignment with RMC goals and objectives, and granting of funds is consistent with RMC programs, which include:

Common Ground, from the Mountains to the Sea - Supports the Watershed and Open Space Plan vision for the San Gabriel and Los Angeles River Watersheds, seeks to restore balance between natural and human systems. Guiding principles: 1) growing greener (create, expand and improve open space and access to open space), 2) enhancing waters and waterways, and 3) coordinate regional planning efforts.

RMC Environmental Justice Policy - To ensure that the public, including minority and low income populations, are informed of opportunities to participate in the development and implementation of all RMC-related programs, policies and activities, and that they are not discriminated against, treated unfairly, or caused to experience disproportionately high and adverse human health or environmental effects from environmental decisions.

Tribal Consultation - To ensure Indian tribes and tribal communities are able to provide meaningful input into the development of regulations, rules policies, programs, projects, plans, property decisions, and activities that may affect tribal communities; supporting AB52 and CEQA, which require separate consideration of tribal cultural resources from that of paleontological resources.

BACKGROUND:

In 2015, California State Assembly Bill 530 (AB 530) was passed to revitalize the Lower Los Angeles River through development efforts informed by community input, nature-based solutions, and accessibility. AB 530 called for a working group, chaired by the RMC, which included community insight to create the Lower Los Angeles River Revitalization Plan. The property is within the Wrigley Heights River Park Opportunity Area of the LLARRP and is one of seven signature project sites. It is a portion of Opportunity Site 68 in the Lower Los Angeles Revitalization Plan and was given the Opportunity Potential score of 98, making it one of the highest-ranking sites out of the 155 identified Opportunity Sites in the Plan.

FISCAL INFORMATION:

The Watershed Conservation Authority is requesting a \$16,000,000 grant to acquire the property, continue due diligence such as permitting and community engagement, and cover indirect costs the agency may incur in leading the acquisition (Exhibit C). If approved, the grant will have a performance period of March 1, 2025- June 1, 2025 (Exhibit D).

Funding for this project is allocated from the following:

Proposition 1, Chapter 188 Statutes of 2014

Water Quality, Supply, and Infrastructure Improvement Act of 2014, appropriations under Chapter 6 Protecting Rivers, Lakes, Streams, Coastal Waters, and Watersheds

79735(a): San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy, fifty million dollars (\$50,000,000)

General Fund via Budget Act of 2021 (Senate Bill 170)

3825-101-0001 – For local assistance, San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy.....10,000,000

Schedule:

(1) 2990-San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy.....10,000,000

Provisions:

1. The amount appropriated in this item shall be available pursuant to Division 22.8 (commencing with Section 32600) of the Public Resources Code for projects that improve the climate resiliency or the protection of the Los Angeles River Watershed or are consistent with the Lower Los Angeles River Revitalization Master Plan.

2. The amount appropriated in this item shall be available for encumbrance or expenditure until June 30, 2024.

3. Up to 5 percent of the amount appropriated in this item may be used for administrative costs.

General Fund via Budget Act of 2022 (Senate Bill 154)

3825-101-0001 – For local assistance, San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy.....6,670,000

Schedule:

(1) 2990-San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy.....6,670,000

Provisions:

1. The amount appropriated in this item shall be available pursuant to Division 22.8 (commencing with Section 32600) of the Public Resources Code for projects that improve the climate resiliency or the protection of the Los Angeles River Watershed or are consistent with the Lower Los Angeles River Revitalization Master Plan.

2. The amount appropriated in this item shall be available for encumbrance or expenditure until June 30, 2025.

LEGISLATIVE AUTHORITY AND RMC ADOPTED POLICIES/AUTHORITIES: Public Resources Code Division 22.8 provides in part that:

Section 32602: There is in the Natural Resources Agency, the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy, which is created as a state agency for the following purposes:

- (a) To acquire and manage public lands within the Lower Los Angeles River and San Gabriel River watersheds, the Dominguez Channel watershed, and the Santa Catalina Island, and to provide open-space, low-impact recreational and educational uses, water conservation, watershed improvement, wildlife and habitat restoration and protection, and watershed improvement within the territory.
- (b) To preserve the San Gabriel River and the lower Los Angeles River, the Dominguez Channel watershed, and Santa Catalina Island consistent with existing and adopted river and flood control projects for the protection of life and property.
- (c) To acquire open-space lands within the territory of the conservancy.
- (d) To provide for the public's enjoyment and enhancement of recreational and educational experiences on public lands in the San Gabriel Watershed and lower Los Angeles River, the San Gabriel Mountains, the Dominguez Channel watershed, and Santa Catalina Island in a manner consistent with the protection of lands and resources in those watersheds.

Section 32604: The conservancy shall do all of the following:

- (a) Establish policies and priorities for the conservancy regarding the San Gabriel River and the lower Los Angeles River, and their watersheds, and conduct any necessary planning activities, in accordance with the purposes set forth in Section 32602.
- (b) Give priority to river related projects that create expanded opportunities for recreation, greening, aesthetic improvement, and wildlife habitat along the corridor of the river, and in parts of the river channel that can be improved for the above purposes without infringing on water quality, water supply, and necessary flood control.
- (c) Approve conservancy funded projects that advance the policies and priorities set forth in Section 32602.

Section 32614: The conservancy may do all of the following:

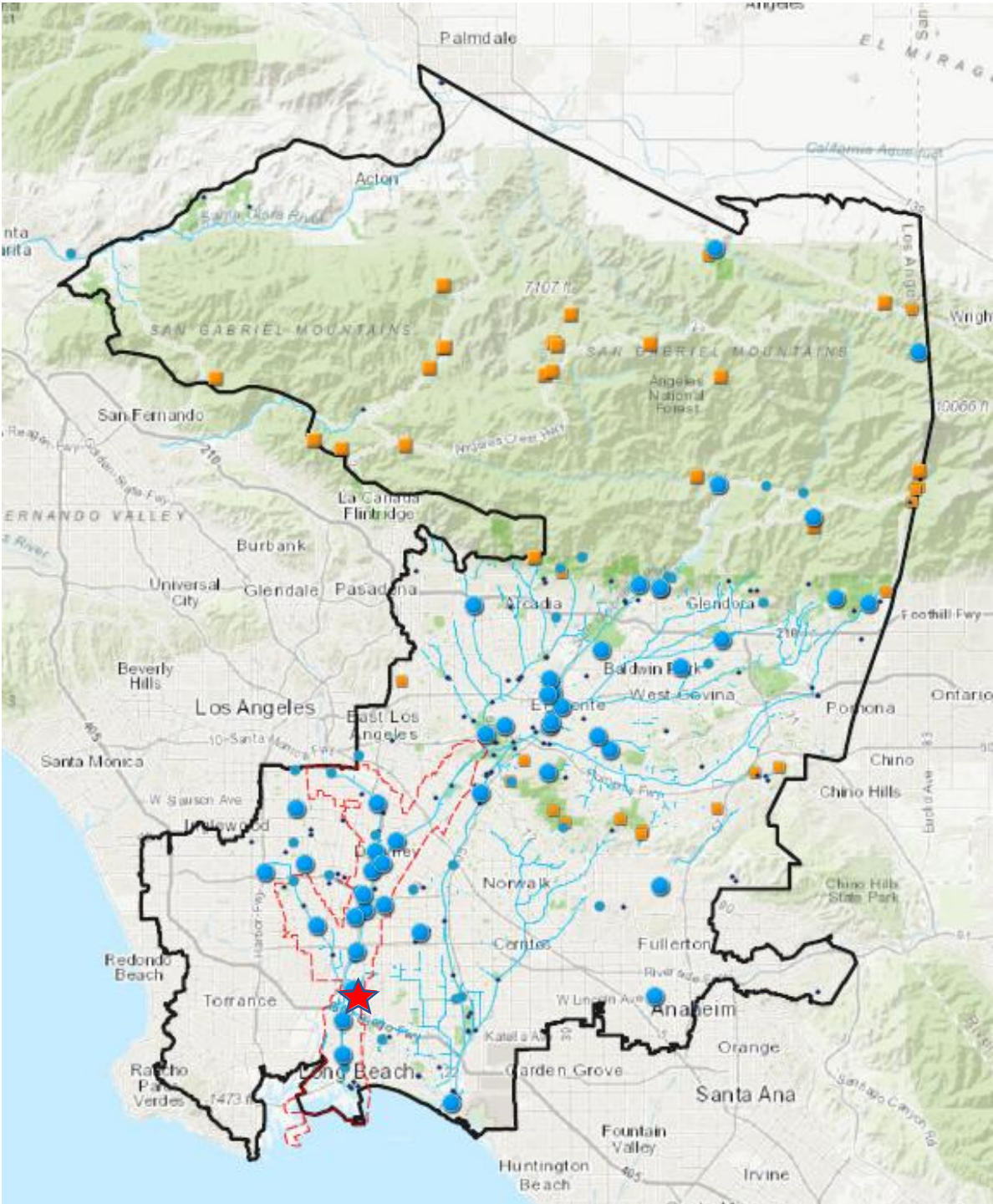
- (b) Enter into contracts with any public agency, private entity, or person necessary for the proper discharge of the conservancy's duties, and enter into a joint powers agreement with a public agency, in furtherance of the purposes set forth in Section 32602.
- (e) Enter into any other agreement with any public agency, private entity, or person necessary for the proper discharge of the conservancy's duties for the purposes set forth in Section 32602.
- (f) Recruit and coordinate volunteers and experts to conduct interpretive and recreational programs and assist with construction projects and the maintenance of parkway facilities.
- (g) Undertake, within the territory, site improvement projects, regulate public access, and revegetate and otherwise rehabilitate degraded areas, in consultation with any other public agency with appropriate jurisdiction and expertise, in accordance with the purposes set forth in Section 32602. The conservancy may also, within the territory, upgrade deteriorating facilities and construct new facilities as needed for outdoor recreation, nature appreciation and interpretation, and natural resources projection. The conservancy may undertake those projects by itself or in conjunction with another local agency; however, the conservancy shall provide overall coordination of those projects by setting priorities for the projects and by ensuring a uniform approach to projects. The conservancy may

undertake those projects with prior notification to the legislative body of the local agency that has jurisdiction in the area in which the conservancy proposes to undertake that activity.

Further, Section 32614.5 provides that:

- (a) The conservancy may award grants to local public agencies, state agencies, federal agencies, and nonprofit organizations for the purposes of this division.
- (b) Grants to nonprofit organizations for the acquisition of real property or interests in real property shall be subject to all of the following conditions:
 - (1) The purchase price of any interest in land acquired by the nonprofit organization may not exceed fair market value as established by an appraisal approved by the conservancy.
 - (2) The conservancy approves the terms under which the interest in land is acquired.
 - (3) The interest in land acquired pursuant to a grant from the conservancy may not be used as security for any debt incurred by the nonprofit organization unless the conservancy approves the transaction.
 - (4) The transfer of land acquired pursuant to a grant shall be subject to the approval of the conservancy and the execution of an agreement between the conservancy and the transferee sufficient to protect the interests of the state.
 - (5) The state shall have a right of entry and power of termination in and over all interests in real property acquired with state funds, which may be exercised if any essential term or condition of the grant is violated.
 - (6) If the existence of the nonprofit organization is terminated for any reason, title to all interest in real property acquired with state funds shall immediately vest in the state, except that, prior to that termination, another public agency or nonprofit organization may receive title to all or a portion of that interest in real property, by recording its acceptance of title, together with the conservancy's approval, in writing.
- (c) Any deed or other instrument of conveyance whereby real property is acquired by a nonprofit organization pursuant to this section shall be recorded and shall set forth the executor interest or right of entry on the part of the state.

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Jeanne E. McDonald
Trustee of the Jeanne E McDonald Revocable Trust

October 31st 2023

To: San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC)

Re: Purchase of 3916-4201 Ambeco Rd Long Beach, CA 90806
Located in Los Angeles County;
Assessor's Parcel # (s) 7140-014-021, 7140-014-022, 7140-014-027 &
7140-014-023

To Whom It May Concern,

This letter is provided to confirm that Jeanne E. McDonald, Trustee of the Jeanne E. McDonald Revocable Trust, owner of the above-referenced properties, is a willing participant in the proposed real property transaction. Should grant funds be awarded to the grant applicant **San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC)**, then Jeanne E. McDonald, as seller, is willing to enter into an agreement for the sale of the above real property at Fair Market Value based upon the "Highest and Best Use" designed for Light Industrial/Neo-Industrial zoned land.

