

Amy Harbin

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Sent: Monday, June 02, 2025 7:07 PM
To: Amy Harbin
Cc: Erin Weesner-McKinley; Alison Spindler-Ruiz
Subject: Response to Coalition Letter re: 3701 Pacific Place & Request for Recirculation
Attachments: Response to Coalition Letter re 3701 Pacific Place & Request for Recirculation.pdf

-EXTERNAL-

Amy,

Attached please find the applicant's response to the RiverPark Coalition's letter to the City requesting recirculation of the Draft EIR for the Pacific Place project.

Please let us know if you have any questions regarding this correspondence, or require any further information from us.

Thanks,
Lindsay

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June 2, 2025

City of Long Beach Planning Commission
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411 West Ocean Blvd.
Long Beach, California 90802

**Re: Response to Letter re: 3701 Pacific Place & Request for Recirculation
of the Pacific Place Project DEIR**

City Staff & Honorable Commissioners:

This letter responds to the April 16, 2025 letter submitted to the City of Long Beach (“**City**”) by Carstens, Black & Minter LLP on behalf of the RiverPark Coalition and Los Angeles Waterkeeper (the “**Coalition**”) regarding the proposed development of a self-storage facility and RV parking (the “**Project**”) at 3701 N Pacific Place (“**Project Site**”). The letter principally contends that the City has an obligation under the California Environmental Quality Act (“**CEQA**”) to recirculate the Draft Environment Impact Report (“**DEIR**”) for the Project “in light of decision by the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (“**RMC**”) to allocate \$16 million (the “**RMC Grant**”) to acquire and develop the adjacent parcel located at 3916-4021 Ambeco Road for the ‘Wrigley Heights River Park Planning Project,’ an open space development to be used for public recreation space (the “**Potential Open Space Project**”).” As the adjacent parcel located at 3916-4021 Ambeco Road is currently owned by the Jeannie McDonald Trust (“**McDonald Trust**”), it is hereinafter referred to as the “**McDonald Property**.”

I. RECIRCULATION IS NOT REQUIRED.

The Coalition contends not only that the City must recirculate the DEIR in light of the RMC Grant, but that “the Project’s intended land use is now directly inconsistent with the intended adjacent land uses, and environmental review must account for the new environmental impacts and impacts of increasing severity that will unavoidably result from this land use conflict.” As

discussed in detail below recirculation is not required because the Potential Open Space Project is too speculative to be analyzed and therefore does not constitute “significant new information.” As no application or concrete details regarding the Potential Open Space Project have been provided to the City, the Project’s CEQA document cannot provide meaningful analysis of a speculative future project.

Furthermore, the City has no obligation to include a unknown park project in the CEQA analysis as the RMC Grant was awarded *two years* after the Project’s environmental setting and baseline conditions (for purposes of the DEIR) were set. According to applicable law and the City’s established policy, the date of issuance of a Notice of Preparation (“**NOP**”) establishes the CEQA baseline for project analyses in an EIR. (CEQA Guidelines, § 15125.) The City published the NOP for this Project on: **June 7, 2023**. As the RMC Grant was not issued and any speculative development of the McDonald Property was not even known to the City at that time, it would violate applicable law for the City to recirculate the DEIR to analyze a project that may never be developed. Finally, should a proposed passive greenspace use be funded, designed and formally proposed to the City at some unknown point in the future for the McDonald Property, the Project would be consistent and compatible with that use as outlined herein.

A. As a Matter of Law, Recirculation is Not Required as the Potential Open Space Project on the McDonald Property is Too Speculative to Be Analyzed in the Project EIR.

Recirculation of an EIR is required when “significant new information” is added to the EIR after public notice is given but before certification. (CEQA Guidelines, § 15088.5(a).) New information is not “significant” unless the EIR is “changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.” (*Id.*) In contrast, recirculation is *not* required where the new information “merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.” (*Id.*) “By codifying the ‘significant new information’ language . . . the Legislature apparently intended to reaffirm the goal of meaningful public participation in the CEQA review process. [Internal citation omitted.] It is also clear, however, that by doing so the Legislature did not intend to promote endless rounds of revision and recirculation of EIR’s. Recirculation was intended to be an exception, rather than the general rule. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1132.)

The need for recirculation is based on new information that is added to a Final EIR (“**FEIR**”). As a foundational matter, the Project’s FEIR does not discuss the Potential Open Space Project, so no “new information” has been included within the FEIR that would require recirculation pursuant to CEQA Guidelines, section 15088.5.

Further, the City is under no obligation to analyze the Potential Open Space Project because development of the McDonald Property is – at the time the DEIR was circulated and even as of today’s date – a wholly speculative endeavor. The City does not have any substantial evidence to indicate that a public park may be developed on the McDonald Property. The McDonald Property has not yet been acquired from the McDonald Trust. No development plans for the Potential Open Space Project have been submitted to the City or been made publicly available. As indicated in the materials submitted to the RMC, the Potential Open Space Project will require discretionary approvals from the City and the Department of Toxic Substances Control (“DTSC”), none which been *initiated*, much less completed. Thus, the Potential Open Space Project is not concrete and defined enough to be included in the Project’s CEQA analysis.

CEQA requires only that an EIR discuss “[t]he significant environmental effects of the proposed project.” (Public Resources Code § 21100(a); *Village Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal.App.3d 1022, 1030.) “[W]here future development is unspecified and uncertain, no purpose can be served by requiring an EIR to engage in sheer speculation as to future environmental consequences.” (*Lake County Energy Council v. County of Lake* (1977) 70 Cal.App.3d 851, 854–855.) By this standard, the Potential Open Space Project is – without a doubt – much too speculative to include in a recirculated DEIR or the FEIR.

Practically, there are numerous hurdles that may prevent the RMC Grant from ripening into a fully formed project including, without limitation, the transfer of funds, completion of the sale process from the McDonald Trust, the filing and processing of a discretionary entitlement application, the associated CEQA review, and remediation of the McDonald Property in coordination with the DTSC. Where, as here, an EIR cannot provide meaningful information about a speculative future project, deferral of an environmental assessment does not violate CEQA. (*Towards Responsibility in Planning v. City Council* (1988) 200 Cal.App.3d 671, 681 [“It would be unreasonable to expect this EIR to produce detailed information about the environmental impacts of a future . . . facility whose scope is uncertain and which will in any case be subject to its own environmental review”]; *No Oil, Inc. v. City of Los Angeles* (1987) 196 Cal.App.3d 223, 237.)

Therefore, the Coalition’s request for recirculation is fundamentally flawed because the letter incorrectly asserts that the DEIR must presume with certainty that the McDonald Property will be improved for the “planned development of the Wrigley Height River Park,” which would be “public recreation space.” None of these facts have been established with certainty. **In fact, not a single, concrete detail has been provided to the City to establish the actual parameters of the Potential Open Space Project, and, as such, any future development on the McDonald Property is – for purposes of determining the City’s obligations under CEQA to account for such development – “speculative” as a matter of law.** (Cf, *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1984) 151 Cal.App.3d 61, 76 [related projects should be included in an EIR when “the physical elements (e.g., height, floor space) . . . are sufficiently

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quantified so as to make an analysis of their future impacts far more accurate and useful than sheer speculation”).) The Coalition is asking the City to violate CEQA, and that improper demand must be rejected.

Finally, even if it were appropriate to address the Potential Open Space Project in the Project’s CEQA review, *and it is not*, recirculation would still not be necessary because no “significant” information has been provided to the City. As noted above, information is not significant if it merely clarifies or amplifies impacts in the DEIR. Here, the Project DEIR already considered the Project’s potential impacts on nearby sensitive receptors, including residences approximately 160 feet away and Los Cerritos Park. (*See, e.g.*, DEIR, Sections 4.2 [Air Quality]; 4.8 [Hazards & Hazardous Materials]; 4.11 [Noise].) As such, the remote possibility of a new sensitive receptor being developed at some unknown point in the future near the property is not “significant” new information given that it would, at best, amplify the analysis already completed in the DEIR. In fact, the public had an adequate opportunity to comment on the Project’s potential environmental effects on sensitive receptors in the community and nothing more is needed.

B. As a General/Policy Matter, the Project Would Be Consistent and Compatible with Adjacent Public Open Space Uses

The Project is harmonious with its location near the LA River and would be compatible and consistent with adjacent open space uses. The Project Site is located adjacent to 1) the vacant McDonald Property to the east, and 2) a vacant property owned by the Los Angeles County Flood Control District (“**LACFCD Property**”) to the west, which abuts the LA River and existing public trails along the river used by bicyclists, pedestrians, and equestrians. There is no current public access to the LA River from the Project Site or near the Project Site’s location. For several years, the City and LACFCD have been discussing potential development of the LACFCD Property for public open space and recreational uses consistent with the RiverLink Plan’s vision to improve the LACFCD Property as a riparian woodland. To date, those discussions remain tentative; no steps have been taken to advance beyond preliminary conversations.

Nevertheless, the Project has been designed to facilitate a potential future open space use of the LACFCD Property by dedicating an easement for a publicly accessible trail and trailhead that would provide safe, efficient public access from Pacific Place to the LACFCD Property via a path around the southern and western edge of the Project Site, which in turn would connect the public to the bike path/LA River (where no public access currently exists) (“**Open Space Easement**”). If the McDonald Property were developed with open space uses at some point in the future (as noted above, the City has not been provided any substantial evidence to support that supposition now), the Open Space Easement would allow public access from the McDonald Property to the LACFCD Property and the LA River trails.

In addition, the Project would provide a safer, cleaner environment for any future adjacent public open space uses. Due to their isolated location between the I-405 freeway, LA River, and Metrolink tracks, the Project Site, the LACFCD Property, and the McDonald Property have long been an attractive nuisance for illegal off-road activity, drug use, vagrancy, fires, trash disposal and makeshift encampments. These issues have created safety risks resulting in community complaints in the past. The Project would reduce the amount of space in which those concerning activities can occur, add new security lighting and measures, and activate the area with new commercial development, making those illegal activities less likely to occur because the area will no longer be isolated and vacant. Accordingly, the area around the Project Site would become safer for adjacent open space or park uses, regardless of their likelihood at this time, with development of the Project Site.

Moreover, the Project Site contains legacy environmental contamination, including sludge and other waste, from its previous use as an oil brine water treatment facility, and the Project Site does not have a permanent stormwater control system to manage stormwater flowing off the Project Site. Large-scale remediation and stormwater management are extremely costly and intensive, requiring funds that the City does not currently have. The Project will include a comprehensive and expensive soil remediation component and implement major upgrades including landscaping, construction of a new building with high-quality architecture and new paving, installation of water and energy efficient systems, a comprehensive stormwater control system including detention basins and modular wetland biofiltration, and off-site roadway improvements. These efforts support future development of the LACFCD Property and the McDonald Property because they will significantly improve the current condition of the area, especially in terms of aesthetics, environmental contamination, access, and stormwater runoff and quality.

II. NO SIGNIFICANT NEW IMPACTS REQUIRING REVISIONS TO THE DEIR ARE IDENTIFIED IN THE LETTER

The Coalition contends that “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 significant impacts and/or substantially more severe impacts that have not been addressed by the DEIR.” (Coalition Letter, p. 2.) First, as detailed above, as of the date of this letter any development on the McDonald Property is speculative at best, as the ownership of the McDonald Property has not yet changed hands, nor has an application for any project been filed with the City. Second, access to the Project site will be through a City-owned road easement. As such, future development of the McDonald Property will need to manage access independent of the Project status, and design around the existing City easement.

Finally, none of the impact categories cited in the letter identified deficiencies in the DEIR that give rise to a duty to revise and recirculate the analysis to account for the RMC Grant, as explained in more detail below.

A. Air Quality & Hazards Impacts

The Coalition contends that because “the Project would be immediately adjacent to another sensitive receptor (a public recreation area), vulnerable to the Project’s Air Quality and Hazards impacts, [t]he EIR must be recirculated to address these and other impacts.” (*Id.* at p. 3.)

First, to characterize the “Wrigley Heights River Park” as “a public recreation area” that will be frequented by sensitive receptors is contrary to the information provided by the Watershed Conservation Authority to the RMC. The Phase 2 Environmental Site Assessment (“**ESA**”) site investigation that was the basis for the grant funding analyzed the use of the McDonald Property for passive “open space.” This clear disconnect undermines the entire premise of the Coalition claims.

Second, even if the Potential Open Space Project had to be analyzed in the Project’s CEQA analysis (and it did not for the reasons shown herein) development of the McDonald Property with passive open space use or a park would not require preparation of a Health Risk Assessment (“**HRA**”) analyzing air quality impacts. Pursuant to the South Coast Air Quality Management District (“**SCAQMD**”) protocols, a HRA is limited to *habitable areas where a person would reside for 24 hours* (homes, prisons, hospitals, senior care facilities, etc.). As established by SCAQMD: “Sensitive receptor locations include any residence including private homes, condominiums, apartments, and living quarters; schools, including preschools and daycare centers; health facilities such as hospitals, retirement homes, nursing homes, long term care hospitals, and hospices; prisons, dormitories, or similar live-in housing, where children, chronically ill individuals, or other sensitive persons could be exposed to TACs.” (SCAQMD Risk Assessment Procedures, Version 9.0, p. 11.) Neither an open space area or a park, neither of which may ever come to fruition, qualifies.

Third, the DEIR definitively demonstrated that the Project’s operational emissions would be below all applicable screening thresholds and, as a result, the Project would not result in an air quality impact or a carbon monoxide hotspot. (FEIR, Section 4.8 [Hazards and Hazardous Materials].) As stated above, even if the adjacent parcel were evaluated as a sensitive receptor for localized emissions, and that is a remote possibility, impacts would be less than significant.

With regard to potential disturbance of hazardous materials during construction, extensive environmental monitoring of all earth-moving and intrusive activities will be implemented in accordance with applicable SCAQMD and DTSC requirements. During all clearing, grading, and construction activities, the DTSC-approved Soil Management Plan (SMP) will be utilized by workers to maintain a safe and healthy environment. The SMP will ensure dust generated by the Project is monitored and maintained below SCAQMD limits, odors (if any) are eliminated, contaminated soil is properly managed, and that any waste generated at the site is legally and safely handled. Real-time monitoring and discrete sampling specified in the Ambient Air Monitoring Plan (AAMP) will be implemented to protect off-site receptors, document conditions, and allow field

personnel to implement control measures and best management practices (BMPs), if necessary, as detailed in the SMP and the Excavation Management Plan (EMP) that is an appendix thereto.

Confirmation soil samples and soil vapor samples from the proposed perimeter probes will be collected post-grading. A site-specific long-term Operations, Maintenance and Monitoring (“OM&M”) Plan will be prepared and submitted to DTSC and will use a post-grading risk evaluation to develop fence line screening concentrations for chemicals of potential concern (COPCs) in soil vapor to ensure that site operations remain protective of both on-site and off-site receptors. The post-grading risk evaluation also will evaluate a future construction worker’s exposure to soil and establish baseline conditions to which future trends will be compared. Implementation of the proposed environmental monitoring, control measures and BMPs during construction and long-term OM&M would ensure the Project does not result in any potential impacts to a speculative Potential Open Space Project.

B. Biological Resources Impacts

The Coalition contends that development of the McDonald Property would result in “the Project [being] adjacent to a site that may serve as habitat for protected species and/or may serve as a connective corridor for such species” and that the “EIR must be recirculated to address these and any other impacts.”

Any potential biological impacts that the Potential Open Space Project would have upon protected species or connective corridors must be addressed in the CEQA document for that development, not the CEQA document for the Project. The DEIR addressed the Project’s potential impacts, including on the vacant, undeveloped McDonald Property, in Section 4.3 (Biological Resources) of the DEIR. Nothing about the speculative future development of the McDonald Property, which would *not* constitute biological habitat in any developed state, changes the adequacy of the analysis.

C. Land Use Impacts – The RMC Grant for the McDonald Property does not change the EIR’s conclusion that the Project does not conflict with relevant land use plans.

The Coalition next contends that development of the McDonald Property “heightens the degree to which the Project will frustrate and conflict with” the plans, policies and goals identified on pages 11-19 of the September 30, 2024 DEIR comment letter submitted by Carstens, Black & Minter, LLP. First, the City responded to each of those comments in detail in the Response to Comments included in the FEIR that was published on May 16, 2025. (FEIR, Responses 60-1 through 60-E25-7, inclusive.)

Second, the RMC Grant for the McDonald Property does not change the EIR’s conclusion that the Project does not conflict with relevant land use plans. With regard to land use and

planning, CEQA requires that the lead agency evaluate whether a project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (CEQA Guidelines, Appendix G.) The EIR correctly determined that the Project does not conflict with applicable land use plans. (DEIR, Section 4.10 [Land Use & Planning]; FEIR Appendix N [Draft EIR Land Use & Planning Section with Revised Pagination].) The City has not received any substantial evidence to require revision to that conclusion, as discussed below in detail.

1. The Project Does Not Conflict with the Lower Los Angeles River Revitalization Plan (“LLARRP”) or RiverLink Plan (“RiverLink”).

(a) LLARRP

The LLARRP describes opportunities for improving the environment and residents’ quality of life along the LA River, largely by developing riverside open space and parkland. The McDonald Property, like the Project Site, falls within Opportunity Area 68 of the LLARRP, which is one of 155 Opportunity Areas across 14 different jurisdictions identified therein. (LLARP, Volume 2, Chapter 2, §§ 2.1-2.2; Table 2.1-1 [Opportunity Areas identified for LLARRP].) The LLARRP notes that most of Opportunity Area 68 is privately owned, including the Project Site, and therefore the Project Site presents a public acquisition opportunity. The LLARRP recognizes that acquisition opportunities, where privately owned like the Project Site, may be cost prohibitive given legacy pollutant issues. Indeed, the LLARRP identifies the existence of soil contamination on the Project Site as a constraint to open space development. (LLARP, Volume 2, Chapter 3, §§ 3.7.2, 3.7.4.2.)

As noted in Section 4.10, Land Use and Planning, of the DEIR, the Project does not conflict, and is consistent, with the LLARRP. The City’s 2021 Feasibility Report did not recommend the Project Site as a priority for parkland development because (1) the Project Site’s “location in terms of access, contamination and surrounding land uses (freeways, the river, Metro light rail tracks) renders it an auto-oriented property that prevents pedestrian compatibility by default” and (2) acquisition of the Project Site would likely require eminent domain since the Project Site is not listed for sale and many grant funding sources would be unavailable, as many of them prohibit using grant funds for eminent domain. (City of Long Beach Park Acquisition Feasibility Report (Apr. 2021), pp. 25-27.) It is our understanding, that City staff has conducted an updated review of the issues evaluated in the 2021 Feasibility Report and concluded that the analysis remains valid; the staff report for the Project will provide further detail on this issue. Development of the Project Site as open space continues to be infeasible today because no public agency has identified, secured, or issued funding to acquire, remediate, and develop open space on the Project Site, which was and remains a privately owned property, nor has the City or any other public agency (or private entity) made an offer to acquire the Project Site. Accordingly, the Project does not conflict with the LLARRP.