Within the last 4 years, the Trust has received several qualified purchase offers from established national developers and private investors interested in developing the Long Beach property into a rare and highly desirable state-of-the-art Neo-Industrial campus with a flexible and sustainable design. The "Front Row" parcels are especially suited for a wide range of designated industries that may include 50 percent office use, logistics, clean manufacturing, e-commerce, warehousing, and fulfillment, under the Neo-Industrial place type.

The land owned by the Trust totals 5.52 AC (240,618 sf) which is comprised of:

- A. Four (4) parcels of 4.33 AC (188,702 sf) and;
- B. Its Easements: Two (2) Right of Ways of 1.1 AC (47,916 sf) and Ambeco land of 0.09 AC (4,000 sf) can be reclaimed (if the adjacent site is not developed).
- C. The Billboard rights (to be valued or sold separately)

Acknowledged:


Signature of Land Owners) (Trustee(S), etc.)

11/2/23
Date Signed

	Grantee: Watershed Conservation Authority		
	Project Name: Wrigley Heights River Park		
	Contact and Address: 100 N. Old San Gabriel Canyon Road, Azusa, CA 91702		
	RMC Total Budget Request: \$16,000,000		
	Work Plan Task Number and Name <i>(insert rows as needed for work plan, ensure task item #s match the ones on tasklist and timeline)</i>		RMC Budget (this total amount must be the same as the amount requested in the grant application)
		Cost Per Task	
1	Due Diligence	\$144,000	\$144,000
2	Property Acquisition	\$14,856,000	\$14,856,000
2	Indirect 20%	\$1,000,000	\$1,000,000
	Total Funded		\$16,000,000

Grantee: Watershed Conservation Authority Project Name: Wrigley Heights River Park Contact and Address: 100 N. Old San Gabriel Canyon Road, Azusa, CA 91702			
RMC Tasklist and Timeline			
Performance Begin and End Date: March 1, 2025 - June 1, 2025			
Work Plan Task Number and Name	Q1 2025	Q2 2025	End Period
Task #1 - Due Diligence			
Task #2- Property Acquisition			
Task #3 - Indirect			



LOWER LOS ANGELES RIVER Opportunity Assessment

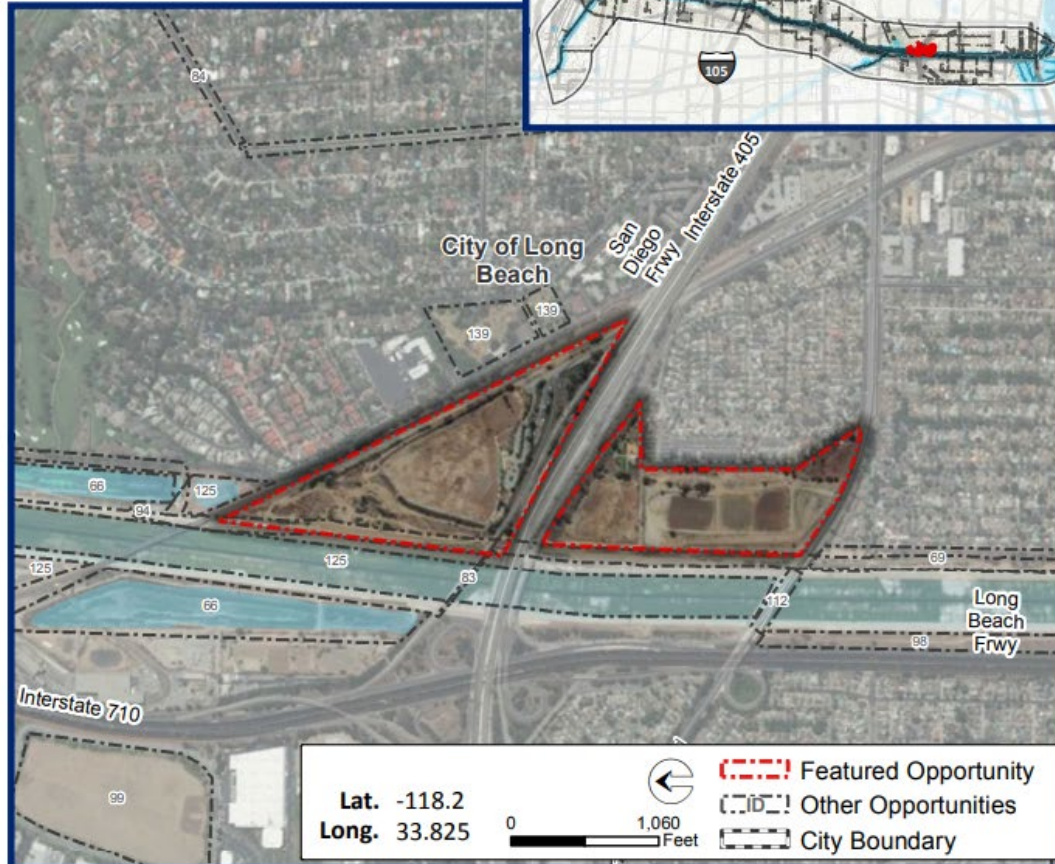
Opportunity Area

Wrigley Heights River Park

Opportunity ID **Opportunity Driver**
68 Priority/Long Beach
 RiverLink

Opportunity Description

Driving Range. Potential to continue Dominguez Gap-like wetland southward. Propose wetland, riparian woodland, pedestrian and bicycle paths.



Plan Element	Objective	Applicable Metrics Advanced (%)
Water and Environment	Conserve, Enhance, and Restore Habitat, Biodiversity, and Floodplain Functions	100
	Enhance Local Water Capture and Use	100
	Improve Environmental Quality	100
	Manage Flood Risk	100
Public Realm	Enhance Connectivity	100
	Improve User Experience and Equitable Access	100
	Enhance and Create Diverse, Vibrant Public Spaces	100
Community Economics, Health, and Equity	Address Homelessness	75
	Increase Community Green Infrastructure	100
	Increase Equitable Community Access to Multi-use Trails, Assets	100
	Prevent Local Gentrification-Induced Displacement	100
	Promote Wellness and Physical Activity	100
	Support and Develop Local Business and Workforce	100

Opportunity Potential
(Average of Applicable Metrics Advanced)