As further stated in the DEIR Section 4.10, Land Use and Planning, the Project would not prevent the City or another public agency from identifying and securing funding in the future to acquire and remediate the Project Site and develop it pursuant to the LLARRP. And, more importantly, the Project does not prevent the adjacent LACFCD Property, which is a significant portion of Opportunity Area 68 and the site directly abutting the L.A. River and existing public bike path, from being developed as public open space in the near term. Nor does it prevent development of the McDonald Property for open space for the same reasons. The Project actually facilitates these efforts since, as noted above, it includes the Open Space Easement, which would provide safe, efficient public access from Pacific Place to the LACFCD Property and the McDonald Property, which in turn would connect the public to the bike path/LA River where no public access currently exists.

(b) *RiverLink*

Next, Section 4.10, Land Use and Planning, of the DEIR explains that RiverLink assesses open space needs of the City and envisions possibilities for connecting west side neighborhoods and greater Long Beach with the LA River greenway. RiverLink designates “destinations,” which are places where accessible open space or habitat restorations are located. Importantly, RiverLink states, “RiverLink is a *conceptual plan*. The large majority of the Destinations, Gateways, Pathways, and Connections presented are *simply ideas to be discussed and pursued*.” (Long Beach RiverLink (Feb. 2007), p. 5 (*emphases added*).)

The McDonald Property, like the Project Site, is depicted in the diagram for Destination Six within RiverLink, Wrigley Heights – North. The City’s General Plan Land Use Element’s City-Wide Implementation Strategy LU-M-86 incorporates RiverLink in hopes of creating a continuous greenway of pedestrian and bike paths along the east bank of the LA River. RiverLink does not propose any actual changes to the privately owned Project Site or the McDonald Property, and instead proposes improving the excess river right-of-way (primarily the LACFCD Property) as a riparian woodland. As shown in the DEIR, the Project does not conflict with RiverLink for the same reasons it is not inconsistent with the LLARRP.

Finally, RiverLink is a self-identified “conceptual plan” for the mere discussion of “ideas.” It does not demand adherence to its aspirations. Even if it did, substantial evidence demonstrates that the Project’s design supports adjacent open space or park development, no matter the level of speculation today, which furthers RiverLink’s recommendation and goals.

2. The RMC Grant Does Not Create a Conflict between the Project and the LLARRP/RiverLink.

The RMC Grant for the McDonald Property does not make open space development on the Project Site more feasible pursuant to the LLARRP and RiverLink, nor does it change the Project’s consistency with those plans. Whether an adjacent site *may* at some unknown point in the future be

acquired for open space development does not change, alter, or impact in any way the fact that (i) the Feasibility Report does not recommend the Project Site for parkland development at this time for the reasons discussed above; (ii) no public agency has identified, secured, or issued funding to acquire, remediate, and develop open space on the Project Site; and (iii) no public agency has made an offer to acquire the Project Site.

Indeed, there is no evidence that the RMC Grant for the McDonald Property indicates that public agencies would be willing or even able to acquire the Project Site. It is important to recognize that the McDonald Property is significantly smaller than the Project Site – only 5.32 acres compared to the 14.20-acre Project Site. (RMC Grant, p. 1, DEIR, p. 3-1.) Based on this metric alone, a public agency would need to secure and decide to allocate almost triple the \$16 million RMC Grant. Furthermore, unlike the Project Site, which both the LLARRP and DEIR identify as requiring large-scale remediation, the RMC Grant states that a Phase II Environmental Site Report confirmed the McDonald Property “does not need remediation to serve as open space.” (RMC Grant, p. 4.) If the Project Site’s land size does not price out public agencies, the immense cost of remediation certainly will. Therefore, the RMC Grant does not evidence a public ability to acquire the Project Site.

Further, the Coalition’s claim that the City must take action to acquire the Project site is entirely outside of the bounds of CEQA. They imply that, instead of analyzing and considering the Project, the City should purchase the Project Site and develop it for an entirely different use. CEQA does not require that a lead agency become a project proponent, change its current purchasing activity, set aside resources and staff to research and obtain funding it does not currently have, and purchase private property to develop it for a public use. Nor does CEQA require that an applicant bind its property into a “willing seller” arrangement with a public entity that would significantly affect a property owner’s interest, as well as a property’s flexibility and marketability during the pendency of a grant process. Such demands are so far outside the scope of CEQA that no response or action is required of the City of the Project Applicant. The RMC Grant does not change that fundamental fact.

Should the RMC Grant ever ripen into an actual development project on the McDodnald Property, then the Project will work to further the goals, objectives, and implementation of RiverLink and the LLARRP, since the proposed Open Space Easement will provide safe, efficient public access from Pacific Place to the LACFCD Property and the McDonald Property where none currently exists. **Indeed, without the Project and Open Space Easement, any speculative open space on the McDonald Property would be landlocked from other open space and the LA River.** The Project therefore furthers the goals of RiverLink and the LLARRP for a connected network of green spaces along the L.A. River. Therefore, despite the absence of substantial evidence to support the Potential Open Space Project, the Project will facilitate high-quality green space along the L.A. River just as the LLARRP and RiverLink envision.

D. Noise Impacts

The Coalition next contends that the RMC Grant establishes that “the Project would be adjacent to yet another sensitive receptor, as parks are designated as sensitive receptors.” First, and as explained herein, the Project’s potential noise impacts on the McDonald Property have been analyzed in full in Section 4.11, Noise of the DEIR. Second, with regard to site operations, even if developed as open space, the McDonald Property would not constitute a sensitive receptor for purposes of the City’s Noise Element’s definition of the term.

Third, with regard to Project potential construction impacts, Project development would precede any future park improvements. If some Project construction occurred concurrent with a future public open space use on the McDonald Property, the Project would be required to comply with the City’s Noise Ordinance and implement buffering or other BMPs that are appropriate in the discretion of the City.

Finally, and most importantly, development on the McDonald Property for any use is mere speculation at this time. The Coalition does not and has not provided sufficient (or any) information regarding a potential project that may be developed at some unknown time in some unknown fashion on the McDonald Property that would mandate an update to the Project’s noise analysis.

E. Hydrology & Water Quality

Earlier comments regarding hydrology and water quality impacts raised in the September 30, 2024 DEIR Comment Letter are addressed in the City’s responses to that comment letter. (FEIR, Responses 60-1 through 60-E25-7, inclusive.)

The stated concern that Project design “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” is unfounded; and again demonstrates just how speculative potential development is at this time. The Project has been designed to *reduce* the flooding burden that currently exists on the McDonald Property. In the existing condition, the majority of the water from the Project Site drains onto the McDonald Property and a portion of the neighboring residential area located east of the railroad tracks, such that the McDonald Property is acting as an informal detention basin. The Project will *improve* the existing drainage conditions by collecting, treating and conveying all stormwater runoff from the Project Site to the existing municipal storm drain system on the southwest side of the Project Site, which ultimately drains to the LA River. Ultimately, development of the Project will reduce the current flood burden on the McDonald Property by approximately one third.

With regard to water quality, the Project Site and McDonald Property have a long history of contamination due to prior oil development uses, which resulted in soil that is not allowed to be infiltrated for water quality treatment. As a result, both properties have reduced water quality

treatment options based on the existing conditions. Development of the Project requires the use of proprietary storm water treatment devices and it is expected that any future unknown development of the McDonald Property would need to do the same.

Finally, no grading or engineering of storm drain and/or treatment systems on the McDonald Property is proposed by the Project. And, development of the McDonald Property – including hydrology and water quality management – would need to be designed to account for the Project, not the other way around, as this letter suggests.

F. Transportation

As detailed above, if the McDonald Property were developed with open space uses, the Open Space Easement would allow public access from the McDonald Property to the LACFCD Property and the LA River trails. Therefore the Project would *foster*, not interfere, with pedestrian and bicycle connectivity between the McDonald Property and the LA River trails.

The balance of this portion of the letter demonstrates just how speculative a future park on the McDonald Property is at this time. The DEIR for the Project cannot reasonably be expected to analyze alternative versions of the Potential Open Space Project that *both* 1) include a public parking lot on the McDonald Property; and 2) include use of the Project's private parking lot by the public. The Coalition does not and has not provided any information regarding a future development that would mandate an update to the transportation analysis.

G. Cumulative Impacts

An EIR must discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, which may involve a "list of past, present, and probable future projects producing related or cumulative impacts." (CEQA Guidelines, § 15130(b)(1)(A).) The discussion of cumulative impacts should be "guided by the standards of practicality and reasonableness." (*Id.* at (b).)

For purposes of preparing a list of cumulative projects, a lead agency has the discretion to determine the cutoff point during environmental review to cease considering new applications for cumulative analysis purposes, lest the CEQA process never end. (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1128; *see also San Franciscans for Reasonable Growth v. City and County of San Francisco* (1984) 151 Cal.App.3d 61, 74 n.14.) Additionally, to be included in the cumulative analysis, a future project must be "probable," meaning the applicant has devoted significant time and financial resources to prepare for any regulatory review. (*Gray, supra*, 167 Cal.App.4th at pp. 1127-1128.) In other words, more is required than a "mere awareness" of a proposed project. (*City of Maywood v. Los Angeles Unified School District* (2012) 208 Cal.App.4th 362, 397-398.) Ultimately, a good faith and reasonable effort to disclose cumulative impacts is sufficient. (*Greenebaum v. City of Los Angeles* (1984) 153 Cal.App.3d 391, 411.) "Absent a

showing of arbitrary action, a reviewing court must assume the agency has exercised its discretion appropriately.” (*South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 338.)

According to applicable law and the City’s established policy, the date of issuance of an NOP establishes the CEQA baseline for project analyses in an EIR. (CEQA Guidelines, § 15125.) The City published the NOP for this Project on: **June 7, 2023**. As discussed above, the City has the discretion to establish such a cutoff point. As the RMC Grant was not issued and the speculative development of the McDonald Property was not known to the City at that time, it would violate applicable law for the City to recirculate the DEIR to analyze a project that may never see the light of day, particularly where, as here, there is no evidence to suggest that any entity has “devoted significant time and financial resources” to develop an actual project that is sufficiently defined to allow rigorous review.

Moreover, even if the cutoff deadline had not already passed, the Potential Open Space Project is not sufficiently “probable” to be included in a cumulative impact analysis. A simple grant allocation does not demonstrate whether or how the Coalition has taken any steps to actually “acquire and develop” the McDonald Property, submit a project application or seek the necessary approvals from any interested agency:

- The McDonald Property has not yet been acquired from the McDonald Trust. The “willing seller” letter only states that the owner is a “willing participant” in a proposed transaction and that she is “willing to enter into an agreement” for the sale of the property at fair market value. The letter is not a binding agreement to sell the property. Further, while an appraisal was completed on May 10, 2024, the appraisal still needs to be approved by an independent third-party appraiser and the State Department of General Services before the Coalition would be able to move forward with the acquisition.
- Preliminary project plans have not been made available for public review, or submitted to the City for conceptual review.
- As indicated in the materials submitted to the RMC, the Potential Open Space Project will require discretionary approval from the City and associated CEQA review, none which been *initiated*, much less completed. (See LBMC §§ 21.33.060, 21.25.407.)
- As also indicated in the materials submitted to the RMC, the Potential Open Space Project will also require coordination with DTSC regarding site cleanup, a complicated process that also has not been initiated.

In sum, there are numerous outstanding hurdles that the Coalition will have to overcome to make the Potential Open Space Project a reality. As of the date of the Coalition letter, sufficient steps have not been taken for the endeavor to be considered sufficiently probable to be included within the Project's CEQA analysis.

H. Alternatives

The Coalition contends that “the acquisition and development of the adjacent property for . . . the Wrigley Heights River Park Project demonstrates that a park alternative is indeed feasible at [the Project] Site.” As discussed above, the McDonald Property has not yet been acquired or developed for a park, and no details have been provided to the City; as such, the underlying premise of this statement is false. The City is under no obligation to recirculate the DEIR to consider a Park Alternative in light of the RMC Grant for all the reasons stated in this letter.

CEQA requires that an environmental document provide a range of reasonable alternatives to a project, or to the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. (CEQA Guidelines, § 15126.6(a).) An EIR need not consider every conceivable alternative to a project, but rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. Importantly, an EIR is not required to consider alternatives that are infeasible. (*Ibid.*)

In the first instance, Section 5.0, Alternatives, of the DEIR explained at length why a park alternative at the Project Site is infeasible. The Project is a proposal by a private party to develop private property with a private project. The Project Site is zoned by the General Plan as Neo-Industrial and zoned Light Industrial. No public agency, including the City, has identified, secured, or issued funding to acquire, remediate, and develop the Project Site as a park or open space, and no public agency has made an offer to acquire it. In fact, the DEIR clarified that an open space use at the Project Site would not support six of the eight Project objectives, and a park would be inconsistent with the underlying Project purpose. Thus, the DEIR properly considered and rejected a park alternative.

The RMC Grant does not change the DEIR's alternatives analysis and conclusion. The RMC Grant does not make acquisition of the Project Site any more feasible. Nor does it change the fact that no public agency has obtained funds, allocated resources, or made an actual offer to acquire the Project Site.

To advance its argument, the Coalition contends that the DEIR relied on “outdated data to claim that such a project alternative is infeasible.” This portion of the letter presumably is referring to the City's Feasibility Report, which dates to 2021 and was attached as Appendix K to the DEIR. The City's Feasibility Report does highlight a number of reasons why the City's recreational efforts

Allen Matkins Leck Gamble Mallory & Natsis LLP
Attorneys at Law

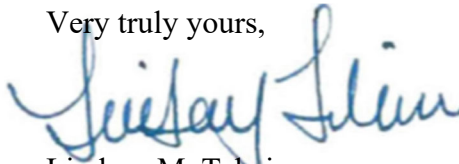
City of Long Beach Planning Commission
June 2, 2025
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remain focused on developing the LACFCD Property for open space uses, as opposed to the Project Site. None of those reasons have changed.

For instance, the Property is designated by the General Plan as Neo-Industrial and zoned Light Industrial. The Property has not been listed for sale by the Applicant, who is actively pursuing an entitlement project on its own private property. As explained in the DEIR Section 5.0, Alternatives, the City is not currently allocating staff for, or investing any money, time or public resources towards, the potential acquisition, remediation, and development of a public park on the Project Site. The Coalition has provided no substantial evidence to refute those basic facts and therefore, the 2021 Feasibility Report remains accurate.

In light of the Project's exhaustive CEQA review, and the extensive information provided to the City as part of the pending entitlement process, we respectfully request that you reject the speculative claims made by the Coalition regarding the McDonald Property for the reasons outlined above and certify the EIR for the Project.

Very truly yours,



Lindsay M. Tabaian

cc: Erin Weesner-McKinley, Principal Deputy City Attorney
Alison Spindler-Ruiz, Planning Bureau Manager
Christopher Koontz, Director of Development Services

Item #3 Correspondence - Lisa Baca

From: Lisa Baca <clli.baca@gmail.com>

Sent: Saturday, May 31, 2025 7:27 AM

To: PlanningCommissioners <PlanningCommissioners@longbeach.gov>

Cc: Alison Spindler-Ruiz <Alison.Spindler-Ruiz@longbeach.gov>; Lisa Baca <clli.baca@gmail.com>

Subject: OPPOSE EIR please vote NO ACTION 3701 Pacific Place

-EXTERNAL-

Dear Long Beach Planning Commissioners

The land at **3701 Pacific Place** is not just another vacant lot—

It is the **last remaining gateway** to restore **historic equestrian trails** and protect a **century-old riding culture** that helped shape the Los Angeles River corridor.

SELA and LONG BEACH NEED MORE OPEN SPACE. PLEASE KEEP IT OPEN RECREATIONAL SPACE AND VOTE NO ACTION.

Thank you,
Lisa Baca, Equestrian

From: anngadfly@aol.com <anngadfly@aol.com>

Sent: Wednesday, June 4, 2025 9:32 PM

To: Amy Harbin <Amy.Harbin@longbeach.gov>; PlanningCommissioners <PlanningCommissioners@longbeach.gov>

Subject: Agenda Item 3, June 5, 2025

-EXTERNAL-

To: The Long Beach Planning Commission

From: Ann Cantrell, co-chair, Sierra Club Los Cerritos Wetlands Task Force

Re: 3701 Pacific Place/Pacific Project

Dear Decision Makers:

This FEIR and 6 amendments must be denied. **Amendment 2 increases the allowed height from 40 feet to 50 feet/5 story building.** The Environmental Impact Report for this project was based on a *40 foot. 206,756-sf self-storage building consisting of approximately 1,681 self-storage units on four levels.* **If you approve Amendment #2, the FEIR must be amended to conform to the 50 foot height change.**

The previously rejected Mitigated Negative Declaration was for a *3 story 152,745-square foot (sf) self-storage building with approximately 1,132 self-storage units.* The DTSC ordered the following:

STOCKPILING AND SURCHARGE ON FUTURE BUILDING FOOTPRINT: One part of the future construction plans includes building a **three-story self-storage building** that will be approximately 50,000

square feet in size. **Due to historical Site operations, the soil beneath the future building is made of weak compressible earth (compressible clay and undocumented fill), which makes the Site susceptible**

to excessive settlement. Prior to construction, a test program, called surcharge, will be implemented to measure the bearing capacity of the area beneath the building footprint. The surcharge test program will include grading and moving existing surface soil from the northern section of the Site to the southern section of the Site and create a mound of soil (stockpile) to monitor the settlement over the proposed building footprint area. (See illustration in Figure below.) The resulting stockpile of soil will be approximately 15 feet high to simulate the future building weight and it will be covered to minimize dust generation. The surcharge test program will include several months of field monitoring to evaluate settlement behavior of the Site. Artesia plans to implement the test in August 2020.

Over 4 years later, the surcharge has not been removed and the public was never informed as to whether any earth movement has occurred. Now with a 5 story building of much greater weight, it would appear necessary to create a larger surcharge. At the very least the EIR needs to address the possible impacts this extra weight may have.

We agree with the many public comments on the inadequacies of the FEIR in addressing bats, Burrowing Owls, Monarch Butterflies, Southern Tar Plants and other native plants; traffic and alternative uses for this property.

The MacDonald portion of the property, which was included in the MND, has since become a willing seller and the Rivers and Mountains Conservancy is searching for purchasing funds to make this portion of the property into a public park, as has been planned in a number of LA River Plans over the years.

Item #3 Correspondence - Ann Cantrell

For all of these reasons, I urge a No vote on the FEIR and the amendments.
Ann Cantrell

Item #3 Correspondence - Carstens, Black & Minter LLP Law Firm

From: Sunjana Supekar <sss@cbcearthlaw.com>

Sent: Wednesday, June 4, 2025 6:36 PM

To: PlanningCommissioners <PlanningCommissioners@longbeach.gov>

Cc: Doug Carstens <dpc@cbcearthlaw.com>; Amy Harbin <Amy.Harbin@longbeach.gov>; LBDS-EIR-Comments <LBDS-EIR-Comments@longbeach.gov>

Subject: Comments re Agenda Item 3 (25-55508) June 5, 2025 Planning Commission Hearing; Pacific Place Final EIR

-EXTERNAL-

Dear Honorable Chair and Commissioners,

On behalf of Riverpark Coalition and Los Angeles Waterkeeper, our office submits a letter regarding Item 3 on the agenda for the June 5 Planning Commission hearing. We submit the letter (with supporting attachments) via the Dropbox link below as the file is too large to attach. I have also attached a version of the letter without the supporting attachments for convenience.