98

January 22, 2025 – Item 12

RESOLUTION 2025-03

RESOLUTION OF THE SAN GABRIEL AND LOWER LOS ANGELES
RIVERS AND MOUNTAINS CONSERVANCY (RMC) APPROVING A
GRANT TO THE WATERSHED CONSERVATION AUTHORITY (WCA)
FOR THE WRIGLEY HEIGHTS RIVER PARK ACQUISITION

WHEREAS, The legislature has found and declared that the San Gabriel River and its tributaries, the Lower Los Angeles River and its tributaries, Dominguez Channel Watershed, Santa Catalina Island, and the San Gabriel Mountains, Puente Hills, and San Jose Hills constitute a unique and important open space, environmental, anthropological, cultural, scientific, educational, recreational, scenic, and wildlife resource that should be held in trust to be preserved and enhanced for the enjoyment of, and appreciation by, present and future generations; and

WHEREAS, The people of the State of California have enacted the Water Quality, Supply, and Infrastructure Improvement Act of 2014 ("Proposition 1"); and

WHEREAS, the State of California has authorized an expenditure of funds from Proposition 1, the Water Quality, Supply, and Infrastructure Improvement Act of 2014 to the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy for capital outlay and local assistance multi-benefit grants for ecosystem and watershed protection and restoration projects; and

WHEREAS, the State of California has authorized an expenditure of local assistance funds enacted in the Budget Act of 2022 (Senate Bill 154) to the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy for projects that improve the climate resiliency or the protection of the Los Angeles River Watershed or are consistent with the Lower Los Angeles River Revitalization Master Plan (\$6,670,000); and

WHEREAS, the State of California has authorized an expenditure of local assistance funds enacted in the Budget Act of 2021 (Senate Bill 170) to the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy for projects that improve the climate resiliency or the protection of the Los Angeles River Watershed or are consistent with the Lower Los Angeles River Revitalization Master Plan (\$10,000,000); and

WHEREAS, The RMC may award grants to local public agencies, state agencies, federal agencies, and nonprofit organizations for the purposes of Division 22.8 the Public Resources Code; and

WHEREAS, The proposed project meets an objective of the California Water Action Plan for more reliable water supplies, restoration of important species and habitat, more resilient and sustainably managed water infrastructure; and

WHEREAS, The proposed project meets the goals of reducing greenhouse gas emissions consistent with AB 32; and

WHEREAS, The proposed project is consistent with the San Gabriel and Los Angeles River Watershed and Open Space Plan; and

WHEREAS, The proposed project protects land and water resources; and

WHEREAS, The grantee has requested a grant from Proposition 1, Section 79731 (f) or Section 79735 (a) of the Water Code; and

This action is exempt from the environmental impact report requirements of the California Environmental Quality Act (CEQA); and NOW

Therefore be it resolved that the RMC hereby:

1. FINDS that this action is consistent with the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy Act and is necessary to carry out the purposes and objectives of Division 22.8 of the Public Resources Code.
2. FINDS that the Proposition 1 RMC Grant Program is consistent with the Water Quality, Supply, and Infrastructure Improvement Act of 2014 ("Proposition 1"), which provides funds for the RMC grant program.
3. FINDS the proposed project meets at least one of the purposes of Proposition 1.
4. FINDS the proposed project meets at least one of the three objectives of the California Water Action Plan.
5. FINDS that the proposed action is consistent with the San Gabriel and Lower San Gabriel and Los Angeles River Watershed and Open Space Plan as adopted by the Rivers and Mountains Conservancy;
6. FINDS that the actions contemplated by this resolution are exempt from the environmental impact report requirements of the California Environmental Quality Act.
7. ADOPTS the staff report dated January 22, 2025.
8. APPROVES a Proposition 1 grant in the amount of \$5,773,492 and Lower Los Angeles River general fund grant in the amount of \$10,226,508 for a total \$16,000,000 grant to the Watershed Conservation Authority for the acquisition of Wrigley Heights River Park for a performance period of Marach 1 2025 through June 1, 2025.

~ End of Resolution ~

Passed and Adopted by the Board of the
SAN GABRIEL and LOWER LOS ANGELES RIVERS AND MOUNTAINS
CONSERVANCY on January 22, 2025.

Motion _____ Second: _____

Ayes: _____ Nays: _____ Abstentions: _____

Ali Saleh, Chair

ATTEST:

John M. Natalizio
Deputy Attorney General

Attachment 3

DATE: January 22, 2025

TO: RMC Governing Board

FROM: Karen Diaz, Associate Governmental Project Analyst

THROUGH: Mark Stanley, Executive Officer

SUBJECT: Item 13: Consideration of a resolution approving a grant to the Watershed Conservation Authority for plan development of Wrigley Heights River Park Planning Project

PROGRAM AREA: Lower LA River, Rivers and Tributaries

PROJECT TYPE: Planning

JURISDICTION: City of Long Beach

PROJECT MANAGER: Karen Diaz

RECOMMENDATION: That the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy Governing Board approve a **Proposition 68** grant in the amount of \$3,300,000 to the Watershed Conservation Authority for the Wrigley Heights River Park Planning Project

PROJECT DESCRIPTION:

Exhibit A: Location Map
 Exhibit B: Budget
 Exhibit C: Tasklist & Timeline
 Exhibit D: LLARRP Opportunity Site 68

The Watershed Conservation Authority (WCA) seeks to acquire 5.32 gross acres along the Lower Los Angeles River in the City of Long Beach to both support its mission to increase access to open space and align with the 2018 Lower Los Angeles River Revitalization Plan (LLARRP) vision. The property is within the Wrigley Heights River Park Opportunity Area of the LLARRP and is one of seven signature project sites. It is a portion of Opportunity Site 68 (Exhibit D) in the Lower Los Angeles Revitalization Plan and was given the Opportunity Potential score of 98, making it one of the highest-ranking sites out of the 155 identified Opportunity Sites in the Plan. WCA is looking to acquire the Property to expand access to recreation and programming opportunities along the Lower LA River to a Severely Disadvantaged Community (SDAC). The property is comprised of 4 parcels (APN 7140-014-021, 022, 023, 027) of vacant land covering 4.33 acres, 0.90 of an acre City of Long Beach city street (North Pacific Place & Frontage Road) through the four parcels, plus a right-of way easement over 0.09 of an acre (Amebco Road) that runs for approximately 160' to the northeast and dead ends at the Metro A Line (former Blue Line) tracks (Exhibit A). In addition, an outdoor advertising sign may potentially be included in the acquisition, which would provide future billboard revenues to the WCA.