<https://www.dropbox.com/scl/fo/e87ka4kt86s1wd2ylklze/AJOz2swlxXAtlQBBRLfvy4k?rlkey=vydxjcejnhgsq4zhzq1lqv6dn&st=vgb3a303&dl=0>

Please let me know if you have any questions. Thank you for your consideration of these comments.

Sincerely,
Sunjana Supekar

--

Sunjana Supekar (she/her)
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Sunjana S. Supekar
Email Address:
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June 4, 2025

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

Planning Commission
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411 West Ocean Blvd, 3rd Floor
Long Beach, CA 90802
PlanningCommissioners@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: Agenda Item 3 (25-55508) June 5, 2025 Planning Commission Hearing; 3701
Pacific Place; Objections to Pacific Place Project FEIR

Dear Honorable Chair and Commissioners:

On behalf of the Riverpark Coalition and Los Angeles Waterkeeper, **we urge the City of Long Beach (“City”) to reject the Final Environmental Impact Report (“FEIR”) for the Pacific Place Project at 3701 Pacific Place, Long Beach, CA, (“Project”).**

This Project would convert 14 acres of undeveloped space along the Los Angeles River, serving as habitat to rare species and an important corridor for bicycle, pedestrian, and equestrian trails, to a self-storage facility with parking for hundreds of recreational vehicles (“RVs”). The FEIR for this Project is woefully inadequate, and fails to adequately address and mitigate this highly impactful Project. Despite the Project’s many impacts—which include destruction of over 1,200 protected plant species, unmitigated emissions of pollutants, numerous conflicts with applicable land use plans, among others—the FEIR fails to find a single significant and unavoidable impact. This is a violation of CEQA’s substantive mandate.

Moreover, this site—the “gem” of the Lower Los Angeles River—is one of the last remaining parcels of undeveloped space abutting the LA River in Long Beach. As demonstrated by numerous local, regional, and even state plans, this Project is simply not the right fit for this location. The Project would increase air emissions, traffic, and hazardous impacts in an area already overburdened by these impacts.

The Superior Court has already found that the City's approval of the precursor to this Project violated CEQA. We implore the City not to make the same mistake again.

I. The FEIR Fails to Respond to Significant Comments Made on the Draft EIR.

CEQA requires the City to respond to the public's comments and questions. (CEQA Guidelines § 15088). When a comment raises a significant environmental issue, the lead agency must address the comment "in detail giving reasons why" the comment was "not accepted." (*Ibid.*) "Conclusory statements unsupported by factual information will not suffice." (*Ibid.*; *Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1124.) The level of detail of responses to comments ("RTC") must be commensurate with the level of detail of the comments. (*Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 878 ["the determination of the sufficiency of the agency's responses to comments on the draft EIR turns upon the detail required in the responses"].)

This requirement for good faith, reasoned analysis "ensures that stubborn problems or serious criticism are not swept under the rug." (*Santa Clarita Organization for Planning the Environment v. County of Los Angeles* (2003) 106 Cal. App. 4th 715, 732.) The courts have held that inadequate responses to comments – alone – can be grounds for voiding a project's approval. (*See, Env. Protection Information Center v. Johnson* (1985) 170 Cal. App. 3d 604, 627.) Failure to respond to a *single* comment is sufficient to invalidate approval of a FEIR. (*Flanders Foundation v. City of Carmel by-the-Sea* (2012) 202 Cal. App. 4th 603.)

Moreover, where comments from responsible experts or sister agencies disclose new or conflicting data or opinions that cause concern that the agency may not have fully evaluated the project and its alternatives, these comments may not simply be ignored. There must be good faith, reasoned analysis in response. (*Cleary v. County of Stanislaus* (1981) 118 Cal.App.3d 348, 357.)

As the sections below demonstrate, the FEIR fails to sufficiently respond to comments raised in our September 30, 2024 Letter on the Draft Environmental Impact Report ("DEIR Letter," Att. 1.)

II. The FEIR Continues to Improperly Rely on Studies Prepared for an Invalidated Mitigated Negative Declaration.

The FEIR continues to rely on studies prepared for the defunct mitigated negative declaration that was prepared for a previous version of the Project, particularly with regards to its assessment of hazardous impacts. (DEIR, p. 2-158 to 2-159.)

III. The FEIR has Failed to Adequately Respond to Comments Regarding the Project's Adverse Impacts.

A. The FEIR Fails to Adequately Analyze and Mitigate Air Quality Impacts.

Under CEQA, an EIR is required to correlate a project's concentrations of pollutant emissions with their health impacts. (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 519.) Here, the EIR evades this review by failing to provide an analysis of the Project's concentrations of air emissions.

Expert consultant Ray Kapahi, of Environmental Permitting Specialists, reviewed the FEIR and DEIR and found that the Project's NOx emissions during the construction phase would result in ambient concentrations that would violate California's and federal 1-hour ambient air quality standard for NOx emissions. Expert Kapahi also found that these emissions would expose sensitive receptors surrounding the site to substantial pollutant concentrations. These impacts were not disclosed in the EIR. (Att. 2, June 2, 2025 Technical Memorandum from Ray Kapahi.)

The FEIR evades proper CEQA review and a finding of significance by claiming that the use of Tier 3 engine emission standards for site preparation activities related to the pre-development surcharge activities that were conducted prior to environmental review is effective mitigation for those impacts under MM-AIR-1. (FEIR, p. 2-143.) This measure cannot retroactively mitigate the impacts of the surcharge activities which have already taken place. A significant impact must be found.

B. The FEIR Fails to Adequately Analyze and Mitigate Biological Impacts.

The FEIR must find the Applicant's removal and destruction of almost 1,300 protected southern tarplants from the site a significant and unavoidable impact. Though it incorrectly stated otherwise in the DEIR, the FEIR now admits that MM-BIO-1b will use "southern tarplant seeds obtained from a seed distributor or collected from a nearby population," rather than the seeds and propagules it removed from the site, to mitigate this impact. The FEIR fails to provide any evidence that seeds from a distributor or collected from a nearby population, restored at a mere 1:1 ratio, would actually mitigate this loss to less than significant. While MM-BIO-1c provides for a 2:1 ratio for additional southern tarplant "detected during rare plant surveys," this does not address the 1,300 individuals already lost, nor other individuals detected during construction or operation of the Project. Moreover, impacts to such individuals must be **avoided**, not mitigated by mere replacement through unproven means.

The California Department of Fish and Wildlife ("CDFW") previously stated that transplantation and relocation was an ineffective mitigation strategy. (DEIR Letter, Exh. 5, Nov. 12, 2020 Letter from CDFW.) Moreover, in the litigation preceding this EIR, the trial court relied on this determination in finding that the Project may have significant biological impacts. This significant and unavoidable impact remains unaddressed by the FEIR. (CEQA Guidelines §15126.2, subd. (d).)

Moreover, expert consultant Robert Hamilton, President of Hamilton Biological, Inc., also found that MM BIO-1b continued to be insufficient and improperly deferred mitigation. (Att. 3, June 2, 2025 Letter from Robert Hamilton, Hamilton Biological, Inc.) Expert Hamilton further addressed the FEIR's responses to comments Riverpark Coalition and Los Angeles Waterkeeper submitted from expert consultant Dr. Travis Longcore, regarding the Project's lighting and bird collision impacts. (*Ibid.*)

C. The FEIR Fails to Adequately Analyze and Mitigate Impacts Relating to Hazards.

The RTC claims that it does not overly rely on deferring analysis and mitigation to DTSC, but the FEIR imposes a sole mitigation measure, MM-HAZ-1, which defers mitigation completely to DTSC's approval of a Response Plan. This leaves the public in the dark about how this Project—surrounded by many sensitive receptors—will cause impacts relating to hazardous materials, with too many questions unanswered, and too many impacts to be analyzed and mitigated at some later date. The Mitigation, Monitoring and Reporting Program (“MMRP”) states that the City is required to monitor compliance with this measure, but specifies no means of doing so. (MMRP, p. 4-7.) The FEIR continues to rely on outdated data from the draft Response Plan, and defers analysis to DTSC to be performed only after grading. (FEIR, p. 2-158 to 2-159 [RTC 60-25].)

The FEIR claims that the Remedial Design and Implementation Plan and Operations, Maintenance and Monitoring Plan are not improperly deferred. (FEIR, p. 2-162.) These plans are critical plans that demonstrate how the actions in the Response Plan will be implemented, how they will be monitored and maintained for efficacy, and what would happen in the event of toxic releases and/or contamination to soils or groundwater. Without a basic understanding of these activities, any mitigation of the Project's hazardous materials impacts is illusory. The Response Plan defers evaluation of hazardous material impacts and implementation of mitigation measures to address those impacts only *after* the impacts occur. (FEIR, p. 2-162 to 2-163.) This is unacceptable. (*Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 280.)

In particular, the FEIR improperly defers analysis of groundwater to DTSC, admitting that “Monitoring of the groundwater *will* be required to occur as part of the Response Plan implementation to ensure that the development does not negatively impact the current groundwater quality, as described in Draft EIR Section 4.8, Hazards and Hazardous Materials. The proposed groundwater monitoring wells *will* allow monitoring of the groundwater to ensure that its quality does not degrade due to the proposed development.” (FEIR, p. 2-159, emphasis added.) This backwards analysis means that by the time groundwater impacts resulting from the Project are detected, it will already be too late. These analyses must be done in the first instance to disclose to the public and decisionmakers the Project's impacts to groundwater. The FEIR's groundwater monitoring also constitutes improperly deferred mitigation, as it relies on initial monitoring to “dictate” the “frequency and period of monitoring,” and potential remedial actions. (FEIR, p. 2-160.) These are not specific performance criteria.

The RTC also fails to adequately address impacts resulting from the RV dump station, which the Draft EIR failed to analyze. The January 7, 2025 Roux Memorandum regarding the RV Dump Station (“RV Dump Station Memo”) states merely that the dump station would not impact sensitive receptors because the design will be approved by Los Angeles County Sanitation District (“LACSD”), use will only be allowed for tenants, design features would prevent odor discharge, gases would dissipate into the atmosphere, and the dump station is approximately 600 feet from the nearest residence and 450 feet from the elementary school boundary. (FEIR, Appendix J, RV Dump Station Memo, p. 2.)

These points do not eliminate the potential for significant impacts arising from the dump station. First, the FEIR improperly defers environmental analysis to LACSD. CEQA requires such analysis to be done before project approval. The Memo fails to analyze impacts relating to wastewater discharge at the dump station. The dump station must also be reviewed by the Regional Water Quality Control Board (“RWQCB”) due to the potential for wastewater to be discharged into the LA River. Second, the Memo’s discussion of the design of the dump station does not address the potential for spills or misuse/user error at the station, nor does it specify how the station will be maintained and monitored to ensure that it is operating properly. Third, the RV dump station would service the wastewater dumping needs for up to 551 recreational vehicles. With average RV tank capacity of 100 gallons of wastewater, the site could be a dumping ground for thousands of gallons of wastewater.¹ The Memo fails to analyze the impacts resulting from this. Fourth, the Memo claims that because sewer gases from the dump station would be discharged in the open air, it would not present a health risk, but provides no support for that conclusion. Exposure even to low levels of sewer gas, such as hydrogen sulfide, can have serious adverse health effects.² Finally, the Memo does not demonstrate that the distance of the dump station to nearby residences and the elementary school would eliminate the potential for impacts. The Memo also fails to address the planned park that will be adjacent to the Project site.

Regarding the storm drain underlying the site, the FEIR claims without evidence that the Project’s intention to backfill the storm drain will eliminate the potential for the Project to impact the integrity of the storm drain. (FEIR, p. 2-160.) The FEIR does not address the type of backfill, method of backfill, or the propensity of the backfill to be impacted by factors such as improper compaction, seismic events, flooding or other natural events, corrosive soils, among others. The FEIR also does not properly address the condition or operation of the storm drain. While a video review of the storm drain was done in November 2024, that review was done during a very dry period in Long Beach, where precipitation for the six months preceding the review was far below normal according to NOAA’s Online Weather Data. (Att. 4.)

The FEIR further claims without support that the proposed development “will be” engineered to withstand corrosion from sump materials. (FEIR, p. 2-160 to 2-161.) The Project’s impacts resulting from disturbance of corrosive soils must be mitigated through enforceable means, such as requiring all project features to be constructed with corrosion-resistant material, to be monitored for corrosion on an ongoing basis, and to avoid contact with sump materials.

D. The FEIR Fails to Adequately Analyze and Mitigate Land Use Impacts.

An EIR is required to discuss any inconsistency with applicable general plans and regional plans. (CEQA Guidelines §15125, subd. (d).) Instead of discussing the Project’s many

¹ See

[https://yosemite.epa.gov/oa/rhc/epaadmin.nsf/Filings/F26E22AA6502AA68852580740021470E/\\$File/SDWA-08-2016-0011%20AO%20on%20consent.pdf](https://yosemite.epa.gov/oa/rhc/epaadmin.nsf/Filings/F26E22AA6502AA68852580740021470E/$File/SDWA-08-2016-0011%20AO%20on%20consent.pdf), incorporated by reference.

² See <https://pmc.ncbi.nlm.nih.gov/articles/PMC10395451/pdf/nihms-1917928.pdf> and <https://link.springer.com/content/pdf/10.1186/s12995-018-0191-z.pdf>, incorporated by reference.

inconsistencies with applicable land use plans, the FEIR evades this requirement by claiming no conflicts exist.

Almost a quarter-century ago, the State of California Resources Agency, San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy, and Santa Monica Mountains Conservancy developed a watershed and open space plan for the San Gabriel and Los Angeles Rivers, entitled “Common Ground: From the Mountains to the Sea” (“Common Ground”, Atts. 5 and 6.³) The purpose of the plan was to guide open space planning in the watersheds to reduce impacts to water quality, ocean water quality, native habitat, wildlife movement, recreation, among others. (Att. 5, Common Ground, p. 1.) The plan also developed the following guiding principles intended to allow jurisdictions to advance, promote and enable the following concepts:

LAND: Grow a Greener Southern CA

- Create, Expand and Improve Public Open Space Throughout the Region.
- Improve Access to Open Space and Recreation for All Communities.
- Improve Habitat Quality, Quantity, and Connectivity.
- Connect Open Space with a Network of Trails.
- Provide Stewardship of the Landscape.
- Encourage Sustainable Growth to Balance Environmental, Social and Economic Benefits.

WATER: Enhance Waters and Waterways

- Maintain and Improve Flood Protection.
- Establish Riverfront Greenways to Cleanse Water, Hold Floodwaters and Extend Open Space.
- Improve Quality of Surface Water and Groundwater.
- Improve Flood Safety Through Restoration for River and Creek Ecosystems.
- Optimize Water Resources to Reduce Dependence on Imported Water.

PLANNING: Plan Together to Make It Happen

- Coordinate Watershed Planning Across Jurisdictions and Boundaries.
- Encourage Multi-Objective Planning and Projects.
- Use Science as a Basis for Planning.
- Involve the Public Through Education and Outreach Programs.
- Utilize the Plan in an On-going Management Process.

(Att. 5, Common Ground, p. 2.) In particular, the plan seeks to “create a continuous ribbon of open space, trails, active and passive recreation areas, and wildlife habitat” along the Los Angeles River. (*Id.*, p. 3.) The plan also emphasizes land acquisition as a strategy (*Id.*, p. 4), and using existing river corridors to create a comprehensive network of pedestrian, bike, and

³ Available at <https://www.dropbox.com/scl/fi/34wgyhpst7s0p940q7wu2/Common-Ground.pdf?rlkey=nc6uy68j7ft9i6qpsfbodwz7i&dl=0>, and https://www.dropbox.com/scl/fi/uvghyq2u7ex4qn1ko3pi/Common-Ground_Phase-II-Final_combined.pdf?rlkey=wu4vpge0kb5yg4gg7o05i33vd&dl=0, incorporated by reference.

equestrian trails. (*Id.*, p. 5.) The plan also identifies the Wrigley Heights Parkway and LA River Greenbelt in Long Beach as proposed projects within the scope of the plan. (Att. 6, San Gabriel and Los Angeles Rivers Watershed and Open Space Plan: Phase II—Final Report, p.21.) The FEIR fails to analyze the Project’s conflicts with this comprehensive plan that is critical to the LA River Watershed.

The FEIR claims that the Long Beach General Plan Open Space and Recreation Element’s (“Open Space Element”) fundamental, mandatory, and specific requirement to achieve a ratio of 8.0 acres of park space per 1,000 residents is merely an “ambition[n].” (FEIR, p. 2-163; DEIR Letter, Exh. 9, Open Space Element, p. 25.) On the contrary, the Open Space Element specifically set out to rectify the longstanding disparity in park space, stating that “open space for public recreation is a preeminent Long Beach concern.” (DEIR Letter, Exh. 9, Open Space Element, p. 23.) The Element identified nine issues demonstrating the need to prioritize increasing park space in deprived areas, including:

- Issue 4.1 - The ratio of recreation open space per capita in Long Beach has declined 18 percent in the past 28 years.
- Issue 4.2 - Outdoor recreation open space land is unevenly distributed in Long Beach; populations in the north, central and western areas of the City are underserved.
- Issue 4.3 - Rising land costs and tightly constrained municipal budgets have made acquisition of additional open space for outdoor recreation difficult in heavily urbanized areas.
- Issue 4.4 - Non-outdoor recreation uses, including police and fire facilities, are increasingly impinging on existing recreation open spaces.
- Issue 4.5 - An inadequate number of recreation facilities has resulted in competition for outdoor recreation open space between adult and children's sports leagues.
- Issue 4.6 - Tight constraints on municipal funding have negatively impacted City recreation facilities and capital improvement budgets.
- Issue 4.7 - Some recreation facilities are no longer popular and new recreation preferences require new facilities.
- Issue 4.8 - Public school recreation facilities are often completely closed to the public.
- Issue 4.9 - Recreation open spaces are not well linked; i.e., recreation trails are weak.

(DEIR Letter, Exh. 9, Open Space Element, p. 23.)

These identified issues demonstrate the fundamental nature of the Open Space Element’s goals and policies to address park disparity and lack of recreational access. Far from merely an “ambition,” these goals and policies are central commitments of the Element. The FEIR further states that the requirement of 8 acres per 1000 residents is City-wide, not restricted to western Long Beach, which is precisely the point we raise. (FEIR, p. 2-163.) Western Long Beach is currently at 1 acre per 1000 residents; thus, to meet the Citywide ratio specified in the Open Space Element, recreation and open space in western Long Beach must increase.

As we discussed in our DEIR letter, the Open Space Element provides a list of goals and policies to address the park disparity. (DEIR Letter p. 18.) The FEIR appears to claim that the Open Space Element includes only three strategies for implementing this goal/objective, and claims that none of these three strategies identify the Project site. The Open Space Element contains 14 implementation programs, including a specific program to adopt the 8 acres per 1000 residents ratio (Program 4.2), and a program to analyze opportunities for open space linkages (Program 4.8). (DEIR Letter, Exh. 9, Open Space Element, pp. 27-29.) Further, the implementation programs need not specifically identify the Project site; rather, the EIR is required to disclose whether the Project would conflict with these implementation programs, goals, and policies. (CEQA Guidelines §15125, subd. (d); App. G, Section XI, subd. (b).) The City may not support its determination based on a misinterpretation of CEQA's requirements.

The FEIR completely dismisses the Riverlink Plan, claiming that the Riverlink Plan “is not a zoning ordinance nor an element of the City’s General Plan.” (FEIR, p. 2-164.) The goals of the Riverlink Plan include to identify areas for the acquisition of additional open space, identify ways to connect city residents to the LA River, identify locations along the LA River where native habitats could be restored, and improve the aesthetics of the LA River and the City. (DEIR Letter, Exh. 22, Riverlink Plan, p. 4.) The Riverlink Plan is clearly a “land use plan...adopted for the purpose of avoiding or mitigating an environmental effect.” (DEIR, p. 4.10-6.) Thus, the City is required to analyze and disclose conflicts with the Riverlink Plan. The FEIR claims that the project is private property and not owned by the City, but the ownership of the site does not preclude it from being subject to the requirements of applicable land use plans like the Riverlink Plan, nor does it justify the failure to disclose the conflict with the plan as a significant impact, and the FEIR provides no reasons to justify such a failure. The FEIR’s failure to disclose and mitigate this conflict violates CEQA.

The FEIR fails to address the Project’s conflicts with the Long Beach Department of Park, Recreation and Marine’s (“DRPM”) 2022 Strategic Plan.⁴ (DEIR Letter, Exh. 23.) Our DEIR Letter provided a list of fundamental, mandatory and specific actions established by the Strategic Plan with which the Project would conflict. (DEIR Letter, p. 13.) Importantly, the Strategic Plan requires the City to “**Aggressively** apply for County, State, Federal grant funds and align transportation funding for holistic improvements to parks and park access.” (DEIR Letter, Exh. 23, p. 102 [Action 1-1-E], emphasis added.) Instead, the FEIR focuses on limited project features for pedestrian access, claiming generally that the Project would be consistent with the Strategic Plan. (FEIR, p. 2-164.) The FEIR’s failure to disclose and mitigate this conflict violates CEQA.

The FEIR also dismisses the Project’s conflicts with the West Long Beach Livability Implementation Plan (“Livable West Long Beach”), despite that plan’s clear incorporation of the Riverlink Plan and its designation of the site for park purposes. (FEIR, p. 2-165.) The FEIR claims that the Project would be consistent with other “livability criteria” identified in the Plan, but even if that were the case, it would not resolve the clear conflict with the Plan’s identification

⁴ <https://www.longbeach.gov/globalassets/park/media-library/documents/business-operations/about/strategic-business-plan/final-prm-strategic-plan-01>, incorporated by reference.

of the site as space for a park project. Moreover, the Project clearly conflicts with several of the livability criteria, including the following:

(see next page)

The Project’s Conflicts with the Livable West Long Beach Plan’s Livability Criteria

Enhance Mobility Choices And Efficiency

- | | |
|---|--|
| <ul style="list-style-type: none"> • Improve existing traffic conditions, safer roads and intersections. | <ul style="list-style-type: none"> • <i>The Project would add traffic, including traffic from RVs, in an already heavily congested and unsafe corridor.</i> |
|---|--|
-

Safe Neighborhoods

- | | |
|--|--|
| <ul style="list-style-type: none"> • Reduce number of cars on neighborhood streets and truck traffic through neighborhoods. • Improve safety for bicycles and pedestrians. • Increase neighborhood beautification programs and outdoor recreational activities. | <ul style="list-style-type: none"> • <i>The Project would increase the number of vehicles on the surrounding neighborhood streets.</i> • <i>The Project would worsen traffic safety by adding vehicle traffic in a congested corridor.</i> • <i>The Project would remove a potential outdoor recreation area.</i> |
|--|--|
-

Increase Availability/Access To Community Parks, Schools, And Open Spaces

- | | |
|--|---|
| <ul style="list-style-type: none"> • Increase parks and open space. • Connect recreation open spaces with greenway linkages. | <ul style="list-style-type: none"> • <i>The Project would reduce available land for parks and open space.</i> • <i>The Project would prevent greenway linkages to recreational open space along the LA River.</i> |
|--|---|
-

Clean Air And Water

- | | |
|---|---|
| <ul style="list-style-type: none"> • Improve air quality. • Improve the water quality of LA River, Long Beach Harbor and beaches. | <ul style="list-style-type: none"> • <i>The Project would worsen air quality in an already highly impacted area.</i> • <i>The Project could worsen water quality at the LA River.</i> |
|---|---|
-

Healthy Ecosystems For Marine And Wildlife Habitats

- | | |
|--|--|
| <ul style="list-style-type: none"> • Protect, maintain and/or restore natural ecosystems, marine and wildlife habitats. | <ul style="list-style-type: none"> • <i>The Project has impacted, and will continue to impact, wildlife habitat and rare species.</i> |
|--|--|
-

(Att. 12, Livable West Long Beach, p. 28.) Thus, the FEIR’s failure to disclose the Project’s conflicts with this plan violate CEQA.

The FEIR also dismisses the West Long Beach I-710 Community Livability Plan (“Livability Plan”), claiming that it does not present a conflict as it merely “reiterates opportunities identified” in the Riverlink Plan. (FEIR, p. 2-166.) The purpose of the Livability Plan was to address impacts on I-710 corridor neighborhoods resulting from operation of the I-

710 freeway and the goods movement industry. The Livability Plan considered the RiverLink system “a vital part of the Los Angeles River corridor,” directing future I-710 projects to avoid existing and future RiverLink Plan projects. (DEIR Letter, Exh. 11 [Livability Plan, p. 35].) Removing a vital component of the Riverlink Plan—the Wrigley Heights Park—would not only be inconsistent with the Livability Plan, but it would deprive western Long Beach of a strategy adopted to reduce the disproportionate environmental burdens and associated health impacts experienced by I-710 corridor neighborhoods. This must be analyzed and disclosed as an environmental impact.

The FEIR fails to address comments regarding the Project’s conflicts with the Los Angeles River Master Plan (“LARMP”), instead referring back to Section 4.10 of the DEIR. (FEIR, p. 2-166.) That section downplays the Project’s conflicts with the LARMP, stating that the LARMP’s designation of the site as a Planned Major Project was only a “reiteration” of the Riverlink Plan and the Lower Los Angeles River Revitalization Plan (“LLARRP”). (DEIR, p. 4.10-14.) The LARMP identifies the portion of the LA River abutting the Project site as year-round freshwater and important bird habitat area, and identifies the significant equestrian community in the area, the River’s algae mats which provide an important food source for migrating birds, and the significant habitat and corridor connectivity opportunities along this stretch. (Att. 7 [LARMP, p. 404.].) The planned Wrigley River Park is a component of implementing the LARMP. (Att. 7, LARMP, p. 248.)

The FEIR similarly fails to address comments regarding the Project’s conflicts with the LLARRP, instead referring to the DEIR. (FEIR, p. 2-166.) The DEIR and the FEIR lack any support for concluding that the Project, which would divest the public from the LLARRP’s identified “gem” of the LA River and one of the last (if not last) remaining parcel of undeveloped open space, would not conflict with the LLARRP resulting in a significant impact. The FEIR’s claim that PDF-4 is adequate to address these impacts is unconvincing, and the PDF constitutes improperly deferred mitigation as it lacks any specific performance criteria by deferring dedication of an easement to be negotiated at a later date.

The FEIR claims that the Project does not conflict with the site’s existing General Plan land use designation of Neo-Industrial, claiming without any citation that “amendment in and of itself is not a significant impact.” (FEIR, p. 2-167.) This is self-serving logic that does not conform to CEQA’s requirements. The Project requires a General Plan Amendment *because* of its inconsistency with the existing land use designation. This must be identified as a significant impact, rather than swept under the rug. (*Santa Clarita Organization for Planning the Environment v. County of Los Angeles* (2003) 106 Cal. App. 4th 715, 732.) Moreover, while the FEIR claims that the Project would not have significant land use impacts, it then states that its Alternative 1, which would allow development according to existing land use designations, would result in “reduced” impacts as it would not require a General Plan Amendment or zoning change. (FEIR, p. 2-189.)

We raised in our DEIR Letter the Project’s many conflicts with General Plan provisions adopted for the purpose of reducing environmental impacts along the western Long Beach corridor. (DEIR Letter, pp. 17-19.) The FEIR once again declines to respond to comments regarding the Project’s conflicts with LU-M-86, LU-M-53, LU-M-54, and LU-M-85, which

respectively require implementation of the Livability Plan, Livable West Long Beach Plan, DPRM Strategic Plan and Open Space and Recreation Element, and Riverlink Plan, instead directing the reader to review the DEIR Section 4.10. (FEIR, p. 2-167.) The DEIR fails to support its conclusions with substantial evidence. (DEIR, p. 4.10-25.)

The FEIR dismisses the numerous General Plan conflicts by claiming state law does not require a project to “satisfy every policy stated in a General Plan.” (FEIR, p. 2-167.) In response to the Project’s conflicts with LU-M-84 and LU-M-85, the FEIR cites to *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 719, which dealt with a challenge to a determination of a project’s consistency with a general plan under the Subdivision Map Act, not CEQA. CEQA requires an EIR to disclose any inconsistency with a general plan, and to evaluate whether a project would conflict with general plan provisions adopted to avoid or mitigate environmental impacts. (CEQA Guidelines §15125, subd. (d); App. G, section XI.) The FEIR has failed to do so by failing to address and mitigate the Project’s many conflicts with the General Plan.

Moreover, under the Planning and Zoning Law, an agency cannot find consistency with a general plan if a project is inconsistent with a fundamental, mandatory, and specific policy of that general plan. (*Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Bd. of Sup’rs* (1998) 62 Cal.App.4th 1332, 1341.) General consistencies cannot overcome this. (*Id.* at 1343.) Each of the goals and policies listed in our DEIR Letter represents a fundamental, mandatory, and specific policy, and the FEIR lacks support in its determination that there are no conflicts with these goals and policies.

The FEIR also disingenuously states that “none of the Land Use Element’s policies for creation of open space call for the City to meet its goal by acquiring industrially-zoned private property for conversion to parkland.” (FEIR, p. 2-168.) But this does not address the fact that the General Plan calls for implementation of plans that designate park development at the Project site, and the Project would conflict with implementation of those plans.

Additional land use conflicts are set forth in Sections VI and VII below.

E. The FEIR Fails to Adequately Analyze and Mitigate Water Quality and Hydrology Impacts.

The FEIR’s analysis of water quality and hydrology impacts continue to be inadequate. With regards to responses 60-42 and 60-43, none of the FEIR’s points are a direct response to our comments. The DEIR simply does not characterize the environmental condition regarding water quality and hydrology before the surcharge activities. It minimally described the general flow path of stormwater, but the DEIR contained no description of the water quality of that stormwater, which was likely to be quite polluted given contamination onsite and potential pollutants picked up from the offsite run-on. The FEIR did not adequately address this point—it only referenced the potential pollutants to be found during construction and project completion.

In response to our concerns that the DEIR failed to sufficiently analyze and mitigate stormwater pollution, the FEIR makes the unsupported statement that “anticipated pollutants

during Project operation would be the same categories of pollutants that would occur during Project construction.” (FEIR, p. 2-173.) That simply cannot be true. The Project’s operation of a carwash would likely include soaps and toxic pollutants that have no reason to be present during construction. Visiting vehicles during project operation would bring more types of metals, oil and grease, and trash to the site.

The FEIR’s reference to Appendix F only is for construction SWPPP, and there are no specifics of what pollutants are present onsite, only general categories such as “metals” and “synthetic organics” and “nutrients.” (FEIR, p. 2-173.) References to specific metals in the comment response (lead, tin, zinc chloride) are only in reference to plumbing work during construction. Neither the DEIR nor the FEIR’s response mentioned copper from brake pads or zinc from tires. The construction SWPPP cannot be a surrogate for fulsome discussion of significant impacts to water quality from the Project’s completion and operation.

The FEIR provides a general discussion about structural and non-structural BMPs (FEIR, p. 2-174), but that does not provide clarity about the pollutants that will be addressed by those BMPs and whether any additional actions may need to be taken. For example, some of the substances vaguely referenced might not be captured by a bioswale. Additional analysis and disclosure is required.

Regarding the carwash, the FEIR appears to gloss over the need to explain how wastewater from washing RVs will be collected and sent to the sanitary sewer (FEIR, p. 2-174, 2-35, 2-64), as well as the risks of spills of materials from RVs stored onsite. Even if there is no maintenance activity happening, if vehicles are stored there for a long time, leaks of antifreeze, motor oil, and other pollutants may occur that will require specific cleanup plans and BMPs to prevent mobilization in stormwater.

Expert consultant Pearl Hanks of PEnterprise Consulting Services has made additional findings, which are forthcoming and will be submitted to the City under separate cover. In particular, due to the Project’s proximity to the Los Angeles River, the Project requires a Section 404 permit from the U.S. Army Corps of Engineers (“USACE”) and may not be approved until that process has been completed. Expert Hanks has found that the project’s adjacency to the Los Angeles River (a federally protected waterway) triggers Section 404 of the Clean Water Act due to:

- Potential discharges of dredged/fill material during grading and construction.
- Contaminated runoff risks (arsenic, lead, VOCs) from the site’s legacy as an oil brine waste facility (1940s–1950s).
- Stormwater infrastructure directly connected to the river via existing drains.

Thus, Expert Hanks recommends that the City must halt approval until the applicant secures a USACE jurisdictional determination and/or Section 404 permit.

F. The FEIR Fails to Adequately Analyze and Mitigate Traffic Impacts.

The FEIR’s Supplemental Traffic Memorandum (FEIR, Appendix D) fails to adequately respond to comments on the Project’s traffic impacts. Included as Attachment 9 are supplemental

comments on the EIR from expert consultant Gary Hamrick, which outline additional flaws in the EIR's traffic analysis. (Att. 9, June 3, 2025 Letter from Gary Hamrick regarding Comments on Pacific Place Project EIR.)

G. The FEIR Fails to Adequately Analyze and Mitigate Impacts to Tribal Cultural Resources.

The FEIR appears to simply dismiss expert comments regarding the existence of the Tibajabet settlement in the vicinity of the Project. (FEIR, p. 2-202.) It claims that because the site is not currently listed as a historic resource, no further analysis is needed. (*Ibid.*) But CEQA does not limit historic resources to only those listed on historic registers; the city may use its discretion to determine whether a resource is historically significant based on substantial evidence, and must choose whether to do so. (*Valley Advocates v. City of Fresno* (2008) 160 Cal.App.4th 1039, 1062–1063.) The FEIR's failure to address this is a prejudicial error. (*Ibid.*)

The FEIR fails to adequately respond to these and other detailed comments on tribal cultural resources, instead claiming sufficiency of the tribal consultation process. This does not comply with CEQA.

H. The FEIR Fails to Adequately Analyze Greenhouse Gas Impacts.

Climate change due to greenhouse gas impacts exacerbates the urban heat island effect, which is caused by increased surface temperatures resulting from absorption of heat by building and pavements. (Att. 10, Cooling Long Beach, pp. 8-9.) The Project would convert 14 acres of undeveloped land to 14 acres of impervious surface, worsening the urban heat island effect. The Long Beach Climate Action Plan ("CAP") has identified West Long Beach as more susceptible to high surface temperatures. (Att. 8, CAP, p. 59; Att. 8, CAP Appendix C, p. 65.)⁵

The CAP addresses extreme heat, setting a Goal that "Long Beach buildings, neighborhoods, and infrastructure are climate resilient, reduce the urban heat island effect, and are set up to ensure and improve public health and safety in the face of extreme heat events." (Att. 8, CAP, p. 68.) The CAP also adopts an Objective that "[n]ew and existing buildings, streets, and public spaces reduce extreme heat through incorporation of cool surfaces and green infrastructure," and to that end, adopts three Actions:

EH-1: Increase presence of cool roofs and cool walls

EH-2: Increase the presence of reflective streets, cool surfaces, and shade canopies

EH-3: Enhance and expand urban forest cover and vegetation

(Att. 8, CAP, p. 68, 73-76.) Despite this Goal, this Objective, and these Actions, the EIR fails to analyze or address the albedo-reducing Project's potential to conflict with the extreme heat provisions of the CAP. Thus, it is inadequate under CEQA.

⁵ Available at https://www.longbeach.gov/globalassets/lbcd/media-library/documents/planning/lb-cap/adopted-lb-cap_-aug-2022, incorporated by reference.

Moreover, because the EIR failed to adequately address and analyze vehicle miles traveled, it also conflicts with provisions of the CAP intended to reduce transportation emissions.

For decades, this Project site was used for oil extraction and treatment, which not only contaminated the land and poisoned the community, but also contributed to our global climate crisis. The City has the unique opportunity to reject another impactful project, in favor of protecting the opportunity for a flourishing river-adjacent park that would reduce greenhouse gas impacts and improve the surrounding environment and public health. We urge it to do so.

I. The FEIR Fails to Adequately Analyze and Mitigate Noise Impacts.

The FEIR fails to adequately analyze and mitigate the Project's noise impacts. The EIR claims that the City of Long Beach does not have quantitative construction noise limits. (DEIR Attachment L, Noise and Vibration Report, p. 15.) However, the Long Beach General Plan Noise Element⁶ has adopted the State's Land Use Compatibility Criteria, which identify normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable noise levels for various land uses. (General Plan Noise Element, pp. 12-13.) Policy N 6-2 requires that the City use these criteria "to guide land use and zoning reclassification, subdivision, conditional use and use variance determinations and environmental assessment considerations, especially relative to sensitive uses, as defined by this chapter within a line-of-sight of freeways, major highways, or truck haul routes." (*Id.* at p. 43.) Thus, the Land Use Compatibility Criteria serve as quantitative noise limits against which the Project's impacts must be measured.

Here, the FEIR does not appear to present data that would allow for an apples-to-apples comparison of the Project's noise impacts (measured in L_{eq} against the Land Use Compatibility Criteria (measured in L_{dn} or CNEL), but it appears that the Project would likely trigger clearly unacceptable noise levels during the excavation and paving phases of construction at the Los Cerritos Elementary School playground, clearly unacceptable noise levels during the excavation and paving phases at the residential uses north of Los Cerritos Elementary School, normally unacceptable uses during the ground clearing and building construction phases during those same uses, and normally unacceptable noise levels during ground clearing, excavation, building construction, and paving phases at the Los Cerritos Elementary School Building. (DEIR Attachment L, Noise and Vibration Report, p. 15.) The EIR must be recirculated to provide the omitted analysis and evaluate and properly mitigate these impacts.

IV. The FEIR Fails to Adequately Respond to Comments Regarding the Inadequate Alternatives Analysis.

The FEIR fails to demonstrate that the Alternatives analysis was sufficient under CEQA. The FEIR has not shown that the City considered a reasonable range of alternatives, or demonstrated that the project objectives were not improperly narrow. While it may be permissible to consider project objectives for a specific purpose and use, CEQA does not permit the selection of objectives so as to make a project a "foregone conclusion." (*We Advocate*

⁶ Available at <https://www.longbeach.gov/globalassets/lbcd/media-library/documents/planning/noise-element-update/noise-element>, incorporated by reference.