The Watershed Conservation Authority is requesting a \$3,300,000 grant award to lead planning efforts for the project (Exhibit B). The planning grant requested would cover the costs of design,

community engagement, site clearance, and environmental services such as CEQA. This grant would cover the cost of full design for the project including construction documents. The grant would have a performance period of April 1, 2025 - March 31, 2028 (Exhibit C) with community engagement occurring early in the performance period to ensure the design is built from community needs.

The WCA was established in 2003 pursuant to the Joint Excise of Powers Act under Government Code, Section 6500, et. seq. It is a local public entity of the State of California exercising joint powers of the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy and the Los Angeles County Flood Control District. The role of the WCA is to facilitate the development and implementation of a comprehensive program to improve open space and recreational opportunities within the San Gabriel and Lower Los Angeles River Watersheds that are consistent with the goals of flood protection, water supply, groundwater recharge, and water conservation. The WCA is also empowered to acquire and protect lands for watershed protection, conservation, natural open space, and recreational purposes. The organization leads the development and management of capital improvement projects throughout RMC territory and is well suited to lead acquisition and planning efforts for Wrigley Heights River Park. The Authority developed Parque Dos Rios along the Lower Los Angeles River and currently operates the Lower LA River Ranger program, which looks at providing operations and maintenance along the river. The development of this new park would enable the Authority to leverage its current partnerships and projects to further increase access to and along the Lower LA River.

After review by RMC staff, this grant received an initial score of 14 out of a total 18 points or 77% and recommends funding of this project.

Project:	Wrigley Heights River Park Planning Project	
Applicant:	Watershed Conservation Authority	
Program area:	Urban Lands/ Lower LA River	
Amount requested:	\$3,300,000	
Amount recommended for funding:	\$3,300,000	
RMC GRANT PROGRAM - EVALUATION CRITERIA SUMMARY		
Factor	Project Score	Total Points Possible
LLAR Urban Streams and Rivers Program – The scope of work is appropriate and supports Climate Resilience and LA River Master Plan goals in RMC’s LLAR territory	5	5
Project Readiness	2	5
Disadvantaged Communities	2	2
Workforce Development	2	2
Project is reflective of needs/desires if local community and consults with community-based organizations and/or tribes.	1	1
Matching Funds	1	1
Project will be implementable, and applicant has a plan for funding/implementation	1	

TOTAL POINTS	14	18
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Projects that score above 80 for Los Angeles River submittals, and subject to other factors upon review, are prioritized for funding recommendations to the Governing Board. Project proponents are provided the opportunity to receive higher scores based on additional information provided through staff interviews that demonstrate an alignment with RMC goals and objectives, and granting of funds is consistent with RMC programs, which include:

Common Ground, from the Mountains to the Sea - Supports the Watershed and Open Space Plan vision for the San Gabriel and Los Angeles River Watersheds, seeks to restore balance between natural and human systems. Guiding principles: 1) growing greener (create, expand and improve open space and access to open space), 2) enhancing waters and waterways, and 3) coordinate regional planning efforts.

RMC Environmental Justice Policy - To ensure that the public, including minority and low income populations, are informed of opportunities to participate in the development and implementation of all RMC-related programs, policies and activities, and that they are not discriminated against, treated unfairly, or caused to experience disproportionately high and adverse human health or environmental effects from environmental decisions.

Tribal Consultation - To ensure Indian tribes and tribal communities are able to provide meaningful input into the development of regulations, rules policies, programs, projects, plans, property decisions, and activities that may affect tribal communities; supporting AB52 and CEQA, which require separate consideration of tribal cultural resources from that of paleontological resources.

BACKGROUND:

In 2015, California State Assembly Bill 530 (AB 530) was passed to revitalize the Lower Los Angeles River through development efforts informed by community input, nature-based solutions, and accessibility. AB 530 called for a working group, chaired by the RMC, which included community insight to create the Lower Los Angeles River Revitalization Plan. The property is within the Wrigley Heights River Park Opportunity Area of the LLARRP and is one of seven signature project sites. It is a portion of Opportunity Site 68 in the Lower Los Angeles Revitalization Plan and was given the Opportunity Potential score of 98, making it one of the highest-ranking sites out of the 155 identified Opportunity Sites in the Plan.

The property was a part of the former North Long Beach Oil Field and by the mid-1980s oil operations had ceased. It became a Golf Learning Center from Golf Learning Center from 1996-2014 and during that time was included in the concept of industrial park development by CRG Properties. That concept was based on an 18 acre potential industrial park and the partnership of two property owners, which is no longer active. In 2005, CRG Properties entered into a Voluntary Clean Up Agreement (VCA) with the Department of Toxic Substances Control (DTSC), which erroneously included the five acre McDonald Property. In 2019, the owners of the Property conducted exploratory borings to test and analyze soil and soil vapor particles on their site. The Limited Subsurface Assessment found that environmental issues that had been found on the other parcels had not impacted the McDonald Property. Subsequently, the owners of the property

contacted DTSC to be removed from the VCA, and the removal was granted. As the WCA became interested in acquiring the property, the RMC conducted due diligence with a Phase 1 Environmental Site Assessment (ESA) and Phase 2 ESA to understand the current site condition. The Phase 2 ESA confirmed that the site does not need remediation to serve as open space.

The Wrigley Heights River Park project would help increase connectivity both to and along the Lower LA River path, as well as increase access to open space for the Wrigley Heights neighborhood. Both planning and implementation of Wrigley Heights River Park would encourage workforce development opportunities, and partnership with the Conservation Corps of Long Beach will be explored by WCA during both site development.

FISCAL INFORMATION:

The grant amount requested is a not to exceed amount of \$3,300,000 with a performance period of April 1, 2025 through March 31, 2028. Funding for this project is allocated from the following:

Proposition 68, Chapter 852 Statutes of 2017

Chapter 7 of Proposition 68, entitled “California River Recreation, Creek and Waterway Improvement Program,” allocates one hundred sixty-two million dollars (\$162,000,000) for projects to protect and enhance an urban creek. Thirty-seven million, five hundred thousand dollars (\$37,500,000) of the funds available in Chapter 7 is allocated to the Rivers and Mountains Conservancy for projects that protect or enhance the Lower Los Angeles River watershed and its tributaries pursuant to Section 79508 of the Water Code and Division 22.8 (commencing with Section 32600) and Division 23 (commencing with Section 33000).