Through Environmental Review v. County of Siskiyou (2022) 78 Cal.App.5th 683, 692.) By stacking the deck with five out of eight objectives tailored to the Project, the FEIR fails this requirement. Moreover, as a matter of policy, the project objectives should better reflect that this site is critical for environmental preservation and stewardship.

The FEIR fails to demonstrate that it adequately considered a parkland alternative. The FEIR misinterprets Riverpark Coalition and LA Waterkeeper's DEIR comments, claiming that we propose that the City become the Project proponent to purchase the property for public use. (FEIR, p. 2-185.) This is incorrect. Our comments respond to the fact that the **DEIR** set forth the Parkland Alternative for consideration, and then rejected it from further consideration on the basis of supposed lack of feasibility. (DEIR, p. 5-4; DEIR Letter, pp. 29-30.) The FEIR makes much of conversations regarding efforts to obtain a willing seller letter, but those conversations do not demonstrate that acquisition is infeasible within the meaning of Public Resources Code section 21061.1. In fact, the FEIR appears to demonstrate the potential for the Applicant to become a willing seller under certain conditions. (FEIR, p. 2-214.)

The FEIR fails to adequately address our concern that the DEIR did not consider off-site alternatives, and lacks support for its conclusion. (FEIR, p. 2-186.) The FEIR's conclusion that the site is an "auto-oriented property that prevents pedestrian compatibility by default" is not justified and is belied by the presence of nearby recreational paths.

The FEIR's analysis of the No Project Alternative is misleading and defies CEQA's requirements. "The purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." (CEQA Guidelines §15126.6, subd. (e)(1).) The FEIR claims that the No Project Alternative would have increased environmental impacts, supposedly owing to the lack of mitigation of the impacts of the surcharge activities, pre-development grading, southern tarplant removal, and lack of DTSC involvement. These all refer to actions taken at the behest of the applicant, and cannot be basis for a finding that the No Project Alternative would be less impactful than the Project. The EIR also claims that the No Project Alternative would have increased land use impacts because of the minimal, general ways in which the Project may achieve City goals and policies related to economic development and remediation of contaminated sites, despite the Project's many conflicts with fundamental, mandatory, and specific policies. (DEIR, p. 5-9.) The EIR also wrongly claims the No Project Alternative would increase recreational impacts due to the lack of a potential easement for public access to the LA River, despite the fact that the Project would foreclose the potential for the site to be utilized for recreational purposes, in line with the many land use plans designating the site as such. (DEIR, p. 5-10.) The EIR's analysis of the No Project Alternative is misleading and inadequate.

The FEIR fails to demonstrate that the range of alternatives is reasonable. As we stated in our DEIR Letter, Alternative 1 and Alternative 2 fail to provide meaningful alternatives against which the decisionmakers and the public may compare the Project. Alternative 1 is extremely vague, and does not provide a useful comparison that would fulfill the purpose of the alternatives analysis by identifying ways to avoid or mitigate the Project's significant impacts (CEQA Guidelines §15126.6, subd. (b)). Alternative 1 lacks the specificity necessary to fulfill the

substantive mandate of CEQA by evaluating and adopting all feasible alternatives. (Pub. Resources Code §21081.) Also, the FEIR's claim that Alternative 1 would reduce land use impacts by complying with the underlying zoning and General Plan designation is belied by its claim that the Project's conflicts with these designations do not result in significant impacts. (FEIR, p. 2-188.) Alternative 2 is a modestly reduced version of the Project, which would still "result in full site disturbance." (DEIR, p. 5-18.) It would still have similar impacts to the Project for 11 out of 17 impact areas. (FEIR, p. 2-190.)

Finally, the Project may not be approved without the adoption of a statement of overriding considerations. Under CEQA, an agency may not approve a project with significant impacts unless it adopts all feasible mitigation measures and alternatives to avoid those impacts. (Pub. Resources Code §21081.) If impacts are significant and unavoidable, an agency must adopt a statement of overriding considerations. (*Id.*) Here, as our letters have demonstrated, the Project would have significant impacts that cannot or have not been mitigated. Moreover, the EIR relies on mitigation for hazardous impacts, MM-HAZ-1, that is under the jurisdiction of another agency, DTSC. Accordingly, the EIR must include findings that the mitigation measures under MM-HAZ-1 "are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency." (Pub. Resources Code §21081, subd. (a)(2).) Thus, the Project cannot be approved under Public Resources Code section 21081.

V. The FEIR Fails to Address the Proposed Park Use Adjacent to the Project Site.

On April 16, 2025, we submitted a letter to the City to inform it 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. (Att. 11, April 16, 2025 Letter to Amy Harbin.) The Project is in conflict 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.

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. As we stated in our letter, the EIR requires recirculation because the acquisition of the adjacent parcels for the Wrigley Heights River Park Planning Project constitutes significant new information demonstrating that the Project would result in new significant impacts and/or a substantial increase in the severity of environmental impacts. (CEQA Guidelines §15088.5.) Our letter highlighted new or more severe impacts relating to air quality, hazards, biological resources, land use, noise, hydrology and water quality, transportation, and cumulative impacts, and identified the need to revise the alternatives analysis to take into account this new information. (Att. 11, April 16, 2025 Letter to Amy Harbin, pp. 3-4.) Despite this, the City has failed to recirculate the EIR or to incorporate this new information in the FEIR. Thus, it is inadequate.

VI. The Project Violates the Planning and Zoning Law.

For the reasons stated above in Section III.D and in our DEIR comment letter, the Project's many conflicts with fundamental, mandatory, and specific provisions of the General Plan Land Use Element and Open Space Element constitute a violation of Planning and Zoning Law. (*Spring Valley Lake Assn. v. City of Victorville* (2016) 248 Cal.App.4th 91, 100–101.)

The General Plan Amendment findings (“GPA Findings”) lack substantial evidence. (*Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 514–515.) The GPA Findings cannot show that the proposed changes to the General Plan will benefit the public interest pursuant to Government Code section 65358. These findings make a conclusory statement that “the proposed change will benefit the public interest by allowing for the Project, which will turn a physically isolated and underutilized site in need of remediation into a multifaceted storage service that will benefit the community.” (GPA Findings, p. 1.)

Simply “allowing for” development of a private project is not a legitimate basis for which to claim sufficient public interest for a General Plan Amendment. The General Plan is replete with goals, policies, and programs indicating that this Project does not belong at this site. (Section III.D; DEIR Letter, pp. 16-19.) The findings claim without support that the property's viable uses are severely limited, except for this Project. (GPA Findings, p. 1.) Moreover, the proposed change is not consistent with the site's existing zoning designation, light industrial (IL), as the findings admit. (GPA Findings, p. 3.)

Further, the GPA Findings fail to address whether the Project is consistent with the desired General Plan designation, Community Commercial. It is not. The General Plan Land Use Element is clear that storage uses are designated within the Industrial PlaceType. (General Plan Land Use Element, p. 65.) “The Community Commercial PlaceType applies to a **few** select segments of major arterial corridors and larger-scale commercial shopping centers (outside of the Waterfront and the Downtown PlaceTypes).” (*Id.* at p. 87, emphasis added.) Except for one spot on the arterial corridor Pacific Coast Highway, there are no places designated Community Commercial on parcels abutting the Los Angeles River. (*Id.* at p. 88.) The General Plan designates Community Commercial for businesses that are located “along corridors and in shopping centers.” (*Id.* at p. 87.) In contrast, the Project is not located along a corridor or a shopping center. It is not located on a major arterial corridor, but rather near a busy freeway interchange. It does not belong in this PlaceType.

Finally, the Project seeks to modify the General Plan Land Use Element's Major Areas of Change, to designate the Project site within area #4, “Convert **some** industrial uses to commercial and regional-serving uses.” (General Plan Land Use Element, pp. 113-14, emphasis added.) However, this was a narrowly defined major area of change, that sought to convert “select” industrial uses to commercial uses in the areas between Cherry Avenue and the Union Pacific Railroad. (*Id.* at p. 115.) The Project site does not fall within this area.

VII. The Project Violates the Municipal Code.

A. The Project Does Not Qualify for a Zoning Code Amendment or Zoning Map Change.

The Project cannot show the findings required under the Long Beach Municipal Code (“LBMC”) for the requested zone change. Under LBMC section 21.25.106, the City is required to make the following findings:

- A. The proposed change will not adversely affect the character, livability or appropriate development of the surrounding area; and
- B. The proposed change is consistent with the goals, objectives and provisions of the General Plan; and
- C. If the proposed change is a rezoning of an existing mobile home park, that the requirements of Section 21.25.109 have been or will be fully met.

Here, the proposed zoning amendments do not fulfill these requirements. The Zoning Code Amendment would modify the High-Rise Overlay District to permit parcels zoned for Commercial Storage (CS) to utilize the overlay. The Zoning Map Change would then amend the Zoning Designation for the site and allow it to exceed the site’s current height restrictions.

1. The Proposed Changes Conflict with the General Plan.

First, the proposed changes would not be consistent with the goals, objectives and provisions of the General Plan. The General Plan is clear that Community Storage does not comport with this location. We have documented the numerous conflicts that construction of a storage facility at this site would have with the General Plan Land Use Element, and Open Space and Recreation Element.

The proposed changes conflict with many provisions of the General Plan Land Use Element, including but not limited to:

(see next page)

Goal No. 1: Implement Sustainable Planning and Development Practices	
LU Policy 1-9: Correlate new land uses to the existing street system such that that existing street system, in combination with improvements focused on supporting alternative modes of travel, operates at an acceptable level of capacity. New rights-of-way essential to the accommodating all modes of travel will avoid significant social, neighborhood and environmental impacts by utilizing adjacent paved area (e.g. formerly parking or development). The conversion of open space, parkland, buffer areas adjacent to wetlands and rivers and streams for street improvements is discouraged.	The Project would have significant traffic impacts and would increase traffic congestion. The Project would convert area buffering the Los Angeles River for a street extension to North Pacific Place. (DEIR, p. 3-7.)
LU Policy 1-10: In addition to analyzing project and plan impacts on Levels of Service and Stop Delay, analyze Vehicle Miles Traveled consistent with the State's guidelines.	The Project has not complied with the State's guidelines relating to vehicle miles traveled analysis
Goal No. 2: Strengthen the City's Fiscal Health by Stimulating Continuous Economic Development and Job Growth	
LU Policy 6-10: Discourage fiscally draining land uses such as public storage, vacant lots and outdoor storage.	The Project would conflict with this policy, as it aims to construct a storage facility.
Goal No. 4: Support Neighborhood Preservation and Enhancement	
LU Policy 9-1: Protect neighborhoods from the encroachment of incompatible activities or land uses that may have negative impacts on residential living environments.	The Project fails to protect the residential neighborhoods surrounding the site with an incompatible, highly intensive commercial land use.
LU Policy 11-5: Ensure neighborhoods are accessible to open spaces, parks, trails and recreational programs that encourage physical activity and walkability.	The Project would foreclose the possibility of a park or recreational corridor at this river-adjacent site.
LU Policy 11-6: Achieve health equity, eliminate disparities and improve the health of residents throughout the City.	The Project would increase air quality and noise related impacts, as well as worsen the urban heat island effect.

Goal No. 6: Ensure a Fair and Equitable Land Use Plan

LU Policy 14-1: Remedy existing deficiencies in blighted and underserved neighborhoods by providing public facilities, amenities, improvements and services equitably throughout the City.	The Project would foreclose the possibility of providing a park at this river-adjacent site.
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LU Policy 14-3: Avoid concentrating undesirable uses, service facilities and infrastructure projects in any manner that results in an inequitable environmental burden on low-income or minority neighborhoods.	The Project would concentrate an intense commercial use in an already overburdened community.
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LU Policy 14-7: Directly address Environmental Justice through programs and investments that reduce compound health risks within disadvantaged communities. Evaluate new land uses in a manner that is conscious of the cumulative impacts of pollutants and history of pollutant burden and public under investment in disadvantaged communities.	The Project fails to consider the cumulative impacts of pollutants and history of pollutant burden in this disadvantaged community.
--	---

Goal No. 8: Increase Access to, Amount of, and Distribution of Green and Open Space

LU Policy 18-7: Prioritize the location of new parks in underserved or low-income communities with the lowest ratio of park space per thousand residents.	The Project forecloses a park use on one of the last remaining parcels of undeveloped space in western Long Beach, which will make it impossible to improve the ratio and rectify the lack of park space in western Long Beach.
---	---

LU Policy 18-8: Pursue resources to clean up land that could safely be used for public recreation.	The Project would undermine the City's duty to pursue resources to clean up the site to be used for public recreation.
--	--

LU Policy 18-10: Prioritize vacant and underutilized land for the development of new green space, including parks, community gardens and local urban farms in park-poor communities.	The Project would undermine the City's duty to prioritize the site for park development.
--	--

Goal No. 9: Preserve, Protect, Restore and Reconnect with Local Natural Resources

LU Policy 20-1: Identify, acquire, protect and manage open spaces, sensitive biological resources, native habitat and vegetative communities, including wetlands and uplands, to support wildlife species and wildlife	The Project would have significant impacts to sensitive biological resources.
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linkages and to add ecological value and climate resiliency to the entire open space system

LU Policy 20-5: Prevent stormwater runoff and pollutants from entering natural water bodies, wildlife habitats, wetlands, rivers and the Pacific Ocean.

The Project would have an intense use adjacent to the Los Angeles River and would have potential impacts relating to stormwater runoff.

Citywide Implementation Strategies

LU-M-53: Continue to implement the Long Beach I-710 Community Livability Plan aimed at incorporating and prioritizing livability improvements in the I-710 freeway corridor neighborhoods.

The Project fails to implement the Livability Plan.

LU-M-54: Continue to implement the West Long Beach Livability Implementation Plan to improve the quality of life in West Long Beach and to bring to fruition the community's vision of a healthy, vibrant and livable neighborhood through land use planning and capital improvement projects.

The Project fails to implement the West Long Beach Livability Implementation Plan.

LU-M-84: Increase parks and open space areas to meet the City standard of eight acres of park land for every 1,000 Long Beach residents, particularly in neighborhoods where there is a deficiency in park space.

The Project forecloses a park use on one of the last remaining parcels of undeveloped space in western Long Beach, which will make it impossible to achieve the stated ratio and rectify the lack of park space in western Long Beach.

LU-M-85: Continue to implement and update the Department of Parks, Recreation and Marine Strategic Plan and the Open Space and Recreation Element.

The Project fails to implement the Department of Parks, Recreation and Marine Strategic Plan and the Open Space and Recreation Element.

LU-M-86: Update and implement the Long Beach Riverlink Plan to create a continuous greenway of pedestrian and bike paths and linkages along the east bank of the Los Angeles River, as well as to connect to existing and future parks, open space and beaches along western portions of the City.

The Project fails to implement the Long Beach Riverlink Plan.

LU-M-95: Reuse vacant properties as community amenities such as gardens, parks or temporary green spaces to reduce blight

The Project fails to reuse the vacant site for a community amenity that would increase

and safety issues, increase residents' access to needed parks and open spaces, and spur additional investment in neighborhoods.	residents' access to needed parks and open space.
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Bixby Knolls Land Use Strategies:

Land Use Strategy 2. Upgrade the quality of development by using appropriate design guidelines, zoning standards and improved design review processes to ensure that all new buildings, remodels and additions enhance the neighborhood fabric. (General Plan Land Use Element, p. 144.)	In Strategies 2 and 3, the General Plan relies on the zoning standards to enhance the neighborhood fabric and protect established residential districts from the intrusion of commercial activities in the Bixby Knolls neighborhood, in which the Project is located. (General Plan Land Use Element, pp. 144-45.) The proposed change would undermine these strategies by modifying the applicable zoning to allow for commercial storage.
Land Use Strategy 3. Use design guidelines and upgraded zoning standards to further protect established residential districts from the intrusion of commercial activities. (General Plan Land Use Element, p. 144.)	
Land Use Strategy 6. Seek opportunities to create recreation and green areas, and implement the RiverLink Plan for the Los Angeles River. (General Plan Land Use Element, p. 144.)	The Project would fail to implement the Riverlink Plan at this river-adjacent site.
Land Use Strategy 7. Implement the I-710 Livability Plan for the Long Beach Freeway. (General Plan Land Use Element, p. 144.)	The Project would fail to implement the I-710 Livability Plan.

The proposed changes also conflict with many provisions of the General Plan Open Space and Recreation Element, including but not limited to:

(see next page)

Open Space and Recreation Element Goals	
Goal 4.2: Achieve a ratio of 8.0 acres of publicly owned recreation open space per 1,000 residents.	The Open Space and Recreation Element adopts Policy 4.1 and Program 4.2 to effectuate this goal. The Project forecloses a park use on one of the last remaining parcels of undeveloped space in western Long Beach, which will make it impossible to achieve the stated ratio and rectify the lack of park space in western Long Beach.
Goal 4.3: Add recreation open space and recreation facilities in the areas of the City that are most underserved.	The Project is located in one of the most park-poor places in Long Beach.
Goal 4.4: Provide the recreational resources the public wants.	The public has extensively fought for a park use on this site for decades.
Goal 4.6: Increase recreation resources and supplement publicly owned recreation resources with privately owned recreation resources.	The public has extensively fought for a park use on this site for decades.
Goal 4.9: Connect recreation open spaces with greenway linkages.	The Project would prevent linkage to the Dominguez Gap wetlands to the north of the site.
Goal 4.10: Provide access to recreation resources for all individuals in the community.	The Project would foreclose an opportunity to rectify the disparity of park resources in western Long Beach.

The Project simply does not comport with these provisions. Moreover, the proposed changes would not only permit a building with outsized height at the Project site, but it would alter all locations zoned Commercial Storage throughout the entire city to allow for a height district overlay.

2. The Proposed Change Will Adversely Affect the Character, Livability or Appropriate Development of The Surrounding Area.

The proposed change would adversely affect the character, livability, and appropriate development of the surrounding area. The surrounding area includes residences, schools, and recreational uses as the site abuts the Los Angeles River. The Project would bring traffic, air quality emissions, and noise into an area with many sensitive receptors. For this and the many other reasons we have set forth, the City cannot find that the proposed changes would not adversely affect the character, livability, and appropriate development of the surrounding area.

B. The Project Does Not Qualify for a Conditional Use Permit.

Pursuant to LBMC section 21.25.206, the City may not grant a Conditional Use Permit (“CUP”) without making the following findings:

- A. The approval is consistent with and carries out the General Plan, any applicable specific plans such as the local coastal program and all zoning regulations of the applicable district;
- B. The proposed use will not be detrimental to the surrounding community including public health, safety or general welfare, environmental quality or quality of life;
- C. The approval is in compliance with the special conditions for specific conditional uses, as listed in Chapter 21.52; and
- D. The related development approval, if applicable, is consistent with the green building standards for public and private development, as listed in Section 21.45.400.

The Zoning Code Amendment Findings lack substantial evidence. Regarding Finding A, the proposed zone changes are not consistent with the goals, objectives, and provisions of the General Plan, as set forth above in Section VII.A.1.

Moreover, as set forth in Section III, the proposed use will be detrimental to the surrounding community due to its many environmental impacts, including air quality, biological resources, land use, hydrology, greenhouse gas, noise, traffic, and other impacts.

C. The Project’s Site Plan Review Findings Cannot be Made.

The Project is not “harmonious, consistent and complete within itself and is compatible in design, character and scale, with neighboring structures and the community in which it is located, as required by LBMC section 21.25.506. As described above in Sections III.D and VII.A.1, the Project conflicts with many provisions of the General Plan and other land use plans that designate this site as intended for parkland. Thus, the Project cannot be granted Site Plan Review approval.

VIII. 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 Planning Commission not approve this Project.

Thank you for consideration of these comments.

Sincerely,



Sunjana Supekar

Attachments:

1. September 30, 2024 Letter from Carstens, Black & Minter to Amy Harbin on the Pacific Place Project DEIR.
2. June 2, 2025 Technical Memorandum from Ray Kapahi, Environmental Permitting Specialists.
3. June 2, 2025 Letter from Robert Hamilton, Hamilton Biological, Inc.
4. National Weather Service, NOWData, Precipitation between May 19, 2024 and November 19, 2024. Available at: <https://www.weather.gov/wrh/Climate?wfo=lox>. To create map, select Long Beach Area, select Accumulation graphs, select date range 05-19-2024 to 11-19-2024, with variable set to Precipitation.
5. Excerpts from Common Ground: From the Mountains to the Sea, Watershed and Open Space Plan, San Gabriel and Los Angeles Rivers, October 2001.
6. Excerpts from Common Ground: From the Mountains to the Sea, Watershed Open Space Plan, Phase II Final Report, June 2002.
7. Excerpts from 2022 Los Angeles River Master Plan.
8. Excerpts from 2022 Long Beach Climate Action Plan.
9. June 3, 2025 Letter from Gary Hamrick regarding Comments on Pacific Place Project EIR.
10. Cooling Long Beach: Urban Heat Island Reductions Strategies.
11. April 16, 2025 Letter from Carstens, Black & Minter to Amy Harbin regarding Recirculation of the Draft EIR.
12. Excerpts from the West Long Beach Livability Implementation Plan.

Amy Harbin

From: Carol Choate <carolch@verizon.net>
Sent: Thursday, June 05, 2025 8:44 AM
To: Amy Harbin
Cc: Carol Choate
Subject: RiverPark EIR review

-EXTERNAL-

I can't be their today to speak in person but I am in 100 percent agreement of having this last remaining land turned into a park for all to use. We need to save open space as it seems as everyday we are being encroached by high density apartments etc . Once that open space is gone..ITS GONE FOREVER. I hope the planning commission will value what its constituents want.!!! I don't see anyone cheering for more storage etc except an investor or too(do they live in Long Beach?) looking out for their own \$\$ interests.

Please remember our world needs open spaces, not more asphalt!!

Sincerely,

Carol Choate

A black rectangular redaction box covering the signature area.

[Sent from AOL on Android](#)

Amy Harbin

From: Monica Cummings <monica.cummings@gmail.com>
Sent: Thursday, June 05, 2025 8:26 AM
To: Cuentin Jackson; Amy Harbin
Subject: Vote No on EIR for the Pacific Place Project

-EXTERNAL-

Good morning,

As a constituent and resident of Bixby Knolls. I would urge you to vote No on the Environmental Impact Report for Pacific Park Place. It is crucial to speak out against the Pacific Place Project's Environmental Impact Report (EIR) because this decision affects the health, safety, and future of West Long Beach. The current EIR overlooks serious risks—like toxic contamination, cancer-causing pollution, and the destruction of one of the few chances to create parkland and restore equestrian trails in a community with severe environmental and recreational inequities.

I would strongly urge you to vote "NO" as this means defending public health, demanding environmental justice, and ensuring the city follows through on long-standing plans to serve its most underserved neighborhoods.

Thanks for your consideration,

Monica Cummings

From: Lynette Ferenczy <lferenczy62@verizon.net>

Sent: Wednesday, June 4, 2025 11:44 AM

To: PlanningCommissioners <PlanningCommissioners@longbeach.gov>; Amy Harbin <Amy.Harbin@longbeach.gov>; Council District 7 <District7@longbeach.gov>; Mayor <Mayor@longbeach.gov>; Council District 5 <District5@longbeach.gov>

Subject: Fw: Opposition to 3701 Pacific Place Self Storage Project

-EXTERNAL-

June 4, 2025

Dear Planning Commission:

Subject: Opposition to 3701 Pacific Place Self Storage Project, 25-55508, EIR 02-23

I am writing to express my opposition to the proposed development at 3701 Pacific Place.

This project violates the following plans:

- RiverLink Plan
- Long Beach Department of Parks, Recreation, and Marine Strategic Plan 2022
- 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
- Long Beach Open Space Element of the General Plan
- The Westside Promise (WSP),

Most importantly this project removes the last opportunity to increase park/open space in central Long Beach. The proposed Zone Change, General Plan Amendment, and Zoning Text Amendment for Height overlay are all inconsistent with the plans mentioned above. Approval of the EIR and project entitlements will increase open space inequality and remove the opportunity for adding recreational open space and facilities in an area of the City most underserved for these services.

The EIR also fails to address these issues:

- 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

The construction will create a 14 acre heat island as almost no landscaping is proposed for this massive RV parking lot. The proposed 5 story/50 foot height limit is completely out of scale with the surrounding community. Additionally, this 14 acre site will only create 10 low paying jobs. The City has over 25 self storage facilities and another one was just built at the 405 and California Avenue about 1.5 miles away. These businesses do not benefit the community but do create more air pollution and traffic in an area that suffers from horrible air quality. The City approved 226 homes at Baker Street just south of this site adding a huge number of vehicle trips per day. Please do not approve development that is inconsistent with City plans and policies.

Further commercial development removes any hope of additional green/open/park space on the west side while ignoring multiple plans to create linked areas open for public use along the LA River. The City is quick to emphasize a favorable parkland to resident ratio while conveniently glossing over the reality that the figure is radically skewed by the preponderance of park space (16.7 acres/thousand residents) on the east side as opposed to only 1 acre/1000 residents on the west side. As density continues to increase along the A Line corridor, this imbalance will only worsen. A necessary first step toward addressing this inequity is for the proposed project to be denied after which resident centered alternatives can be considered. Future generations won't know or care about who found space for storage facilities, let rejection of this development followed by a plan that improves resident quality of life serve as a legacy for your term of office.

Thank you for your consideration of my concerns,

Lynette Ferenczy
Wrigley Resident
lferenczy62@verizon.net

Item #3 Correspondence - Michael Gallagher

From: ARC LAX Michael Gallagher <Michael@arc-logistics.com>
Sent: Monday, June 2, 2025 2:06 PM
To: CityClerk <CityClerk@longbeach.gov>
Subject: Re: Support for the Redevelopment of the Old LB Golf Center Site

-EXTERNAL-

Dear Councilmembers,

I'm writing to express my strong support for the project returning to the Planning Commission at the former Long Beach Golf Center site. As a nearby resident, I believe this redevelopment is a significant step forward for our community.

The area has long been neglected and is currently plagued by illegal dumping, crime, and homelessness. The activation of this site with a new, well-maintained business will bring much-needed security and vitality.

I'm especially excited about the proposed trail connection from Pacific Place to the LA River, which will be a great community asset. Additionally, it's encouraging to see this contaminated and underutilized land finally being cleaned up and permanently capped.

As a local resident, the inclusion of secure storage for classic cars, boats, and RVs is very welcome. The building itself is also a breath of fresh air—the thoughtful, attractive design looks more like an upscale commercial property than a typical storage facility.

It's also great to see the project include solar energy generation and drought-tolerant landscaping—both of which reflect environmental responsibility.

Lastly, I truly appreciate that the developers are choosing to downzone the site rather than pursue more intensive uses that could have brought significant truck traffic into our neighborhoods.

This project is a win for the community in every way, and I hope you'll continue to support its approval and progress.

Sincerely,

Michael Gallagher

[REDACTED]

[REDACTED]

[REDACTED]

Amy Harbin

From: Michael Gardner <Michael.Gardner@csulb.edu>
Sent: Tuesday, June 03, 2025 7:07 PM
To: Amy Harbin
Subject: RE: 3701 Pacific Place; 6/5 Planning Commission Agenda Published

-EXTERNAL-

Hi Amy-

Thank you so much for your help.

Item 1

My concern as a neighbor to the site is the view from the road at the entry to the school, as this point is about 30' in elevation above the site and provides a deep view into the future parking lot. I think the project should do more to screen this view from the neighborhood into the site. The planting legend calls for 15 gal pot trees, 20' o.c.. This will take 10-15 years to create a reasonable sight barrier. My request is that the project provide a thickened line of trees, perhaps two deep, spaced closer together and use at least 36" box trees to get a start on developing screening.

See images below

Item 2

The road leading into the site is in horrible condition. Construction will make it worse. Is the City or the developer addressing the public road condition?

See images below

Please let me know what to do to make this comment official. Other than these items I would support the project as it seems a good use for the area.

Item 1





Very Small, Widely Spaced Trees

ON-GRADE PLANTING LEGEND			
SYMBOL	BOTANICAL NAME	COMMON NAME	REMARKS
	AESCULUS CALIFORNICA 20'-0" O.C.	CALIFORNIA BUCKEYE	15 GAL.
	CHILOPSIS LINEARIS 20'-0" O.C.	DESERT WILLOW	15 GAL.
	PARKINSONIA 'DESERT MUSEUM' 25'-0" O.C.	DESERT MUSEUM PALO VERDE	15 GAL.
	PINUS SABINIANA 30'-0" O.C.	FOOTHILL PINE	15 GAL.
	QUERCUS DOUGLASII 30'-0" O.C.	BLUE OAK	15 GAL.

Item 2



Michael Gardner | Campus Architect | Director of Campus Planning & Sustainability
 California State University, Long Beach
 1331 Palo Verde, Suite 109 | Long Beach, CA 90807
 [REDACTED] Mobile | 562-985-0123 Office | Michael.gardner@csulb.edu

From: Amy Harbin <Amy.Harbin@longbeach.gov>
Sent: Monday, June 2, 2025 1:00 PM
To: Michael Gardner <Michael.Gardner@csulb.edu>
Subject: RE: 3701 Pacific Place; 6/5 Planning Commission Agenda Published

CAUTION: This email was sent from an external source.

Good afternoon,

If you go to the meeting agenda
<https://longbeach.primegov.com/Portal/Meeting?meetingTemplateId=32298> click on the agenda item number 25-55508, scroll down to Attachment B, click on Attachment B, and it will have the renderings/plans for the building and site photos.

Let me know if that doesn't work. The renderings are too large to send in an email.

Thank you,
Amy

Amy L. Harbin, AICP
Planner

Community Development | Planning Bureau
411 W. Ocean Blvd., 3rd Fl. | Long Beach, CA 90802
Office: 562.570.6872



From: Michael Gardner <Michael.Gardner@csulb.edu>
Sent: Monday, June 02, 2025 11:48 AM
To: Amy Harbin <Amy.Harbin@longbeach.gov>
Subject: RE: 3701 Pacific Place; 6/5 Planning Commission Agenda Published

-EXTERNAL-

Hi Amy-

Is there a rendering available for the project?

Does the Planning Commission Meeting include time for public comment/questions, or is the meeting just for the commission to formally approve what has been submitted?

From: Amy Harbin <Amy.Harbin@longbeach.gov>
Sent: Saturday, May 31, 2025 1:31 AM
To: Amy Harbin <Amy.Harbin@longbeach.gov>
Cc: Cuentin Jackson <Cuentin.Jackson@longbeach.gov>
Subject: 3701 Pacific Place; 6/5 Planning Commission Agenda Published

You don't often get email from amy.harbin@longbeach.gov. [Learn why this is important](#)

CAUTION: This email was sent from an external source.

Hello all,

The agenda for the Planning Commission meeting of Thursday, June 5th is now published on OneMeeting:
[City of Long Beach - Calendar.](#)

Thank you,
Amy

Amy L. Harbin, AICP
Planner

Community Development | Planning Bureau
411 W. Ocean Blvd., 3rd Fl. | Long Beach, CA 90802
Office: 562.570.6872



Amy Harbin

From: Dave Hall <bittermelondave@gmail.com>
Sent: Wednesday, June 04, 2025 1:44 PM
To: Amy Harbin
Subject: Re: 3701 Pacific Place; 6/5 Planning Commission Agenda Published
Attachments: image001.png; image002.png; image003.png; image004.png

-EXTERNAL-

Dear Planning Commission Chair and Commission Members:

The EIR is outdated and the project will destroy Western Burrowing Owl habitat.

The destruction is not mitigated because even if the developer does wait for Burrowing Owls to nest and then proceeds with development the Burrowing Owl habitat will be lost forever. Definitely an unmitigated disaster will occur.

The project EIR does not even provide for artificial nesting boxes to house the owls who will be displaced.

Second, the California Fish and Wildlife Commission has named the Burrowing Owl as Endangered.

Third, AB 454 the Migratory Bird Protection Act was passed and then signed by the Governor on May 12th, 2025 and took effect immediately, outlaws the take of non-game birds such as the Western Burrowing Owl.

Please reject the outdated EIR.

Respectfully,
Dave Hall



On Sat, May 31, 2025, 01:31 Amy Harbin <Amy.Harbin@longbeach.gov> wrote:

Hello all,

The agenda for the Planning Commission meeting of Thursday, June 5th is now published on OneMeeting: [City of Long Beach - Calendar](#).

Thank you,

Amy

Amy L. Harbin, AICP

Planner

Community Development | Planning Bureau

[411 W. Ocean Blvd.](#), 3rd Fl. | Long Beach, CA 90802

Office: 562.570.6872



Amy Harbin

From: Dave Hall <bittermelondave@gmail.com>
Sent: Wednesday, June 04, 2025 1:50 PM
To: Amy Harbin
Subject: Re: 3701 Pacific Place; 6/5 Planning Commission Agenda

-EXTERNAL-

Forwarded.

On Wed, Jun 4, 2025, 13:44 Dave Hall <bittermelondave@gmail.com> wrote:

Dear Planning Commission Chair and Commission Members:

The EIR is outdated and the project will destroy Western Burrowing Owl habitat.

The destruction is not mitigated because even if the developer does wait for Burrowing Owls to nest and then proceeds with development the Burrowing Owl habitat will be lost forever. Definitely an unmitigated disaster will occur.

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Please reject the outdated EIR.

Respectfully,
Dave Hall

A black rectangular redaction box covering the signature area.

On Sat, May 31, 2025, 01:31 Amy Harbin <Amy.Harbin@longbeach.gov> wrote:

Hello all,

The agenda for the Planning Commission meeting of Thursday, June 5th is now published on OneMeeting: [City of Long Beach - Calendar](#).

Thank you,

Amy

Amy L. Harbin, AICP

Planner

Community Development | Planning Bureau

[411 W. Ocean Blvd.](#), 3rd Fl. | Long Beach, CA 90802

Office: 562.570.6872



From: Tim Sell <applnce@aol.com>

Sent: Monday, June 2, 2025 3:14 PM

To: CityClerk <CityClerk@longbeach.gov>

Subject: Strong Support for the Development of Long Beach Golf Center

-EXTERNAL-

Dear Mayor and Members of the Long Beach City Council,

I am writing to express my strong support for the development of the Long Beach Golf Center. This project is a much-needed improvement that will revitalize an underutilized and currently neglected area, bringing economic benefits, environmental enhancements, and increased security to our community.

For too long, this site has been plagued by crime, homelessness, and environmental contamination. The development will not only clean up the area with a permanent cap but also bring active business activities that contribute to a safer and more vibrant community. The inclusion of solar energy generation and drought-tolerant landscaping demonstrates a forward-thinking approach that will help sustain our environment.

Additionally, I am excited about the trail connection from Pacific Place to the LA River, which will provide more accessibility and recreational opportunities for residents. The project's thoughtful design ensures that the new storage facility seamlessly blends into the area, resembling an upscale commercial building rather than a typical storage space.

Having local storage for vehicles, Boats, and RVs is a great addition, meeting the needs of residents while maintaining an attractive and functional space. I also appreciate that the owners have chosen to downzone the land use when they had the option to build a more intensive project that could have brought unwanted port truck traffic into the neighborhood. Their consideration for the community's well-being speaks volumes.

I strongly urge the City Council to support this development and move forward with its implementation. It is a responsible, well-designed project that will enhance Long Beach and provide long-term benefits for residents and businesses alike. Thank you for your time and dedication to making our city a better place.

Sincerely, James Family
District 5 Resident

From: Jim Kelly <jbk90807@gmail.com>
Sent: Tuesday, June 03, 2025 10:21 AM
To: Cuentin Jackson <Cuentin.Jackson@longbeach.gov>
Subject: Proposed 3701 Pacific Place development

-EXTERNAL-

Re: 3701 Pacific Place development EIR

I have been a homeowner in your District since 1988. Of all the developments that have been proposed during my many years in my neighborhood, the proposed storage facility at 3701 Pacific Place presents the greatest threat to our neighbors and west Long Beach. This may seem extreme, but think about the irreversible impact of losing out on an opportunity to protect our riverside and create a buffer of open space that benefits everyone, not just RV owners.

Please vote "NO" on approving the project EIR and encourage other council members to find means for acquiring this parcel for much needed open space.

Thank you for your support and your advocacy.

Sincerely

Jim Kelly



Amy Harbin

From: Jim Kelly <jbk90807@gmail.com>
Sent: Tuesday, June 03, 2025 10:26 AM
To: Amy Harbin
Subject: EIR vote for the proposed 3701 Pacific Place storage facility

-EXTERNAL-

Subject: Proposed 3701 Pacific Place development and EIR

Dear Ms Harbin:

I have been a homeowner in your District since 1988. Of all the developments that have been proposed during my many years in my neighborhood, the proposed storage facility at 3701 Pacific Place presents the greatest threat to our neighbors and west Long Beach. This may seem extreme, but think about the irreversible impact of losing out on an opportunity to protect our riverside and create a buffer of open space that benefits everyone, not just RV owners.

Please understand that I strongly support a “NO” vote on approving the project EIR and would encourage all council members to push for acquiring this parcel for much needed open space for an underserved community.

Thank you,

Jim Kelly



Amy Harbin

From: Aaron Kreisberg <akberg90@gmail.com>
Sent: Thursday, June 05, 2025 10:06 AM
To: PlanningCommissioners; Amy Harbin; LBDS-EIR-Comments
Subject: Agenda Item 25-55508, June 5, 2025 Meeting

-EXTERNAL-

Long Beach Planning Commissioners,

I am writing to ask you to not certify EIR-02-23 for the Pacific Place Project at 3071 Pacific Place. This site adjacent to the Los Angeles River represents an opportunity to preserve open space and provide an additional parkland and open space to west Long Beach. The site has an interesting history, however despite a legacy of impacts the area still hosts southern tarplant (*Centromadia parryi* subsp. *australis*), which holds a California Rare Plant Rank of 1B.1 meaning this species is rare, threatened, or endangered in California. A letter from the California Department of Fish and Wildlife (CDFW) cites 1,275 southern tarplant individuals removed from the project site. 2023 surveys suggest 2,000 tarplants in the area. A population is viable on the site and conservation and restoration will only be feasible if the site is not hardscaped.