LEGISLATIVE AUTHORITY AND RMC ADOPTED POLICIES/AUTHORITIES: Public Resources Code Division 22.8 provides in part that:

Section 32602: There is in the Natural Resources Agency, the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy, which is created as a state agency for the following purposes:

- (a) To acquire and manage public lands within the Lower Los Angeles River and San Gabriel River watersheds, the Dominguez Channel watershed, and the Santa Catalina Island, and to provide open-space, low-impact recreational and educational uses, water conservation, watershed improvement, wildlife and habitat restoration and protection, and watershed improvement within the territory.
- (b) To preserve the San Gabriel River and the lower Los Angeles River, the Dominguez Channel watershed, and Santa Catalina Island consistent with existing and adopted river and flood control projects for the protection of life and property.
- (c) To acquire open-space lands within the territory of the conservancy.
- (d) To provide for the public’s enjoyment and enhancement of recreational and educational experiences on public lands in the San Gabriel Watershed and lower Los Angeles River, the San Gabriel Mountains, the Dominguez Channel watershed, and Santa Catalina Island in a manner consistent with the protection of lands and resources in those watersheds.

Section 32604: The conservancy shall do all of the following:

- (a) Establish policies and priorities for the conservancy regarding the San Gabriel River and the lower Los Angeles River, and their watersheds, and conduct any necessary planning activities, in accordance with the purposes set forth in Section 32602.
- (b) Give priority to river related projects that create expanded opportunities for recreation, greening, aesthetic improvement, and wildlife habitat along the corridor of the river, and in parts of the river channel that can be improved for the above purposes without infringing on water quality, water supply, and necessary flood control.
- (c) Approve conservancy funded projects that advance the policies and priorities set forth in Section 32602.

Section 32614: The conservancy may do all of the following:

- (b) Enter into contracts with any public agency, private entity, or person necessary for the proper discharge of the conservancy's duties, and enter into a joint powers agreement with a public agency, in furtherance of the purposes set forth in Section 32602.
- (e) Enter into any other agreement with any public agency, private entity, or person necessary for the proper discharge of the conservancy's duties for the purposes set forth in Section 32602.
- (f) Recruit and coordinate volunteers and experts to conduct interpretive and recreational programs and assist with construction projects and the maintenance of parkway facilities.
- (g) Undertake, within the territory, site improvement projects, regulate public access, and revegetate and otherwise rehabilitate degraded areas, in consultation with any other public agency with appropriate jurisdiction and expertise, in accordance with the purposes set forth in Section 32602. The conservancy may also, within the territory, upgrade deteriorating facilities and construct new facilities as needed for outdoor recreation, nature appreciation and interpretation, and natural resources projection. The conservancy may undertake those projects by itself or in conjunction with another local agency; however, the conservancy shall provide overall coordination of those projects by setting priorities for the projects and by ensuring a uniform approach to projects. The conservancy may undertake those projects with prior notification to the legislative body of the local agency that has jurisdiction in the area in which the conservancy proposes to undertake that activity.

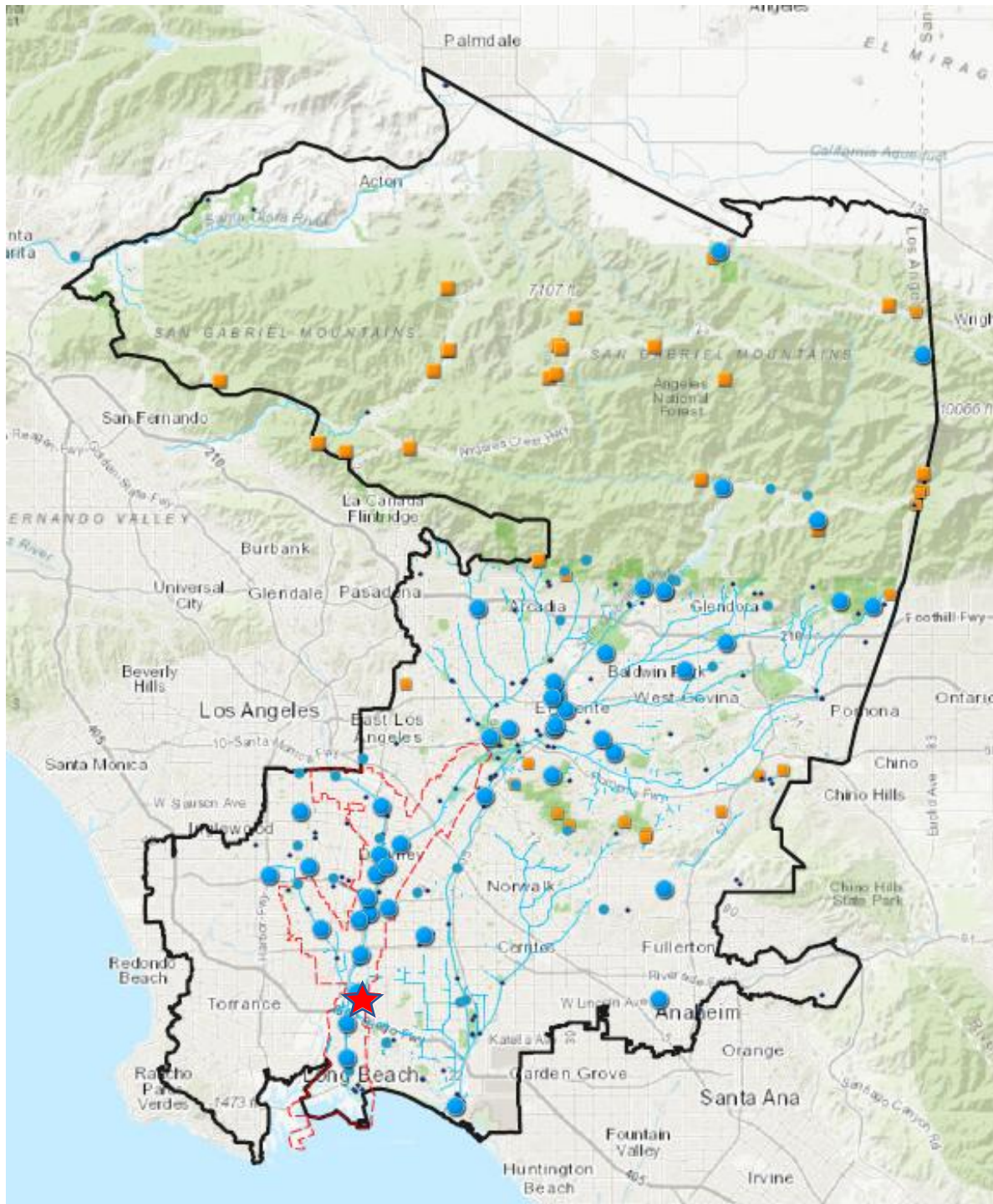
Further, Section 32614.5 provides that:

- (a) The conservancy may award grants to local public agencies, state agencies, federal agencies, and nonprofit organizations for the purposes of this division.
- (b) Grants to nonprofit organizations for the acquisition of real property or interests in real property shall be subject to all of the following conditions:
 - (1) The purchase price of any interest in land acquired by the nonprofit organization may not exceed fair market value as established by an appraisal approved by the conservancy.
 - (2) The conservancy approves the terms under which the interest in land is acquired.
 - (3) The interest in land acquired pursuant to a grant from the conservancy may not be used as security for any debt incurred by the nonprofit organization unless the conservancy approves the transaction.
 - (4) The transfer of land acquired pursuant to a grant shall be subject to the approval of the conservancy and the execution of an agreement between the conservancy and the transferee sufficient to protect the interests of the state.

- (5) The state shall have a right of entry and power of termination in and over all interests in real property acquired with state funds, which may be exercised if any essential term or condition of the grant is violated.
- (6) If the existence of the nonprofit organization is terminated for any reason, title to all interest in real property acquired with state funds shall immediately vest in the state, except that, prior to that termination, another public agency or nonprofit organization may receive title to all or a portion of that interest in real property, by recording its acceptance of title, together with the conservancy's approval, in writing.
- (c) Any deed or other instrument of conveyance whereby real property is acquired by a nonprofit organization pursuant to this section shall be recorded and shall set forth the executor interest or right of entry on the part of the state.

Wrigley Heights River Park Planning Project

Location Map



Grantee: Watershed Conservation Authority

Project Name: Wrigley Heights River Park Planning

Contact and Address: 100 N. Old San Gabriel Canyon Road, Azusa, CA 91702

RMC Total Budget Request: \$3,300,000

	Work Plan Task Number and Name (insert rows as needed for work plan, ensure task item #s match the ones on tasklist and timeline)	Cost Per Task	RMC Budget (this total amount must be the same as the amount requested in the grant application)
1	Project Management	\$300,000	\$300,000
2	Site Clearance	\$50,000	\$50,000
2	Community Engagement	\$200,000	\$200,000
3	Design	\$1,000,000	\$1,000,000
4	Environmental Services	\$1,000,000	\$1,000,000
5	Permitting	\$90,000	\$90,000
6	Indirect 20%	\$660,000	\$660,000
	Total Funded		\$3,300,000

Grantee: Watershed Conservation Authority

Project Name: Wrigley Heights River Park

Contact and Address: 100 N. Old San Gabriel
Canyon Road, Azusa, CA 91702

RMC Tasklist and Timeline

Performance Begin and End Date:

April 1, 2025- March 31, 2028

Work Plan Task Number and Name	Q2 2025	Q3 2025	Q4 2025	Q1 2026	Q2 2026	Q3 2026	Q4 2026	Q1 2027	Q2 2027	Q3 2027	Q4 2027	Q1 2028	End Period
Task #1 - Project Management													
Task #2- Site Clearance													
Task #3 - Community Engagement													
Task #4 - Design													
Task #5- Environmental Services													
Task #6- Permitting													
Task #7- 20% Indirect													



LOWER LOS ANGELES RIVER Opportunity Assessment

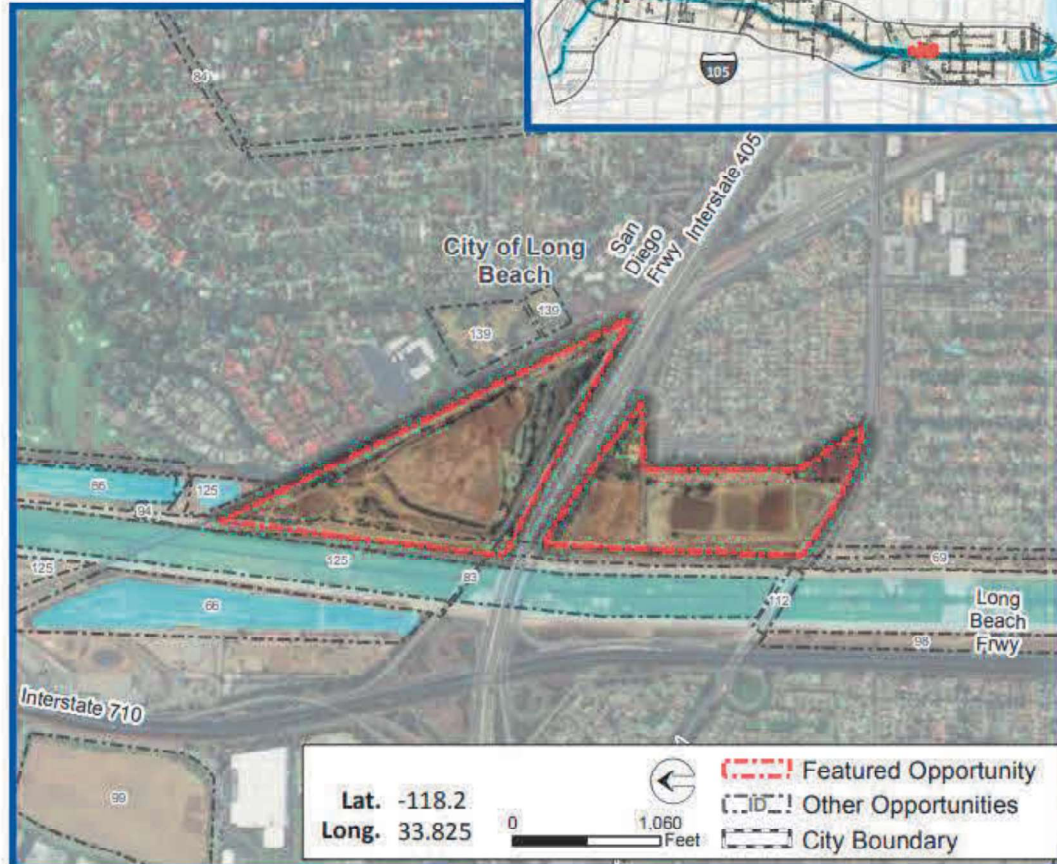
Opportunity Area

Wrigley Heights River Park

Opportunity ID 68
Opportunity Driver Priority/Long Beach RiverLink

Opportunity Description

Driving Range. Potential to continue Dominguez Gap-like wetland southward. Propose wetland, riparian woodland, pedestrian and bicycle paths.