In light of the state of California's 30X30 initiative to conserve 30% of California's land by 2030, urban parkland is a small but outsized component of this amount. The project's impacts on rare plants and environmental justice ramifications are too severe and identified mitigation in the final EIR is not adequate enough nor I fear will be vigorously enforced. I ask that the planning commission not certify the EIR and work with community partners and other entities to move forward parkland on this site.

Thank you for your consideration of my comments regarding this comment.

Aaron

--

Aaron Kreisberg


From: AOLMemberInfo@comms.aol.net <mjllmf@verizon.net>
Sent: Wednesday, June 4, 2025 6:14 PM
To: PlanningCommissioners <PlanningCommissioners@longbeach.gov>
Subject: Fw: 3701 Pacific Place

-EXTERNAL-

-

Dear Commissioners,,

I am writing to express my opposition to the proposed development at 3701 Pacific Place. This is the wrong project at this location for many reasons, in the interest of brevity I will only list a few. The DEIR is inadequate both in its use of outdated and flawed information and in its failure to completely analyze the full environmental impacts of the proposed project. Even if this was not the case, this is the wrong usage for the last open space in our part of Long Beach. Further commercial development removes any hope of additional green/open/park space on the west side while ignoring multiple plans to create linked areas open for public use along the LA River. The City is quick to emphasize a favorable parkland to resident ratio while conveniently glossing over the reality that the figure is radically skewed by the preponderance of park space (16.7 acres/thousand residents) on the east side as opposed to only 1 acre/1000 residents on the west side. As density continues to increase along the A Line corridor, this imbalance will only worsen. A necessary first step toward addressing this inequity is for the proposed project to be denied after which resident centered alternatives can be considered. Future generations won't know or care about who found space for storage facilities, let rejection of this development followed by a plan that improves resident quality of life serve as a legacy for your term of office.

Thank you for your consideration of my concerns,

Mike Laquatra

[REDACTED]

Amy Harbin

From: corlisslee@aol.com
Sent: Thursday, June 05, 2025 10:55 AM
To: PlanningCommissioners; Amy Harbin
Cc: CityClerk
Subject: Agenda item 3 FEIR comments on 3071 Pacific Place - Planning Commission meeting
June 5 2025
Attachments: Planning Commission FEIR comments Corliss Lee.docx

-EXTERNAL-

Please provide these comments to the Planning Commission for agenda item 3 June 5 2025 meeting.

Respectfully,
Corliss Lee
VP Citizens About Responsible Planning (CARP)


The plan being evaluated in the EIR was for a 4 story building at 40 feet high which would be at maximum height. Amendment 2 now calls for a 5 story building at 50 feet height.

Also note that the surcharge test deposited approximately **15 feet of dirt**, which was not removed from the site and the response I received to my comments on the EIR stated it would be retained and graded into the project (see response 66 comments). That would mean that **the building could be elevated to possibly 65 feet above the rest of the area.**

This will be a monstrous building that doesn't fit into the neighborhood bringing in traffic to include large RVs and cars on narrow streets that will increase pollution in an already pollution burdened area.

2) ENVIRONMENTAL JUSTICE

Environmental justice: The air quality in this neighborhood, which ranks in the top 10% of polluted air in the State, will not be improved by putting in an RV parking lot and storage facility. Hundreds of vehicles coming and going will surely add to the pollution.

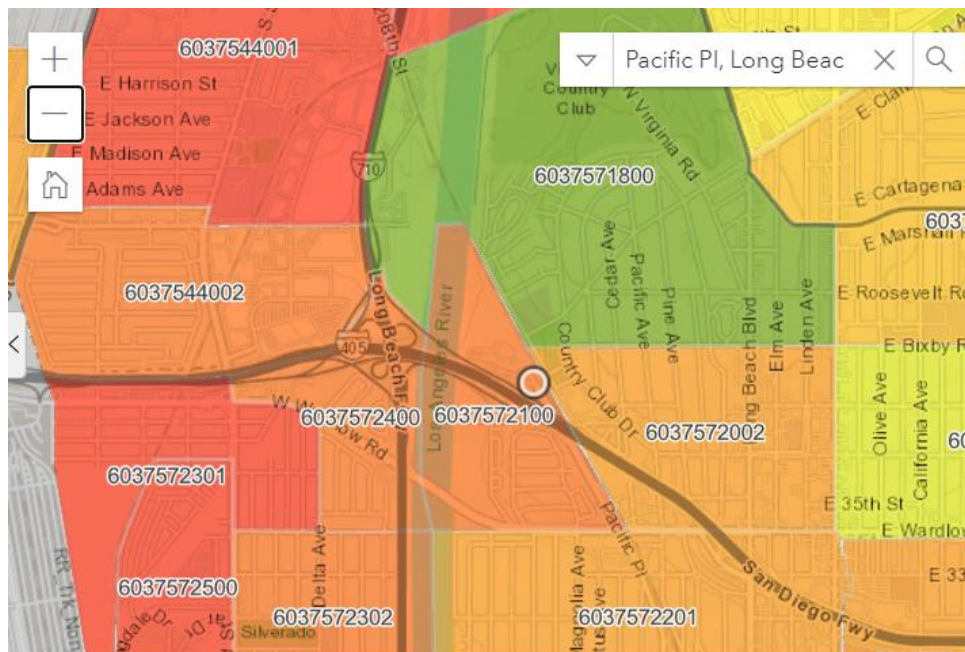
Pollution Score












CAL ENVIROSCREEN SCORES FOR PACIFIC PLACE

Census Tract: 6037572100 (Population: 1,113)

The results for each indicator range from 0-100 and represent the percentile ranking of census tract 6037572100 relative to other census tracts.

City of Long Beach, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA, USDA | Header, P1, P2, P3, P4, H1, and P5 Tables from U.S. Census Bureau's 2020 Public Law 94-171 files.



CAL ENVIROSCREEN LEGEND	
Overall Percentile CalEnviroScreen 4.0 Results  >90 - 100 (Highest Scores)  >80 - 90  >70 - 80  >60 - 70  >50 - 60  >40 - 50	 >40 - 50  >30 - 40  >20 - 30  >10 - 20  0 - 10 (Lowest Scores)

CAL ENVIROSCREEN LINK

<https://oehha.ca.gov/calenviroscreen>

<https://oehha.ca.gov/calenviroscreen/maps-data> (PUT IN LONG BEACH)

Census tract scores for Pacific Place census tract **6037572100**

Overall Percentiles

CalEnviroScreen 4.0 Percentile 82

Pollution Burden Percentile 89

Population Characteristics Percentile 67

Exposures

Ozone 22

Particulate Matter 2.5 62

Diesel Particulate Matter 95

Toxic Releases 99

Traffic 98

Pesticides 52

Drinking Water 35

Lead from Housing 50

Environmental Effects	
-----------------------	--

Cleanup Sites	58
Groundwater Threats	78
Hazardous Waste	2
Impaired Waters	87
Solid Waste	12

Sensitive Populations	
-----------------------	--

Asthma	92
Low Birth Weight	92
Cardiovascular Disease	87

Socioeconomic Factors	
-----------------------	--

Education	56
Linguistic Isolation	9
Poverty	34
Unemployment	28
Housing Burden	N/A

3) SOCIAL JUSTICE

Social justice: on the westside, there is less than 1 acre of park space per thousand residents (mainly brown people); while the eastside (mainly white) enjoys 17 acres of park space per thousand residents.

4) LAND USE ALTERNATIVES

This is the last large piece of land available for a significant size park on the westside. This alternative was not adequately considered in the EIR.

Thank you for considering these issues. We ask that you deny the approval of the FEIR.

Respectfully,

Corliss Lee

VP Citizens About Responsible Planning (CARP)



Amy Harbin

From: Carina Lister <carinalister@yahoo.com>
Sent: Saturday, May 31, 2025 2:52 PM
To: Amy Harbin; Cuentin Jackson; lbds-EIRComments@longbeach.gov; Alison Spindler-Ruiz
Subject: NO on EIR for 3701 Pacific Place Project

-EXTERNAL-

Good afternoon:

Amy Harbin
Cuentin Jackson
Alison Spindler-Ruiz
Development Services EIR Comments Email

I urge the Planning Commission to **VOTE NO on the Final Environmental Impact Report** (EIR), as well as deny any permit for the proposed development at 3701 Pacific Place.

The EIR conflicts with plans calling for park space at the site: the report fails to acknowledge the multiple plans and policies that identified this site as parkland, including several initiatives already adopted by Long Beach City Council. The EIR must take these plans into consideration to provide the public and decision makers the context surrounding the site.

Analyzing alternative uses for a site is the core of an EIR. This EIR fails to consider unprecedented funding opportunities that are widely available for park projects.

It is well documented that residents in the western half of Long Beach have less access to park land than residents in the eastern half of Long Beach. Population density is likely to grow in west Long Beach because there are many ADUs being built here. West Long Beach is home to mostly working class families, and residents suffer from much higher rates of asthma and cancer than people in eastern Long Beach. More so now than ever, the City of Long Beach has an obligation to lean into its stated goals of achieving equity in our city. The immense disparities in access to green space cannot be allowed to stand; park equity must be made a top priority for the City of Long Beach.

Given the urgent need for increasing park spaces in western Long Beach, and given the immediate threat posed to the last remaining parcels along the lower LA River, **I urge you reject the EIR**. Long Beach must not miss this opportunity.

Thank you for your consideration.

Carina Lister
Long Beach Resident
email: carinalister@yahoo.com

Amy Harbin

From: Long Beach OFG <ofg@longbeach.surfrider.org>
Sent: Wednesday, June 04, 2025 11:13 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
Cc: Surfrider Long Beach EC
Subject: Surfrider Foundation Opposes Proposed Development at 3701 Pacific Place; Supports a River Park
Attachments: Surfrider Foundation_ Reject 3701 Pacific Place Proposed Development.pdf

-EXTERNAL-

On behalf of the Long Beach Chapter of the Surfrider Foundation, I would like to submit the attached letter regarding the proposed development at 3701 Pacific Place.

Thank you for your consideration.

Regards,

--

Kai Craig
Ocean Friendly Gardens Coordinator
Surfrider, Long Beach Chapter



RE: Reject the Proposed Development at 3701 Pacific Place

Dear Mayor Richardson, Chair Lewis and Members of the Planning Commission, and Long Beach City Councilmembers:

The Surfrider Foundation is dedicated to the protection and enjoyment of the world's ocean, waves, and beaches for all. The Long Beach Chapter has broad support in the community through its programs to keep our local beaches, bays, and rivers clean, and to help people of all backgrounds engage with our coast.

We appreciate Councilmember Kristina Duggan's efforts to hold upstream polluters accountable and her support in securing permits for our recent San Gabriel River Cleanup that pulled over 1.5 tons of garbage out of sensitive sea turtle habitat.

At the same time, we urge our city's leadership to reconsider how it treats riverfront property. In previous decades, the rivers which are so important to our coastal health have been zoned and developed in damaging ways out of the public's eye. It's time we reverse this trend and recognize the many benefits of blending riparian habitat with recreation and open space, and create green buffers to minimize the impacts of urban development. The opportunities to do so are few, which makes this site too important for light industrial or commercial zoning.

The Long Beach Chapter of the Surfrider Foundation strongly opposes the proposed project at 3701 Pacific Place for a four-story storage facility, RV parking lot, private car wash, and wastewater dump station. Western Long Beach desperately needs more open space, access to nature, and places to thrive—not more pollution, waste, and noise.

**REJECT THE CURRENT PROPOSED DEVELOPMENT AT 3701 PACIFIC PLACE BY
VOTING NO ON THE FINAL ENVIRONMENTAL IMPACT REPORT (EIR) AND
DENYING ALL PERMITS FOR THE PROPOSED DEVELOPMENT]**

Decades of planning and advocacy have envisioned this parcel as parkland. This includes the Lower Los Angeles River Revitalization Plan, the Los Angeles River Link Plan, the Long Beach Department of Parks, Recreation, and Marine Strategic Plan, the Los Angeles River Master Plan, among other actions.

As an organization committed to environmental health and justice in our great city, we urge you to stop this development. Furthermore, we urge you to go even further- and envision a future for the site that reflects the will of the community by establishing a River Park.

Thank you Mayor Richardson, the Planning Commission, and City Councilmembers for your consideration. If you wish to reach out to our Chapter Executive Committee, we welcome a dialogue.

Sincerely,

The Executive Committee
Long Beach Surfrider Foundation

Mariano Bautista- Chair mbautista@longbeach.surfrider.org

Bill Hillburg- Vice Chair bhillburg@longbeach.surfrider.org

Danielle Dong- Communications Coordinator ddong@longbeach.surfrider.org

Ron Bartels- Treasurer rbartels@longbeach.surfrider.org

Murriel McCabe- Secretary mgrace@longbeach.surfrider.org

Millie Heur- Member-at-Large mheur@longbeach.surfrider.org

Kai Craig- Ocean Friendly Gardens Coordinator kcraig@longbeach.surfrider.org

Item #3 Correspondence - Martha Michalczak

From: Martha Michalczak <m.egland@verizon.net>
Sent: Tuesday, June 3, 2025 1:19 PM
To: PlanningCommissioners <PlanningCommissioners@longbeach.gov>
Cc: Council District 5 <District5@longbeach.gov>
Subject: June 5th PC hearing agenda item 3

-EXTERNAL-

Good Afternoon,

This will serve to state my position in full support of the proposed development at 3701 Pacific Place. It is unfortunate that a company with a plan for this underutilized site has not had the opportunity to move forward due to the opposing special interest groups that have litigated in attempts to stop the project. In its present state, the site has attracted, the unhoused, or those that would partake in disruptive activities to the community nearby. As a Los Cerritos resident for over 28 years I hope this development for the RV storage site will move forward and provide a much needed service while deterring the space from being further destroyed. It appears the site proposal has a thoughtful design in mind that will serve that space well given that the location would not be suitable for a park due to its proximity to two interconnecting freeways. Instead, it will provide a much needed space for those that need to store large vehicles and keep them off our streets as well as increased security in the area. I hope to see this development come true to clean up that neglected space.

Thank you for your consideration.

Martha Michalczak
Los Cerritos Resident

From: Tracy Murchison <tracylh2014@gmail.com>
Sent: Monday, June 2, 2025 12:22 PM
To: CityClerk <CityClerk@longbeach.gov>
Cc: Council District 5 <District5@longbeach.gov>
Subject: June 5th PC hearing agenda item 3

-EXTERNAL-

In regards to the project at 3701 Pacific Place proposed development. I was in favor of this project a few years ago and was very disturbed to see nothing ever came of it. Since then, we have had nothing but garbage, homeless people, fires and such in that area. It's very disturbing, as a resident of over 28 years in this beautiful community, we have had to deal with this simply because certain groups have different agendas and want to stop the development. Our agenda should be to allow the company who plans to renovate this space which should give us something better to look at than dead space with homeless encampments. My understanding is with the new development, there will be lights, security and other ways to protect our neighborhood.

I also have a neighbor who houses his 2 boats, RV and other 'toys' in our adjacent driveways and on the city streets in front of our houses. It looks like a junkyard and it's very difficult to see passing traffic when trying to drive down our street and out of our

own driveway. Hopefully this will encourage people to get their recreational vehicles off the city streets and store them where it's more appropriate.

Thank you for your consideration.

Resident of Los Cerritos.

Tracy

Item #3 Correspondence - Tracy Murchison

From: Tracy Murchison <tracell_2@icloud.com>

Sent: Monday, June 2, 2025 3:08 PM

To: CityClerk <CityClerk@longbeach.gov>; Council District 5 <District5@longbeach.gov>

Subject: PC Hearing June 5th agenda 3

-EXTERNAL-

Hello,

I am a resident in the 5th district and would like to express my support for the project for 3701 Pacific Place - development project. Please reconsider this because our neighborhood has been overwhelmed with the site which has been vacant for so long and is now a homeless encampment and they are causing a lot of problems. We would like to see it developed and put to good use.

Thank you

Tracell_2@icloud.com

From: Mary Parsell <mfp2001@hotmail.com>
Sent: Wednesday, June 4, 2025 3:16 PM
To: PlanningCommissioners <PlanningCommissioners@longbeach.gov>
Cc: Megan Kerr <Megan.Kerr@longbeach.gov>
Subject: 3701 Pacific Place -- Reject the EIR

-EXTERNAL-

El Dorado Audubon Society
Local chapter of National Audubon Society
Mission: Conservation of Native Birds and their Habitats & Education

June 4, 2024

RE: 3701 Pacific Place Agenda on the June 5, 2025 meeting

Dear Planning Commission Chair and Commission Members:

Please reject the EIR for this project, the Western Burrowing Owl is Endangered per the California Department of Fish & Wildlife.

AB 454 (Migratory Bird Protection Act) signed on May 12, 2025 by the Governor and outlaws the take of non-gave birds such as the Western Burrowing Owl.

At the very least the project EIR should provide artificial nesting boxes for Western Burrowing Owls displaced by this project.

Sincerely,

Mary Parsell

El Dorado Audubon

[REDACTED]

[REDACTED]

Email: mfp2001@hotmail.com

From: Tim Sell <timsell07@gmail.com>
Sent: Monday, June 2, 2025 3:08 PM
To: CityClerk <CityClerk@longbeach.gov>
Subject: Fwd: LB Golf Center

-EXTERNAL-

Date: 6/2/2025

To: **Long Beach City Council**

Dear Members of the Long Beach City Council,

I am writing as a resident of District 5 to express my strong support for the proposed redevelopment of the Long Beach Golf Center.

This area has been severely underutilized for years and, unfortunately, has become a magnet for crime, illegal dumping, and homelessness. The proposed project represents a much-needed revitalization that will bring increased activity, security, and positive use to the neighborhood.

I am particularly pleased with the plan's many thoughtful features:

- The proposed trail connection from Pacific Place to the L.A. River is an exciting and welcomed enhancement that will improve community access and recreation.
- The permanent environmental cleanup and capping of this contaminated site is a responsible and long-overdue step in protecting our health and the environment.
- As an enthusiast, I'm thrilled about the opportunity to have secure, local storage for classic cars, boats, and RVs—something that is currently very limited in our area.
- The architectural design is impressive. It doesn't resemble a typical storage facility at all but rather an upscale commercial building that will add to the area's aesthetics.
- The inclusion of solar power generation and drought-tolerant landscaping shows a clear commitment to sustainability and environmental responsibility.
- Lastly, I appreciate that the project is down-zoning the land. The owners could have pursued more intensive industrial uses, which might have brought significantly more traffic—particularly from port-related trucks—but they chose a more community-conscious path.

This project reflects smart, sustainable development that will bring real benefits to our community. I respectfully urge the Council to support its approval and help move this long-neglected site into a productive and positive future.

Thank you for your time and your continued service to our city.

Sincerely,

Timothy Sell

Amy Harbin

From: Shoshanah Siegel <shoshanah.siegel@gmail.com>
Sent: Monday, June 02, 2025 2:07 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 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.

Sincerely,

Shoshanah Siegel

Shoshanah.siegel@gmail.com,

From: Don Smith <dsmith@sunrisemortgage.com>
Sent: Monday, June 2, 2025 8:36 PM
To: CityClerk <CityClerk@longbeach.gov>
Cc: Pat <pat@patwestllc.com>
Subject: FW: 3701 Pacific Place

-EXTERNAL-

Dear Planning Commission,

I am a resident of Bixby Knolls and a frequent user of the open space along the LA River. 3 to 4 times a week I run my dog the entire length of the nice Dominquez Gap, under Del Amo Blvd and trails adjacent to DeForest Park (for water) and back. On occasion we run south of Line A tracks to 405 Freeway. I am very familiar with the real estate involved. The supporters of a park are delusional at best and barely know where Los Cerritos Park is located in their own neighborhood.

I encourage the Planning Commission and City Council to adopt the staff recommendation to certify the EIR and Mitigation Monitoring Program for the Pacific Place Project at 3701 Pacific Place. I am happy to see this underutilized toxic site finally getting cleaned up and developed with good looking commercial buildings. The trail connection from Pacific Place to the LA River will be a nice public access point which I support

In addition, the area will benefit from the increased security of active business activity with lighting, security and landscaping.

(\(\(\

Don W. Smith

[REDACTED]
[REDACTED]
[REDACTED]

dsmith@sunrisemortgage.com

Item #3 Correspondence - Valerie Smith

From: Val Smith <vsmith1042@gmail.com>

Sent: Monday, June 2, 2025 8:53 PM

To: CityClerk <CityClerk@longbeach.gov>

Subject: 3701 Pacific Place

-EXTERNAL-

Planning Commission,

I live in the Bixby Knolls area of Long Beach, I encourage the Planning Commission and City Council to adopt the staff recommendation to certify the EIR and Mitigation Monitoring Program for the Pacific Place Project at 3701 Pacific Place. We are glad this underutilized contaminated site is finally getting cleaned up. We also support the trail connection from Pacific Place to the LA River.

The area will benefit from the increased security of active business activity with lighting, security and landscaping.

Valerie Smith



Amy Harbin

From: Suzanne Caflisch <suzanne@betterworldgroup.com>
Sent: Monday, June 02, 2025 4:35 PM
To: PlanningCommissioners
Cc: LBDS-EIR-Comments; Cuentin Jackson; Amy Harbin
Subject: Public Comment on 6/5/25 Planning Commission Item #25-55508
Attachments: Wrigley Association Comment Letter 6.2.25.pdf; Coalition Comment Letter 6.2.25.pdf

-EXTERNAL-

Hello,

I am writing to submit two comment letters on the 6/5/25 LBC Planning Commission Meeting Agenda Item #25-55508, concerning 3701 Pacific Place. See two PDF documents attached.

Please circulate with the Commissioners.

Sincerely,

Suzanne Caflisch

Suzanne Caflisch (she/her)
Senior Associate



310 941 1005 (mobile)
betterworldgroup.com

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Sacramento

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PITZER COLLEGE



June 2, 2025

VIA ELECTRONIC MAIL

Chair Lewis and Members of the Planning Commission
411 West Ocean Blvd, 3rd Floor
Long Beach, CA 90802
Email: PlanningCommissioners@longbeach.gov
Long Beach Planning Commission

RE: Comments on Agenda Item #25-55508; Final Environmental Impact Report for the Pacific Place Project at 3701 Pacific Place

Dear Chair Lewis and Members of the Planning Commission,

We the undersigned neighborhood associations, community-based organizations, environmental and environmental justice organizations write in strong opposition to the current development

proposal at 3701 Pacific Place. As organizations that represent and serve communities in Long Beach and throughout California, we urge Long Beach decision-makers to reject more polluting industry in western Long Beach and instead support investments in the health and vitality of these communities.

We ask the Mayor and members of the Long Beach City Council, as well as the Long Beach Planning Commission, to reject the current proposal at 3701 Pacific Place by voting NO on the Final Environmental Impact Report (EIR) and denying all permits for the development. The proposed development—which includes a four-story storage facility, an RV parking lot, a private car wash, and a wastewater dump station—is a bad fit for the community given the history of pollution, lack of investment, and environmental injustice in western Long Beach. If approved, the project would continue this legacy of environmental injustice and would exacerbate existing inequities for under-resourced communities and communities of color.

The lack of open space for under-resourced communities in the City of Long Beach is well-known. In 2002, the City’s General Plan conducted an analysis on [Open Space and Recreation](#) and highlighted the unequally distributed open space in under-resourced areas of the city. Despite the City’s previous policy to address these disparities through the Lower Los Angeles River Revitalization Plan and the Los Angeles River Link Plan, industrial development continues to take precedence over parks and open space for western Long Beach residents, resulting in [only 1 acre of park space per 1100 residents](#), which meets the legal definition of “[park-poor](#)”.

This inequity is further compounded by severe pollution in western Long Beach. CalEnviroScreen data shows that under-resourced communities in the city experience some of the [highest pollution impacts](#) in California. These impacts are driven by [high levels of particulate matter \(PM\) and nitrogen oxides \(smog\)](#) from vehicles—particularly diesel trucks on the 405 and 710 freeways—as well as pollution from refineries and the Ports of Long Beach and Los Angeles. As a result of these impacts, the western side of the city has a life expectancy that is [five to ten years lower](#) than the more affluent East Side. The legacy of environmental racism and enduring health disparities in communities of color must be a central consideration for any development proposal in western Long Beach.

Western Long Beach desperately needs more open space, access to nature, and places to thrive, not more pollution, waste, and noise. The 3701 Pacific Place parcel represents an opportunity to address these existing inequities rather than perpetuate them. **With strong public opposition to this development, City leaders have a clear mandate to vote NO on the Final Environmental Impact Report.** By rejecting a development that would only increase pollution in western Long Beach, the City can make space to explore ideal projects that align with the needs of the community.

Thank you for your consideration.

Sincerely,

Leslie Garretson
President
Riverpark Coalition

Seng So
LA Organizing Director
Asian Pacific Environmental Network (APEN)

Brittany D. Rivas
CARE Coordinator
Communities for a Better Environment

Jocelyn Del Real
Energy Policy Organizer
East Yard Communities for Environmental Justice

Candice Dickens-Russell
CEO
Friends of the Los Angeles River

Andrea Marpillero-Colomina
Sustainable Communities Program Director
GreenLatinos

Maggie Quan
Program Director
Khmer Girls in Action

James Suazo
Executive Director
Long Beach Forward

Tori Kjer
Executive Director
Los Angeles Neighborhood Land Trust

Benjamin Harris
Senior Staff Attorney, Regulatory Affairs & Legal Policy
LA Waterkeeper

Irma R. Muñoz
Founder and Executive Director
Mujeres de la Tierra

Denisse Tapia
Community Organizer
ORALE

Deja McCauley
Land Use and Health Program Manager
Physicians for Social Responsibility Los Angeles

Theral Golden
President
West Long Beach Association

Alex Tomko
President
Wrigley Association

Dr. Susan Phillips
Director
Robert Redford Conservancy for Southern California Sustainability

Gabrielle Weeks
Chair
Long Beach Area Group of Sierra Club

cc: Cuentin Jackson, Project Planner, Cuentin.Jackson@longbeach.gov
Amy Harbin, Project Planner, Amy.Harbin@longbeach.gov

Item #3 Correspondence - Katelyn Wanttaja

From: Katelyn West <kmwanttaja@gmail.com>

Sent: Monday, June 2, 2025 12:15 PM

To: Council District 5 <District5@longbeach.gov>; megankerr@lbcd5.ccsend.com; CityClerk <CityClerk@longbeach.gov>

Subject: Pacific Place Project

-EXTERNAL-

Hello,

I am writing in support of the Pacific Place Project at 3701 Pacific Place, Planning Commission item #3, 25-55508, for the June 5, 2025 meeting. Please support the staff recommendation to adopt the EIR and Mitigation Monitoring and Reporting Program. This blighted contaminated site will benefit from new development along with the increased security of active business and commerce. I also support the trail connection from the site to the LA river. Thank you for your consideration!

Katelyn Wanttaja

Item #3 Correspondence - Veronica Wegener

From: Veronica Wegener <veroweg@gmail.com>
Sent: Wednesday, June 4, 2025 6:17 PM
To: PlanningCommissioners <PlanningCommissioners@longbeach.gov>
Cc: Council District 5 <District5@longbeach.gov>
Subject: June 5th PC hearing agenda item 3

-EXTERNAL-

Dear City of Long Beach Community Leader.

I am writing today in support of the development at 3701 Pacific Place, I am a resident and small business owner in Long Beach. The delay in the development of this property has made all of the local residents nightmares come true. Instead of having an income generating, well lit, secure, clean area we have a homeless encampment that is, trash filled and unsanitary (most likely breeding Typhus from the feces), fire ridden, and a veritable meth-head playground.

I have reviewed the rejection of the Environmental Impact Report at 3701 Pacific Place that is posted on the River Park Coalition (RPC) and I watched their video to try understand their point of view. There is not a lot of common sense exhibited there. To start with in both the video and the "Rejection Statement" they literally site how bad our air quality is on this side of town and how our life expectancy is shorter than the Eastside. They specifically mention the 405 & 710 area of pollution, but then talk about how wonderful it would be to have a park right there. Does anyone see the dichotomy, let's shorten life spans even further by having people play directly beneath the 710/405 intersection so we can all breath in those lovely diesel particulates. They also speak about the history of pollution on the Westside implying that this storage facility is going to be a polluter, from potential car washing. They fail to mention that the business if they offer this service will have a clean water run off plan that will get submitted for approval and the inference is that the owner is a polluter, but if he actually was they would have called it out and they didn't.

The next aspect of their "Park" is the location, currently there are 2 parks that are in the neighborhoods on each side of the property and just 100 yards to the north of the blue line rail is the whole LA River/ Duck Pond Nature Area that runs all the way down to DelAmo. The only legal ingress and egress to this area in general is from the intersection of Wardlow and Pacific Place. I have used this area for years, I access the freeway from there, I used to ride my horse on the bridle trail when I lived in Wrigley and for years walk my Great Danes down there. I have watched persons of interest many times throughout the years ride up and down the riverbed where the bike lane is on bikes, scooter, and even cars stop and furtively deliver "things" to the people under the freeway. In the present day because the land development has been stalled there is a huge homeless encampment and everyone who is a regular law abiding, tax paying citizen is afraid to go down there because there is nefarious activities going on there.

A park in that location is going to require a lot security, where are the funds for that? Maintaining those bathrooms is going to require a HAZMAT Team for cleanliness and you had just best set it up as a win and decorate in graffiti. My business is by Shoreline Aquatic Park and I can tell you that we had late night shootings for years in the parking lot on a very regular basis until the City finally put a gate on the entrance to close the parking lot and Teeth on the exit. The homeless meth heads break through my windows 5 or 6 times a year to rob us. Pimps and their ladies still set up on nice afternoons on the weekdays along the parking lot and the "Nameless" Mafia sends down their Red Umbrella Food Vendors on a regular basis and Food Trucks park illegally in the the loading zone and fire lanes and threaten you if you ask them to move. The bathrooms constantly have plumbing issues with foreign objects being stuffed down the toilets along with the usual graffiti and public masturbaters in the restroom foyer. This is what happens at parks that are off the beaten path, and at least Shoreline Park is down by the Aquarium where the City really does cares about what goes on, believe me there is a lot that just falls through the cracks, we just don't have enough police and/or the police's hand are often tied and they can't do anything. The maintenance department does what they can to keep things looking nice for the tourist but they have a lot of ground to cover on a daily basis. So a park that is nestled at the 405 & 710 junction, I just don't see the

Item #3 Correspondence - Veronica Wegener

resources available for it to receive the maintenance and security that it needs to NOT devolve into drugs, guns and homeless encampment. People will end up afraid to use a park in that location and it will attract the criminal element. On the other hand having a viable storage business in that location provides much needed security for that area, will decrease the criminal element and unsanitary encampments.

The only responsible choice you can make that promotes community safety is to let the storage facility be built! If you block it, it's highly unlikely that the "Park" will ever get done and even if it does the Wrigley and Los Cerritos neighborhoods around the area will be stuck with a homeless encampment that is, trash filled, unsanitary, fire ridden, and facilitates criminal activity.

It's time to clean up Long Beach, the eyes of the world are going to be focused on us soon for the Olympics!

Veronica W.
Los Cerritos Resident

Item #3 Correspondence - Joe Weinstein

From: Joe Weinstein <jweins123@hotmail.com>

Sent: Thursday, June 5, 2025 3:57 AM

To: PlanningCommissioners <PlanningCommissioners@longbeach.gov>; Amy Harbin <Amy.Harbin@longbeach.gov>

Subject: Agenda Item #3 LB Planning Commission June 5 2025

-EXTERNAL-

Re: Agenda item 3 (3701 Pacific Place)

Long Beach Planning Commission – 5 June 2025

Dear Commissioners :

Many a project proposal that comes before you embodies simply the benign intentions of the owner of a small private parcel, a parcel in whose fate the general public, apart from a few neighbors, has scant interest or stake. In such a case you can readily grant needed approvals and impose feasible and mutually agreeable conditions.

The agenda verbiage in this case may look similar, but what is in fact at stake is not merely the interest of the property owner but in fact the fate of one of the city's notably large and strategically located parcels - a fate in which the public has significant stake – especially the tens of thousands of us western Long Beach residents and Riverpark Coalition supporters. This is a case which calls precisely for a Planning Commission to live up to its title, to heed the significant neighborhood and city-wide impacts and land-use planning issues – and not merely facilitate the whims of the parcel owner.

The Final Environmental Impact Report - in its length, scope of topics, and details – at first glance looks impressive. However, the FEIR lacks the basic characteristic of any legitimate EIR – namely a reasonable scope of alternatives. That scope is farcically constrained. A legitimate EIR at least seriously considers the alternative that is most popularly and vocally sought. This would-be EIR utterly disregards that alternative – park!! The proposed project in fact subverts the LA River parkland corridor which for decades, and in repeatedly documented detail, was planned and promised to us.

The FEIR list of project objectives also is farcically constrained. It is heavily weighted toward specific aims that can be met only by the project itself or an 'alternative' whose features will be so similar to the proposed project that the 'comparison' of 'alternatives' is a farce. (Indeed, this bias in the list of objectives, as well as the constrained spectrum of alternatives, are ample grounds for legal action.)

The FEIR does incorporate comments of various public agencies, but – sad to say - those comments fail to question the narrow spectrum of alternatives and biased objectives. Their proposed mitigations and conditions merely attempt to make the proposed unsuitable fate for the parcel a bit more palatable – sort of like spraying whipped cream on a cowpat.

So, don't be misled by your usual focus on what a parcel owner wants, as versus the unusual significance of this parcel for thousands of residents.

Please reject the proposed approvals and FEIR, and demand instead a focus on the amply demonstrated needs and desires of us residents!

Cordially,

Joseph M (Joe) Weinstein (Ph.D.)

[REDACTED]

Amy Harbin

From: Suzanne Caflisch <suzanne@betterworldgroup.com>
Sent: Monday, June 02, 2025 4:35 PM
To: PlanningCommissioners
Cc: LBDS-EIR-Comments; Cuentin Jackson; Amy Harbin
Subject: Public Comment on 6/5/25 Planning Commission Item #25-55508
Attachments: Wrigley Association Comment Letter 6.2.25.pdf; Coalition Comment Letter 6.2.25.pdf

-EXTERNAL-

Hello,

I am writing to submit two comment letters on the 6/5/25 LBC Planning Commission Meeting Agenda Item #25-55508, concerning 3701 Pacific Place. See two PDF documents attached.

Please circulate with the Commissioners.

Sincerely,

Suzanne Caflisch

Suzanne Caflisch (she/her)
Senior Associate



310 941 1005 (mobile)
betterworldgroup.com

Los Angeles | Bay Area
Sacramento

*Better World Group is currently piloting a Flexible Fridays schedule and will be **closed on Fridays**.*

P.O. Box 16192, Long Beach, CA 90806
info@wrigleyassociation.org



May 31, 2025

Planning Commission
Development Services Department
City of Long Beach
411 West Ocean Blvd, 3rd Floor
Long Beach, CA 90802

RE: Opposition to the Proposed Development at 3701 Pacific Place – Request to Deny Final EIR and Permits

Dear Chair Lewis and Members of the Planning Commission,

On behalf of the Wrigley Association, which represents residents in the heart of Long Beach's 6th and 7th Council Districts, we are writing to express our strong opposition to the proposed development at **3701 Pacific Place**. We stand with the Riverpark Coalition and other community members in urging the **Planning Commission to vote NO on the Final Environmental Impact Report (EIR)** and deny any associated permits for this project.

The proposed development—which includes a four-story self-storage facility, RV parking lot, car wash, and wastewater dump station—is not appropriate for this site. Western Long Beach continues to suffer from a severe lack of green space and parkland. The project site represents the **last remaining open parcel of this size** in the area—one that could offer a meaningful opportunity to address long-standing environmental injustices and public health disparities.

Currently, residents in this part of Long Beach have access to just **1 acre of parkland per 1,000 residents**, compared to **16.7 acres per 1,000 residents in East Long Beach**. This imbalance is deeply concerning and far below both state and national standards. Further industrialization of this parcel would only deepen the inequities faced by our community.

Additionally, West Long Beach bears a disproportionate environmental burden due to its proximity to major freeways, the ports, and other industrial infrastructure. This has resulted in **elevated rates of asthma, respiratory illness, and a shorter average lifespan**. Approving a project that adds to this pollution—and dismisses the opportunity to provide much-needed green infrastructure—is not only shortsighted but irresponsible.

Our Mission: The Wrigley Association is a 501 C4 non-profit organization, (CA State ID # 1673284) whose mission is to promote the common interest, instill pride, establish and encourage the highest standards in Wrigley. To foster an active understanding of citizenship and civic responsibility. To oppose and discourage discrimination and to create a sense of belonging. To promote higher business standards and encourage uniformity and cooperation among merchants, property owners and residents. To eliminate crime, promote community pride, and develop wholesome, enjoyable, cultural, social, and physical activities.

We urge the Planning Commission to carefully consider how this project undermines key city and regional plans, including:

- The **Lower Los Angeles River Revitalization Plan**
- The **Department of Parks, Recreation and Marine Strategic Plan**
- The **Westside Promise (WSP)**, a 10-year community investment framework
- The **Elevate '28 Infrastructure Investment Plan**, which includes over \$533 million for citywide capital improvements, including parks

The current EIR is inadequate and fails to comply with CEQA requirements. It is based on outdated data, omits recent funding developments (such as the Rivers and Mountains Conservancy's investment in adjacent parcels), and does not properly evaluate critical issues like **air quality**, **ecological impacts**, or the **public health consequences** of continued industrial uses in an already overburdened area.

We respectfully ask the Planning Commission to reject the current EIR and send a clear message that Long Beach is committed to equitable development, environmental justice, and the well-being of all its residents—especially those who have historically been overlooked.

Thank you for your time and consideration.

Sincerely,

Wrigley Association

Our Mission: The Wrigley Association is a 501 C4 non-profit organization, (CA State ID # 1673284) whose mission is to promote the common interest, instill pride, establish and encourage the highest standards in Wrigley. To foster an active understanding of citizenship and civic responsibility. To oppose and discourage discrimination and to create a sense of belonging. To promote higher business standards and encourage uniformity and cooperation among merchants, property owners and residents. To eliminate crime, promote community pride, and develop wholesome, enjoyable, cultural, social, and physical activities.