Plan Element	Objective	Applicable Metrics Advanced (%)
Water and Environment	Conserve, Enhance, and Restore Habitat, Biodiversity, and Floodplain Functions	100
	Enhance Local Water Capture and Use	100
	Improve Environmental Quality	100
	Manage Flood Risk	100
Public Realm	Enhance Connectivity	100
	Improve User Experience and Equitable Access	100
	Enhance and Create Diverse, Vibrant Public Spaces	100
Community Economics, Health, and Equity	Address Homelessness	75
	Increase Community Green Infrastructure	100
	Increase Equitable Community Access to Multi-use Trails, Assets	100
	Prevent Local Gentrification-Induced Displacement	100
	Promote Wellness and Physical Activity	100
	Support and Develop Local Business and Workforce	100

Opportunity Potential (Average of Applicable Metrics Advanced)

98

JANUARY 22, 2025 – Item 13

RESOLUTION 2025-04

RESOLUTION OF THE SAN GABRIEL AND LOWER LOS ANGELES
RIVERS AND MOUNTAINS CONSERVANCY (RMC) APPROVING A
PROPOSITION 68 GRANT TO THE WATERSHED CONSERVATION
AUTHORITY (WCA) FOR THE WRIGLEY HEIGHTS RIVER PARK
PLANNING PROJECT

WHEREAS, The legislature has found and declared that the San Gabriel River and its tributaries, the Lower Los Angeles River and its tributaries, Dominguez Channel Watershed, Santa Catalina Island, and the San Gabriel Mountains, Puente Hills, and San Jose Hills constitute a unique and important open space, environmental, anthropological, cultural, scientific, educational, recreational, scenic, and wildlife resource that should be held in trust to be preserved and enhanced for the enjoyment of, and appreciation by, present and future generations; and

WHEREAS, The people of the State of California have enacted the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018 (“Proposition 68”); and

WHEREAS, the State of California has authorized an expenditure of funds from Proposition 68, the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018 to the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy for capital outlay and local assistance multi-benefit grants for ecosystem and watershed protection and restoration projects; and

WHEREAS, The grantee has requested a grant from Proposition 68, Chapter 7, Section 80100(a)(1)(B) or Chapter 8, Section 80110(b)(6) of the Water Code; and

WHEREAS, The RMC may award grants to local public agencies, state agencies, federal agencies, and nonprofit organizations for the purposes of Division 22.8 the Public Resources Code; and

WHEREAS, The proposed project meets an objective of the California Water Action Plan for more reliable water supplies, restoration of important species and habitat, more resilient and sustainably managed water infrastructure; and

WHEREAS, The proposed project meets the goals of reducing greenhouse gas emissions consistent with AB 32; and

WHEREAS, The proposed project is consistent with the San Gabriel and Los Angeles River Watershed and Open Space Plan; and

WHEREAS, The proposed project protects land and water resources; and

WHEREAS, The grantee has requested a grant from Proposition 1, Section 79731 (f) or Section 79735 (a) of the Water Code; and

Resolution No. 2025-04

This action is exempt from the environmental impact report requirements of the California Environmental Quality Act (CEQA); and NOW

Therefore be it resolved that the RMC hereby:

- 1 FINDS that this action is consistent with the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy Act and is necessary to carry out the purposes and objectives of Division 22.8 of the Public Resources Code.
- 2 FINDS that the Proposition 1 RMC Grant Program is consistent with the Water Quality, Supply, and Infrastructure Improvement Act of 2014 ("Proposition 1"), which provides funds for the RMC grant program.
- 3 FINDS the proposed project meets at least one of the purposes of Proposition 1.
- 4 FINDS the proposed project meets at least one of the three objectives of the California Water Action Plan.
- 5 FINDS that the proposed action is consistent with the San Gabriel and Lower San Gabriel and Los Angeles River Watershed and Open Space Plan as adopted by the Rivers and Mountains Conservancy;
- 6 FINDS that the actions contemplated by this resolution are exempt from the environmental impact report requirements of the California Environmental Quality Act.
- 7 ADOPTS the staff report dated January 22, 2025.
- 8 AUTHORIZES a **Proposition 68 Lower LA River grant** in the amount of \$3,300,000 to the Watershed Conservation Authority for the Wrigley Heights River Park Planning Project for a performance period of April 1, 2025, through March 31, 2028.

~ End of Resolution ~

Passed and Adopted by the Board of the
SAN GABRIEL AND LOWER LOS ANGELES RIVERS AND MOUNTAINS
CONSERVANCY on January 22, 2025.

Motion _____ Second: _____

Ayes: _____ Nays: _____ Abstentions: _____

Ali Saleh, Chair

ATTEST:

John M. Natalizio
Deputy Attorney General

Amy Harbin

From: Sunjana Supekar <sss@cbcearthlaw.com>
Sent: Wednesday, April 16, 2025 12:01 PM
To: LBDS-EIR-Comments@longbeach.gov; Amy Harbin
Cc: Doug Carstens
Subject: Comments re 3701 Pacific Place; Recirculation of the Pacific Place Project DEIR
Attachments: 2025-04-16 Letter to City re Recirculation Final.pdf

-EXTERNAL-

Dear Ms. Harbin,

Please see attached a letter on behalf of Riverpark Coalition and Los Angeles Waterkeeper in regards to significant new information requiring recirculation of the Pacific Place Project Draft EIR.

Please let me know if you have any questions. Thank you.

Sincerely,
Sunjana Supekar

--

Sunjana Supekar (she/her)

CARSTENS, BLACK & MINTEER LLP

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Redondo Beach, CA 90277-2147

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Email: sss@cbcearthlaw.com

Website: www.cbcearthlaw.com